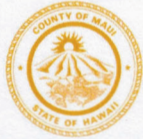


**NOVEMBER 23, 2019
DRAFT EA COMMENTS
AND RESPONSES**

MICHAEL P. VICTORINO
Mayor

LORI TSUHAKE
Director

LINDA R. MUNSELL
Deputy Director



DEPARTMENT OF HOUSING
& HUMAN CONCERNS
COUNTY OF MAUI
2200 MAIN STREET, SUITE 546
WAILUKU, MAUI, HAWAII 96793
PHONE: (808) 270-7805

November 26, 2019

Mr. Peter T. Young
President
Ho'okuleana LLC
1539 Kanapu'u Drive
Kailua, Hawaii 96734

Dear Mr. Young:

**Subject: Miki Basin Industrial Park – Adjoining Lanai Airport, Lanai
Draft Environmental Assessment (DEA)
TMK: (2) 4-9-002:061**

The Department has reviewed the Draft Environmental Assessment for the above subject project. Based on our review, we have determined that the subject project is not subject to Chapter 2.96, Maui County Code. The owner will not be required to comply.

Please call Mr. Buddy Almeida of our Housing Division at 270-7355 if you have any questions.

Sincerely,

C. BUDDY ALMEIDA
Housing Administrator

cc: Director of Housing and Human Concerns

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Buddy Almeida, Housing Administrator
County of Maui
Department of Housing and Human Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Mr. Almeida:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

You note that the Department has made a determination that the project is not subject to Chapter 2.96, Maui County Code.

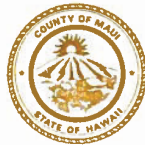
Thank you for your comments.

Sincerely,
HO'OKULEANA LLC

Peter T. Young
President

Do well by doing good.

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
December 16, 2019

Mr. Peter T. Young
Hookuleana LLC
1539 Kanapuu Drive
Kailua, Hawaii 96734

Dear Mr. Young:

**SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL
ASSESSMENT (DEA) FOR THE MIKI BASIN INDUSTRIAL
PARK, ON 200 ACRES OF LAND ADJACENT TO THE
LANAI AIRPORT, LANAI, HAWAII; TMK: (2) 4-9-002:061
(POR.) (EAC 2019/0011)**

The Department of Planning (Department) is in receipt of the Draft Environmental Assessment (DEA) for the Miki Basin Industrial Park (Park) located on approximately 200 acres adjacent to the Lanai Airport on the Island of Lanai at TMK: (2) 4-9-002:061 (POR.). The applicant is Pulama Lanai.

On September 25, 2019, the State of Hawaii Land Use Commission (LUC) made a determination that the proposed project on Lanai triggered HRS Chapter 343 review and that the LUC would be the accepting authority for the environmental assessment. Also, the LUC made a determination that the applicant's DEA at that time warranted an anticipated Finding of No Significant Impact (FONSI). The Department concurred with the LUC decision at its September meeting.

The Park will provide 100 acres for light industrial uses and 100 acres for heavy industrial uses as defined in the Maui County Code (MCC) and as to be further defined through the Change in Zoning review by the Lanai Planning Commission and Maui County Council (Council). Full buildout of the proposed 200-acre Park will be done incrementally over a period of about 30 years. Having industrial entitled land ready for development should assist in providing diversified employment opportunities on Lanai through the growth of small businesses that could quickly ramp up if such land were available. Additionally, relocating some "industrial" uses currently operating in Lanai City to the Miki Basin Industrial Park likely will enhance safety by moving certain "industrial" uses further away from the residential core of Lanai City. Although 200 acres may seem like a lot of land to be moved into the industrial zone, the Department recognizes that this is a 30 year build-out plan and that it is consistent with the goals of the Lanai Community Plan in providing sufficient space for placement of industrial operations.

MAIN LINE (808) 270-7735 / FACSIMILE (808) 270-7634
CURRENT DIVISION (808) 270-8205 / LONG RANGE DIVISION (808) 270-7214 / ZONING DIVISION (808) 270-7253

Mr. Peter T. Young
December 16, 2019
Page 2

This project implements the vision for logical placement of industrial land uses on Lanai and expands the industrial zoned land area called for in the 2016 Lanai Community Plan. Consequently, a District Boundary Amendment (DBA) from Agricultural to Urban and a Change in Zoning from Agricultural to M-1 Light Industrial, M-2 Heavy Industrial, and M-3 Restricted Industrial will provide for consistent land designations with the Lanai Community Plan.

The Department is pleased to see in the DEA the comment that, "*Pulama Lanai will work with Maui County in establishing the allowable uses in the Miki Basin Industrial Park from the overall permitted uses allowed by zoning. Of note, while apartments and many other business-related use are permitted under zoning, no form of residential use will be permitted in the Miki Basin Industrial Park. The Park will focus on Light and Heavy Industrial uses, as well as relocation of their cement/asphalt facility to this site.*" Page 19, DEA. The Department notes that many industrial uses are regulated by layers of state and federal laws which regulate and monitor potential environmental impacts.

The Department is aware that Pulama Lanai in its hearings before the Lanai Planning Commission and Maui County Council will further define which particular industrial uses are likely to be located in the Park at least in the near term and that the Lanai Planning Commission and the Council will review conditional zoning in detail. The Department welcomes additional detail on which uses currently operating on Lanai may be relocated to the Park and what effect this relocation may have on service provisions to the community.

Thank you for the opportunity to comment on this project. Should you have any questions about the comments in this letter, please contact the Department by email at planning@mauicounty.gov or by phone at (808) 270-8205.

Sincerely,

MICHELE MCLEAN, AICP
Planning Director

xc: Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
John S. Rapacz, Planning Program Administrator (PDF)
Pam Eaton, Planning Program Administrator (PDF)
Kathleen Aoki, Administrative Planning Officer (PDF)
Peter Young, Hookuleana LLC (PDF)
Lynn McCrory, Pulama Lanai (PDF)
State Land Use Commission (PDF)
State Office of Planning
Project File
MCM:CIY:KFW:lak
K:\WP_DOCS\Planning\EAC\2019\0011_MikiBasinIndustrialPark\FOR AX\AgencyResponse.doc

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young

1539 Kanapu'u Drive

Kailua, Hawaii 96734

(808) 226-3567 (Cell Phone)

PeterYoung@Hookuleana.com

www.Hookuleana.com



Michele McLean, Planning Director
County of Maui
Department of Planning
2200 Main Street, Suite 315
Wailuku, HI 96793

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Ms. McLean:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

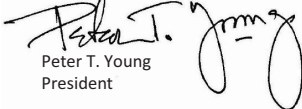
You note that the proposed project on Lanai triggered HRS Chapter 343 review and that the SLUC would be the accepting authority for the environmental assessment. Also, the SLUC made a determination that the applicant's DEA, at that time, warranted an anticipated finding of no significant impact (AFONSI). The Department concurred with this decision of the SLUC at its September meeting.

You also noted that having industrial entitled land ready for development should assist in providing diversified employment opportunities on Lanai through the growth of small businesses that could quickly ramp up if such land were available. Additionally, relocating some "industrial" uses currently operating in Lanai City to the Miki Basin Industrial Park likely will enhance safety by moving certain "industrial" uses further away from the residential core of Lanai City. Although 200 acres may seem like a lot of land to be moved into the industrial zone, the Department recognizes that this is a 30 year building out plan and that it matches the goals of the Lanai Community Plan in providing sufficient space for placement of industrial operations.

You also noted that this project implements the vision for logical placement of industrial land uses on Lanai and expands the industrially-zoned land area called for in the recently adopted Lanai Community Plan. Consequently, a District Boundary Amendment (DBA) from Agricultural to Urban and a Change in Zoning from Agricultural to M-1 Light Industrial, M-2 Heavy Industrial, and M-3 Restricted Industrial will provide for consistent land designations with the Lanai Community Plan.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC


Peter T. Young
President

Do well by doing good.



MICHAEL P. VICTORINO
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

December 9, 2019

Mr. Peter T. Young, President
Ho'okuleana LLC
1539 Kanapuu Drive
Kailua, Hawaii 96734

Re: Draft Environmental Assessment on Miki Basin Industrial Park


Dear Mr. Young:

This is in response to your letter dated November 23, 2019 requesting comments on the Draft Environmental Assessment on Miki Basin Industrial Park.

In review of the submitted documents, we have no comments or recommendations at this time.

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

Sincerely,


Assistant Chief John Jakubczak
for: TIVOLI S. FAAUMU
Chief of Police

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young

1539 Kanapu'u Drive

Kailua, Hawai'i 96734

(808) 226-3567 (Cell Phone)

PeterYoung@Hookuleana.com

www.Hookuleana.com



Tivoli Faaumu, Chief of Police
County of Maui
Police Department
55 Mahalani Street
Wailuku, HI 96793

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

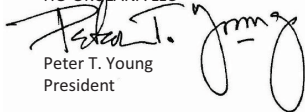
Dear Chief Faaumu:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

You note the Police Department has no comments or recommendations at this time.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC


Peter T. Young
President

Do well by doing good.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850



In Reply Refer To:
01EPIF00-2020-TA-0092

December 9, 2019

Mr. Peter T Young
Ho'okuleana LLC
1539 Kanapuu Drive
Kailua, Hawaii 96734

Subject: Technical Assistance for the Development of the Miki Basin Industrial Park,
Lanai

Aloha Mr. Young,

The U.S. Fish and Wildlife Service (Service) received your correspondence on November 23, 2019 regarding the presence of federally endangered or threatened species and designated critical habitat near the proposed development of the Miki Basin Industrial Park on the island of Lanai (TMK 2-4-9-002:061). This project, which is slated to be developed incrementally over a 30-year timespan, would provide 100 acres of light industrial and 100 acres of heavy industrial development. The initial phase will be the development of the needed infrastructure, including roads and power lines, in order to facilitate additional site-specific development within the complex.

Based on information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Project, there is one listed species in the vicinity of the project area or that may pass through the project area: endangered Hawaiian petrel (*Pterodroma sandwichensis*). There is no proposed or designated critical habitat within the vicinity of the project area. We offer the following recommendations to avoid and minimize project impacts to listed species pursuant to the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

Hawaiian Petrel:

Lanaihale, the mountain just above Lanai City, is home to one of the largest and densest Hawaiian petrel colonies known to exist. The Hawaiian petrel may traverse the project area at night during the breeding, nesting and fledging seasons (March 1 to December 15). Outdoor lighting could result in seabird disorientation, fallout, and injury or mortality. Seabirds are attracted to lights and after circling the lights they may become exhausted and collide with nearby wires, buildings, or other structures or they may land on the ground. Downed seabirds are subject to increased mortality due to collision with automobiles, starvation, and predation by dogs, cats, and other predators. Young birds (fledglings) traversing the project area between

Mr. Peter Young

2

September 15 and December 15, in their first flights from their mountain nests to the sea, are particularly vulnerable.

The Service acknowledges the following avoidance and minimization measures included in the Environmental Assessment and recommends full implementation in the development of the final project:

- The proposed project will use appropriate lighting so as not to unnecessarily attract seabirds.
- The project will not have nighttime construction occurring during the fledging season (September 15 through December 15).
- Use of lower-power (180 Watt) monochromatic and low-pressure sodium lighting (as opposed to the more common full-spectrum and high-pressure sodium lighting), which provides high contrast with sharply reduced brightness and glare, yet the yellow light does not attract insects and is not believed to be used for avian navigation.
- Use of light fixtures with “top-visor” shielding to minimize the potential for stray light up-scatter and side-scatter, so that the bulb is not visible at lamp height from the side.
- Installation of automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.
- Limiting light levels and hours of use to the minimum levels allowable under Occupational Safety and Health Administration (OSHA) worker safety and security.

Even with the incorporation of these avoidance and minimization measures, it is possible that the project may not be able to fully avoid adverse effects to Hawaiian petrels. If this potential project should receive federal funding, federal permits, or any federal authorization, it will require a Section 7 consultation with the Service. The Service only conducts Section 7 consultations with the federal action agency or their designated representative.

Thank you for your efforts to conserve listed species and native habitats. Please contact Fish and Wildlife Biologist John Vetter (808-792-9406, email: john_vetter@fws.gov) if you have any questions or for further guidance. When referring to this project, please include this reference number: **01EPIF00-2020-TA-0092**.

Sincerely,

Michelle Bogardus
Island Team Leader
Maui Nui and Hawaii Island

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young

1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Michelle Bogardus, Island Team Leader, Maui Nui and Hawaii Island
United States Department of the Interior
Fish And Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment
01EPIF00-2020-TA-0092

Dear Ms. Bogardus:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park and Technical Assistance for the Development of the Miki Basin Industrial Park.

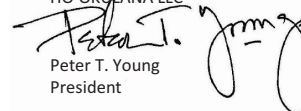
You noted that based on information in the DEA and pertinent information in your files, including data compiled by the Hawaii Biodiversity and Mapping Project, there is one listed species in the vicinity of the project area or that may pass through the project area: endangered Hawaiian petrel (*Pterodroma sandwichensis*). There is no proposed or designated critical habitat within the vicinity of the project area.

You noted that the Service acknowledges that several avoidance and minimization measures were included in the Environmental Assessment and you recommended full implementation in the development of the final project. We intend to do so, and understand, as you note, that even with the incorporation of these avoidance and minimization measures, it is possible that the project may not be able to fully avoid adverse effects to Hawaiian petrels.

At this time, there is no intent to receive federal funding, federal permits or any federal authorization for the project.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC


Peter T. Young
President

Do well by doing good.

Peter T Young

From: Debra Greene <debra@DebraGreene.com>
Sent: Monday, December 23, 2019 5:34 PM
To: daniel.e.ordenker@hawaii.gov
Cc: Imccrory@pulamalanai.com; PeterYoung@Hookuleana.com
Subject: Re: Opposing proposed Lana'i land use change

Aloha Director Orogenker,

I just wanted to clarify that my comments below are on the draft environmental assessment (the 469 page document) and I understand will receive a response. Thank you.

Sincerely,

Debra

Debra Greene, PhD
Founder
KeepYourPower.org

PHONE: 808-874-6441
WEBSITE: www.KeepYourPower.org

Sent from my faster, safer, more secure HARDWIRED computer

On Dec 23, 2019, at 1:59 PM, Debra Greene <debra@debragreene.com> wrote:

Aloha Executive Director Daniel Orogenker,

I am writing on behalf of Keep Your Power, a coalition of concerned citizens, residents of Hawaii, who oppose the application submitted by Pulama Lana'i to change the land use designation for the area by Lana'i airport from agricultural to urban.

In June of this year the Research Corporation of the University of Hawaii (RCUH), on behalf of Alphabet (Google), tech giant SoftBank and defense contractor AeroVironment, submitted an application to the Lana'i Planning Commission to approve use of agricultural land to [build a second airport and turn Lana'i into a giant drone manufacturing plant and launchpad](#).

In fact, RCUH went ahead and built an airstrip and a 16,500 square foot drone hangar on agricultural land without permits or approvals. Clearly they were not acting in good faith.

The "after-the-fact" RCUH application was resoundingly opposed by Hawaii residents, to the extent that the application was quickly modified due to opposition and eventually withdrawn. Their application was also opposed by Hawaiian cultural practitioners in a lawsuit. Despite this opposition, the current proposed upzoning from agricultural to urban would accomplish what RCUH was trying to do. That is not right.

We oppose this zoning change. Lana'i does not need a second airport, nor the loss of agricultural land. Food production is more important than industrial development. And the rest of the state, and our

ocean inhabitants, should not have to suffer the onslaught of highly experimental football field sized drones beaming down toxic radiation in our airspace, because of the desire of a few.

Sincerely,

Debra

Debra Greene, PhD
Founder
KeepYourPower.org

PHONE: 808-874-6441
WEBSITE: www.KeepYourPower.org

Sent from my faster, safer, more secure HARDWIRED computer

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young

1539 Kanapu'u Drive

Kailua, Hawai'i 96734

(808) 226-3567 (Cell Phone)

PeterYoung@Hookuleana.com

www.Hookuleana.com



Debra Greene, PhD

Founder

KeepYourPower.org

PHONE: 808-874-6441

WEBSITE: www.KeepYourPower.org

debra@DebraGreene.com

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Ms. Greene:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

You note several issues related to a suggested second airport on Lanai, a drone manufacturing plant and launchpad. The link in your email notes:

- Flying football field sized drones beaming toxic wireless radiation into the ocean and parts of Maui county
- new airborne overhead 5G communication, which would provide strong wireless service over a large area, including deep valleys, remote lands, and over the ocean
- land on Lānaʻi for high tech drone experiment blanketing the Earth with wireless radiation

You are apparently suggesting something different from the proposed use, as called for in the draft EA. I will call your attention to the mapping and explanations in the Lānaʻi Community Plan.

The Pūlama Lānaʻi proposal mirrors the mapping and land use types for light and heavy industrial uses. That plan notes that "The island's primary industrial areas are located southwest of Lānaʻi City, near the Lānaʻi Airport, and at Kaumālapaʻu Harbor." The proposed uses are consistent with the intent to consolidate industrial uses and the Community Plan notes that "Light industrial uses in Lānaʻi City will also be moved and consolidated in this area. The area will also serve as a staging area for shipments from the harbor to be distributed closer to town."

Related to "loss of agricultural land", I call your attention to the analysis related to agricultural lands that notes,

The development of the Project will result in a loss of 200 acres of fallow agricultural lands on Lānaʻi. However, there are approximately 18,000 acres of former plantation lands on Lānaʻi which remain available for agricultural use, and over 200,000 acres statewide.

The lack of significant growth of diversified crops reflects increased competition from overseas resulting from technology and other advances that have improved the delivery of fresh produce (faster, less spoilage, better coordination of supply to demand), along with trade agreements which increased food exports to the U.S. from low-cost producers in Mexico, Central America, South America, and elsewhere.

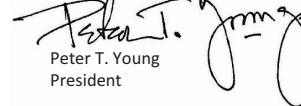
Do well by doing good.

The loss of 200 acres of agriculture land on Lānaʻi, plus the loss of agricultural land due to other projects (i.e., the cumulative impact), is too small to affect the growth of diversified agriculture on Lānaʻi or Statewide.

With respect to your comment that "Lana'i does not need a second airport", please note that the proposed action in the draft EA does not suggest a second airport for the Island. The only association to airports is that the project is adjacent to the Lanai Airport, as well as other industrial types of uses. As noted in the draft EA, "The site is well-suited for industrial development. It is adjacent to the most significant industrial uses on Lānaʻi, the Lānaʻi Airport, the Miki Basin Industrial Condominium, and Maui Electric Company's (MECO) generating facility."

Thank you for your comments.

Sincerely,
HO'OKULANA LLC



Peter T. Young
President

December 22, 2019

Daniel Orodener, Executive Director
State of Hawai'i Land Use Commission
235 S. Beretania Street, Room 406
Honolulu, Hawai'i 96813 daniel.e.oroedner@hawaii.gov

Lynn McCrory, Senior Vice President of Government Affairs
733 Bishop Street, Suite 2000
Honolulu, Hawai'i 96813 lmccrory@pulumalanai.com

Peter T Young, President Ho'okuleana LLC
1539 Kanapu'u Drive
Kailua, Hawai'i 96734 PeterYoung@Hookuleana.com

RE:

Docket No. A19-809 Pūlama Lana'i
Draft Environmental Assessment (DEA) and AFONSI
Proposed Miki Basin Industrial Park
Lana'i Airport, Lana'i, State of Hawai'i
Tax Map Key No. (2) 4-9-002:061 (por.)

Dear Mr. Orodener:

Pūlama Lāna'i has requested the LUC act as the accepting authority for a petition requesting a Land Use District Boundary Amendment, Change in Zoning, and building and subdivision permits for a proposed 200-acre Miki Industrial Park, and submitted an Environmental Assessment in support of a FONSI designation. (EA-2).

I. THE PROPOSED MIKI INDUSTRIAL PARK MUST BE ASSESSED FOR ITS CUMULATIVE IMPACTS AND EFFECT ON THE ISLAND'S WATER RESOURCES.

On September 25, 2019, in response to LUC Commissioner Okuda's question, Pūlama Lāna'i's attorney insisted that the proposed Miki Basin Industrial Park was a "stand-alone" proposition.¹

This contention should be heavily scrutinized.

¹ <http://files.hawaii.gov/luc/minutesofmtgs/2019/09252019kahului.pdf>

Pūlama Lāna'i estimates an additional 1,099,500 GPD will be required to support the Industrial Park at full build-out, which it estimates could take 30 years. There is not a single mention of incremental usage over that period, nor commitment to provide usage figures as it develops. Instead, the EA offers simply that "*there is time to monitor [water] as the incremental development moves forward.*" EA at 67.

The 2016 Lāna'i Community Plan starkly laid out the limitations on Lāna'i's existing water system:

"The capacity of existing water resources may be insufficient to support new growth. Projects that already have entitlements could consume most of the remaining capacity of Lana'i's single aquifer. It may be necessary to increase the capacity of water resources for new development." CP at 2-4.

As a result, Pūlama Lāna'i proposed developing a desalination plant in the Community Plan:

Pūlama Lāna'i told the community that it was "*exploring the option of developing desalination plants that would create potable water out of saltwater. Producing potable water through desalination would greatly decrease the potential of over pumping the aquifer*" and these desal plants would "*increase available daily fresh water from the current 4 MGD to 10 MGD.*" CP at 2-7 and 6-2.

Although the Lāna'i Community Plan Advisory Committee clearly relied on Pūlama's desal promises in stating it had: "*predicated their decisions on the availability of significant additional water sources for future development proposals.*" CP at 7-3, Pūlama Lāna'i has since abandoned any plans for desal; all exploratory wells have been capped; and the EA makes no mention of desalination.

Now, along with proposing additional long-term industrial build-out at Miki Basin, Pūlama Lāna'i simply kicks the can down a 30-year road with respect to how it might meet the additional water demands the Miki Industrial Park would require;² this is especially troubling in light of the fact that a mere 20-acre industrial condominium development at Miki has yet to be completed - after 20 years - its water use as a result is unknown, and there are a multitude of additional development plans on the books, only two of which were mentioned in the EA: a 201H housing development that will require

² Section 4.6.1 of the EA states that sometime in 2019 some unidentified entity at CWRM "*allowed for the possibility that there are seven additional aquifers that could provide water to Lāna'i with up to a SY of 36M GPD.*" EA at 49. Notably this assertion is made with no citation or attribution and is thoroughly useless as predictive of the island's sustainable yield, which remains 6M GPD.

121,700 GPD (EA-68) and a Koele Project District amendment that projects use of 246,392 GPD (EA-70).

Not mentioned or discussed are many additional development plans detailed in the Community Plan (which largely relied on the abandoned desal proposal), among which are:

- A 73-acre County affordable housing project (this is in addition to and separate from Pūlama’s housing plans);
- A 50-acre Tennis Academy Park, including housing;
- A 524-acre University and Research Institute;
- A Gateway Park of 16 acres;
- Rural Residential 50-acre area; and
- 105-acre Mixed Use Residential development, Manele-Mauka.

The following chart details proposed additional developments from the Community Plan:

9 | LAND USE

Table 9.2 Lānaʻi Community Plan Acreage by Growth Area and Land Use Designations									
Growth Area	Land Use Designations								Total Acres
	Mixed-Use Residential	Hotel	Airport	Light Industrial	Heavy Industrial	Public/Quasi-public	Park	Rural	
Lānaʻi City									1,483
Lānaʻi City Expansion*	546								
University Campus						824			
Tennis Academy							50		
Linear Park/Drainage							280		
Gateway Park							16		
Rural Residential								50	
Film Studios				22					
Airport									246
Enhancement of present airport facilities			46						
Miki Basin Industrial				100	100				
Manele									181
Manele Mauka	165								
Rural Residential								75	
Kaunālapāʻu									60
Ocean Resources									
Heavy Industrial					19				
Kaunālapāʻu Mixed-Use Residential	50								
TOTAL ACRES	701		46	122	110	524	346	126	1,975

*Note: Includes proposal to incorporate County Affordable Housing Project into new land use designation.

II. PŪLAMA LĀNAʻI HAS FAILED TO SUPPORT SMALL SUSTAINABLE BUSINESS GROWTH IN THE PAST.

Pūlama Lānaʻi states in the EA that the Miki Industrial Park expansion is consistent with the Lānaʻi Community Plan and furthers Pūlama’s desire to “*foster the growth of small businesses by providing support in key areas such as marketing and human resources and*

by expanding the amount of commercial and industrial space available for lease and for sale.” CP at 6-2.

Unfortunately, Pūlama’s practices have not always supported this philosophy, to the detriment of Lānaʻi residents trying to contribute to Lānaʻi’s economy.

For several years, a native Hawaiian-owned business — The Lānaʻi Ohana Poke Shop — operated out of a small space controlled by Pūlama Lānaʻi in Lānaʻi City. This very successful family-operated shop served poke to residents, construction workers, and tourists alike. Its poke bowls were statewide favorites. And then Larry Ellison’s Richard’s Market began selling poke bowls, with larger portions and lower prices. When Pūlama Lānaʻi’s then-Vice President for Community Relations was asked why they would do that, her response was “we believe that competition is good.” Really? Competition between the deep pockets of Larry Ellison and a small, Lānaʻi native Hawaiian family?

A similar result of the proposed “sustainability” proclaimed by Pūlama Lānaʻi in this EA happened to a small fishing charter operation. Pūlama Lānaʻi simply brought in their own boats, hired their own operators, and put the local fishing charter business out of work.

Lānaʻi had a small car rental operation. Pūlama Lānaʻi put them out of business and now runs its own Lānaʻi Car Rental.

Pūlama states that it provides green waste recycling and makes compost available to residents. EA at 72. Although residents continue to supply green waste to Pūlama, compost has not been available to residents for close to six months.

Pūlama Lānaʻi says its 200-acre master-planned light and heavy industrial development will abut “the existing 20-acre Miki Basin Industrial Condominium,” EA-11, but this 20-acre project has languished uncompleted for close to 20 years; there was no discussion before the LUC in September, nor is there any in the EA, on the status of a mandate to sell 50% of it fee simple.

Not only has the Miki Basin 20-acre condominium project not materialized, Pūlama now apparently wants to reserve the right to maintain total control over the additional 200-acre industrial development. EA at 2.

So it’s with a hearty dose of salt that the LUC should digest Pūlama Lānaʻi’s “commitment” to making Lānaʻi’s economy diversified and sustainable.

Conclusions:

- 1) No further approvals for additional industrial development should be granted until the conditions of Ordinance No. 2895 (Bill No. 79 of 2000) have been complied with. Specifically, PL is required to offer 50% of the 20 acres in fee and has not done so. _
- 2) A FONSI is an inappropriate conclusion to reach, given the fragile water resource available to Lānaʻi and the many published development plans already on the books for Lānaʻi, without further exploration and firm and timely commitments from Pūlama Lānaʻi regarding funding of additional water resource; there is a reason why most of Lānaʻi's high-level wells have been drilled in the Leeward aquifer: the windward side is steep, mountainous, and inaccessible. To simply say that it's "available" for future wells is an empty promise.
- 3) No amendments, zoning changes or approvals should be granted until significant conditions and strenuous reporting requirements are put in place by the LUC.
- 4) Pūlama should be held to its representations regarding supporting sustainable growth for small businesses and required to explain and justify to the LUC any decision to withhold any portion of the 200-acre industrial park from sale.

Sincerely,

Robin Kaye
511 Ilima Ave.
Lānaʻi city, HI 96763
808-559-6124 rkayelny@gmail.com

Hoʻokuleana LLC

... to take responsibility ...

Peter T. Young

1539 Kanapuʻu Drive
Kailua, Hawaiʻi 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Robin Kaye
511 Ilima Ave.
Lānaʻi City, HI 96763

rkayelny@gmail.com

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Mr. Kaye:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

You note several issues related to water availability for the project, desalination and noted several other projects are noted in the Lānaʻi Community Plan that are not noted in the draft EA.. You conclude with matters not directly related to the land use matter, but focus on claims against Pūlama Lānaʻi.

Based on your comments, additional information was added to the final EA. Of note, discussion on other projects that are noted in the Lānaʻi Community Plan was added to the final EA, including the Lānaʻi City Expansion, Tennis Academy, Gateway Park, University, Rural Residential and Mānele Mauka. Summary information is provided for each.

You suggested that a FONSI is inappropriate, especially in the context of water resource availability. The final EA includes further discussion on the recommendations and conclusions from the Lānaʻi Water Use and Development – especially as it relates to water sourcing for future developments.

Related to this, information from the final review and discussion on the 2011 WUDP by the Commission on Water Resource Management was added that notes the resource development strategy for additional development on Lānaʻi includes new ground water source development, water reuse expansion, and desalination, in addition to both supply-side and demand-side conservation.

The Lānaʻi Water Use and Development Plan includes a list of potential supply options sufficient to meet the forecast land uses. These sources include recommissioning old wells, drilling new wells, desalination and other source options. With this was a long list of new potential wells.

In discussing new wells, the WUDP notes that new wells "could be developed to provide additional water supply for Lānaʻi. Aside from additional supply, benefits provided by additional wells would include improved geographical distribution of well pumping, increased production redundancy for system reliability, and potentially increased flexibility of operations."

With respect to Leeward versus Windward well development strategies, the Lānaʻi WUDP (2011) notes the need to "Plan and ultimately develop operable groundwater sources in the Windward aquifer to distribute groundwater pumping and provide resources, as necessary, to provide for system growth beyond the capacity of the Leeward aquifer." (Lānaʻi WUDP; 31)

As noted in the draft EA, it has been anticipated that initially the water system growth would be to expand upon the Leeward system, but then look at new well development on the Windward system. This is consistent with the recommendations and findings in the Lānaʻi WUDP.

Do well by doing good.

The Lānaʻi Water Use and Development Plan notes that “Desalination of seawater offers essentially unlimited ultimate source capacity but is more expensive than other available options.” (Lānaʻi WUDP; 5-38) In 2013, Pūlama Lānaʻi submitted an application for “a reverse osmosis desalination water treatment facility located on property described as Tax Map Key (TMK) (2) 4-9-002:001 (por.)” The request was for a “proposed Reverse Osmosis (“RO”) Well No. 3 (source well), water transmission lines, and access roads.”

In 2015, the Lānaʻi Planning Commission found that “The proposed project could prove to be a dependable alternative water supply that reduces the island’s reliance on the High Level Aquifer, and could positively contribute to the availability of potable and non-potable water on the island and meeting the anticipated long-term water demand.” The Maui Planning Department recommended approval of the Project District Application and recommended approval of the Special Use Permit Application that included the desalination project.

However, after Pūlama Lānaʻi’s request/explanations and the Planning Department’s recommendation for approval as submitted, the Lānaʻi Planning Commission granted a permit for only a 15-year term (rather than the 30-years applied for, which was based on the significant financial cost and the anticipated useful life of the desalination plant) and also added a condition that “Once the desalination plant is operational no High Level Aquifer water will be pumped to or used in the Mānele Project District except in the event of an emergency as determined by the Lānaʻi Water Company and the Lānaʻi Water Advisory Committee, and then only for human consumption.”

As such, construction of the desalination plant was halted on September 12, 2014. Pūlama Lānaʻi has indicated it has not given up on development of a desalination plant. I will also repeat that the Lānaʻi WUDP notes a number of new wells in the Leeward and Windward systems, suggesting that groundwater wells are reasonable and reliable sources for water to Mānele and elsewhere on the Island.

You also note some situations that you suggest call into question Pūlama Lānaʻi’s commitment to support economic growth, economic diversity/sustainability and support for small business growth on the Island. I have passed those on to representatives at Pūlama Lānaʻi and they reaffirm their commitment to the people and businesses on the Islands.

As the proposed project relates to the proposed designation of the site for light and heavy industrial uses, I will call your attention to the mapping and explanations in the Lānaʻi Community Plan. The Pūlama Lānaʻi proposal mirrors the mapping and land use types for light and heavy industrial uses. That plan notes that “The island’s primary industrial areas are located southwest of Lānaʻi City, near the Lānaʻi Airport, and at Kaumālapaʻu Harbor.” The proposed uses are consistent with the intent to consolidate industrial uses and the Community Plan notes that “Light industrial uses in Lānaʻi City will also be moved and consolidated in this area. The area will also serve as a staging area for shipments from the harbor to be distributed closer to town.”

Thank you for your comments.

Sincerely,
HO’OKULEANA LLC

Peter T. Young
President

DAVID Y. IGE
GOVERNOR OF HAWAII



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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 23, 2019

Ho’okuleana LLC
Attention: Mr. Peter Young
1539 Kanapu’u Drive
Kailua, Hawaii 96734

via email: PeterYoung@Hookuleana.com

Dear Mr. Young:

SUBJECT: Draft Environmental Assessment for **Miki Basin Industrial Park** located at Lanai City, Island of Lanai; TMK: (2) 4-9-002:061 (por.) on behalf of Pūlama Lanai

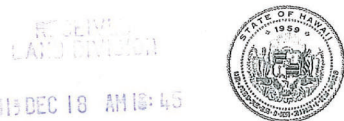
Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated December 19, 2019, enclosed are comments from the Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,


Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 27, 2019

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 Assessment for **Miki Basin Industrial Park**

LOCATION: Lanai City, Island of Lanai; TMK: (2) 4-9-002:061 (por.)

APPLICANT: Ho'okuleana LLC on behalf of Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **December 18, 2019**.

The DEA can be found on-line at: <http://health.hawaii.gov/oegc/> (Click on *The Environmental Notice* in the middle of the page.)

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 Darlene Nakamura at 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

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

Signed: /s/ M. Kaleo Manuel

Print Name: Deputy Director

Date: December 16, 2019

Attachments
cc: Central Files

FILE ID: RFD.4984.5
DOC ID: 22035

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

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

December 16, 2019

REF: RFD.4984.5

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: M. Kaleo Manuel, Deputy Director *Kaleo*
Commission on Water Resource Management

SUBJECT: Draft Environmental Assessment for Miki Basin Industrial Park

FILE NO.: RFD.4984.5
TMK NO.: (2) 4-9-002:061 (por.)

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

Our comments related to water resources are checked off below.

- ☒ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☒ 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_Conervation_BMPs.pdf.

Mr. Russell Tsuji
Page 2
December 17, 2019

- ☒ 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 stream 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 DEA should provide a simple summary table in Section 4.6.2, showing the existing withdrawal amounts from the Leeward and Windward Aquifer System Areas, respectively, as well as the projected future demands for each aquifer system area associated with this project.

We also recommend a discussion of the consistency of this current proposal for the Miki Basin Industrial Park with the projected buildout described in the 2011 Lanai Water Use and Development Plan.

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

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Kaleo Manuel, Deputy Director
Commission on Water Resource Management
Department of Land and Natural Resources
Post Office Box 621
Honolulu Hawaii 96809

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Mr. Manuel:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

You recommend and Pūlama Lāna'i intends to implement coordination with the county; that efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources; 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; use of alternative water sources, wherever practicable; adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii.

The two versions of the EA (draft and final) include summaries of the existing water systems on Lāna'i, including the withdrawal amounts from the Leeward and Windward Aquifer System Areas. As noted in the draft and final EAs, the intent is to use available water capacity to handle the initial needs. As needs increase over time and the development of industrial park expands, then new wells will be drilled in the Leeward and Windward aquifers. It is not clear specifically when and where those new wells will be added; Pūlama Lāna'i and Lāna'i Water Company will be in regular communication with the Water Commission on any future well development.

This is a 30-year project and the water needed will depend on what types of industries come to the island. As we do not know what industries will want to start operations on Lāna'i, we don't have any way to be specific as to what will be needed, produced from where, and in what order. We do know that if we do not rezone the land, expanding the opportunities beyond tourism will not occur for the Lāna'i community. Limiting the island to tourism is not moving toward sustainability. Sustainability for Lāna'i will require multiple options and this is one of them.

Information from the final review and discussion on the 2011 WUDP by the Commission on Water Resource Management was added that notes the resource development strategy for additional development on Lāna'i includes new ground water source development, water reuse expansion, and desalination, in addition to both supply-side and demand-side conservation.

The Lāna'i Water Use and Development Plan includes a list of potential supply options sufficient to meet the forecast land uses. These sources include recommissioning old wells, drilling new wells, desalination and other source options. With this was a long list of new potential wells.

Do well by doing good.

In discussing new wells, the WUDP notes that new wells "could be developed to provide additional water supply for Lāna'i. Aside from additional supply, benefits provided by additional wells would include improved geographical distribution of well pumping, increased production redundancy for system reliability, and potentially increased flexibility of operations."

With respect to Leeward versus Windward well development strategies, the Lāna'i WUDP (2011) notes the need to "Plan and ultimately develop operable groundwater sources in the Windward aquifer to distribute groundwater pumping and provide resources, as necessary, to provide for system growth beyond the capacity of the Leeward aquifer." (Lāna'i WUDP; 31)

As noted in the EA (draft and final), it has been anticipated that initially the water system growth would be to expand upon the Leeward system, but then look at new well development on the Windward system. This is consistent with the recommendations and findings in the Lāna'i WUDP.

With respect to the demand estimates and overall water consumption estimates into the future that are reflected in the Water Use and Development Plan, please note that Pūlama Lāna'i has made significant progress in reduction of leaks, conservation efforts and changes to existing projects resulting in reduced water demands and usage.

In addition to the reduced scale, densities and number of units called for in the proposed Kō'ele Project District and Mānele Project District amendments, during the recent refresh at Mānele, there was also a reduced number of hotel units at Mānele Hotel. Likewise, at Mānele, Pūlama Lāna'i reduced the irrigation and pool water usage for the pool area changes. They changed types of plantings and left large areas to be in a natural state, rather than grass; so there is no irrigation needed. The pool area uses artificial turf rather than grass. And, Mānele went with two pools, rather than the prior three.

Lāna'i Water Company has completed a 100% replacement program for all water meters on Lāna'i with the installation of Smart Meters. These meters allow 15 minute increment readings for all meters, and have an App that consumers can use to see their usage. The system also provides notifications to LWC and the consumer if there appears to be a leak.

Because of this, we believe that the WUDP overestimates the water demand into the future.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC

Peter T. Young
President

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 19, 2019

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

Ho'okuleana LLC
Attention: Mr. Peter Young
1539 Kanapu'u Drive
Kailua, Hawaii 96734

via email: PeterYoung@Hookuleana.com

Dear Mr. Young:

SUBJECT: Draft Environmental Assessment for **Miki Basin Industrial Park** located at Lanai City, Island of Lanai; TMK: (2) 4-9-002:061 (por.) on behalf of Pūlama Lanai

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

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division – Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 27, 2019

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 Assessment for **Miki Basin Industrial Park**
LOCATION: Lanai City, Island of Lanai; TMK: (2) 4-9-002:061 (por.)
APPLICANT: Ho'okuleana LLC on behalf of Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **December 18, 2019**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on The Environmental Notice in the middle of the page.)

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 Darlene Nakamura at 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

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

Signed:

Print Name: Carty S. Chang, Chief Engineer

Date:

12/4/19

Attachments

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji

Ref: **Draft Environmental Assessment for Miki Basin Industrial Park**

Location: **Lanai City, Island of Lanai**

TMK(s): **(2) 4-9-002:061 (por.)**

Applicant: **Ho'okuleana LLC on behalf of Pulama Lanai**

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- o Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- o Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4896.

Signed:

CARTY S. CHANG, CHIEF ENGINEER

Date:

12/4/19

DAVID Y. IGE
GOVERNOR OF HAWAII



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2019 DEC 16 AM 11:37



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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 27, 2019

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 Assessment for **Miki Basin Industrial Park**

LOCATION: Lanai City, Island of Lanai; TMK: (2) 4-9-002:061 (por.)

APPLICANT: Ho'okuleana LLC on behalf of Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **December 18, 2019**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on The Environmental Notice in the middle of the page.)

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 Darlene Nakamura at 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

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

Signed:

Print Name: Daniel Ornelles

Date: 12/6/19

Attachments
cc: Central Files

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Russell Tsuji, Land Administrator
Department of Land and Natural Resources
Post Office Box 621
Honolulu Hawaii 96809

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Mr. Tsuji:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

We note that the Engineering Division noted rules related to the National Flood Insurance Program and acknowledge that the property owner is responsible to research the Flood Hazard Zone designation for the project. We also note that the draft EA indicates that the subject property is within the X flood zone.

We note the Maui Land Division has no comments.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC

Peter T. Young
President

Do well by doing good.

REF-164

**Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health**

If your proposed project:

Requires an Air Pollution Control Permit

You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.

s
Includes construction or demolition activities that involve asbestos

You must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.

Has the potential to generate fugitive dust

You must control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near to existing residences, business, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance complaints.

You should provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- a) Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing airborne, visible fugitive dust from shoulders and access roads;
- e) Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling airborne, visible fugitive dust from debris being hauled away from the project site.

If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch

Clean Air Branch (808) 586-4200 cab@doh.hawaii.gov	Indoor Radiological Health Branch (808) 586-4700
--	---

April 1, 2019

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Barry Ching
Department of Health
Clean Air Branch
Hale Ola Building
2827 Waimano Home Road, Room 225
Pearl City, HI 96782-1487

Cab.General@doh.hawaii.gov

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

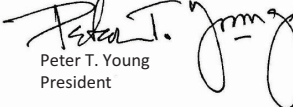
Dear Mr. Ching:

Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

We acknowledge that you provided April 1, 2019 Standard Comments for Land Use Reviews from the Clean Air Branch. These relate to required permitting, procedures and points of contact in addressing clean air concerns.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC


Peter T. Young
President

Do well by doing good.



**OFFICE OF PLANNING
STATE OF HAWAII**

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DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

DTS201912121110HE

December 31, 2019

TO: Daniel Orodener, Executive Officer
Land Use Commission

FROM: Mary Alice Evans, Director *Mary Alice Evans*
Office of Planning

SUBJECT: Docket No. A19-807/Lanai Resorts, LLC dba Pulama Lanai
Miki Basin Industrial Park
Draft Environmental Assessment – Anticipated Finding of No Significant Impact
Lanai Airport, Lanai, Hawaii
TMK: (2) 4-9-002: por. 061

Pulama Lanai is seeking a State Land Use District Boundary Amendment (Land Use Commission Docket No. A19-807) to reclassify 200 acres from the State Agricultural District to the Urban District to develop the Miki Basin Industrial Park. The subject Draft Environmental Assessment – Anticipated Finding of No Significant Impact (DEA-AFONSI) is in support of the reclassification action.

Pulama Lanai proposes a master-planned light and heavy industrial development located 3.2 miles southwest of Lanai City and connected to Kaunapali Highway (State Route 440) via Miki Road. The 200-acre project site is designated for industrial use on the Lanai Community Plan Land Use Map and adjoins the Lanai Airport, the 5-acre Maui Electric Company power plant, and the existing 20-acre Miki Basin Industrial Condominium. All three neighboring facilities are in the State Urban District. The site is on fallow agricultural land, rated “D” by the Land Study Bureau, that has not been used since 1992 when pineapple production ceased.

As a master-planned project, Pulama Lanai will develop the major common infrastructure, such as roads and electric and water utility lines. Industrial park users will be responsible for connection to their individual lots. Pulama Lanai does not intend to build the project all at once and anticipates that full buildout will occur over a 30-year time period.

Mr. Daniel Orodener
December 31, 2019
Page 2

The Office of Planning (OP) has reviewed the DEA-AFONSI and offers the following comments:

1. Development Timetable

Pulama Lanai states that full buildout of the project is expected to take 30 years. Please be aware that projects seeking State Land Use reclassification are required to be *substantially completed within ten years* or seek incremental approvals (Hawaii Administrative Rules § 15-15-50 (c) (20)). The Final Environmental Assessment (FEA) should provide a schedule of development for each phase of the total development and a map showing the location and timing of each phase or increment. Regarding infrastructure, e.g. highway improvements, new water source, storage and distribution system, the FEA should discuss how improvements will be completed to ensure that mitigation coincides with the impact created by the proposed project.

2. Low Impact Development

OP acknowledges that Sections 4.5 (pgs. 42-48) of the DEA-AFONSI contains an extensive evaluation on geology, soils, slope stability and proposed drainage infrastructure that will be incorporated into the industrial park. Page 45 states that offsite runoff will be intercepted before entering the project site by proposed drainage ditches. The drainage ditches will divert runoff around the perimeter of the project site to an offsite discharge point downstream. Onsite runoff will be collected by a proposed underground storm drain system consisting of pipes and inlets. Page 48 goes on to state that storm water treatment will not be provided for this project since the runoff flows into an existing offsite sump with no outlet to the ocean.

Industrial activity in the Miki Basin may alter the absorption rate with the introduction of impervious surfaces, lead to increased sheet flow, and overwhelm drainage infrastructure intended to divert rainwater to detention zones. Low impact development (LID) designs include enhanced landscaping, bio-swales, permeable pavement, rain catchment systems, and bio-detention basins. LID design elements are effective at keeping stormwater in place, and treat toxins, sediment, and loose soil onsite.

Pulama Lanai should consult with the County of Maui on the feasibility and effectiveness of onsite stormwater treatment systems.

3. Water Resources

OP notes that the DEA-AFONSI contains an extensive discussion of the project's impact on water resources, including Lanai Water Company's conformance with the State Commission on Water Resource Management requirements, identification of new sources of water, water infrastructure improvements needed to support full buildout of the

Mr. Daniel Orodener
December 31, 2019
Page 3

project, and the cumulative impact of other development projects on water resources (pgs. 49-72). In addition, a Water Master Plan is also included (Exhibit H).

4. Cultural Resources

OP notes that the DEA-AFONSI partially discusses the project's potential impact on traditional and customary native Hawaiian rights on Pages 37-38. A fuller discussion and a specific finding consistent with the Hawaii Supreme Court's Ka Paakai holding is contained in the DEA-AFONSI, Exhibit A, September 24, 2019 letter to Kurt Matsumoto from Kepa Maly.

5. Previous Comments

Our previous response letter to an Early Consultation Request, dated November 30, 2018, requested that the DEA:

- Examine the project's relevancy with the provisions of Hawaii Revised Statutes (HRS) Chapter 226, the Hawaii State Planning Act; and
- Assess the project's adherence with HRS § 205A-2, the objectives and supporting policies of the Hawaii Coastal Zone Management (CZM) program.

OP acknowledges that our prior comments have been addressed in the DEA-AFONSI.

If you have any questions, please contact Aaron Setogawa of our Land Use Division at (808) 587-2883 or Joshua Hekekoa of our CZM program at (808) 587-2845.

Sincerely,



Mary Alice Evans
Director

c: Lynn McCrory, Senior Vice President of Government Affairs, Pūlama Lanai
Peter T. Young, President, Hookuleana LLC
Michele McLean, AICP, Director, Department of Planning, County of Maui

Ho'okuleana LLC

... to take responsibility ...

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Mary Alice Evans, Director
Office of Planning
Post Office Box 2359
Honolulu Hawaii 96804

Re: Miki Basin Industrial Park – Comments on Draft Environmental Assessment

Dear Mary Alice:

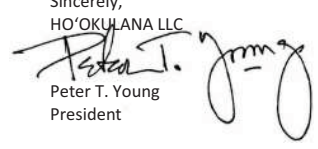
Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

We note the development timetable, drainage, water resources (you note that there is extensive discussion on water resources) and cultural resources. You note the cultural analysis included in the Exhibits section of the report is consistent with requirements and also acknowledge that your previous comments have been addressed in the EA.

We are aware of State Land Use reclassification timing you reference and understand that the project needs to be substantially completed within ten years or Pūlama Lāna'i should seek incremental approvals. As noted in the EA, the development timeframe is dependent on market conditions; the present estimate is that the project will be developed incrementally over a period of 30-years, depending on the market conditions. With respect to drainage, as you suggest, Pūlama Lāna'i will consult with the County of Maui on the feasibility and effectiveness of onsite stormwater treatment systems.

Thank you for your comments.

Sincerely,
HO'OKULEANA LLC


Peter T. Young
President

Do well by doing good.

REFERENCES

IX

IX. REFERENCES

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**MARKET
ASSESSMENT**

APPENDIX

A

MIKI BASIN INDUSTRIAL PARK:
MARKET ASSESSMENT

PREPARED FOR:
Pūlama Lāna‘i

PREPARED BY:
Plasch Econ Pacific LLC

September 2021

REF-171

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EXECUTIVE SUMMARY

1. PROJECT DESCRIPTION

The Miki Basin Industrial Park (the **Project** or **Miki 200**) is a proposed master-planned development on a 200-acre centrally located site in the Miki Basin area on the island of Lānaʻi, Hawaiʻi. Consistent with the Lānaʻi Community Plan, Miki 200 will include 100 acres designated Light Industrial and 100 acres designated Heavy Industrial. It will be Lānaʻi's first large-scale industrial park. Lot sizes may range from less than a half-acre to 20 acres or more. Also, rental space may be available in industrial buildings if built. Infrastructure may include internal roads, water, power, sewers, drainage, etc.

Miki 200 will provide space for the relocation and/or expansion of existing industrial activities on Lānaʻi, land and warehouses for storing goods and equipment, and land and buildings to accommodate industrial activities new to Lānaʻi.

2. PROJECTED SUPPLY AND USE OF INDUSTRIAL LAND

The future supply and use of industrial land on Lānaʻi is projected to be as follows:

	<u>Acres</u>
— Miki 200 (proposed)	
• Committed	
+ Infrastructure	20.0
+ Renewable energy	127.0
+ Concrete/rock-crushing facility	14.5
+ Asphalt plant	12.5
• Typical industrial activities	7.6
• Vacant (projected development after 2030)	<u>18.4</u>
• Total Miki 200	200.0
— Existing Industrial Projects (acreage includes infrastructure):	
Pūlama Lānaʻi Central Services, Miki 20, HECO, and	
Kaumalapau Harbor	
• Currently used (excludes 1.6 acres in temporary use)	21.9
• Available in the future, pending a Land Court Subdivision	
Approval	<u>11.6</u>
• Total Existing Industrial Land	33.5
— Total Industrial Land, Proposed and Existing	233.5

ES-1

3. MARKET FOR MIKI 200

Miki 200 will provide much needed industrial land on Lānaʻi, and a much needed industrial park. Currently, vacant industrial land is not available on the island.

Regarding market feasibility, commitments are in place for 174 acres (87%) of the Project area. An additional 7.6 acres for “typical industrial activities” will increase the projected demand to 181.6 acres (91%) by 2030. About 18.4 acres at Miki 200 will accommodate the demand for industrial land beyond 2030. More importantly, this acreage will provide industrial land approved for development and may have major infrastructure in order to take immediate advantage of any new economic opportunities which may arise, thereby diversifying Lānaʻi's economy.

MIKI BASIN INDUSTRIAL PARK: MARKET ASSESSMENT

PART I: INTRODUCTION AND PROPOSED PROJECT

1. INTRODUCTION

a. Content and Purpose

Miki Basin Industrial Park (the **Project** or **Miki 200**) is a proposed master-planned development on a 200-acre site located in the Miki Basin area on the island of Lānaʻi, Hawaiʻi. This report addresses the anticipated market for the Project. Its purpose is to provide the community, State of Hawaiʻi (**State**) officials and County of Maui (**County**) officials with relevant information about the market on Lānaʻi for an industrial park.

b. Methodology

The market assessment covers:

- The existing supply of industrial land on Lānaʻi based on an inventory of industrial land on Lānaʻi.
- Market conditions for industrial land on Lānaʻi.
- The anticipated demand for industrial land based on committed and anticipated uses. Committed uses were provided by Pūlama Lānaʻi. Anticipated uses are based on per-capita space requirements.

Socio-economic conditions on Lānaʻi are also provided in order to provide insight into possible adjustments to the demand for industrial land. Information is provided on Lānaʻi's population, housing, incomes, education, economic activities, employment and labor force. Data were obtained from the 2010 census by the U.S. Census Bureau, and from the American Community Survey ("ACS"). The ACS is an ongoing survey that provides up-to-date information about the nation's population. The ACS includes questions that were not included in the 2010 decennial census but were included in the 2000 census. The most up-to-date available data from the ACS are five-year estimates from 2015-2019.

Dollar amounts are expressed in terms of 2019 purchasing power and market conditions, thereby reflecting conditions prior to COVID-19. Dollar amounts after 2019 are not increased to account for inflation, appreciation in property values, or changes in market conditions.

c. Organization of the Report

The report is divided into three Parts:

- Part I: Introduction and Proposed Project
- Part II: Lānaʻi's Economy and Socio-Economic Conditions
- Part III: Market for Industrial Land

All Figures in this report are embedded in the text, while all tables are at the end.

d. Economic Consultant

The analysis was conducted by Plasch Econ Pacific LLC, a Hawaiʻi-based economic consulting firm specializing in economic development, land and housing economics, feasibility studies, valuations, market analysis, public policy analysis, and the economic and fiscal impacts of projects.

2. PROJECT OVERVIEW

a. Project Location

The Miki 200 will be centrally located on a 200-acre site in Miki Basin on the island of Lānaʻi, about 1 mile east of the Lānaʻi Airport terminal, 2.7 miles southwest of Lānaʻi City, and 3.7 miles east of Kaunapali Harbor (see Figures I-1 and I-2). The Tax Map Key (TMK) for the Project area is (2)4-9-002:061 (por.).

As shown in Figure I-3, the Project will abut (1) the Hawaiian Electric Company/Maui Electric Co. (**HECO**) power plant, and (2) the "Existing Industrial Condominium" (referred to as **Miki 20** since it is a 20-acre project in the Miki Basin).

b. Project Description

Consistent with the Lānaʻi Community Plan, Miki 200 will include 100 acres designated Light Industrial and 100 acres designated Heavy Industrial. It will be Lānaʻi's first large-scale industrial park. Lot sizes may range from less than a half-acre to 20 acres or more. Also, rental space may be available in industrial buildings if built. Infrastructure may include internal roads, water, power, sewers, drainage, etc.

Miki 200 will provide space for the relocation and/or expansion of existing industrial activities on Lānaʻi, land and warehouses for storing goods and equipment, and land and buildings to accommodate industrial activities new to Lānaʻi. Regarding the last point, it is important to have industrial land readily available and approved for development in order to take immediate advantage of any new economic opportunities which may arise.

c. Development Period

Following approval, most Project development is expected to occur over a period of about 10 years, but development could require more or less time, depending on the pace of future economic and population growth, market conditions and lot leases. About 9% of the land is expected to be developed after 2030 (see Subsection III.3.e).

d. Land Classifications and Required Approvals

Current land classifications of the Project Area and proposed changes are as follows:

- State Districts
 - Current: Agricultural
 - Proposed: Urban
- County Designations
 - Lānaʻi Community Plan
 - + Current: Light and Heavy Industrial
 - + Proposed: No change
 - Maui County Zoning
 - + Current: Agricultural
 - + Proposed: Light and Heavy Industrial

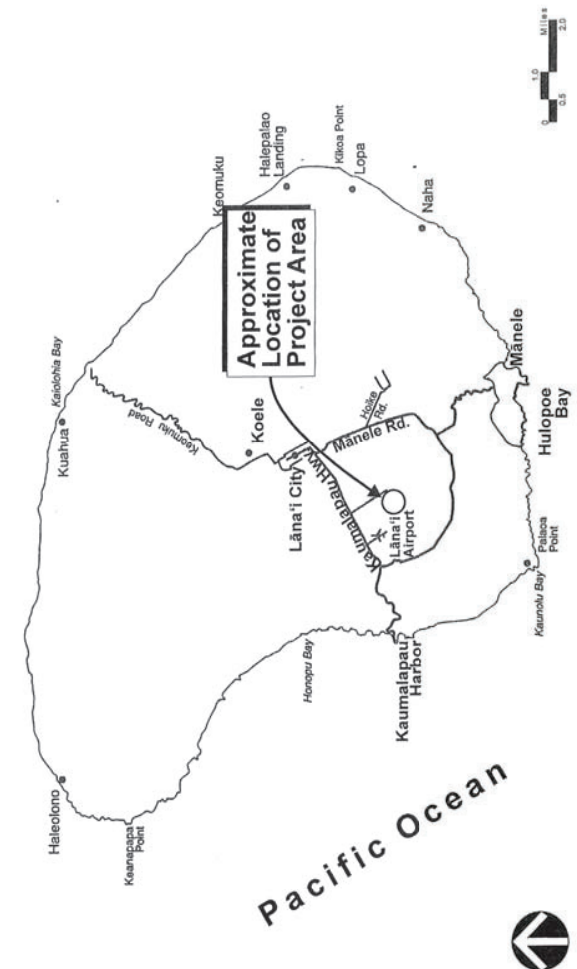


Figure I-1. Project Location, Lāna‘i

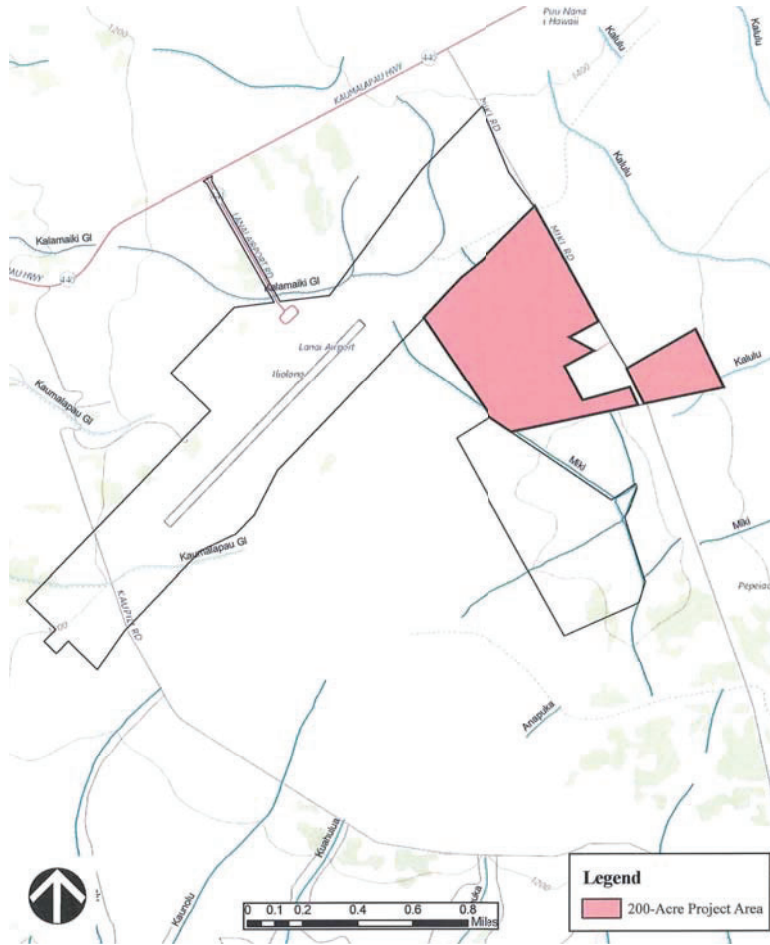


Figure I-2. Project Location, Miki Basin

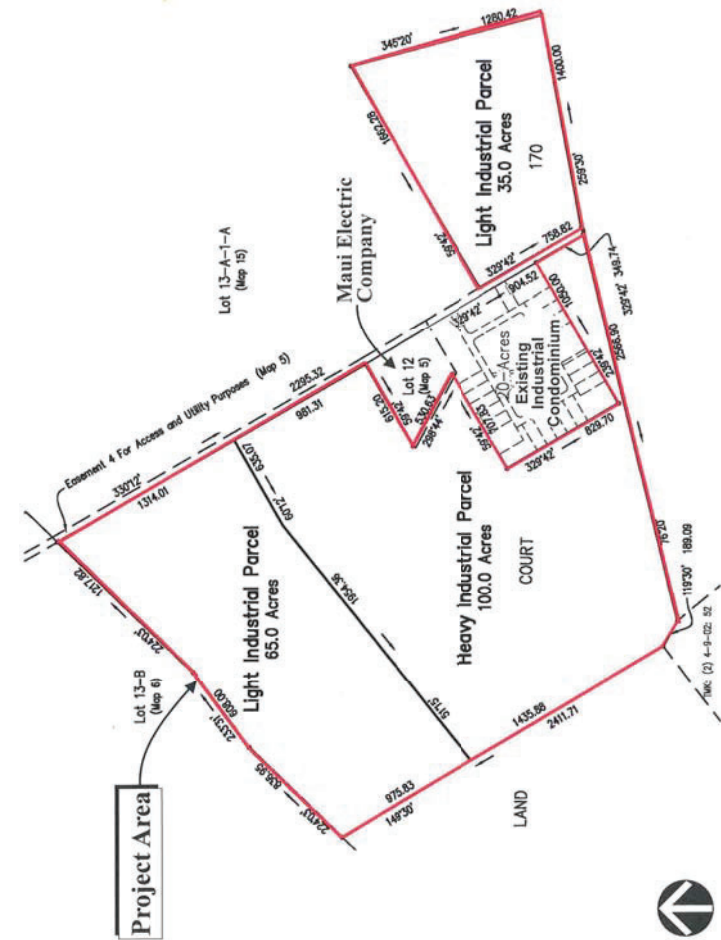


Figure I-3. Site Plan

PART II: LANAI'S ECONOMY AND SOCIO-ECONOMIC CONDITIONS

1. ECONOMIC OVERVIEW

From the 1920s to 1992, the primary economic activity on Lānaʻi was growing pineapple for the mainland canned-pineapple market.

Since the 1990s, the two resorts on Lānaʻi (Manele and Kōʻele) have been the primary driving forces for the economy. Manele and Kōʻele feature 213 and 96 luxury rooms and suites, respectively. In addition, both resorts include single-family homes and multi-family homes for retirees, part-time residents, visitors and managers. The purchase of goods and services by visitors, retirees, part-time residents, the hotel, and hotel employees generate most of the jobs on Lānaʻi.

Other economic driving forces on Lānaʻi's include:

- Sensei Farms, a new hydroponic farm which exports fresh vegetables to markets throughout the Hawaiian Islands, and which employs about 50 workers.
- Government operations (schools, the airport, the harbors, police, fire, post office, etc.)
- Social security and retirement income paid to residents.
- Government income-support payments.
- Occasional construction activity for the building or renovation of hotels, homes, commercial and industrial buildings, government facilities, etc.

Except for the hotel an Manele, most commercial activities on the island are located in Lānaʻi City, including grocery stores, drug stores, restaurants, service stations, beauty salons, building suppliers, etc.

2. SOCIO-ECONOMIC CONDITIONS

Tables II-1 and II-2 summarize socio-economic conditions for County of Maui and Lānaʻi. The County consists of the islands of Maui, Lānaʻi, Molokaʻi, Kahoʻolawe, and Molokini. Except where stated otherwise, the estimates below were reported by the American Community Survey.

a. Population

Between 2015 and 2019, Lānaʻi had a resident population of approximately 2,730, or 1.64% of the County population of 165,979 residents. Residents include those who live full-

time or permanently in the County, and exclude visitors and part-time residents (i.e., those who live most of the time in a primary home located elsewhere).

Throughout most of the decade, the U.S. Census Bureau's five-year population estimate for Lānaʻi ranged from approximately 3,100 to 3,500 residents. However, in 2018 and 2019, the five-year estimate dipped below 3,000 residents. As noted above, the 2015-2019 five-year estimate was 2,730 people, which represents a 12.9% decrease from the 2010 population of 3,135 residents. Meanwhile, the population for the County as a whole has increased by 7.2% since 2010 (see Table II-1).

The Lānaʻi Community Plan, which was updated and approved by the Maui County Council in 2016, originally projected that an additional 885 residents will live on the island by the year 2030, for a total population of 4,020 (based on the County's Land Use Forecast produced in December 2012). The Lānaʻi Community Plan did note that increased economic activity and development plans on the island may result in the population growing beyond the original forecast of up to 6,000 residents.

Between 2015 and 2019, Asian residents comprised a higher proportion of the Lānaʻi population compared to the County as a whole: 53.4% of residents were estimated to be Asians compared to 29.3% for the County (Table II-1).

The resident profile of Lānaʻi is older than that of the County as a whole. The median age on Lānaʻi was about 49.0 years old between 2015 and 2019 compared to 41.2 years for the County.

b. Households

The average household size on Lānaʻi is estimated to be 2.31 people per household between 2015 and 2019—a decrease from 2.71 people per household in 2010 (Table II-1). On average, households on Lānaʻi are smaller than households for the County —3.00 people per household.

Approximately 59.8% of the households were estimated to be homeowners. Also, an estimated 63.1% of the households were family households.

c. Housing

Between 2015 and 2019, Lānaʻi had an estimated 1,549 housing units (Table II-1). This figure includes resort/residential units that were used as second homes, or were available for visitors, or were vacant. Approximately 23.8% of housing units were vacant, compared to 25.5% for the County.

Most residents live in Lānaʻi City in single family homes of less than 1,500 square feet on lots of about 6,000 square feet or less (Google Maps). According to the County tax records, many of the homes on Lānaʻi were built before 1940.

d. Income and Education

The mean household income on Lānaʻi between 2015 and 2019 was estimated at \$73,484, 39.8% lower than the County as a whole (Table II-2). Correspondingly, Lānaʻi had a lower per-capita income.

A slightly lower proportion of residents on Lānaʻi completed some secondary education compared to the County as a whole. An estimated 50.7% of Lānaʻi residents attended some college or received a higher education degree, compared to 60.8% of the residents for the County. About 67.2% of the households spoke only English at home, while 31.5% spoke Asian and Pacific Island languages.

3. ECONOMIC ROLE OF SHIPPING

Inasmuch as Lānaʻi is a small island with a small population and a small economy, few consumer and business goods are produced on the island. Instead, most goods must be imported by barge or airfreight from Honolulu. Barge service is weekly, but the service is canceled occasionally due to kona storms. Airfreight is available daily, but the capacity is low and the shipping rates are higher than the barge rates.

4. IMPLICATIONS TO THE DEMAND FOR INDUSTRIAL LAND

Economic development is needed on Lānaʻi in order to provide jobs and increase incomes for the residents. As mentioned above, the average household income on Lānaʻi is 39.8% lower than the County-wide average.

For both residents and businesses, Lānaʻi needs more storage space than other communities of similar size because most goods must be imported, and shipping is infrequent and occasionally unreliable. And for most residents, home storage is limited by the relatively small lots and homes.

PART III: MARKET FOR INDUSTRIAL LAND

1. SUPPLY OF INDUSTRIAL LAND

Currently, Lānaʻi has about 36.2 acres of industrial land of which about 2.7 acres are used for offices and other non-industrial activities, 23.5 acres are used for industrial activities. The supply of industrial land is as follows:

- Pūlama Lānaʻi Central Services: about 7.7 acres, 0 acres available

This project is located in Lānaʻi City at 13110 Fraser Avenue. About 2.7 acres are used for Pūlama Lānaʻi offices and other non-industrial activities, and about 5 acres are used for industrial activities, including a laundry for the hotels, food storage, and a maintenance warehouse. None of the land is available for additional industrial uses.

- Miki 20: about 20 acres, 10 acres available in the future

Miki 20 is an industrial condominium that abuts both the proposed Project and the HECO power plant (see Figure I-3).

This project is anticipated to be subdivided into 31 lots in accordance with County requirements, but the Land Court has yet to approve the subdivision. A petition to the Land Court for approval was submitted in 2018, but which was later amended to include the Hawaiʻi Department of Transportation due to a public road over an easement which runs in part through a portion of the Lānaʻi Airport property. The petition is under review by a Deputy Attorney General.

Currently, about 10 acres are being used for Pūlama Lānaʻi warehouses, Hawaiʻi Gas, Maui Disposal, equipment rentals by Sunbelt, and a concrete/rock crushing plant. The crushing plant involves a temporary use of 1.6 acres that will be relocated to Miki 200.

None of the land is currently available for additional industrial uses. However, about 10 acres will be available in the future, following subdivision approval by the Land Court. Lots encompassing half of Miki 20 will be offered for sale for various industrial activities. This translates to future land sales of about 9 acres, excluding roads and other common areas.

After the subdivision is approved by the Land Court, Miki 20 may evolve to become a small-scale industrial park hosting a variety of industrial tenants.

- HECO Power Plant: about 5 acres, 0 acres available

HECO's generating facilities are located on about 5 acres abutting the proposed Project and Miki 20 (see Figure I-3). None of this land is currently

available for industrial activities other than that used for HECO's generating facilities.

- Kaunalapau Harbor: about 3.5 acres, 0 acres available

About 3.5 acres of industrial land are located at Kaunalapau Harbor. None of this land is currently available for industrial activities other than harbor-related activities.

None of Lānaʻi's industrial land is currently available for additional industrial activities, but 10 additional acres will be available in the future pending subdivision of Miki 20 by the Land Court. Also, no land or building space is available as part of an industrial-park.

Miki 200 will increase the supply of industrial land by 200 acres, resulting in a total island-wide supply of about 233.5 acres of industrial land. This accounting excludes the 2.7 acres used for non-industrial activities at Pūlama Lānaʻi Central Services.

2. MARKET CONDITIONS

a. Annual Absorption of Industrial land

Except for Miki 20, there have been no significant changes in the supply of industrial land on Lānaʻi in decades. Even though subdivision of Miki 20 has yet to be approved by the Land Court, 10 acres of industrial uses were added in the previous decade as indicated above. Since there are no other industrial parks on Lānaʻi, there is no additional history of industrial-park land or building space absorption.

b. Vacancy Rates

All available industrial land on Lānaʻi is being used. Similarly, all available space within existing industrial buildings is used. Thus, the vacancy rates for industrial land and building space is essentially zero.

c. Industrial Land Sales and Values

There have been no recent sales of industrial lots on Lānaʻi, so price data are not available. However, the County assesses land values at market rates. For 2021, Pūlama Lānaʻi Central Services land was assessed at \$206,210 per acre. Given its location in Lānaʻi City, this value is higher than that what is expected for Miki 200.

The Miki 20 land is assessed as agricultural land as part of a 16,124-acre parcel. Thus, this project provides no meaningful information on industrial-land values.

For tax purposes, the HECO property is assessed as Agricultural land (not Industrial land) at \$94,080 per acre. This high value indicates that the assessment is based on the actual use of the land, and not on a possible agricultural use.

The industrial land at Kaunalapau Harbor is assessed at \$863,203 per acre. Since this is harbor-front land, it is not comparable to Miki 200.

For Miki 200, once developed and serviced with utilities, the land is expected to be valued between \$100,000 to \$200,000 per acre.

d. Industrial Rents

No data are publicly available on market rents for the existing industrial land or space on Lānaʻi.

On Oʻahu, some of the most affordable industrial space can be found at Kenai Industrial Park near the Kalaeloa Barbers Point Harbor. In late 2019, asking rents were about \$1.10 per square foot per month. Land values at Kenai Industrial Park are much higher than on Lānaʻi, but building costs on Oʻahu are much lower than on Lānaʻi. Based on Kenai Industrial Park, rents for industrial space at Miki 200 are expected to be less than \$1 per square foot per month, assuming that industrial buildings are built and areas within buildings are rented to tenants.

3. DEMAND FOR INDUSTRIAL LAND

a. Current Industrial Uses

As indicated in Section III.2, about 23.5 acres of industrial land are currently being used on Lānaʻi: about 5 acres at Pūlama Lānaʻi Central Services, 10 acres at Miki 20, 5 acres at the HECO site, and 3.5 acres at the harbor.

b. Committed Industrial Uses, Miki 200

For Miki 200, about 174 acres are committed for infrastructure and industrial activities, including:

- Infrastructure: about 20 acres

Internal roads, drainage areas and common areas are expected to require about 20 acres (10%) of the Project area.

- Renewable Energy: about 127 acres

HECO has requested proposals for a 17.5 megawatt (MW) photo voltaic system on Lānaʻi plus a 70 MW-hour (MWh) battery energy storage system (PV+BESS). To help meet the need for renewable energy on Lānaʻi, Pūlama Lānaʻi plans to allocate 127 acres at Miki 200 for renewable energy. The acreage is based on the energy facility being developed at the Pacific Missile Range Facility (PMRF) on Kauaʻi (14 MW/70MWh PV+BESS).

— Concrete/Rock Crushing Facility: about 14.5 acres

Pūlama Lānaʻi's concrete recycling and rock-crushing facility uses equipment to crush concrete and rocks into various sizes and types of aggregate to construct roadways, sidewalks, etc., and for backfill throughout the island for construction projects.

The facility and equipment are mobile, and are temporarily located on 1.6 acres at Miki 20. Miki 200 will provide a permanent base for the operation, water for washing equipment and controlling dust, and a central location for serving the island. Most of the acreage for the relocated operation will be used for stockpiling (1) various types of material to be crushed and (2) various grades of aggregate. These stockpiles will provide an ample and ready supply of aggregate when needed.

After the relocation of operations to Miki 200, the 1.6 acres now used at Miki 20 will come available for other industrial activities.

— Asphalt Plant: about 12.5 acres

Pūlama Lānaʻi's asphalt plant is a hot-mix batch plant that services both the community and Pūlama Lānaʻi. The asphaltic concrete produced from this plant supplies material required to pave new roads, and to repair and repave existing ones.

This mobile facility will be relocated from its current temporary site near Kaunalapau Harbor to Miki 200 in order to provide a permanent base of operations in a central location for serving the island. The current location near the harbor will be used for stockpiling supplies.

c. Typical Industrial Activities

“**Typical industrial activities**” are defined to include those industrial activities typically found in Hawaiʻi (such as manufacturing, warehouses, base yards, etc.), but excluding those activities listed in the previous section (i.e., PV+BESS, concrete/rock-crushing facilities, and asphalt plants).

A pent-up demand for industrial land and industrial space to accommodate “typical industrial activities” is readily apparent on Lānaʻi. Many businesses in Lānaʻi City are operated from homes, partly because there are no industrial parks on Lānaʻi that serve small-scale tenants. Yards and rooms are used for operations and to store equipment and supplies. In some cases, inadequate space may be limiting local companies' ability to expand. For some of these businesses, an industrial park may be a more suitable location because of more space, visual impacts, noise, odors, dusts, etc. Many of these home businesses provide a second source of income for workers employed elsewhere on Lānaʻi. If industrial space were available, some business owners might opt to expand their companies into full-time

operations. In other cases, businesses are operated from vans, and some might benefit from a permanent location in an industrial park. In addition, some industrial activities may fail to develop on Lānaʻi due to a lack of a suitable location.

A partial list of industrial activities that could or are likely to develop at Miki 200 include the following:

- Vehicle rentals (cars, 4-wheel drive vehicles, trucks, etc.)
- Vehicle maintenance and repair (engines, transmissions, tires, body, etc.)
- Car wash
- All-terrain vehicle sales, maintenance, repair, etc.
- Small-boat supplies, maintenance and repair (including fishing gear)
- Commercial laundry services for residents
- Base yards and storage for construction trucks, equipment and supplies (lumber, bricks, cement, pipes, roofing, sheetrock, etc.)
- A base of operations for home maintenance, repairs and services (roofing, electrical, plumbing, appliances, cleaning services, pools, etc.)
- A base of operations for maintaining and repairing office equipment (computers, printers, wifi networks, etc.)
- Self-storage space for household goods, records, business supplies, etc.
- Shops and crafts (metal, woodcrafts, taxidermy, lei hulu, etc.)
- Fruit and vegetable processing, possibly with a shared commercial kitchen
- Veterinarian services and pet supplies at a fixed location
- A gym featuring exercise and therapy equipment
- A fixed location for a slaughtering facility and cold storage for hunted animals (i.e., axis deer and mouflon sheep)
- Laboratories (medical, environmental, etc.)
- Shared office facilities for business at Miki 200

d. Land Required for Typical Industrial Activities

Although the Maui Island economy is much larger than that of Lānaʻi, Maui's supply of industrial land provides information for estimating the potential demand for industrial land on Lānaʻi. The economies of both Maui and Lānaʻi are driven primarily by tourism.

In early 2020, about 1,538 acres on Maui were zoned Light or Heavy Industrial. About 80 acres of industrial land were used for two concrete/rock crushing facilities and two asphalt

plants. No industrial land on Maui was used for utility scale PV+BESS. Thus, 1,458 acres were used for “typical industrial activities” (1,538 acres less 80 acres).

In 2019, the *de facto* population for Maui Island was about 216,990 people. This is based on an estimated *de facto* population of 227,213 for the County of Maui as reported in the *Hawai‘i Data Book*, less 9,649 residents living on Lāna‘i and Moloka‘i, less an estimated 575 visitors on Lāna‘i and Moloka‘i (479 visitor units \times 60% occupancy rate \times 2 people per occupied room). The number of visitor units is from the 2020 Visitor Plant Inventory.

Thus, the per-capita land requirement on Maui for “typical industrial activities” was about 6.7 acres per 1,000 people in 2019 (1,458 acres \div 216,990 people).

By 2030, the *de facto* population of Lāna‘i is expected to reach about 4,510 residents and visitors: about 4,020 residents, 380 visitors staying in hotels, and 110 part-time residents and visitors staying in second homes and vacation homes. As indicated in Section II.2.a, the County’s Land Use Forecast for Lāna‘i projects 4,020 residents by 2030, while the Lāna‘i Community Plan noted that increased economic activity and development plans for the island may result in as many as 6,000 residents. The estimate of 380 visitors staying in hotels is based on 320 rooms at Manele, Kō‘ele and Hotel Lāna‘i; 60% occupancy; and 2 people per occupied room. The estimate of 110 part-time residents and visitors staying in second homes and vacation homes is based on 137 single-family homes and 121 multi-family homes at Manele and Kō‘ele; 75% of the homes used for second homes or vacation homes; 25% occupancy; and 2.5 people per home for single-family homes and 2 people for multi-family homes.

Based on the above, **about 30.3 acres would be required on Lāna‘i by 2030 for “typical industrial activities”** (6.7 acres/1,000 people \times 4,510 residents and visitors). As mentioned in Section III.4.a, 23.5 acres of industrial land are currently being used on Lāna‘i, including about 21.9 acres for “typical industrial activities” and 1.6 acres of temporary concrete/rock crushing operations at Miki 20. Thus, by 2030, there is a **potential demand for an additional 8.4 acres for “typical industrial activities”** (30.3 acres less 21.9 acres), **or about 7.6 acres excluding roads and other common areas** (90% of 8.4 acres). Demand for industrial land could be higher due to increased storage requirements to compensate for infrequent and unreliable shipping.

Regarding self-storage, the SpareFoot Storage Beat reports that commercial storage use amounts to about 5.9 square feet per person in the U.S. For Lāna‘i, this translates to about 23,700 square feet of storage by 2030 (5.9 sf/person \times 4,020 residents). Assuming a one-story building with a floor area ratio (FAR) of 35%, about 1.5 acres would be required for a self-storage facility (23,700 sf \times 1 acres/43,560 sf \times 1/35% FAR). This acreage would be included in the estimated 7.6 acres for “typical industrial activities.”

e. Industrial Activities After 2030

About 18.4 acres at Miki 200 will accommodate the demand for industrial land beyond 2030. More importantly, this acreage will provide industrial land approved for development and may have major infrastructure in order to take immediate advantage of any new economic opportunities which may arise, thereby diversifying Lāna‘i’s economy. This acreage will also be available to accommodate “typical industrial activities” before 2030 in the event that the pent-up demand is greater than the estimate given in the previous section.

About 10.6 acres at Miki 20 will also be available to accommodate future demand for industrial land (10 acres vacant plus 1.6 acres of temporary use less 1 acre for infrastructure).

f. Summary

The future supply and use of industrial land on Lāna‘i is projected to be as follows:

	<u>Acres</u>
— Miki 200 (proposed)	
• Committed	
+ Infrastructure	20.0
+ Renewable energy	127.0
+ Concrete/rock-crushing facility	14.5
+ Asphalt plant	12.5
• Typical industrial activities	7.6
• Vacant (to be developed after 2030)	<u>18.4</u>
• Total Miki 200	200.0
— Existing Industrial Projects: Pūlama Lāna‘i Central Services, Miki 20, HECO, and Kaunalapau Harbor	
• Currently used (includes land for infrastructure, but excludes 1.6 acres in temporary use at Miki 20)	21.9
• Available in the future, pending the Land Court Subdivision Approval of Miki 20	
+ Infrastructure	1.0
+ Lots	<u>10.6</u>
• Total Existing Industrial Land	33.5
— Total Industrial Land, Proposed and Existing	233.5

4. CONCLUSIONS

Miki 200 is consistent with the Lāna‘i Community Plan, and will provide much needed industrial lots on Lāna‘i, and a much needed industrial park. Furthermore, the Project will be

centrally located for serving the island. Lots may range in size from about a half-acre to 20 acres or more, and rental space may be provided in new industrial buildings if built. Rents will be at market rates.

Currently, vacant industrial land is not available on the island. However, about 10.6 gross acres will come available at Miki 20 assuming a favorable subdivision approval by the Land Court and relocation of the temporary concrete/rock crushing facility to Miki 200.

Regarding market feasibility of Miki 200, commitments are in place for 174 acres (87%) of the Project area. An additional 7.6 acres for “typical industrial activities” will increase the projected demand to 181.6 acres (91%) by 2030. The remaining 18.4 acres will provide land to take advantage of unforeseen new economic opportunities which may arise, and to accommodate the demand for industrial land beyond 2030.

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**PART II TABLES:
SOCIO-ECONOMIC CONDITIONS**

**Table II-1. Demographic Characteristics, County of Maui
and Island of Lana'i: 2010 and 2015–2019 Estimates**

Item	County of Maui			Lana'i		
	2010	2015-2019	Change	2010	2015-2019	Change
Population (residents)	154,834	165,979	7.2%	3,135	2,730	-12.9%
Male	77,587	82,633	6.5%	1,600	1,396	-12.8%
Female	77,247	83,346	7.9%	1,535	1,334	-13.1%
<u>Distribution</u>						
Male	50.1%	49.8%		51.0%	51.1%	
Female	49.9%	50.2%		49.0%	48.9%	
Population by Age						
Pre-school Age, 4 and Under	10,020	9,907	-1.1%	235	124	-47.2%
School Age, 5 to 19	29,117	29,706	2.0%	621	366	-41.1%
Working Age, 20 to 64	95,894	97,271	1.4%	1,805	1,546	-14.3%
Retirement Age, 65 and Over	19,803	29,095	46.9%	474	694	46.4%
<u>Distribution</u>						
Pre-school Age, 4 and Under	6.5%	6.0%		7.5%	4.5%	
School Age, 5 to 17	18.8%	17.9%		19.8%	13.4%	
Working Age, 18 to 64	61.9%	58.6%		57.6%	56.6%	
Retirement Age, 65 and Over	12.8%	17.5%		15.1%	25.4%	
Median Age	39.6	41.20	4.0%	38.6	49.00	26.9%
Ethnicity						
White alone	53,336	58,891	10.4%	460	488	6.1%
Black or African American alone	870	845	-2.9%	5	0	-100.0%
American Indian and Alaska Native alone	603	424	-29.7%	2	0	-100.0%
Asian alone	44,595	48,579	8.9%	1,745	1,459	-16.4%
Native Hawaiian and Other Pacific Islander alone	16,051	18,093	12.7%	205	186	-9.3%
Some Other Race alone	3,051	2,865	-6.1%	5	52	940.0%
Two or More Races	36,328	36,282	-0.1%	713	545	-23.6%
<u>Distribution</u>						
White alone	34.4%	35.5%		14.7%	17.9%	
Black or African American alone	0.6%	0.5%		0.2%	0.0%	
American Indian and Alaska Native alone	0.4%	0.3%		0.1%	0.0%	
Asian alone	28.8%	29.3%		55.7%	53.4%	
Native Hawaiian and Other Pacific Islander alone	10.4%	10.9%		6.5%	6.8%	
Some Other Race alone	2.0%	1.7%		0.2%	1.9%	
Two or More Races	23.5%	21.9%		22.7%	20.0%	

**Table II-1. Demographic Characteristics, County of Maui
and Island of Lana'i: 2010 and 2015–2019 Estimates**
(continued)

Item	County of Maui			Lana 'i		
	2010	2015-2019	Change	2010	2015-2019	Change
Households	53,886	54,479	1.1%	1,158	1,181	2.0%
Average Size	2.82	3.00	6.4%	2.71	2.31	-14.8%
Tenure						
Homeowners	30,055	33,232	10.6%	591	706	19.5%
Renters	23,831	21,247	-10.8%	567	475	-16.2%
Distribution						
Homeowners	55.8%	61.0%		51.0%	59.8%	
Renters	44.2%	39.0%		49.0%	40.2%	
Household Type						
Family Household	35,498	38,249	7.7%	788	745	-5.5%
Non-family Household	18,388	16,230	-11.7%	370	436	17.8%
Distribution						
Family Household	65.9%	70.2%		68.0%	63.1%	
Non-family Household	34.1%	29.8%		32.0%	36.9%	
Housing Units	70,379	73,169	4.0%	1,545	1,549	0.3%
Occupied	53,886	54,479	1.1%	1,158	1,181	2.0%
Vacant	16,493	18,690	13.3%	387	368	-4.9%
For seasonal, recreational, or occasional use	9,956	n/a		108	n/a	
Distribution						
Occupied	76.6%	74.5%		75.0%	76.2%	
Vacant	23.4%	25.5%		25.0%	23.8%	
For seasonal, recreational, or occasional use	14.1%	n/a		7.0%	n/a	

Sources:

U.S. Census Bureau. Decennial Census. 2010.

U.S. Census Bureau. American Community Survey 5 Year Estimate, 2015-2019.

**Table II-2. Income and Education, County of Maui
and Island of Lana'i: 2010–2014 and 2015–2019 Estimates**

Item	County of Maui			Lana 'i		
	2010-2014	2015-2019	Change	2010-2014	2015-2019	Change
Income						
Mean Household Income	\$84,035	\$102,759	22.3%	\$67,475	\$73,484	8.9%
Per Capita Income	\$29,499	\$35,241	19.5%	\$23,262	\$33,052	42.1%
Educational Attainment, 25 Years and Older						
Less than 9th Grade	4,393	4,416	0.5%	146	219	50.0%
Grades 9 to 12, No Diploma	6,007	5,057	-15.8%	158	128	-19.0%
High School Graduate, No College	34,941	36,912	5.6%	896	723	-19.3%
Some College, No Degree	27,200	27,584	1.4%	505	408	-19.2%
Associate Degree	9,854	12,029	22.1%	170	229	34.7%
College, Bachelor's Degree	19,374	21,366	10.3%	367	334	-9.0%
Graduate or Professional Degree	9,000	10,753	19.5%	170	136	-20.0%
Total Population, Age 25 and Older	110,769	118,117	6.6%	2,412	2,177	-9.7%
Distribution						
Less than 9th Grade	4.0%	3.7%		6.1%	10.1%	
Grades 9 to 12, No Diploma	5.4%	4.3%		6.6%	5.9%	
High School Graduate, No College	31.5%	31.3%		37.1%	33.2%	
Some College, No Degree	24.6%	23.4%		20.9%	18.7%	
Associate Degree	8.9%	10.2%		7.0%	10.5%	
College, Bachelor's Degree	17.5%	18.1%		15.2%	15.3%	
Graduate or Professional Degree	8.1%	9.1%		7.0%	6.2%	
Language Spoken at Home (Household)						
English Only	117,369	120,418	2.6%	2,299	1,751	-23.8%
Spanish	2,768	5,896	113.0%	-	33	0.0%
Other Indo-European	2,483	1,647	-33.7%	1	1	0.0%
Asian and Pacific Island languages	25,882	27,466	6.1%	967	821	-15.1%
Others	234	645	175.6%	-	-	0.0%
Distribution						
English Only	78.9%	77.2%		70.4%	67.2%	
Spanish	1.9%	3.8%		0.0%	1.3%	
Other Indo-European	1.7%	1.1%		0.0%	0.0%	
Asian and Pacific Island languages	17.4%	17.6%		29.6%	31.5%	
Others	0.2%	0.4%		0.0%	0.0%	

Sources:

U.S. Census Bureau. American Community Survey 5 Year Estimate, 2010-2014.