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IN REPLY REFER TO:
DIR 1111
STP 8.3322

December 21, 2021

VIA EMAIL: planning@munekiyohiraga.com

Mr. Chris Sugidono
Senior Associate
Munekiyo Hiraga
305 High Street, Suite 104
Wailuku, Hawaii 96793

Dear Mr. Sugidono:

Subject: 2nd Draft Environmental Assessment (EA)
Miki Basin Industrial Park (MBIP)
Lanai, Hawaii
Tax Map Key: (2) 4-9-002: 061 (por)

Thank you for your letter dated November 19, 2021 requesting the review and comments on the subject Draft EA. The Hawaii Department of Transportation (HDOT) has reviewed the subject Draft EA and understands Pulama Lanai is proposing to construct and operate the MBIP as a mix of Heavy and Light Industrial uses on a 200-acre site adjacent to the Lanai Airport (LNY). Access to the project will be via Miki Road which extends approximately 2.95 miles south of its intersection with Kaumalapau Highway (State Route 440). Full build-out of the project is anticipated by the year 2040.

HDOT has the following comments:

Airports Division (HDOT-A)

1. The proposed facility is adjacent to the property boundary of LNY. All projects within five miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.

2. The proposed facility is approximately 1,850 feet from the existing end of Runway 21 at LNY and will be approximately 1,350 feet from the end of a future 500 feet Runway 21 extension. Prior to construction, Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or

alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp.

3. Due to the proximity to the airport, the developer should be aware of potential noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and depending on airport operations.

4. The HDOT-A requires that the proposed development does not provide landscape and vegetation that will create a wildlife attractant. Standing water also has the potential to become a wildlife hazard. The developer shall prevent standing water from accumulating for periods longer than 48 hours after a storm event. If the development creates a wildlife attractant that can potentially become a hazard to aircraft operations, the developer shall immediately mitigate the hazard upon notification by the HDOT-A and/or FAA. Please review the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports for guidance.

5. Although the use of solar energy photovoltaic (PV) system is not mentioned as part of the subject project, be aware that PV systems located in or near the approach path of aircrafts, can create a hazardous condition for pilots due to possible glint and glare reflected from the PV panel array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT-A and/or FAA.

   The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The www.sandia.gov/glare website has information and guidance with the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the HDOT-A by the owner of the solar energy PV system.

   Solar energy PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT-A and/or FAA.

Highways Division (HDOT-HWY)

The HDOT-HWY has reviewed the Second Draft EA for the MBIP, including Appendix G, Draft Final Traffic Impact Analysis Report (TIAR), dated June 3, 2021, and has the following comments relevant to State highways:

1. Key findings of the TIAR are summarized as follows: The TIAR study area included one intersection with State highways at Miki Road and Kaumalapau Highway. The project is anticipated to generate 161 (163) trips during the A.M. (P.M.) peak traffic hours at full project build-out in 2040. All trips would go through the Miki Road and Kaumalapau Highway intersection, with 75 percent of the MBIP traffic likely to and from the east. All intersection movements are anticipated to operate at Level of Service B or better during A.M. and P.M. peak traffic hours, with or without the project in 2040. The TIAR does not include a full traffic signal warrant study, but preliminary analysis suggests a traffic signal would not be warranted at the intersection.

2. The TIAR Base Year 2040 assumptions include the anticipated population growth and full occupancy of the Miki Basin Industrial Condominium. The Final TIAR should identify and discuss other planned projects that could affect the traffic conditions on Kaumalapau Highway by 2040.

3. There are potential significant adverse impacts with respect to safety at the Miki Road and Kaumalapau Highway intersection due to the large size and weight of the vehicles anticipated for MBIP operations, the 45 mile per hour speed limit on the highway, and the one lane width of Miki Road. The TIAR recommends the following actions to mitigate the potential impact:

    a. Widen Miki Road to two lanes between the project site driveways and Kaumalapau Highway with intersection geometries capable of accommodating turning movements.

    b. Add an exclusive westbound left-turn deceleration lane. The HDOT concurs with the TIAR recommended roadway improvements. With respect to the timing of these improvements, we request the applicant complete all roadway improvements prior to the first MBIP industrial use occupancy.

4. The applicant shall be responsible for intersection improvements at no cost to the State. Consult directly with the HDOT Maui District Engineer at (808) 873-3538 regarding the following permit requirements and list them in the Final Environmental Assessment Section VII. List of Permits and Approvals:

    a. Permit to Perform Work Upon State Highways is required for any work within the State highway right-of-way (Hawaii Revised Statutes (HRS) Chapter 264). The application includes the review and approval of construction drawings and a Traffic Management Plan.

    b. Permit to Operate or Transport Oversize and/or Overweight Vehicles and Loads Over State Highways (HRS Chapter 291, Section 36).

5. We request the applicant be required to implement a maintenance and monitoring program, acceptable to the HDOT Maui District Engineer to address inadvertent spills of materials and or debris to State highways. The maintenance and monitoring program should be in effect for all operations in the MBIP, from the date of first occupancy.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

JADE T. BUTAY
Director of Transportation

c: Mr. Scott Derrickson, Chief Planner – Land Use Commission