



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Nov 24, 2021

MEMORANDUM

TO: **DLNR Agencies:**
___ Div. of Aquatic Resources
___ Div. of Boating & Ocean Recreation
X Engineering Division (DLNR.ENGR@hawaii.gov)
X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
___ Div. of State Parks
X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
___ Office of Conservation & Coastal Lands
X Land Division – Maui District (daniel.l.ornellas@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Proposed **Kanaha Hotel at Kahului Airport**
LOCATION: Wailuku, Island of Maui; TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017, and 018
APPLICANT: Chris Hart & Partners, Inc. on behalf of R.D. Olson Development

Transmitted for your review and comment is information on the above-referenced subject matter. The DEIS was published on November 23, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2021-11-23-TEN.pdf

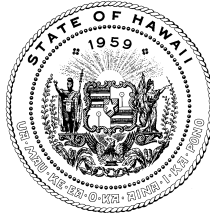
Please submit any comments by **January 5, 2022**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- () We have no objections.
- () We have no comments.
- () We have no additional comments.
- Comments are included/attached.

Signed: *DS*
Print Name: DAVID G. SMITH, Administrator
Division: Division of Forestry and Wildlife
Date: Jan 14, 2022

Attachments
cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

January 12, 2022

MEMORANDUM

Log no. 3439

TO: RUSSELL Y. TSUJI, Land Administrator
Land Division

FROM: DAVID G. SMITH, Administrator
Division of Forestry and Wildlife

SUBJECT: Division of Forestry and Wildlife Comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Kanahā Hotel at Kahului Airport, Maui

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your request for comment on the DEIS for the proposed Kanahā Hotel at Kahului Airport in Wailuku on the island of Maui; TMKs: (2) 3-8-103: 014 (por.), (2) 3-8-103:015 (por.), 3-8-103:016, 3-8-103:017, & 3-8-103:018. The project proposes to construct a 200-room business-oriented hotel that is one to four stories in height, adjacent to the Kahului. Construction will include new driveways that provide vehicle access from Lauo loop to the porte-cochere entry and on-site parking, an in-ground pool, and associated on-site infrastructure. Off-site construction will include roadways, water, and wastewater infrastructure improvements as required; these are in the process of being defined.

DOFAW appreciates the inclusion of mitigation measures in the DEIS intended to avoid construction and operational impacts to State listed species such as the Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*), Blackburn's Sphinx Moth (BSM; *Manduca blackburni*), and endangered native waterbirds and seabirds. We also appreciate measures outlined in the DEIS to use native plant species and to minimize nighttime lighting impacts to seabirds. DOFAW provides the following additional comments on the potential of the proposed work to affect listed species in the vicinity of the project area.

Artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in a collision with manmade structures or the grounding of birds. This structure has a very high potential for attracting native seabirds due to even the most minimal lighting requirements. For nighttime work that might be required, DOFAW recommends that all lights used to be fully shielded to minimize the attraction of seabirds. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. Permanent lighting from the facility and

structural lights also poses a risk of seabird attraction, and as such should be minimized or eliminated. Mitigating the effects of such lighting may require a Habitat Conservation Plan in order to offset the take of listed species. For illustrations and guidance related to seabird-friendly light styles that also protect seabirds and the dark starry skies of Hawai‘i please visit <https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf>.

State-listed waterbirds such as the Hawaiian Duck (*Anas wyvilliana*), Hawaiian Stilt (*Himantopus mexicanus knudseni*), Hawaiian Coot (*Fulica alai*) and Hawaiian Goose or Nēnē (*Branta sandvicensis*) could potentially occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction activities, all activities within 100 feet (30 meters) should cease, and the birds should not be approached. Work may continue after birds leave the area of its own accord. If a nest is discovered at any point, please contact the Maui Branch DOFAW Office at (808) 984-8100.

DOFAW is concerned about attracting vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongooses. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongooses, and provide covered trash receptacles.

DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens (e.g., Rapid ‘Ōhi‘a Death), vertebrate and invertebrate pests (e.g., Little Fire Ants, Coqui Frogs), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Maui Invasive Species Committee (MISC) at (808) 573-6472 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species. Gear that may contain soil, such as work boots and vehicles, should be thoroughly cleaned with water and sprayed with 70% alcohol solution to prevent the spread of Rapid ‘Ōhi‘a Death and other harmful fungal pathogens.

You should avoid importing soil or other plant material to Maui from off-island. Soil and plant material may contain fungi (e.g., Rapid ‘Ōhi‘a Death) and other pathogens that could harm our native species and ecosystems. We recommend consulting the Hawai‘i Interagency Biosecurity Plan at <http://dlnr.hawaii.gov/hisc/plans/hibp/> in planning, design, and construction of the project.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Paul Radley, Protected Species Habitat Conservation Planning Coordinator at (808) 295-1123 or paul.m.radley@hawaii.gov.

Sincerely,



DAVID G. SMITH
Administrator