

## Hakoda, Riley K

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**From:** Orodenker, Daniel E  
**Sent:** Tuesday, November 17, 2020 2:07 PM  
**To:** Hakoda, Riley K  
**Subject:** Fwd: Miki Basin- Final EA testimony

For posting

Daniel E. Orodenker  
Executive Officer, Land Use Commission

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**From:** Butch Gima <bg325@hotmail.com>  
**Sent:** Tuesday, November 17, 2020 12:57 PM  
**To:** Orodenker, Daniel E; PeterYoung@hookuleana.com  
**Cc:** Robin Kaye; Sally Kaye; Keiki-Pua Dancil  
**Subject:** [EXTERNAL] Miki Basin- Final EA testimony

**BUTCH GIMA**  
P.O. Box 630400  
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November 17, 2020

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

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

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

Dear Mr. Orodenker & Young,

Notwithstanding the variety of benefits the proposed project could bring to our community, I believe a FONSI is a premature conclusion given the following:

1. Like several of PL's previous written and oral presentations on water, the LUC was inundated with 37 pages of water related information some of which can be viewed as "fluff".
2. There was no specific reference to how this project conforms or does not conform to Lanai's Water Use and Development Plan and/or Community Plan.
3. Specifically, there was no reference to whether the project's proposed water use is within or exceeds the island's allocation and/or the categorical allocation.

4. Additionally, there does not appear to be five-year projections of water use leading up to the full buildout.
5. On face value, it appears the project's proposed water demand plus the current water use plus the approved water use for entitled projects exceeds the 4.3MGD threshold.

As a side note, PL could have saved a lot of time and energy had they vetted this project with the Lana'i Water Advisory Committee (LWAC) as had been done many times before over the last 25+ years. The aforementioned issues would have been discussed and ultimately consensus would've been reached and/or a recommendation offered as it's been done with the Lana'i Planning Commission. However, PL has not participated in the LWAC since May 2017.

To summarize, the Final EA is missing critical water data and information, thus my statement about issuing a FONSI prematurely. Until the aforementioned issues are addressed an informed decision about the project's impact on our water cannot be responsibly made.

Thank you for considering my input.

Sincerely,

/s/ Butch Gima

Sent from my iPad