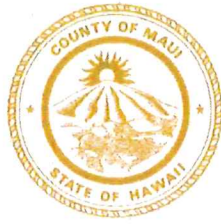


MICHAEL P. VICTORINO  
Mayor

JEFFREY T. PEARSON, P.E.  
Director

HELENE KAU  
Deputy Director



DEPARTMENT OF WATER SUPPLY  
COUNTY OF MAUI  
200 SOUTH HIGH STREET  
WAILUKU, MAUI, HAWAII 96793  
[www.mauicounty.gov/water](http://www.mauicounty.gov/water)

December 21, 2021

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

RE: Miki Basin Industrial Park 2<sup>nd</sup> Draft Environmental Assessment (DEA), Lāna'i Island, Hawai'i.  
TMK: (2) 4-9-002: 061 (por.)

2022 JAN - 7 A 8:55  
LAND USE COMMISSION  
STATE OF HAWAII

Dear Mr. Sugidono:

The County of Maui Department of Water Supply (MDWS) Water Resources and Planning (WRP) Division thanks you for the opportunity to offer the following comments on the Miki Basin Industrial Park 2<sup>nd</sup> DEA. The WRP previously submitted a letter on October 21, 2021 regarding the Miki Basin Interim Industrial Uses in the State Agricultural and Rural Districts (SUP2) Application (see attachment), and the MDWS Engineering Division previously submitted a letter regarding this 2<sup>nd</sup> DEA on December 13, 2021 (see attachment). The entire Island of Lāna'i is served by the Lāna'i Water Company (LWC), a private water utility company regulated by the Public Utilities Commission. Please note that MDWS has no jurisdiction over projects on Lāna'i.

### **Lāna'i Island Water Use and Development Plan (WUDP) Alignment**

#### Lāna'i Island WUDP Wastewater/R-1 Provisions and Resource Options

The MDWS was unable to find any mention of the *potential* use of R-1 water for irrigation and other industrial uses in the analysis of alternatives in the DEA or supporting reports. The proposed project's *potential* use of R-1 recycled wastewater would be in alignment with the Lāna'i Island WUDP Provisions:

"Lana'i's water and wastewater utilities should implement water recycling and water conservation programs targeting landscape...to substantially reduce water consumption to the extent allowed by the Public Utilities Commission" (Lāna'i Island WUDP, page 30).

*"By Water All Things Find Life"*

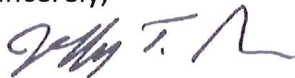
The Lāna'i Island WUDP Resource Options (page 15) cites expanded use of Lāna'i City reclaimed wastewater from: 1) Lāna'i City to Miki Basin; 2) Lāna'i City to Manele via Miki Basin; and 3) Lāna'i City to Manele (Lāna'i Island WUDP, page 13). The proposed project footprint appears to come within approximately one mile of an existing available R-1 recycled wastewater pipeline. Opportunity to satisfy Miki Basin Industrial Park's water demand for washing down stockpiles, dust control, and irrigation with R-1 recycled wastewater may be accomplished by extending the Lāna'i City reclaimed wastewater pipeline one mile to the Miki Basin Industrial Park.

Lāna'i Island WUDP Conservation Options

Specific water conservation resource options measures advocated by the Lāna'i Island WUDP (Page 19) that may be applicable to project landscaping and water reuse (considering the aesthetics of being in the vicinity of the airport, where visitors first impressions occur) include the following: 3) improve irrigation scheduling; 4) soil moisture sensors; 5) improve performance of irrigation systems; 6) auto rain shut off; and 7) greywater for irrigation.

We hope you find this information useful. Should you have any questions, please contact staff planner Alex Buttaro at (808) 463-3103 or alex.buttaro@mauicounty.gov.

Sincerely,



Jeffrey T Pearson, P.E.

Director

BAB

Cc: MDWS Engineering

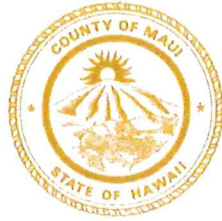
Scott Derrickson, Chief Planner, State of Hawai'i Land Use Commission

S:\PLANNING\Permit\_Review\Projects Review\planning review\EA-EIS\249002061 Miki Basin Industrial Park 2nd DEA\249002061 Miki Basin Interim Industrial 2nd DEA Letter

MICHAEL P. VICTORINO  
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JEFFREY T. PEARSON, P.E.  
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October 22, 2021

Kurt Wollenhaupt, Staff Planner  
County of Maui Department of Planning  
2200 Main Street, Suite 315  
Wailuku, Hawai'i 96793

RE: Miki Basin Interim Industrial Uses in the State Agricultural and Rural Districts (SUP2)  
Application, Lāna'i Island, Hawai'i.  
TMK: (2) 4-9-002: 061 (por.)

2022 JAN - 7 9A 8:55  
LAND USE COMMISSION  
STATE OF HAWAII

Dear Mr. Wollenhaupt:

The County of Maui Department of Water Supply (MDWS) thanks you for the opportunity to offer the following comments on the Miki Basin Interim Industrial Uses Special Uses in the State Agricultural and Rural Districts Application (SUP2).

### **Water Source and Demand**

According to the Commission on Water Resource Management (CWRM), Lāna'i Island has a sustainable yield of 6 million gallons per day (gpd). Fresh water is found solely in the high-level Central Aquifer Sector. The entire Island of Lāna'i is served by the Lāna'i Water Company (LWC), a private water utility company regulated by the Public Utilities Commission. Please note that MDWS has no jurisdiction over projects on Lāna'i. The SUP2 permit application states that the water demand for the proposed project is 2,000 gpd (Miki Basin Interim Industrial Uses LUC Permit Application, page 11).

### **Lāna'i Island Water Use and Development Plan (WUDP) Alignment**

#### Lāna'i Island WUDP R-1 Resource Options

The projects *potential* use of R-1 recycled wastewater would be in alignment with the Lāna'i Island WUDP:

"Efficient use of water...." is "...essential to reduce waste of Lana'i's limited water resources. Lana'i's water and wastewater utilities should implement water recycling and water conservation programs targeting landscape...to substantially reduce water consumption to the extent allowed by the Public Utilities Commission" (Lāna'i Island WUDP, page 30).

*"By Water All Things Find Life"*

The Lāna'i Island WUDP Resource Options (page 15) cites expanded use of Lāna'i City reclaimed wastewater from: 1) Lāna'i City to Miki Basin; 2) Lāna'i City to Manele via Miki Basin; and 3) Lāna'i City to Manele (Lāna'i Island WUDP, page 13). The proposed project footprint appears to come within approximately one mile of existing available R-1 recycled wastewater. Opportunity to satisfy Miki Basin Industrial's water demand for washing down stockpiles and dust control with R-1 recycled wastewater may be accomplished by extending the Lāna'i City reclaimed wastewater pipeline from Lāna'i City.

#### Lāna'i Island WUDP Conservation Options

Specific water conservation resource options measures advocated by the Lāna'i Island WUDP (Page 19) that may be applicable to project landscaping and water reuse (considering the aesthetics of being in the vicinity of the airport, where visitors first impressions occur) include the following: 3) improve irrigation scheduling; 4) soil moisture sensors; 5) improve performance of irrigation systems; 6) auto rain shut off; and 7) greywater for irrigation.

#### **Pollution Prevention and Conservation**

CWRM promotes the protection of groundwater and the value of treating stormwater as a resource, including groundwater recharge capability when contained onsite, described in its document titled *A Handbook for Stormwater Reclamation and Reuse Best Management Practices in Hawai'i*, December, 2008 found here:

[http://files.hawaii.gov/dlnr/cwrm/planning/hsrar\\_handbook.pdf](http://files.hawaii.gov/dlnr/cwrm/planning/hsrar_handbook.pdf). The MDWS recommends implementing Best Management Practices (BMPs) contained in the document, such as permeable surfaces to reduce storm water loss (for example, permeable detention ponds and vegetated filter strips), and bio-retention rain gardens. Leadership in Energy and Environmental Design (LEED) certification is recommended for water conservation.

#### **Construction BMPs for Pollution Prevention**

In order to protect ground and surface water resources, we recommend that in addition to required BMPs, the following measures designed to minimize infiltration and runoff be implemented during construction:

- Prevent cement products, oil, fuel and other toxic substances from falling or leaching into the ground.
- Maintain vehicles and equipment to prevent oil or other fluids from leaking. Concrete trucks and tools used for construction should be rinsed off-site.
- Properly install and maintain erosion control barriers, such as silt fencing or straw bales.
- Disturb the smallest area possible. Retain ground cover until the last possible date.
- Replanting of denuded areas should include soil amendments and temporary irrigation. Use high seeding rates to ensure rapid establishment of stands of plants.
- Keep runoff on-site.

## Conservation BMPs

### Indoor

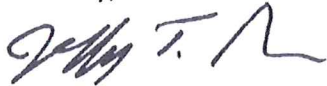
- Use EPA WaterSense labeled plumbing fixtures.
- Install flow reducers and faucet aerators in all plumbing fixtures wherever possible.
- Install dual flush toilets with high-efficiency models that use 1.28 gallons per flush or less.
- Install bathroom sink faucets with fixtures that do not exceed 1 gallon per minute at 60 pounds per square inch (psi).

### Outdoor

- Use Smart Approved WaterMark irrigation products. Examples include evapotranspiration irrigation controllers, drip irrigation and water-saving spray heads.
- After plants are established, in order to avoid stimulating excessive growth, avoid fertilizing and pruning. Time watering to occur in the early morning or evening to limit evaporation. Limit the use of turf.
- Use native Hawaiian climate-adapted plants for landscaping. Native Hawaiian plants adapted to the area conserve water and protect the watershed from degradation due to invasive species.
- We recommend adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawai'i at [https://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH\\_Irrigation\\_Conservation\\_BMPs.pdf](https://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf)

We hope you find this information useful. Should you have any questions, please contact staff planner Alex Buttaro at (808) 463-3103 or [alex.buttaro@mauicounty.gov](mailto:alex.buttaro@mauicounty.gov).

Sincerely,



Jeffrey T Pearson, P.E.

Director

BAB

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