

MICHAEL P. VICTORINO
Mayor

MICHELE CHOUTEAU MCLEAN, AICP
Director

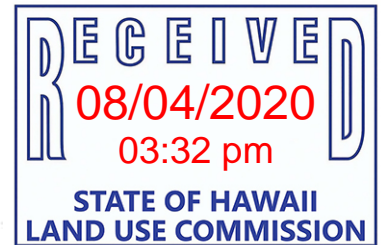
JORDAN E. HART
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

July 23, 2020

Mr. Daniel Orodener, Executive Officer
Hawaii State Land Use Commission
Department of Business, Economic Development & Tourism
Post Office Box 2359
Honolulu, Hawaii 96804



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Dear Mr. Orodener

SUBJECT: COMMENTS ON ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN) FOR THE PROPOSED KANAHA HOTEL, FORMERLY REFERRED TO AS THE WINDWARD HOTEL TO BE LOCATED IN KAHULUI, ISLAND OF MAUI, HAWAII; TMKS: (2) 3-8-103:014 (POR.), 015 (POR.), 016, 017 & 018 (RFC 2020/0095)

The Department of Planning (Department) is in receipt of the above-referenced document for the proposed Kanaha Hotel (Project), formerly referred to as the Windward Hotel. Prior to the LUC's decision to serve as the accepting authority, the Department issued comments in a letter dated November 20, 2019 for preparation of the Final EIS. Since the Final EIS was never published, the comments were never addressed. Therefore, in preparation of this new Draft EIS, we are providing the same comments:

1. Please ensure that the market study includes occupancy and demand projections for other competitive hotels that were not previously incorporated into the analysis, such as the Maui Beach Hotel and Maui Seaside Hotel, and the three hotels proposed in the Maui Research and Technology Park.
2. In order to comply with Maui County Code (MCC) Chapter 2.96, prior to final subdivision approval or issuance of a building permit for a development, the Department of Housing and Human Concerns (DHHC) shall require the developer to fulfill the workforce housing agreement through one or a combination of the following: 1) offering units for sale within the community plan area, 2) offering units for rent within the community plan area, 3) conveying units to a qualified housing provider

per DHHC approval or 4) payment of a fee, or provision of land, which must both be approved by the Maui County Council. Given the feedback from public testifiers, as well as the Maui Planning Commissioners (MPC) at the November 12, 2019 MPC meeting, the Department strongly encourages the Applicant to work with the County DHHC to attempt to develop units for sale or rent.

3. In the Draft EIS, please explain whether solar water heating and/or photovoltaics will be utilized. We note that the Applicant previously indicated that it did not plan on using PV in its project to address the concern of glint and glare on nearby airport traffic. Please verify whether that is still the case.
4. In the Draft EIS, please indicate which parking stalls will be designated for ADA use stalls on the plans. Please also indicate the proposed loading zone. Please include a detailed discussion of parking in the project description.
5. Please have the traffic engineer update the Traffic Impact Assessment Report (TIAR) to factor in traffic counts associated with the Consolidated Rental Car facility. The TIAR previously included with the old Draft EIS mentioned the facility and assumptions made about trips but does not include actual data. Now that the facility is in operation, the TIAR should include actual information.
6. In addition, while the proposed hotel location is in close proximity to Costco, it does not provide an onsite gift or sundry shop or a variety of food or dining options that most hotels provide. Since these services are located quite a distance away, hotel guests will need to drive to them, thus increasing traffic. Please discuss the effect of the lack of onsite amenities and traffic/shuttle alternatives in the TIAR, if such amenities will not be provided onsite.
7. For the Draft EIS, a discussion on the terms of the Maui Business Park Phase II should be included, particularly the portion on use restrictions so that people are aware that the condition no longer applies. Per the Land Use Commission's Decision and Order for Maui Business Park Phase II, Condition number 19 states that for a period of eight years from the date of the County's zoning approval, at least 50 percent of the project acreage for Maui Business Park Phase II was to be used and developed for non-retail, light industrial use and/or sold or leased to and developed and used by third-party buyers for non-retail, light industrial use by Alexander and

Baldwin. Also, A&B was to develop or offer for sale or lease an equal amount of acreage within the property for non-retail, light industrial use. We note that the Change of Zoning was effective May 2, 2008. The eight year period terminated on May 2, 2016. A Cancellation of Declaration of Use Restriction was provided in the 2016 annual report.

7. To reduce the use of potable water for landscape irrigation and other non-potable purposes, the Applicant should design and install the project's irrigation system to enable future connection to a County reclaimed water source or other approved non-potable source. In the event a County reclaimed water line is extended to the property, the Applicant should pay its pro-rata fair share of said County reclaimed water system improvements.
8. In the Draft EIS, please include a statement on the proposed hotel operator. If it has not yet been decided, please state that it is still under negotiation.
9. In the Draft EIS, please clarify water demand with respect to the Na Wai Eha case.
10. In the Draft EIS, please indicate the rationale for pursuit of the entitlements in the order that they were being sought. Please also include the status of the Motion to Amend the District Boundary Amendment Order for Maui Business Park Phase II.
11. In the Economic Development section of the Maui Island Plan, Objective 4.2.3 is to "maximize residents' benefits from the visitor industry." Under that objective, Policy 4.2.3.a says, "Promote a desirable island population by striving to not exceed an island-wide visitor population of roughly 33 percent of the resident population." Per the Hawaii Tourism Authority, in 2018, the average daily visitors to the island was 64,480. The population for the island varies, depending on the data source. Per The State of Hawaii Data Book 2018, the population for the island of Maui for 2013-2017, the population for Maui was 153,997. Per The Maui County Data Book 2018, the population for Maui Island was 154,834. No matter which island population number is utilized, the ratio of visitors to residents is now approximately 42 percent, which exceeds the 33 percent visitor-resident ratio discussed in the Maui Island Plan. In the Draft EIS, please include the Maui Island Plan and the current visitor-resident ratio information, state that the proposed hotel will conflict with the objective and policy of the Maui Island Plan, and discuss why the land use entitlements should still be approved despite these statistics and this conflict.

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Thank you for the opportunity to comment on this Project. Should you have any questions about the comments in this letter, please contact Staff Planner Tara Furukawa by email at tara.furukawa@mauicounty.gov or by phone at (808) 270-7520.

Sincerely,



MICHELE MCLEAN, AICP
Planning Director

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Project File

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