

DAVID Y. IGE
GOVERNOR OF HAWAII

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DEC -5 AM 11:27



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:

FROM

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:

TO

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: Cary S. Chang, Chief Engineer
 Date: 12/4/19

Attachments
cc: Central Files

19120202010655 ENGINEERING

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.

**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
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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

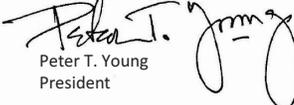
Dear Mr. Ching:

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**

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

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 Kaunalapau 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 Hekekia 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 ...

Peter T. Young

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



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:

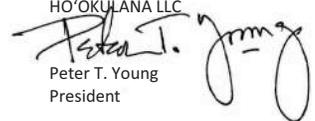
Thank you for your comments on the Draft Environmental Assessment on the Miki Basin Industrial Park.

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'OKULANA LLC



Peter T. Young
President

Do well by doing good.



**PARTIES CONSULTED DURING
THE 30-DAY COMMENT
PERIOD FOR THE 2ND DRAFT
ENVIRONMENTAL
ASSESSMENT; LETTERS
RECEIVED; AND RESPONSES
TO SUBSTANTIVE COMMENTS**

IX

IX. PARTIES CONSULTED DURING THE 30-DAY COMMENT PERIOD FOR THE 2ND DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED; AND RESPONSES TO SUBSTANTIVE COMMENTS

The 2nd Draft EA was published in the Office of Planning and Sustainable Development's The Environmental Notice on November 23, 2021. The following agencies and organizations received a copy of the 2nd Draft EA for review and comment during the 30-day comment period. Comment letters received and responses to substantive comments are included in this Chapter.

Federal

1. Chelsie Javar-Salas, Acting Island Team Leader
U. S. Fish and Wildlife Service
300 Ala Moana Blvd., Rm. 3-122
Honolulu, HI 96850
7. Department of Health
Environmental Health Administration
State of Hawai'i
P.O. Box 3378
Honolulu, HI 96801

State of Hawai'i

2. Office of Planning and Sustainable Development
Environmental Review Program
State of Hawai'i
235 S. Beretania Street, Suite 702
Honolulu, HI 96813
3. Phyllis Shimabukuro-Geiser, Chair
Department of Agriculture
State of Hawai'i
1428 South King Street
Honolulu, HI 96814-2512
4. Jade Butay, Director
Department of Transportation
State of Hawai'i
869 Punchbowl Street
Honolulu, HI 96813
5. Dr. Sylvia Hussey, Chief Executive Officer
Office of Hawaiian Affairs
State of Hawai'i
560 N. Nimitz Highway, Suite 200
Honolulu, HI 96817
6. Nancy McPherson, Senior Planner
Department of Hawaiian Home Lands
via email: nancy.m.mcpherson@hawaii.gov
8. Mike McCartney, Director
Department of Business, Economic Development & Tourism
State of Hawai'i
P.O. Box 2359
Honolulu, HI 96804
9. Curt Otaguro, Comptroller
Department of Accounting and General Services
State of Hawai'i
1151 Punchbowl Street, #426
Honolulu, HI 96813
10. Suzanne Case, Chairperson
Department of Land and Natural Resources
State of Hawai'i
P. O. Box 621
Honolulu, HI 96809
11. Mary Alice Evans, Director
Office of Planning and Sustainable Development
State of Hawai'i
P. O. Box 2359
Honolulu, HI 96804

County of Maui

12. Jo Ann Inamasu, Director
Office of Economic Development
County of Maui
2200 Main Street, Suite 305
Wailuku, HI 96793
13. Eric Nakagawa, Director
Department of Environmental Management
County of Maui
2145 Kaohu Street, Suite 102
Wailuku, HI 96793
14. Bradford Ventura, Chief
Department of Fire and Public Safety
County of Maui
200 Dairy Road
Kahului, HI 96732
15. Lori Tsuhako, Director
Department of Housing and Human
Concerns
County of Maui
2200 Main Street, Suite 546
Wailuku, HI 96793
16. Karla Peters, Director
Department of Parks and Recreation
County of Maui
700 Halia Nako Street, Unit 2F
Wailuku, HI 96793
17. Michele Chouteau McLean, Director
Department of Planning
County of Maui
2200 Main Street, Suite 315
Wailuku, HI 96793
18. Rowena Dagdag-Andaya, Director
Department of Public Works
County of Maui
200 South High Street
Wailuku, HI 96793
19. Marc Takamori, Director
Department of Transportation
County of Maui
110 Ala'ihi Street, Suite #210
Kahului, HI 96732
20. Department of Water Supply
Engineering Division
County of Maui
200 South High Street, 5th Floor
Wailuku, HI 96793
21. Jeffrey Pearson, Director
Department of Water Supply
County of Maui
200 South High Street, 5th Floor
Wailuku, HI 96793
22. Herman Andaya, Administrator
Maui Emergency Management Agency
County of Maui
200 South High Street
Wailuku, HI 96793
23. Dean Rickard, Acting Chief
Maui Police Department
County of Maui
55 Mahalani Street
Wailuku, HI 96793

Libraries

24. Lāna'i Public School and Library
555 Fraser Avenue
Lāna'i City, HI 96763
25. State of Hawai'i
Department of Education
Hawai'i State Library
Hawai'i Documents Center
478 South King Street
Honolulu, HI 96813



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

In Reply Refer To:
01EPIF00-2022-TA-0105

December 15, 2021

Scott Derrickson
State of Hawai'i Land Use Commission
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Subject: Comments on the Second Draft Environmental Assessment for the Proposed Miki Basin Industrial Park, Lāna'i

The U.S. Fish and Wildlife Service (Service) received your request for comment on the Second Draft Environmental Assessment (Draft EA) for the proposed Miki Basin Industrial Park on Lāna'i on November 23, 2021. The proposed project is a 200-acre master-planned light and heavy industrial development that will be developed incrementally over a 20-year period on a portion of Tax Map Key (2)4-9-002:061. The proposed Miki Basin Industrial Park will include areas for renewable energy projects, infrastructure improvements, relocating an existing asphalt plant, constructing new future industrial uses, and relocating an existing concrete recycling and rock crushing operation. The 200-acre project area is largely vacant and formerly part of the large pineapple plantation.

This letter has been prepared under the authority of, and in accordance with, provisions of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*), as amended. We provide the following comments for incorporation in your final Environmental Assessment and further consultation as necessary.

Please provide additional detail in the final EA regarding listed species that may occur or transit through the proposed project area. Below, we provide a list of species and our recommended avoidance and minimization measures for your consideration and incorporation into the final EA and your project plans as applicable.

Our data indicate the following federally listed species may occur or transit through the vicinity of the proposed project area: the endangered 'ōpe'ape'a or Hawaiian hoary bat (*Lasiurus cinereus semotus*), the endangered 'ua'u or Hawaiian petrel (*Pterodroma sandwicensis*), the

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA*, OREGON*, WASHINGTON
*PARTIAL

INTERIOR REGION 12
PACIFIC ISLANDS

AMERICAN SĀMOA, GUAM, HAWAI'I, NORTHERN
MARIANA ISLANDS

endangered ‘ake‘ake or Hawai‘i distinct population segment of the band-rumped storm-petrel (*Oceanodroma castro*), the threatened ‘a‘o or Newell’s shearwater (*Puffinus auricularis newelli*), and the endangered Blackburn’s sphinx moth (*Manduca blackburni*). The Hawaiian petrel, band-rumped storm-petrel, and Newell’s shearwater will, hereafter, collectively be referred to as “Hawaiian seabirds.” There is no critical habitat within the vicinity of the project area.

Hawaiian hoary bat

The Hawaiian hoary bat roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet (ft) or taller are cleared during the pupping season, there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away. Additionally, Hawaiian hoary bats forage for insects from as low as 3 ft to higher than 500 ft above the ground and can become entangled in barbed wire used for fencing.

To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend you incorporate the following applicable measures into your project plan:

- Do not disturb, remove, or trim woody plants greater than 15 ft tall during the bat-birthing and pup-rearing season (June 1 through September 15).
- Do not use barbed wire for fencing.

Blackburn’s sphinx moth

The adult Blackburn’s sphinx moth feeds on nectar from native plants, including *Ipomoea pes-caprae* (beach morning glory), *Plumbago zeylanica* (‘ilie‘e), *Capparis sandwichiana* (maiapilo), and others. Blackburn’s sphinx moth larvae also feed on nonnative *Nicotiana glauca* (tree tobacco), and native, federally listed, *Nothocestrum* spp. (‘aiea). To pupate, the larvae burrow into the soil and can remain in a state of torpor for a year or more before emerging from the soil. Soil disturbance can result in death of the pupae.

We offer the following survey recommendations to assess whether the Blackburn’s sphinx moth occurs within the project area:

- A biologist familiar with the species should survey areas of proposed activities for Blackburn’s sphinx moth and its larval host plants prior to work initiation.
 - Surveys should be conducted during the wettest portion of the year (usually November to April or several weeks after a significant rain) and within 4 to 6 weeks prior to construction.
 - Surveys should include searches for adults, eggs, larvae, and signs of larval feeding (i.e., chewed stems, frass, or leaf damage).
 - If moths, eggs, larvae, or native ‘aiea or tree tobacco over 3 ft tall, are found during the survey, please contact the Service for additional guidance to avoid impacts to this species.

If no Blackburn’s sphinx moth, ‘aiea, or tree tobacco are found during surveys, it is imperative that measures be taken to avoid attraction of Blackburn’s sphinx moth to the project location and prohibit tree tobacco from entering the site. Tree tobacco can grow greater than 3 ft tall in

approximately 6 weeks. If it grows over 3 ft tall, the plants may become a host plant for Blackburn's sphinx moth. We therefore recommend that you:

- Remove any tree tobacco less than 3 ft tall.
- Monitor the site every 4 to 6 weeks for new tree tobacco growth before, during, and after the proposed ground-disturbing activity.
 - Monitoring for tree tobacco can be completed by any staff, such as groundskeeper or regular maintenance crew, provided with picture placards of tree tobacco at different life stages.

Measures to Avoid the Spread of Invasive Species

Construction activities at project areas in or near local natural areas and areas with native habitat, risk introduction of nonnative species. Ensure that all equipment, personnel, and supplies are properly checked and are free of contamination (i.e., weed seeds, organic matter, or other contaminants) before entering natural areas and areas with native habitat.

Hawaiian seabirds

Lānaʻihale, the mountain just above Lānaʻi City, is home to one of the largest and densest Hawaiian petrel colonies known to exist. Hawaiian seabirds 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 September 15 and December 15, in their first flights from their mountain nests to the sea, are particularly vulnerable to light attraction.

Thank you for incorporating avoidance and minimization measures for the Hawaiian petrel in your draft DEA. To avoid and minimize potential project impacts to all Hawaiian seabirds we recommend you incorporate the following applicable measures into your project plan:

- Fully shield all outdoor lights so the bulb can only be seen from below.
- Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.
- Avoid nighttime construction during the seabird fledging period, September 15 through December 15.

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 seabirds. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats and defines measures to minimize and mitigate those adverse effects.

We appreciate your efforts to conserve protected species and native habitats. If you have questions regarding this letter, please contact Chelsie Javar-Salas, Fish and Wildlife Biologist at 808-792-9400 or chelsie_javar@fws.gov. When referring to this project, please include this reference number: ***01EPIF00-2022-TA-0105***.

Sincerely,

**CADE
LONDON** Digitally signed by
CADE LONDON
Date: 2021.12.14
21:40:57 -05'00'

Acting Island Team Manager
Pacific Islands Fish and Wildlife Office

February 7, 2022

Cade London, Acting Island Team Manager
Pacific Islands Fish and Wildlife Office
United States Department of the Interior Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

**SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin
Industrial Park at TMK (2)4-9-002:061 (por.), Lānaʻi, Maui, Hawaiʻi
(Reference No. (Reference No. 01EPIF00-2022-TA-0105))**

Dear Mr. London:

Thank for your comment letter dated December 15, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lānaʻi Resorts LLC, a Hawaiʻi Limited Liability Company, doing business (dba) as Pūlama Lānaʻi (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we recognize the request for additional detail regarding listed species that may occur or transit through the proposed project area. The list of species and recommended avoidance and mitigation measures provided by the department will be incorporated into the Final EA and the project plans, as applicable.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte

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STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

JADE T. BUTAY
DIRECTOR

Deputy Directors
ROSS M. HIGASHI
EDUARDO P. MANGLALLAN
PATRICK H. MCCAIN
EDWIN H. SNIFFEN

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 Kaunalapau 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 Kaunalapau 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 Kaunalapau 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 Kaunalapau Highway by 2040.
3. There are potential significant adverse impacts with respect to safety at the Miki Road and Kaunalapau 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 Kaunalapau 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).

Mr. Chris Sugidono
December 21, 2021
Page 4

STP 8.3322

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

February 7, 2022

Jade T. Butay, Director
Department of Transportation
State of Hawai'i
869 Punchbowl Street
Honolulu, Hawai'i 96813-5097

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Mr. Butay:

Thank for your comment letter dated December 21, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development. On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letters:

Airports Division (HDOT-A)

1. The Applicant acknowledges the comment and will review the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits.
2. The Applicant acknowledges the required submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration. The Applicant also acknowledges that construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal.
3. The Applicant acknowledges the potential noise from aircraft operations, as well as the potential for fumes, smoke, vibrations, odors, etc. resulting from occasional aircraft flight operations over or near the project location.
4. The Applicant acknowledges the requirement and will not provide landscape and vegetation that will create a wildlife attractant at the proposed project site. It should be further noted that landscaping in an industrial area is not conducive.
5. The Applicant will comply with all applicable requirements and regulations regarding solar energy facilities near airports.

Highways Division (HDOT-HWY)

1. The Applicant acknowledges the Division's preliminary analysis suggesting that a traffic signal would not be warranted at the Miki Road and Kaumālapa'u Highway intersection.
2. Planned housing projects within Lāna'i City were not included in Year 2040 projections as the new housing is primarily planned to alleviate current overcrowded multi-generational living conditions on the island. As such, the planned projects are not anticipated to generate new trips along Kaumālapa'u Highway. In the event that the planned housing projects have capacity to accommodate returning or new residents to the island, traffic impacts are expected to be captured in the population growth rates applied to the Kaumālapa'u Highway (4.7% per year until 2030 and 1% per year from 2030 to 2040) or in the added turning movements associated with employment at the Miki Basin Industrial Condominium or the Miki Basin Industrial Park.
3. The Applicant acknowledges the comment and will follow the TIAR recommendations for mitigating potential impacts from the large size and weight of the vehicles anticipated for the proposed project.
4. The Applicant acknowledges its responsibility for intersection improvements and will consult directly with the HDOT Maui District Engineer. The Traffic Management Plan and Permit to Operate or Transport Oversize and/or Overweight Vehicles and Loads Over State Highways will also be added to Section VII of the Final EA.
5. The Applicant acknowledges the comment and will coordinate with the HDOT Maui District Engineer on maintenance and monitoring during the project's development.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Matt Nakamoto, Austin, Tsutsumi & Associates, Inc.

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Subject: FW: Miki Basin Industrial Park--2nd Draft EA (AFNSI)

From: Cab General <Cab.General@doh.hawaii.gov>

Sent: Wednesday, December 22, 2021 4:18 PM

To: kdancil@pulamalanai.com; General eMail <planning@munekiyohiraga.com>

Subject: Miki Basin Industrial Park--2nd Draft EA (AFNSI)

Aloha

Thank you for the opportunity to provide comments on the subject project.

Please see our standard comments at:

<https://health.hawaii.gov/cab/files/2019/08/Standard-Comments-Clean-Air-Branch-2019.pdf>

Please let me know if you have any Questions

Lisa M.M. Wallace
EHS QA Officer
Clean Air Branch
Environmental Health Office
Hilo, Hawaii 96720

**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.

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

February 7, 2022

Email: Cab.General@doh.hawaii.gov

Lisa M.M. Wallace, EHS QA Officer
Clean Air Branch
Department of Health
State of Hawai'i
Hilo, Hawai'i 96720

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Ms. Wallace:

Thank for your comment letter dated December 22, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we acknowledge the list of "Standard Comments for Land Use Reviews" from the Clean Air Branch. The Applicant will obtain an air pollution control permit, as applicable. The Applicant will also provide reasonable measures to control airborne, visible fugitive dust from the road areas during the various phases of construction.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 21, 2021

State of Hawaii
Department of Business, Economic Development & Tourism
Land Use Commission
Attn: Mr. Scott Derrickson, Chief Planner via email: dbedt.luc.web@hawaii.gov
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Mr. Derrickson:

SUBJECT: **Second** Draft Environmental Assessment (DEA) for the Proposed **Miki Basin Industrial Park** located at Lanai, Island of Lanai; TMK: (2) 4-9-002:061 (por.) on behalf of Lanai Resorts, LLC dba Pulama 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 Engineering Division 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,



for Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Nov 24, 2021

MEMORANDUM

FROM:

TO:

DLNR Agencies:

Div. of Aquatic Resources

Div. of Boating & Ocean Recreation

Engineering Division (DLNR.ENGR@hawaii.gov)

Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)

Div. of State Parks

Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)

Office of Conservation & Coastal Lands

Land Division – Maui District (daniel.i.ornellas@hawaii.gov)

TO:

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT: **Second** Draft Environmental Assessment (DEA) for the Proposed
Miki Basin Industrial Park

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

APPLICANT: Munekiyo Hiraga on behalf of Lanai Resorts, LLC dba Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. The DEA 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 **December 21, 2021**. 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: *Carty S. Chang*
 Print Name: Carty S. Chang, Chief Engineer
 Division: Engineering Division
 Date: Dec 7, 2021

Attachments
cc: Central Files

February 7, 2022

Russell Y. Tsuji, Land Administrator
Department of Land and Natural Resources
State of Hawai'i
869 Punchbowl Street
Honolulu, HI 96813-5097

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Mr. Tsuji:

Thank for your comment letter dated December 21, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we acknowledge that the Department of Land and Natural Resources has no comments on the proposed project.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

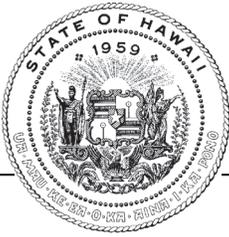


Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

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**STATE OF HAWAII
OFFICE OF PLANNING
& SUSTAINABLE DEVELOPMENT**

DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <https://planning.hawaii.gov/>

Coastal Zone
Management
Program

DTS 202111221357SE

Environmental Review
Program

December 30, 2021

Land Use Commission

TO: Scott Derrickson, Chief Planner
Land Use Commission

Land Use Division

Special Plans Branch

FROM: Mary Alice Evans, Director *Mary Alice Evans*
Office of Planning and Sustainable Development

State Transit-Oriented
Development

SUBJECT: 2nd Draft Environmental Assessment for the Proposed Miki
Basin Industrial Park
TMK (2) 4-9-002:061 (por.)
Lanai, Hawaii

Statewide Geographic
Information System

Statewide
Sustainability Program

Dear Mr. Derrickson,

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 2nd Draft Environmental Assessment (2nd DEA) is in conjunction with the proposed reclassification.

Pulama Lanai proposes a master-planned light and heavy industrial development located 3.2 miles south of Kaunalapau Highway (State Route 440) in Lanai City. 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 (MECO) power plant, and the 20-acre Miki Basin Industrial Condominium. The three neighboring facilities are in the State Urban District. The project site is on fallow agricultural land, rated "D" by the Land Study Bureau, that has not been used since 1992 when pineapple production ceased.

The project includes the following proposed uses:

- 127 acres for renewable energy projects (e.g., photovoltaic plus battery energy storage)
- 12.5 acres for the relocation of an existing asphalt plant

- 14.5 acres for the relocation of an existing concrete recycling and rock crushing operation, and for the storage and stockpiling of aggregate and construction materials
- 26 acres for new industrial uses (e.g., a slaughterhouse, warehouse space for cold storage, laboratory/testing facilities, product development, automotive services, multi-media facility, animal hospital), and
- 20 acres for infrastructure.

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 connecting to their individual lots.

Pulama Lanai anticipates that full buildout of the project will occur over a 20-year period. Relocation of the existing asphalt plant and concrete recycling and rock crushing operation and storage of aggregate and construction materials will occur during the first 10 years and the remainder of the project completed over the following 10 years.

The Office of Planning and Sustainable Development (OPSD) has reviewed the 2nd DEA and offers the following comments:

1. Conceptual Plan

The Final Environmental Assessment (FEA) should provide a conceptual plan showing the anticipated location of each of the proposed relocated and new uses, project access, new industrial lots, and internal roadways.

2. Renewable Energy Projects

The FEA should discuss whether the renewable energy projects are intended to supply all the electrical energy needs of the proposed industrial park at full buildout, and what relationship if any they will have with the adjoining MECO power plant.

3. Development Timetable

Pulama Lanai states that full buildout of the project is expected to take 20 years. As we noted in our comments on the previous DEA, 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 FEA should provide a schedule of development for each phase of the total development. The FEA should also discuss when infrastructure and energy improvements (e.g., highway

Mr. Scott Derrickson
December 30, 2021
Page 3

improvements, new water source, storage and distribution system, renewable energy sources) are anticipated to be completed to ensure that mitigation coincides with the impacts created by the proposed project.

4. Previous Comments

OPSD provided comments on the previous DEA in a letter dated December 31, 2019 (see 2nd DEA REF-166) and notes that our comments regarding low impact development, water resources, and cultural resources have been addressed.

If you have any questions regarding these comments, please email Aaron Setogawa at aaron.h.setogawa@hawaii.gov.

cc. Chris Sugidono, Munekiyo Hiraga

February 7, 2022

Mary Alice Evans, Director
Office of Planning and Sustainable Development
State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Ms. Evans:

Thank for your comment letter dated December 30, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we offer the following responses to your comments which are presented in **Exhibit A**, herein.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

K:\DATA\Pulama Lanai\MikiBasinExp 1769\Applications\Draft EA\0 2nd DEA Response\OPSD - Cover Letter.docx

Comment No. 1:

The Final Environmental Assessment (FEA) should provide a conceptual plan showing the anticipated location of each of the proposed relocated and new uses, project access, new industrial lots, and internal roadways.

Response:

On page REF-28, Figure 3 of the Draft EA provides a conceptual site plan identifying the areas designated for heavy industrial and light industrial uses. Two (2) driveway access points to the project site will be provided along Miki Road. Project Driveway 1 provides access to the light and heavy industrial areas west of Miki Road and Project Driveway 2 provides access to the light industrial area east of Miki Road. The graphic below provides a summary by the identification of use type (i.e., Heavy Industrial (M-2) and Light Industrial (M-1)). This graphic will be included in the Final EA.

Identified Use (Community Plan)	Year 1 to 10	Year 11 to 20
Heavy Industrial Use (M-2)	<ul style="list-style-type: none"> Relocating existing industrial uses (i.e., concrete recycling and rock crushing operation and existing asphalt plant) 	
Heavy and Light Industrial Use (M-2 and M-1)	<ul style="list-style-type: none"> Renewable energy projects (e.g., Photovoltaic plus battery energy storage) <ul style="list-style-type: none"> Current Request For Proposals include an expected guarantee commercial operation date (GCOD) of August 2025, developers are encouraged to have a GCOD date of December 2024 Other New industrial uses 	<ul style="list-style-type: none"> Other New industrial uses

Comment No. 2:

The FEA should discuss whether the renewable energy projects are intended to supply all the electrical energy needs of the proposed industrial park at full buildout, and what relationship if any they will have with the adjoining MECO power plant.

Response:

Public Utilities Commission (PUC) Docket No. 2015-0389 explicitly details the procurement requirements for the photovoltaic and battery energy storage project, which will be interconnected to the electric grid on Lānaʻi, serving all residents and businesses connected to the grid.

Hawaiian Electric (HECO) is responsible for procuring the energy for the project and the PUC oversees the process and approves the power purchase agreement. HECO is responsible for the operation of the electric system on Lānaʻi, which includes integrating the renewable energy from the photovoltaic and battery energy storage project as well as the existing fossil fuel generation fleet. The request for annual energy in the current procurement is 35,800 megawatt-hours (MWh).

While the renewable energy projects are not specifically intended to provide energy directly¹ to the proposed Miki 200 Industrial park at full buildout, the applicant is very keen to obtain the lowest cost renewable energy project for the benefit of all residents and businesses on Lānaʻi. By co-locating the renewable energy project next to the HECO fossil fuel facility, the interconnection cost becomes negligible, which is one of the most difficult items to predict when connecting to the HECO system.

Comment No. 3:

Pulama Lanai states that full buildout of the project is expected to take 20 years. As we noted in our comments on the previous DEA, 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 FEA should provide a schedule of development for each phase of the total development. The FEA should also discuss when infrastructure and energy improvements (e.g., highway improvements, new water source, storage and distribution system,

¹ The renewable energy project will be interconnected to the HECO system, providing energy to all entities with a HECO meter. It is anticipated that the renewable energy project contemplated in Public Utilities Docket No. 2015-0389 will provide 95 percent of the energy for Lānaʻi.

renewable energy sources) are anticipated to be completed to ensure that mitigation coincides with the impacts created by the proposed project.

Response:

The graphic provided in the response Comment No. 1, which will be included in the Final EA, details the phasing for the project. During the initial 10-year development period, the proposed Miki Basin Industrial Park will be “substantially completed.” This period includes the relocation of the existing concrete recycling and rock crushing operation and existing asphalt plant, as well as the construction of renewable energy projects. The infrastructure is anticipated to be developed as needed. While other new industrial uses will be implemented throughout the duration of the full 20-year development period, it only accounts for 13 percent of the requested re-zoning land area (i.e., 26 acres of the total 200 acre project). It should also be noted that other new industrial uses may be implemented during the initial 10-year period, with some possibly added later in the development process.

It should be further noted that the Lānaʻi Community Plan states in the Economic Development Section, under Strategy 1A, the following:

*Diversify Lānaʻi’s economy by attracting and developing new industries, providing appropriate infrastructure, and **increasing the supply of commercial and industrial spaces.**²*

Due to the lengthy entitlement process to re-zone land, the applicant is re-zoning the Miki Basin Industrial Park that was identified in the Community Plan. There are no specific details for the 26 acres; however, ensuring that there is “supply of commercial and industrial spaces” fulfills this strategy identified in the Community Plan.³

Comment No. 4:

OPSD provided comments on the previous DEA in a letter dated December 31, 2019 (see 2nd DEA REF-166) and notes that our comments regarding low impact development, water resources, and cultural resources have been addressed.

² See Lānaʻi Community Plan (Page 6-3) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

³ See Lānaʻi Community Plan (Map 9.4 Airport Land Use Detail) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

Response:

Thank you for confirming that your comments regarding low impact development, water resources, and cultural resources have been addressed.



UNIVERSITY
of HAWAII®
MĀNOA

December 23, 2021

Via email:

State of Hawai'i, Land Use Commission
P.O. Box 2359
Honolulu, HI 96804-2359

Attention: Mr. Dan Orodener (dbedt.luc.web@hawaii.gov)

Re: Miki Basin Industrial Park—2nd Draft Environmental Assessment (AFNSI)
TMK: (2) 4-9-002:061
Lāna'i District, Lāna'i Island

Dear Mr. Orodener:

Thank you for the opportunity to comment on the 2nd draft EA for the proposed Miki Basin Industrial Park project (published November 23, 2021), specifically with respect to issues and concerns regarding light pollution.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā and Maunakea and operated by IfA and our partner institutions. Both Haleakalā and Maunakea are among the best sites in the world for astronomical facilities because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

Because of the outstanding quality and productivity of these facilities, IfA is acutely concerned about negative impacts on astronomy from increased light pollution. Our work to combat light pollution has also brought us into contact with others concerned about light pollution for other reasons, including impacts on wildlife (particularly seabirds) and on human health. While IfA's comments focus on the impacts of light pollution on astronomy, appropriate mitigation measures also help to reduce non-astronomy impacts.

With that background, we offer the following comments:

Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. All observations performed by the Pan-STARRS observatories, the ATLAS telescopes, and the Faulkes telescope on Haleakalā are sky-background

limited. This means that there is a natural sky brightness coming from airflow and zodiacal light. Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes.

Some of the observations performed by the Air Force telescopes atop Haleakalā are also sky-background limited, so those observations, performed for national defense purposes, will also be adversely affected.

Appropriate steps to further reduce the impact on the observatories would include:

1. The minimum possible amount of outdoor lighting should be used.
2. The planned use of low-pressure sodium (LPS) lighting in place of the more common full-spectrum or high-pressure sodium lighting may not be practical since LPS bulbs are no longer manufactured. Amber LED lights are a suggested substitute.
3. In any event, both fluorescent lights and high-intensity discharge lamps (such as metal halide) must be avoided. Both types of lamps use mercury and emit light at wavelengths that are very damaging to astronomy.
4. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected and in general the use of blue-wavelength light should be limited as much as possible. The best choices are filtered LED lights, or amber LED lights.
5. White light should be avoided because the blue component of white light is very damaging to astronomy. White light should always have a Correlated Color Temperature of 2700 K or below.

Finally, we note that there is a strong need for further dialog with the University regarding light pollution in Maui County, and a strong need for revision of the present lighting ordinance to properly address the impacts of changes in lighting technology including LED lighting.

Thank you for your consideration of these comments and attention to IfA's concerns. If you have questions or need further detail regarding these comments, please do not hesitate to contact the undersigned or Richard Wainscoat (rjw@hawaii.edu).

Very truly yours,



Doug Simons
Director

cc: Mx. Keiki-Pua Dancil, Lanai Resorts, LLC dba Pūlama Lāna'i (kdancil@pulamalanai.com)
Mx. Chris Sugidono, Munekiyo Hiraga (planning@munekiyohiraga.com)

February 7, 2022

Doug Simons, Director
University of of Hawai'i at Mānoa
Institute for Astronomy
2680 Woodlawn Drive
Honolulu, Hawai'i 96822

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin
Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Mr. Simons:

Thank for your comment letter dated December 23, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we acknowledge the comments regarding new or additional artificial light at night having an adverse effect on astronomical observations by increasing the night sky brightness. The Applicant also acknowledges the steps provided to further reduce the impact on the observatories, and will implement them as applicable and feasible.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:yp

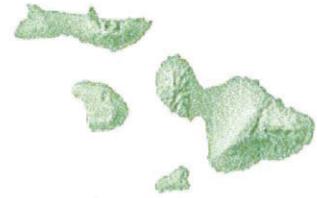
cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

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MICHAEL P. VICTORINO
Mayor

LORI TSUHAKO
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

December 1, 2021

Scott Derrickson, Chief Planner
State of Hawaii
Land Use Commission
Department of Business, Economic Development
& Tourism
PO Box 2359
Honolulu, Hawaii 96804

Dear Mr. Derrickson:

**SUBJECT: 2nd DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED
MIKI BASIN INDUSTRIAL PARK; LANAI, MAUI, HAWAII (TAX MAP
KEY (2)4-9-002:061 (POR.))**

The Department has reviewed the information submitted for the above subject project. Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code, and does require a residential workforce housing agreement. At the present time, the Department has no additional comments to offer.

Please contact Mr. Buddy Almeida, Housing Administrator, at (808) 270-7351 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Tsuhako".

LORI TSUHAKO, LSW, ACSW
Director of Housing and Human Concerns

cc: Buddy Almeida, Housing Administrator
Chris Sugidono, Munekiyo Hiraga

February 7, 2022

Lori Tsuhako, Director
Department of Housing and Human Concerns
County of Maui
2200 Main Street, Suite 546
Wailuku, Hawai'i 96793

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061, Lāna'i, Maui, Hawai'i

Dear Ms. Tsuhako:

Thank for your comment letter dated December 1, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we offer the following responses to your comments which are presented in **Exhibit A**, herein.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

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Comment No. 1:

Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code, and does require a residential workforce housing agreement.

Response: Chapter 2.96.030 (Applicability), Maui County Code states:

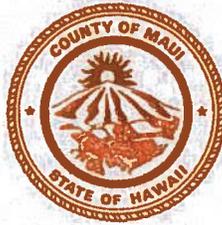
- A. *Any development, including the subdivision of land and/or the construction of single-family dwelling units, two-family dwelling units, multi-family dwelling units, or hotels, as defined in section 19.04.040 of this code, whether constructed at one time or over several years, shall be subject to this chapter upon final subdivision or building permit approval, whichever is applicable and occurs first, if it will result in the creation of the following:*
1. *Ten or more lots, lodging units, time share units, or dwelling units, excluding farm labor dwellings or a second farm dwelling, as defined in section 19.04.040 of this code; provided that, such farm labor dwelling or farm dwelling is in full compliance with chapter 205, Hawaii Revised Statutes, and is not part of a condominium property regime, as set forth in chapter 514A, Hawaii Revised Statutes;*
 2. *A conversion of ten or more hotel units to dwelling units or time share units; or*
 3. *Any hotel redevelopment or renovation project that increases the number of lodging or dwelling units in a hotel by ten or more.*

Pūlama Lānaʻi does not intend to subdivide the Miki Basin Industrial Park into separate lots. Rather, Pūlama Lānaʻi will retain ownership of the entire subject parcel, TMK (2)4-9-002:061 (por.), and may lease portions of the parcel to future tenants. Inasmuch as the proposed action does not involve a subdivision that would create ten or more lots and the action does not create ten or more lodging units, time-share units, or dwelling units, Chapter 2.96, Maui County Code would not be applicable to the Miki Basin Industrial Park.

MICHAEL P. VICTORINO
Mayor

KARLA H. PETERS
Director

MARCI M. SATO
Deputy Director



DEPARTMENT OF PARKS AND RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793
Main Line (808) 270-7230 / Facsimile (808) 270-7942

December 22, 2021

Mr. Scott Derrickson, Chief Planner
State of Hawaii
Land Use Commission
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Mr. Derrickson:

SUBJECT: 2nd DRAFT ENVIRONMENTAL ASSESSMENT FOR PROPOSED MIKI BASIN INDUSTRIAL PARK, LANAI, HAWAII (TAX MAP KEY (2)4-9-002:061 (POR.))

Thank you for the opportunity to review and comment on the subject project. The Department of Parks and Recreation has no comment at this time.

Should you have any questions, please feel free to contact me or Samuel Marvel, Chief of Planning and Development at samual.marvel@co.maui.hi.us or (808) 270-6173.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Peters".

KARLA H. PETERS
Director of Parks and Recreation

c: Sam Marvel, Chief of Planning and Development
Chris Sugidono, Senior Associate, Munekiyo Hiraga

KHP:SM:kb

February 7, 2022

Karla H. Peters, Director
Department of Parks and Recreation
County of Maui
700 Hali'a Nakoia Street, Unit 2
Wailuku, HI 96793

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lāna'i, Maui, Hawai'i

Dear Ms. Peters:

Thank for your comment letter dated December 22, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lāna'i Resorts LLC, a Hawai'i Limited Liability Company, doing business (dba) as Pūlama Lāna'i (Applicant), we acknowledge that the Department of Parks and Recreation has no comments to offer at this time.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte

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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 23, 2021

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

Dear Mr. Sugidono:

SUBJECT: REQUEST FOR COMMENTS FROM THE PLANNING DEPARTMENT REGARDING THE SECOND DRAFT ENVIRONMENTAL ASSESSMENT PREPARED IN SUPPORT OF THE DISTRICT BOUNDARY AMENDMENT AND CHANGE OF ZONING FOR THE MIKI BASIN INDUSTRIAL PARK, A 200-ACRE MASTER PLANNED LIGHT AND HEAVY INDUSTRIAL DEVELOPMENT, LOCATED AT LANAI, HAWAII. TMK(S) (2) 4-9-002:061 (POR) (A19-809) (EAC 2021/0009)

The County of Maui Department of Planning (Department) received for its review the proposed Miki Basin Industrial Park (Project) Request for Comments on the Second Draft Environmental Assessment (EA). This letter reflects comments to be addressed in the proposed Final EA by Lanai Resorts, doing business as Pulama Lanai (Applicant).

The Project is a 200-acre master-planned light and heavy industrial development implementing the vision for placement of industrial land uses on Lanai and expanding industrially zoned lands called for in the updated Lanai Community Plan.

Many of the Department's concerns are reflected in the extensive comments offered by the Lanai Planning Commission during their review at their meeting of December 15, 2021. Therefore, the Department offers the following additional comments for review by the Applicant to be addressed in the Final EA.

1. In the description of the "Proposed Action" section, please clearly articulate the total maximum square footage of use types for the full build out of the project, including total impacts to utilities and services in a single table. Please include total water usage, as well as the outputs of wastewater, solid waste and traffic.
2. On the map with both the Heavy and Light Industrial boundaries indicated, please outline as best as possible the location of the concrete batching plant, the asphalt plant, the renewable energy project, and new industrial uses.
3. Considering that solar facilities are permitted on lands zoned for agriculture, why is the Applicant proposing to use 127.0 acres of Heavy and Light Industrial land for such a facility? Why wouldn't the Applicant place the solar facility on lands already zoned for agriculture, apply for a County Special Use Permit for a facility of 20 acres, and reserve the 127.0 acres for other industrial uses requiring such zoning? Considering the land use designations proposed are not required for the described use of the majority of the project area, please clarify why the total land area is appropriate to urbanize and then zone.

4. Will waste to energy be conducted within the project area?
5. Please state the purpose for the Community Plan designation that was presented to the Community Advisory Committee, Lanai Planning Commission and Council respectively when establishing the industrial designations in the Lanai Community Plan update.
6. Within the context of current Island water usage and anticipated water usage for this specific Project, please review water demand accounting for future developments including but not limited to the recently approved Hokuao housing project, the Agriculture Park, the Koele Project District Amendment, and any other well-defined projects “in the pipeline.” The Miki Basin Industrial Park water demand should be reviewed in context of all current demand and likely future demand from full build-out of anticipated projects “on the book.”
7. For anticipated “new industrial uses”, please estimate water demand for each specific use so that some range of water usage may be revealed. Obviously, a slaughterhouse will use more water than a testing laboratory.
8. The majority of the references to industrial land uses in the 2016 Lanai Community Plan are accompanied by the representation that Pulama Lanai intends to increase offerings of commercial and industrial lease and fee simple opportunities in order to stimulate economic growth. Please state the total square footage of usable area in heavy and light industrial that is to be leased and sold fee simple resulting from these projects. Please clarify how those spaces will be divided into units for lease or ownership (i.e. undivided, condominized, or subdivided, etc.). Please also describe level of improvement intended to be made to those various offerings (i.e. improved raw land, unfinished warehouse space or finished occupiable space, etc.).

Thank you for the opportunity to comment on the Second Draft EA for the Miki Basin Industrial Park. Should you require further clarification, please contact Kurt Wollenhaupt at kurt.wollenhaupt@mauicounty.gov or at (808) 270-8205.

Sincerely,



JORDAN E. HART
Deputy Director

for MICHELE MCLEAN, AICP
Planning Director

xc: Clayton I. Yoshida, Planning Program Administrator (PDF)
Jacky Takakura, Acting Planning Program Administrator (PDF)
Kurt F. Wollenhaupt, Staff Planner (PDF)
Richelle Thomson, Corporation Counsel (PDF)
Chris Sugidono, Senior Associate, Munekiyo Hiraga (PDF)
Tessa Munekiyo Ng, Vice President, Munekiyo Hiraga (PDF)
State Land Use Commission (PDF)
Dr. Keiki-Pua Dancil, Pulama Lanai (PDF)
Project File

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February 7, 2022

Jordan E. Hart, Deputy Director
Department of Planning
County of Maui
2200 Main Street, Suite 315
Wailuku, Hawai'i 96793

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin
Industrial Park at TMK (2)4-9-002:061 (por.), Lānaʻi, Maui, Hawaiʻi

Dear Mr. Hart:

Thank for your comment letter dated December 23, 2021, regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lānaʻi Resorts LLC, a Hawaiʻi Limited Liability Company, doing business (dba) as Pūlama Lānaʻi (Applicant), we appreciate you taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we offer the following responses to your comments which are presented in **Exhibit A**, herein.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:yp

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte

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Comment No. 1:

In the description of the “Proposed Action” section, please clearly articulate the total maximum square footage of use types for the full build out of the project, including total impacts to utilities and services in a single table. Please include total water usage, as well as the outputs of wastewater, solid waste and traffic.

Response:

See **Table 1** below summarizing the uses and designated acres:

Use	Acres
Infrastructure (roads, common areas, etc.)	20 acres
Renewable Energy Projects	127 acres
Concrete Crushing and Recycling Operation	14.5 acres
Asphalt Plant	12.5 acres
Other Industrial Uses*	26 acres
Total	200 acres
*Other industrial uses will consist of industrial related uses allowed under “M-1, Light Industrial” and “M-2, Heavy Industrial” zoning. ¹	

The development plans are in the early design phase, as such land area acreage for various uses were presented.

Projected water demand: See page REF-62 in the Draft EA for the summary of acres and water demand projected.

Wastewater projected: Starting on page REF-466, the wastewater master plan is provided. In particular, please see the wastewater flow summation table on page REF-472 for the proposed areas, which also includes the acres for each land use.

Traffic: Starting on page REF-411, the traffic impact analysis report is provided. The projected trip generation is provided on page REF-420 in Table 4.1 for the proposed areas, which also includes the acres for each land use.

It should be noted that the summary of existing conditions and potential impacts and mitigation measures is provided on pages REF-12 through REF-22 in the Draft EA. Regarding water, see Section D.2 in the EA and page REF-20 and REF-21 for potential impacts. Regarding wastewater, see Section D.3 in the EA and page REF-21 for potential impacts. Regarding traffic, see Section D.1 in the EA and page REF-19 for potential impacts. Regarding utilities such as electricity and telephone systems, see Section D.5 and page REF-22 for potential impacts.

¹ See MCC 19.24 and 19.26 for M-1 Light Industrial District and Heavy Industrial District, respectively for more information.

Regarding solid waste, see Section C.3 in the EA and page REF-18 for potential impacts.

Comment No. 2:

On the map with both the Heavy and Light Industrial boundaries indicated, please outline as best as possible the location of the concrete batching plant, the asphalt plant, the renewable energy project, and new industrial uses.

Response:

On page REF-28 of the Draft EA, the Heavy and Light Industrial boundaries are indicated. Below is a graphic, which identifies the use as well as whether it will be located in the Heavy or Light Industrial areas.

Identified Use (Community Plan)	Year 1 to 10	Year 11 to 20
Heavy Industrial Use (M-2)	<ul style="list-style-type: none"> Relocating existing industrial uses (i.e., concrete recycling and rock crushing operation and existing asphalt plant) 	
Heavy and Light Industrial Use (M-2 and M-1)	<ul style="list-style-type: none"> Renewable energy projects (e.g., Photovoltaic plus battery energy storage) Current Request For Proposals include an expected guarantee commercial operation date (GCOD) of August 2025, developers are encouraged to have a GCOD date of December 2024 Other New industrial uses 	<ul style="list-style-type: none"> Other New industrial uses

Comment No. 3:

- (A) *Considering that solar facilities are permitted on lands zoned for agriculture, why is the Applicant proposing to use 127.0 acres of Heavy and Light Industrial land for such a facility?*
- (B) *Why wouldn't the Applicant place the solar facility on lands already zoned for agriculture, apply for a County Special Use Permit for a facility of 20 acres, and reserve the 127.0 acres for other industrial uses requiring such zoning?*

- (C) *Considering the land use designations proposed are not required for the described use of the majority of the project area, please clarify why the total land area is appropriate to urbanize and then zone.*

Response:

- (A) The Applicant acknowledges that solar energy facilities are permitted on Agriculture zoned lands with a County Special Use Permit. However, renewable energy facilities are consistent with the State land use Urban District. The proposed Miki Basin Industrial area is an appropriate location for a renewable energy facility given the industrial character of renewable energy facilities and proximity to the HECO fossil fuel facility, which is a principal use of the area, according to Maui County Zoning designation. The applicant is very keen to obtain the lowest cost renewable energy project for the benefit of all residents and businesses on Lānaʻi. By co-locating the renewable energy project next to the HECO fossil fuel facility, the interconnection cost becomes negligible, which is one of the most difficult items to predict when connecting to the HECO system. This difficulty causes uncertainty, which leads to a higher interconnection cost that is bundled into the final cost of energy. This expense is passed on to the residents and businesses on Lānaʻi, which will be burdened for the lifetime of the power purchase agreement, ranging from 20 to 25 years.
- (B) See response to **Comment 03(A)**.
- (C) The Community Plan designated the area for industrial use, both Heavy and Light Industrial Use. As such, the applicant is re-zoning the area, which has identified specific uses for over 85 percent of the land area.

Comment No. 4:

Will waste to energy be conducted within the project area?

Response:

At the time of this response, waste to energy was not contemplated within the project area.

Comment No. 5:

Please state the purpose for the Community Plan designation that was presented to the Community Advisory Committee, Lanai Planning Commission and Council respectively when establishing the industrial designations in the Lanai Community Plan update.

Response:

The applicant could not find specific discussion notes in the materials² that are provided online. As such, the applicant understands that the Planning Department was an integral part of drafting the Community Plan and ensuring that it went through the proper process steps with the Community, Lānaʻi Planning Commission, Maui County Council and Committee meetings. This question may be more appropriately answered by the Planning Department. Although the applicant was not a member of the Lānaʻi Community Plan Advisory Committee it did participate in the public meetings. It should be further noted that the process started several years before the applicant had acquired the assets on Lānaʻi from the previous land owner.

Comment No. 6:

Within the context of current Island water usage and anticipated water usage for this specific Project, please review water demand accounting for future developments including but not limited to the recently approved Hokuao housing project, the Agriculture Park, the Koele Project District Amendment, and any other well-defined projects “in the pipeline.” The Miki Basin Industrial Park water demand should be reviewed in context of all current demand and likely future demand from full build-out of anticipated projects “on the book.”

Response:

The applicant has included the water demand for projects that have been submitted or approved in the entitlement and permitting processes in the Draft EA (see REF-66).

The Draft EA does not include the water reservation for the 100 acre State Ag Park. It is noted that the lease executed includes a 0.200 MGD water reservation;³ however, the Lānaʻi Water Use and Development Plan references 0.500 MGD.

The amended lease⁴ includes language in Section 19 to read as such:

...the parties further agree that additional water will be allocated to the agricultural park on the property in the future, but that the need for such additional water will be the Lessee’s

² <https://www.mauicounty.gov/1912/Lanai-Community-Plan-Advisory-Committee> and <https://www.mauicounty.gov/Archive.aspx?AMID=205>

³ Document No. 2165943, filed on July 21, 1994, Section F (19) Water Development.

⁴ Document No. 2199103, filed on November 28, 1994, Amendment 1.

responsibility to justify and that any costs incurred for this additional water will be borne by Lessee.

To date the leasee has not justified an increase in additional water, and there has been no action by the State to develop its 100 acre ag park. Because there has been no action by the State for 28 years to develop the State Ag Park, the Water Master Plan included in the EA did not include the water reservation for the State Ag Park.

Comment No. 7:

For anticipated “new industrial uses”, please estimate water demand for each specific use so that some range of water usage may be revealed. Obviously, a slaughterhouse will use more water than a testing laboratory.

Response:

The 26 acres of “new industrial uses” will consist of industrial related uses allowed under “M-1, Light Industrial” and “M-2, Heavy Industrial” zoning. While the exact uses have not been developed or identified at this time, the EA provides examples of potential future new industrial uses.

The water demand for anticipated uses within the Miki 200 Industrial Park was provided on page REF-62 of the Draft EA, Table 2 in gallons per day (GPD). “Other New Industrial Uses” are not defined in greater detail because at this time, there are no specific development plans for those “other new industrial uses.” The State of Hawai‘i Water System Standards, Table 100-18 provides the domestic consumption guidelines for average daily demand by zoning designation. The average daily demand for the Maui County zoning designation category of “Light Industry” is 6,000 gallons per acre, which was used for planning purposes for the proposed project. There are 26 acres designated in the Miki Basin Industrial Park for “Other New Industrial Uses.” The estimated average daily water demand for the “Other New Industrial Uses” was determined by multiplying 6,000 gallons per acre by 26 acres, which is 156,000 gallons per day.

It should be further noted that the Lāna‘i Community Plan states in the Economic Development Section, under Strategy 1A, the following:

*Diversify Lāna‘i’s economy by attracting and developing new industries, providing appropriate infrastructure, and increasing the supply of commercial and industrial spaces.*⁵

⁵ See Lāna‘i Community Plan (Page 6-3) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

Due to the lengthy entitlement process to re-zone land, the applicant is re-zoning the Miki Basin Industrial Park that was identified in the Community Plan. At this time, there are no specific details for the 26 acres; however, ensuring that there is “supply of commercial and industrial spaces” fulfills this strategy identified in the Community Plan.⁶

Comment No. 8:

- (A) *The majority of the references to industrial land uses in the 2016 Lanai Community Plan are accompanied by the representation that Pulama Lanai intends to increase offerings of commercial and industrial lease and fee simple opportunities in order to stimulate economic growth. Please state the total square footage of usable area in heavy and light industrial that is to be leased and sold fee simple resulting from these projects.*
- (B) *Please clarify how those spaces will be divided into units for lease or ownership (i.e. undivided, condominimized, or subdivided, etc.).*
- (C) *Please also describe level of improvement intended to be made to those various offerings (i.e. improved raw land, unfinished warehouse space or finished occupiable space, etc.).*

Response:

- (A) The references in the 2016 Lānaʻi Community Plan includes all of the area in the Miki Basin Industrial area, which is 225 acres, 25 acres more than the subject project. The 20-acre Miki Industrial Park requires that 50% of the area be offered for sale. The applicant intends to comply with that condition. In addition, the applicant will be developing the road and ensuring that there are easements for the drainage in the Miki 20 acre parcel. An update was provided to the Planning Department on March 12, 2021 and publicly available as item E1 on the Lānaʻi Planning Commission Agenda for the April 21, 2021 meeting.⁷

As for the 200 acres within the Miki 200 Industrial Park, see the table below for the breakdown of commitments that have or have not been identified for the various uses proposed.

⁶ See Lānaʻi Community Plan (Map 9.4 Airport Land Use Detail) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

https://www.mauicounty.gov/DocumentCenter/View/126430/042121_Item-E1_Status-Miki-Basin-CPR-Project---Pulama-Lanai-Memo

Use Description	# of acres	Commitments
Renewable Energy	127	Developer to be selected in 2022 by HECO’s request for proposal
Infrastructure	20	shared commitments
Relocation of existing asphalt plant	12.5	Pūlama Lāna’i
Relocation of existing concrete recycling and rock crushing operation	14.5	Pūlama Lāna’i
Other new industrial uses	26	TBD

- (B) At this time, the applicant does not envision subdividing the 200 acres and offering any section for sale. The adjacent 20 acre parcel will have 50% offered for sale.
- (C) It is difficult to predict at this time what entity would be responsible for the infrastructure development within the 200 acres. If the applicant leases an area within the Miki 200 Industrial Park, the leasee would be responsible for infrastructure within the leased area. For example, if a renewable energy project developer is required to install an access road within the renewable energy project area that is leased from the applicant, the renewable energy project developer will be financially responsible for the development of the access road (e.g., infrastructure). If the applicant develops an area within the Miki 200 Industrial Park, the applicant will develop the infrastructure to support the area and its permitted uses.

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 22, 2021

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

Dear Mr. Sugidono:

SUBJECT: REQUEST FOR COMMENTS FROM THE LANAI PLANNING COMMISSION REGARDING THE SECOND DRAFT ENVIRONMENTAL ASSESSMENT PREPARED IN SUPPORT OF THE DISTRICT BOUNDARY AMENDMENT AND CHANGE OF ZONING FOR THE MIKI BASIN INDUSTRIAL PARK, A 200-ACRE MASTER PLANNED LIGHT AND HEAVY INDUSTRIAL DEVELOPEMNT, LOCATED AT LANAI, HAWAII. TMK(S) (2) 4-9-002:061 (POR) (A19-809) (EAC 2021/0009)

The Lanai Planning Commission (LPC) received for its review the proposed Miki Basin Industrial Park (Project) Request for Comments on the Second Draft Environmental Assessment (EA) transmitted by the County of Maui Department of Planning (Department). The LPC discussed this matter in a regularly scheduled meeting held on December 15, 2021, and this letter reflects comments to be addressed in the proposed Final EA by Lanai Resorts, doing business as Pulama Lanai (Applicant).

The Project is a 200-acre master-planned light and heavy industrial development implementing the vision for placement of industrial land uses on Lanai and expanding industrially zoned lands called for in the updated Lanai Community Plan.

The LPC offers the following comments for review by the Applicant to be addressed in the Final EA.

1. Provide detailed discussion and clearly articulate what potential uses are proposed for the areas to be zoned "M-1 Light Industrial District" (current Community Plan of Light Industrial) and "M-2 Heavy Industrial District" (current Community Plan of Heavy Industrial). Which of the "Special Uses" in the proposed "M-2 Heavy Industrial District" that will require a County Special Use Permit are anticipated? Is any "M-3 Restricted Industrial District" zoning proposed in the area with a Community Plan of Heavy Industrial? On page REF-8 the term "other uses" is used for future industrial activities. Please be more specific on what "other uses" may be.

2. Identify in greater detail potential water usage in relation to anticipated future uses. Anticipated water demands for the concrete batching plant, asphalt plant, and renewable energy project are shown in page REF-62. For anticipated future uses given by answering Question #1, provide estimated water demand for each of these defined potential uses, rather than just an aggregate number of 156,000 GPD for “New Industrial Uses.” There is concern that certain special uses such as animal processing/slaughterhouses may use considerable water supply; consequently estimates of water usage by specific activity is requested.
3. What was the underlying reason for the Community Plan area of 35 acres noted as “Light Industrial” extending into the area mauka of Miki Basin Road known as the Palawai Basin area? Why is the “Light Industrial” Community Plan District not contiguous?
4. What “Light Industrial” uses are proposed for the area in the Palawai Basin of approximately 35 acres?
5. Where is the location of the Agricultural Park in relation to this Project?
6. Clarify the demand and use of electricity consumption in light of the relatively small Lanai grid and relatively large solar facility, powering of diesel generators, proposed battery storage, etc. Diesel generators likely are not easily powered “up and down” so what happens with the electricity generated by the proposed solar grid. Is there a significant battery storage component to this project? Is the electricity produced by the solar grid used only for activities in the proposed Miki Basin Industrial Park or is it directed to the Lanai power grid for other consumer use?
7. 26 acres are proposed for “New Industrial Uses”. How much of these 26 acres are left over for potential “other uses” beyond those already listed (slaughterhouse, warehouse space for cold storage, laboratory/testing facilities, multi-media facility, animal hospital)?
8. Provide more information on potential “on-island” businesses anticipated to move to the Project area and the basis for that information. Please clarify if there will be adequate space for these proposed “relocations.”
9. Is the potential slaughterhouse to be used for domestic animals and/or wild game?
10. Are there any potential issues with this Project being relatively close to the Lanai Airport?
11. Please explain in more detail the potential use of “laboratory testing facility.” What is being tested?

Mr. Chris Sugidono, Senior Associate
December 22, 2021
Page 3

12. What disclosures are required for the use of any proposed hazardous or toxic uses in the Project?
13. Assess any impacts to guided hunts in the area of the Project.
14. On page REF-95 there is mention of a new private road through the Palawai Basin. Is this part of the 20-acre infrastructure use? Is this being assessed in the EA?
15. Provide more detail on the “two access directions” to the Project.

Thank you for the opportunity to comment on the Second Draft EA for the Miki Basin Industrial Park. Should you require further clarification, please contact Kurt Wollenhaupt at kurt.wollenhaupt@mauicounty.gov or at (808) 270-8205.

Sincerely,



JORDAN E. HART
Deputy Director

for MICHELE MCLEAN, AICP
Planning Director

xc: Clayton I. Yoshida, Planning Program Administrator (PDF)
Jacky Takakura, Acting Planning Program Administrator (PDF)
Kurt F. Wollenhaupt, Staff Planner (PDF)
Leilani Ramoran, Secretary to Boards/Commissions, Lanai Planning Commission (PDF)
Richelle Thomson, Corporation Counsel (PDF)
Chris Sugidono, Senior Associate, Munekiyo Hiraga (PDF)
Tessa Munekiyo Ng, Vice President, Munekiyo Hiraga (PDF)
State Land Use Commission (PDF)
Dr. Keiki-Pua Dancil, Pulama Lanai (PDF)
Project File

MCM:JEH:KFW:th

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February 7, 2022

Jordan E. Hart, Deputy Director
Department of Planning
Lānaʻi Planning Commission
County of Maui
2200 Main Street, Suite 315
Wailuku, Hawaiʻi 96793

SUBJECT: 2nd Draft Environmental Assessment for Proposed Miki Basin Industrial Park at TMK (2)4-9-002:061 (por.), Lānaʻi, Maui, Hawaiʻi

Dear Mr. Hart:

Thank for your letter dated December 22, 2021, providing the Lānaʻi Planning Commission comments regarding the 2nd Draft Environmental Assessment (EA) for the subject project. On behalf of Lānaʻi Resorts LLC, a Hawaiʻi Limited Liability Company, doing business (dba) as Pūlama Lānaʻi (Applicant), we appreciate the commission taking the time to provide us comments on this 200-acre master-planned light and heavy industrial development.

On behalf of the Applicant, we offer the following responses to your comments which are presented in **Exhibit A**, herein.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

cc: Scott Derrickson, State Land Use Commission
Keiki-Pua Dancil, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte

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Comment No. 1:

- (A) *Provide detailed discussion and clearly articulate what potential uses are proposed for the areas to be zoned “M-1 Light Industrial District” (current Community Plan of Light Industrial) and “M-2 Heavy Industrial District” (current Community Plan of Heavy Industrial).*
- (B) *Which of the “Special Uses” in the proposed “M-2 Heavy Industrial District” that will require a County Special Use Permit are anticipated?*
- (C) *Is any “M-3 Restricted Industrial District” zoning proposed in the area with a Community Plan of Heavy Industrial?*
- (D) *On page REF-8 the term “other uses” is used for future industrial activities. Please be more specific on what “other uses” may be. Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code, and does require a residential workforce housing agreement.*

Response:

- (A) The graphic below provides a summary by the identification of use type (i.e., Heavy Industrial (M-2) and Light Industrial (M-1)). For convenience, **Exhibit A-1 and A-2** are provided as references to Chapter 19.24 M-1 Light Industrial District and Chapter 19.26 M-2 Heavy Industrial District, respectively.

Identified Use (Community Plan)	Year 1 to 10	Year 11 to 20
Heavy Industrial Use (M-2)	<ul style="list-style-type: none"> ▪ Relocating existing industrial uses (i.e., concrete recycling and rock crushing operation and existing asphalt plant) 	
Heavy and Light Industrial Use (M-2 and M-1)	<ul style="list-style-type: none"> ▪ Renewable energy projects (e.g., Photovoltaic plus battery energy storage) ▪ Current Request For Proposals include an expected guarantee commercial operation date (GCOD) of August 2025, developers are encouraged to have a GCOD date of December 2024 	
	<ul style="list-style-type: none"> ▪ Other New industrial uses 	<ul style="list-style-type: none"> ▪ Other New industrial uses

- (B) Maui County Code (MCC) 19.26.040 Special Uses contemplated in the Miki Basin Industrial Park, include the relocated asphalt plant, distribution of rock, sand, and gravel as well as the crushing of rock and recycled concrete.
- (C) At this time, “M-3 Restricted Industrial District” zoning proposed in the area with a Community Plan of Heavy Industrial is not contemplated.
- (D) The 26 acres of new industrial uses will consist of industrial related uses allowed under “M-1, Light Industrial” and “M-2, Heavy Industrial” zoning. While the exact uses have not been identified at this time, the EA provides examples of potential future new industrial uses. The uses are permitted by zoning. Those uses identified as Special Uses by the zoning ordinance will seek a County Special Use Permit from the Lānaʻi Planning Commission. Refer to **Exhibit A-1** and **Exhibit A-2**.

Comment No. 2:

- (A) *Identify in greater detail potential water usage in relation to anticipated future uses. Anticipated water demands for the concrete batching plant, asphalt plant, and renewable energy project are shown in page REF-62.*
- (B) *For anticipated future uses given by answering Question# 1, provide estimated water demand for each of these defined potential uses, rather than just an aggregate number of 156,000 GPD for “New Industrial Uses.” There is concern that certain special uses such as animal processing/slaughterhouses may use considerable water supply; consequently estimates of water usage by specific activity is requested.*

Response:

- (A) The water demand for anticipated uses within the Miki 200 Industrial Park was provided on page REF-62 of the Draft EA, Table 2 in gallons per day (GPD). “Other New Industrial Uses” are not defined in greater detail because at this time, there are no specific development plans for those “other new industrial uses.” The State of Hawaiʻi Water System Standards, Table 100-18 provides the domestic consumption guidelines for average daily demand by zoning designation.¹ The average daily demand for the Maui County zoning designation category of “Light Industry” is 6,000 gallons per acre, which was used for planning purposes for the proposed project. There are 26 acres designated in the Miki Basin Industrial Park for “Other New Industrial Uses.” The estimated average daily water demand for the

¹ <https://www.mauicounty.gov/DocumentCenter/View/120401/DWS-2002-Water-System-Standards> Page 111-3.

“Other New Industrial Uses” was determined by multiplying 6,000 gallons per acre by 26 acres, which is 156,000 gallons per day.

It should be further noted that the Lāna‘i Community Plan states in the Economic Development Section, under Strategy 1A, the following:

“Diversify Lāna‘i’s economy by attracting and developing new industries, providing appropriate infrastructure, and increasing the supply of commercial and industrial spaces.”²

Due to the lengthy entitlement process to re-zone land, the applicant is re-zoning the Miki Basin Industrial Park that was identified in the Community Plan. At this time, there are no specific details for the 26 acres; however, ensuring that there is “supply of commercial and industrial spaces” fulfills this strategy identified in the Community Plan.³

- (B) See response to **Comment 2(A)**.

Comment No. 3:

- (A) *What was the underlying reason for the Community Plan area of 35 acres noted as “Light Industrial” extending into the area mauka of Miki Basin Road known as the Palawai Basin area?*
- (B) *Why is the “Light Industrial” Community Plan District not contiguous?*

Response:

- (A) The Lāna‘i Community Plan did not provide details on why the area mauka of Miki Road was included as “Light Industrial.” As mentioned in response to **Comment 02(B)**, the Applicant is carrying out what was identified in the Community Plan—re-zoning the area identified by the community in the Community Plan.⁴ **Figure 1** of the Lāna‘i Community Plan, below is provided for convenience.

² See Lāna‘i Community Plan (Page 6-3) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

³ See Lāna‘i Community Plan (Map 9.4 Airport Land Use Detail) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

⁴ See Lāna‘i Community Plan (Map 9.4 Airport Land Use Detail) at the following link:

<https://www.mauicounty.gov/DocumentCenter/View/105983/2016-Lanai-Community-Plan->

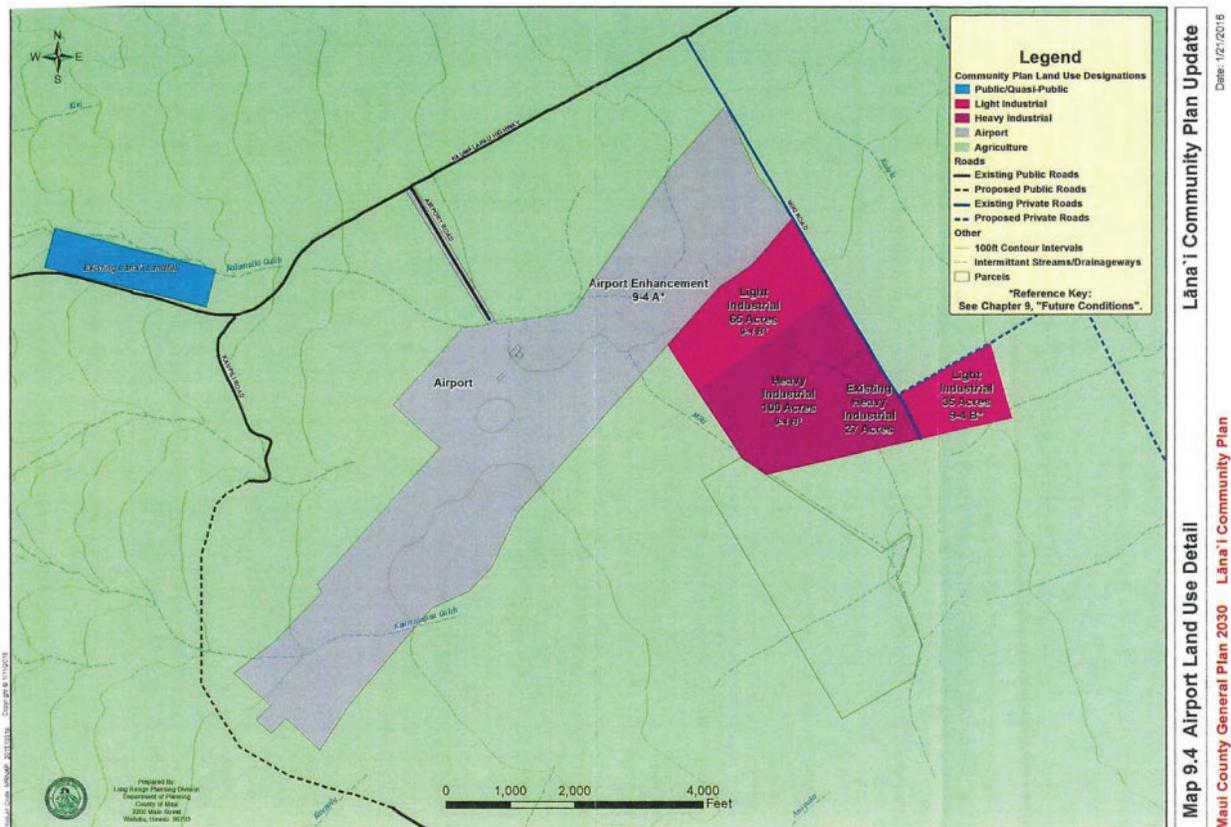


Figure 1: Map 9.4 Airport Land Use Detail from the Lānaʻi Community Plan (2016).

(B) See response to **Comment 03(A)**

Comment No. 4:

What “Light Industrial” uses are proposed for the area in the Palawai Basin of approximately 35 acres?

Response:

Various new industrial uses are planned for the 35 acre area in the Palawai Basin. As previously mentioned, exact uses have not been identified at this time, but the uses within the 35 acre area in the Palawai Basin will fall under “M-1, Light Industrial” zoning district, consistent with the Light Industrial Community Plan designation.