

**LETTER TO OFFICE OF
PLANNING DATED
APRIL 28, 2016**

APPENDIX

D-2



MUNEKIYO HIRAGA

Planning. Project Management. Sustainable Solutions.

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PRESIDENT

Karlynn K. Fukuda
EXECUTIVE VICE PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng
VICE PRESIDENT

April 28, 2016

Leo R. Asuncion, Acting Director
Office of Planning
P.O. Box 2359
Honolulu, Hawai'i 96804

SUBJECT: Proposed Central Maui Landfill Facilities Project at TMK (2)3-8-003:019 (por.), Puunēnē, Maui, Hawai'i

Dear Mr. Asuncion:

On behalf of the County of Maui, Department of Environmental Management (DEM), please be advised that State Land Use Commission (LUC) Special Use Permit (SUP) requirements will be addressed for the subject project, a portion of which involves lands designated Important Agricultural Lands (IAL). See **Exhibit "A"** and **Exhibit "B"**. The proposed project will expand maintenance and landfill related activities adjacent to the existing Central Maui Landfill and will include offices, a refuse collection baseyard, a maintenance facility, a household hazardous and electronic waste collection facility, a construction and demolition material recovery facility, metals processing facility, warehousing and storage facility, and an abandoned vehicle yard. An updated conceptual site plan for the project is provided in **Exhibit "C"**.

Given the use of County lands and funds, a Chapter 343, Hawai'i Revised Statutes Environmental Assessment (EA) is being prepared to evaluate the proposed project. The DEM received early consultation comments dated August 12, 2015 from your office. See **Exhibit "D"**. However, as noted above, this project also involves IAL lands designated for agricultural use. Pursuant to §15.15.127(b), LUC Rules, Hawai'i Administrative Rules (HAR), we respectfully request any additional comments and/or recommendations your office may have regarding the proposed use of IAL lands for the project.

§15-15-127 Standards and criteria for the reclassification or rezoning of important agricultural lands.

(b) An application for a special permit involving important agricultural lands shall include evidence that the request has been referred to the state department of agriculture and the state office of planning for review and comment and contain as part

Leo R. Asuncion, Acting Director
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of the petition any comments or recommendations made by both the state department of agriculture and the state office of planning.

I would appreciate if you could provide any additional early consultation comments your office may have on the proposed project by May 20, 2016. Please address your comments to the following:

Colleen Suyama
Munekiyo Hiraga
305 High Street, Suite 104
Wailuku, Hawai'i 96793

Elaine Baker
Department of Environmental Management
2200 Main Street, Suite 225
Wailuku, Hawai'i 96793

Thank you for your assistance with this request. Should you have any questions, please feel free to call me at (808) 244-2015.

Very truly yours,



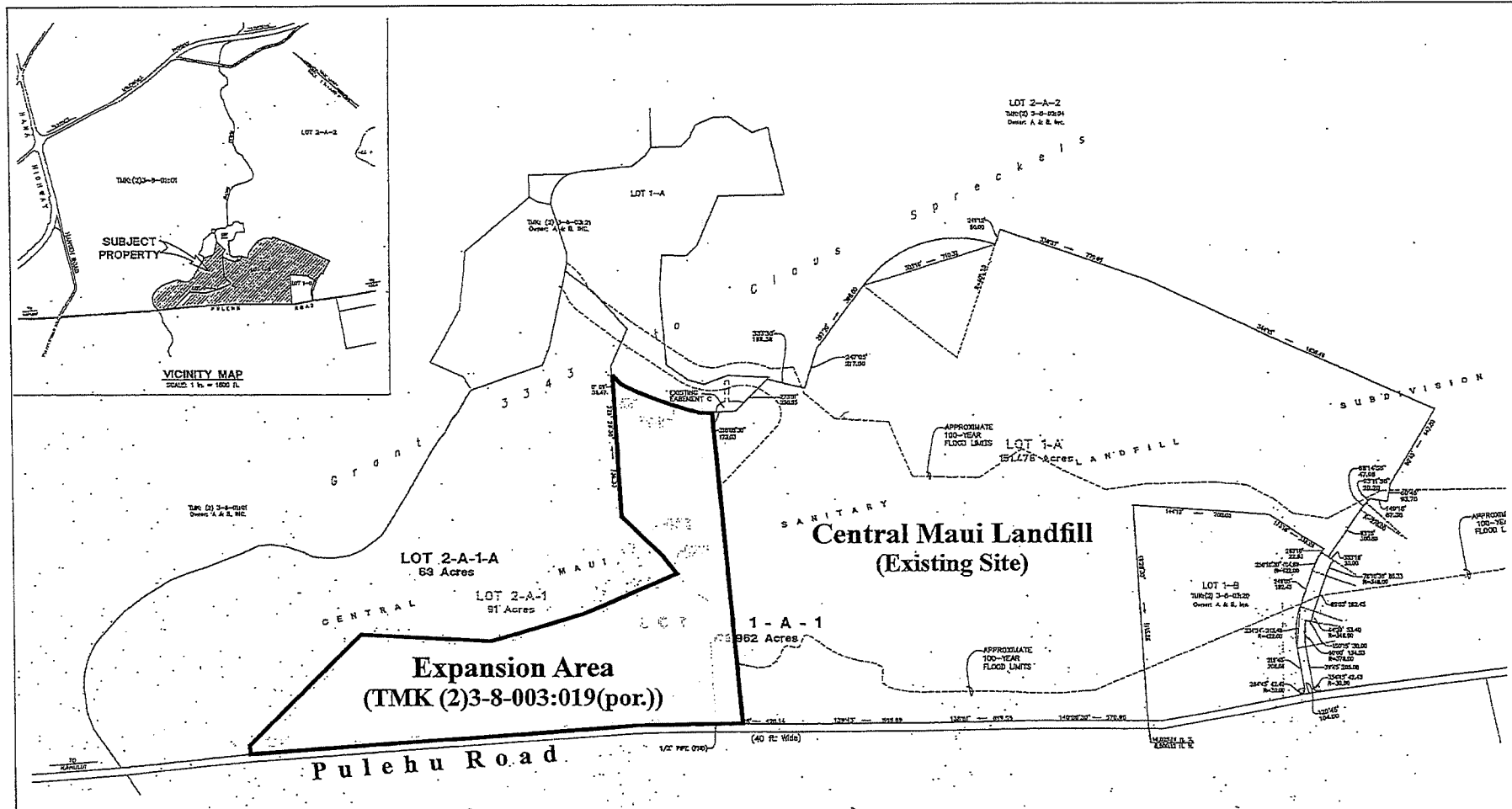
Colleen Suyama
Senior Associate

CS:tn

Attachments

Cc: Elaine Baker, Department of Environmental Management (w/attachments)

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Source: R.T. Tanaka Engineers, Inc.

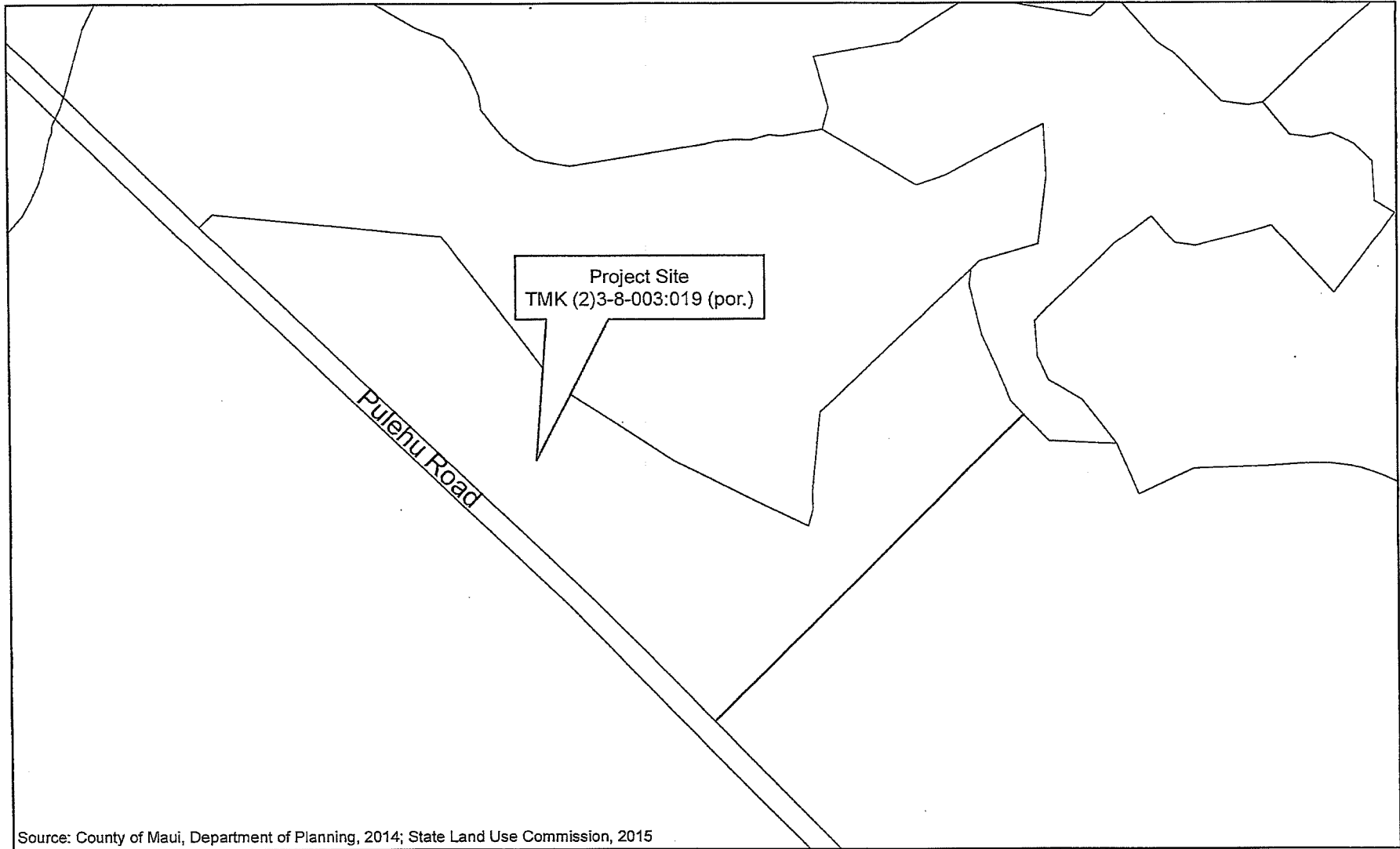
Exhibit "A" Proposed Central Maui Landfill Facilities Project Project Location Map

NOT TO SCALE



 MUNEKIYO HIRAGA

Prepared for: County of Maui, Department of Environmental Management



Source: County of Maui, Department of Planning, 2014; State Land Use Commission, 2015



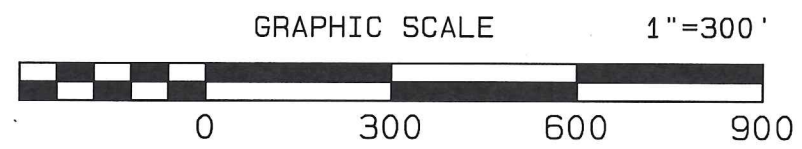
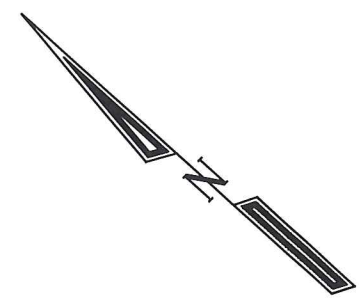
Legend

Important Agricultural Lands

**Central Maui Landfill Facilities Project
Important Agricultural Lands Map**

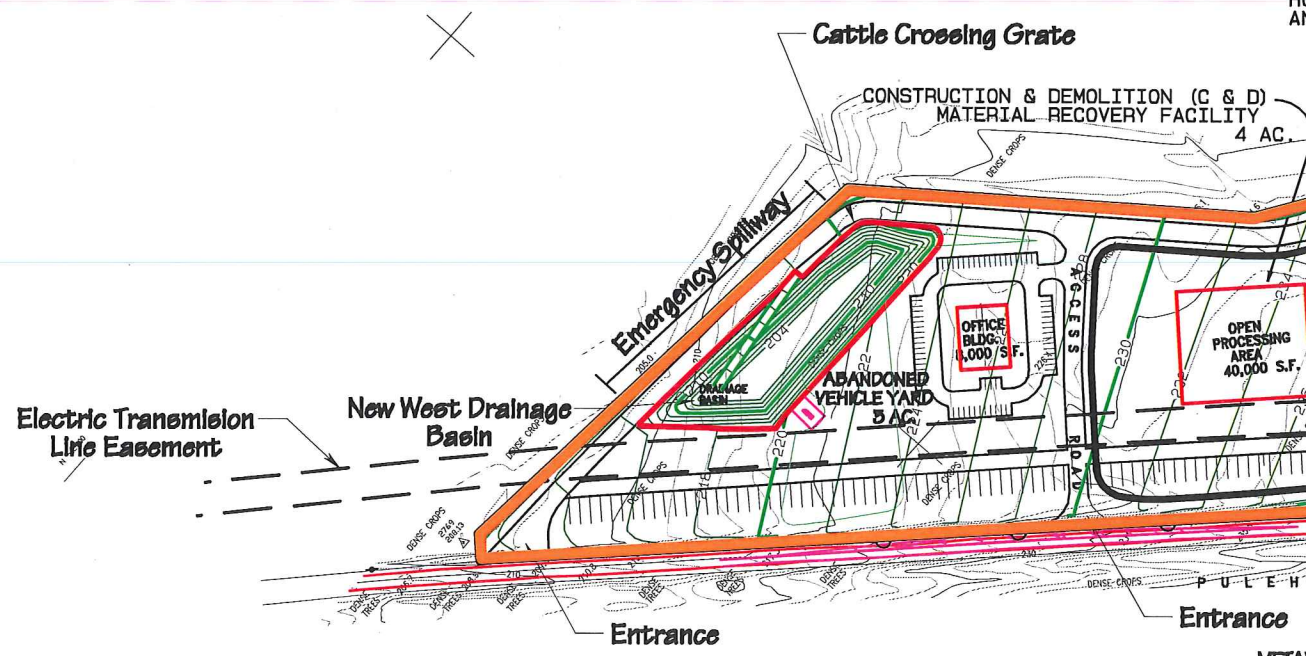
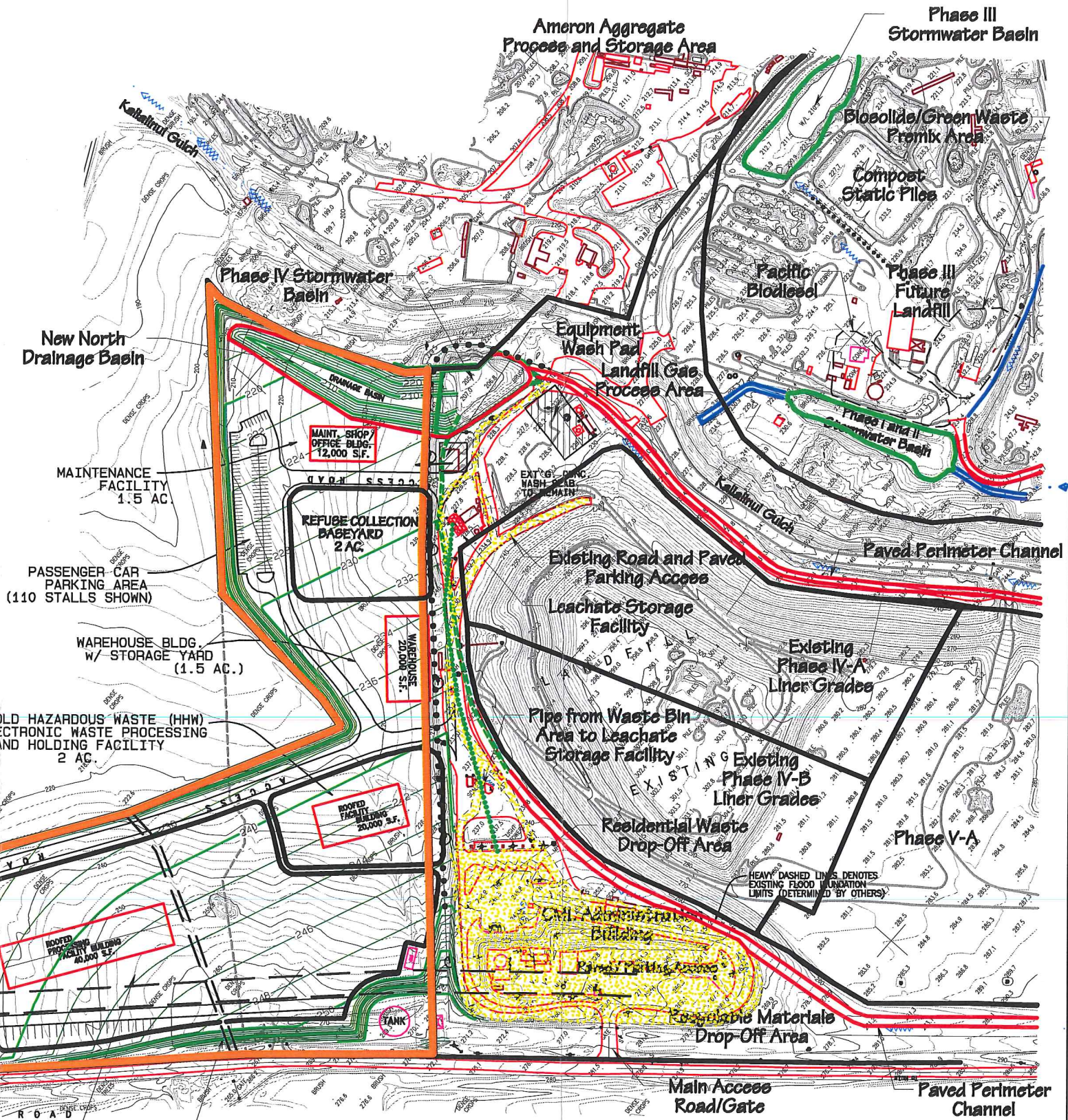
1 inch = 500 feet

EXHIBIT "B"



Legend

-  Expansion Area Boundary
-  Parking and Landscaping
-  Access Road
-  Infiltration Basin
-  Facilities



| | | |
|---|--|-------------------------|
| A-Mehr, Inc. | | FILENAME 4-04-15 Top |
| Central Maui Landfill Integrated Solid Waste Management Facility | | DRAWN RM |
| Proposed Grading and Drainage Plan | | CHECKED |
| 4/24/2015 Topography | | DATE 4/1/15 |
| Permitted Central Maui Landfill | | FIGURE 5 |

CML ISWMF Extension



**OFFICE OF PLANNING
STATE OF HAWAII**

RECEIVED

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
ACTING DIRECTOR
OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

2015 AUG 17 AM 7:46

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

COUNTY OF MAUI
DEPT. OF ENVIRONMENTAL MGMT.

Ref. No. P-14849

August 12, 2015

Ms. Michelle Makii
Department of Environmental Management
2050 Main Street, Suite 1C
Wailuku, Hawaii 96793

Dear Ms. Makii:

Subject: Early Consultation Request for the Central Maui Landfill Expansion,
Puunene, Maui, Hawaii; TMK: (2) 3-8-003:019 (por)

Thank you for the opportunity to provide comments on the early consultation request for a Draft Environmental Assessment (Draft EA) for the Central Maui Landfill Expansion, which was submitted by the County of Maui, Department of Environmental Management (DEM). The pre-consultation review material was transmitted to our office by letter, dated July 13, 2015.

It is our understanding that DEM seeks to expand maintenance and landfill activities adjacent to the Central Maui Landfill on an approximately 40-acre site. The current activities at the landfill include refuse collection, a vehicle baseyard, a maintenance facility, a household hazardous waste facility, a material recovery facility, warehousing and storage, and an abandoned vehicle yard. These activities occur at the Central Maui landfill, as well as in other locations on Maui. DEM proposes to gather these activities in a centralized area. Furthermore, the proposed subject location is zoned for agricultural use and is currently used to cultivate sugar cane.

The Office of Planning (OP) has reviewed the transmitted material and has the following comments to offer:

1. Pursuant to the HAR § 11-200-17(h) – land use plans, policies, and controls – this project must demonstrate that it is consistent with a number of state environmental, social, and economic goals and policies for land-use and housing development. OP provides technical assistance to state and county agencies in administering the statewide planning system in Hawaii Revised Statutes (HRS) Chapter 226, the Hawaii State Plan. The Hawaii State Plan provides goals, objectives, policies, and priority guidelines for growth, development, and the allocation of resources throughout the State. The Hawaii State Plan includes diverse objectives and policies of state interest including but not limited to the economy, agriculture, the visitor industry, federal expenditure, the physical environment, facility systems, socio-cultural advancement, climate change adaptation, and sustainability.

The Draft EA should include an analysis that addresses whether the proposed project conforms or is in conflict with the goals, objectives, policies, and priority guidelines listed in the Hawaii State Plan.

EXHIBIT D

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2. The coastal zone management area is defined as "all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the U.S. territorial sea" see HRS § 205A-1 (definition of "coastal zone management area").

HRS Chapter 205A requires all State and county agencies to enforce the coastal zone management (CZM) objectives and policies. The Draft EA should include an assessment as to how the proposed project conforms to the CZM objectives and its supporting policies set forth in HRS § 205A-2. The assessment on compliance with HRS Chapter 205A is an important component for satisfying the requirements of HRS Chapter 343. These objectives and policies include: recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection, and marine resources.

3. The Draft EA, should provide a list of any federal, state, or county permits required for this project. A listing of required permits will allow OP to examine the impact on plans, programs, and policy objectives that fall under the jurisdiction of our office.
4. Based on the information provided, the Central Maui Landfill project site is considerable distance from the coastline, however the project is within the State Land Use District zoned for agricultural use, within the Kaliahina watershed, and near water resources that ultimately connect to the coastline and nearshore waters of Kahului Bay. In order to ensure that valuable natural resources in the area remain protected, the negative effects of stormwater runoff and a wide range of human activities should be considered and mitigated. The Draft EA should summarize the area's classification in the State Land Use Districts, its relation to wetlands and perennial streams, the tsunami evacuation zone, and the flood zone. These items, as well as the nearshore water quality classification, should be considered when developing mitigation measures to protect the coastal ecosystem.

OP has a number of resources available to assist in the development of projects which ensure sediment and stormwater control on land, thus protecting the nearshore environment. OP recommends consulting these guidance documents and stormwater evaluative tools when developing strategies to address polluted runoff. They offer useful techniques to keep soil and sediment in place and prevent contaminating nearshore waters, while considering the practices best suited for each project. These three evaluative tools that should be used during the design process include:

- Hawaii Watershed Guidance provides direction on site-appropriate methods to safeguard Hawaii's watersheds and implement watershed plans
http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI_Watershed_Guidance_Final.pdf
- Stormwater Impact Assessments can be used to identify and evaluate information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to

Ms. Michelle Makii
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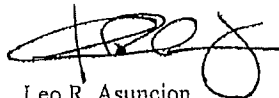
the area

http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_impact/final_stormwater_impact_assessments_guidance.pdf

- Low Impact Development (LID). A Practitioners Guide covers a range of structural best management practices (BMP's) for stormwater control management, roadway development, and urban layout that minimizes negative environmental impacts
http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf
5. The 40-acre expansion site is within the State Agricultural District. The existing landfill previously obtained a State Special Use Permit via the County permit SP97-390. The expansion may require another State Special Permit or an amendment to the existing State Special Permit. Since the expansion is over 15-acres, the Land Use Commission must also approve the permit.
 6. The expansion area is designated as Prime lands under the ALISH system and as A, C, and E lands according to the Land Study Bureau ratings of soil productivity. The proposal will permanently remove Prime agricultural lands from cultivation. Information on the impacts to agriculture should be addressed in the Environmental Assessment.
 7. The Environmental Assessment should also include information on archaeological resources, flora and fauna resources, including invertebrates.

If you have any questions regarding this comment letter, please contact Josh Hekekie at 587-2845 or Lorene Maki at 587-2888.

Sincerely,



Leo R. Asuncion
Acting Director