

EXHIBIT Z

Letter dated October 28, 2019 from Ray P. Montoya of Kimley-Horn



October 28, 2019

Mr. Paul Cheng
Maui Oceanview LP
16610 N. Dallas Parkway
Dallas, TX 75248

Re: 2005 Final Environmental Impact Study - Pulelehua Water and Wastewater

Dear Mr. Cheng:

The purpose of this letter is to summarize our assessment of the Pulelehua 2005 Final Environmental Impact Study (EIS) as it relates specifically to planned water and wastewater infrastructure. Direct reference to the original EIS is provided below, along with specific citation related to the original Maui Land and Pineapple (MLP) approach to support the site with potable water and sanitary sewer service. As shown below, the current approach proposed by Maui Oceanview LP (MOV) follows the original plan established in the 2005 EIS document.

Potable Water System

Original EIS The original EIS identifies two existing water sources in the area; groundwater from the Honokahua and Napili wells and, surface water from the Honokohau Ditch. The EIS states “*while Maui Land and Pineapple Company, Inc., continues to evaluate water supply alternatives, the most likely source for Pulelehua’s potable water will be from new wells*” (Section 4.9.3 Water Systems, Page 97). This section continues to describe the use of R-1 reuse water to reduce the overall potable water demands for the new development.

Current Plan The plan proposed by MOV includes the use of groundwater to serve the new development. Hawaii Water Service has agreed to provide Pulelehua with groundwater supply to support the development. Required treatment and associated infrastructure to address delivery and distribution will be established from this agreement. In addition, MOV has an allocated 1.0 million gallons per day (MGD) of surface water supply from MLP. Combined with the groundwater well supply from Hawaii Water Service, this additional surface water supply provides increased redundancy and resiliency to the overall Pulelehua water system. Per the original EIS and State of Hawaii requirements, both groundwater and surface water systems will be designed in compliance with Hawaii Administration Code (HAR). MOV will submit a water engineering report for approval by the Director of the State Department of Health.

Wastewater System

Original EIS The original EIS details the existing sewer infrastructure in the local area and discussed the limited capacity as follows: “*the existing wastewater facilities along Lower*

Honoapi'ilani Road were not designed to accommodate sewage flows from development mauka of Honoapi'ilani Highway and therefore, Pulelehua's wastewater system will not connect to these facilities" (Section 4.9.4 Wastewater Systems, Page 100).

Additionally, the EIS states "In the event the Lahaina Wastewater Reclamation Plant cannot accommodate Pulelehua, Maui Land & Pineapple Company, Inc. will evaluate the installation of a package sewer treatment plant to address Pulelehua's wastewater treatment demands" (Section 4.9.4 Wastewater Systems, Page 101).

Current Plan In 2017, MOV discussed wastewater treatment options for Pulelehua with the County of Maui Wastewater Reclamation Division. At that time, the County maintained that the existing treatment capacity at the Lahaina Wastewater Reclamation Plant could not accommodate Pulelehua. Therefore, in accordance with the original EIS, the current MOV plan includes the installation of a package sewer treatment plant to address onsite wastewater demands. Additionally, the package sewer facility will provide advanced treatment to produce R-1 reuse quality effluent for onsite non-potable use, reducing the overall potable water demands.

Summary

As it relates to water and wastewater infrastructure, the current MOV plan follows the approved EIS. The overall approach for water supply includes the utilization of groundwater wells and is further complimented by allocated surface water supplied by MLP, providing for improved redundancy. The necessity to provide onsite wastewater treatment, as outlined in the approved EIS, is result of the County's limited treatment capacity at the Lahaina Wastewater Reclamation Plant.

Sincerely,
KIMLEY-HORN AND ASSOCIATES



Ray P. Montoya, P.E.