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IN REPLY REFER TO:


DIR 0690  
STP 8.3437

August 11, 2022

**VIA EMAIL:** aaron.h.setogawa@hawaii.gov

TO: MARY ALICE EVANS  
DIRECTOR  
OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT (OPSD)

ATTENTION: AARON H. SETOGAWA  
PLANNER  
OPSD, LAND USE DIVISION

FROM: JADE T. BUTAY   
DIRECTOR OF TRANSPORTATION

SUBJECT: A19-809 PULAMA LANAI MIKI BASIN INDUSTRIAL PARK  
PETITION FOR STATE LAND USE DISTRICT BOUNDARY  
AMENDMENT (DBA)  
LANAI, MAUI, HAWAII  
TAX MAP KEY: (2) 4-9-002: 061 (POR.)

Thank you for your letter dated July 12, 2022, requesting the State of Hawaii Department of Transportation's (HDOT) review and comments on the subject Petition for a DBA. HDOT understands that Pulama Lanai is petitioning to amend the land use district boundary of approximately 200 acres of land from the Agricultural District to the Urban District. The site is located adjacent to the Lanai Airport and accessed via Miki Road, which connects to Kaunalapau Highway (State Route 440) to the north.

HDOT has the following comments:

Airports Division (HDOT-A)

1. The HDOT-A has no objections to the DBA.
2. The proposed facility is adjacent to the property boundary of Lanai Airport (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](http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf).

3. 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>.
4. 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.
5. 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.
6. During construction, the developer shall mitigate any fugitive dust from construction activities. Fugitive dust may become an obstruction and is hazardous to flight operations.
7. Be aware that solar energy photovoltaic (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](http://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 solar energy PV system shall be

prepared to immediately mitigate the RFI hazard upon notification by the HDOT-A and/or FAA.

8. If energy from the PV system is stored on site, the battery storage facility shall have sufficient firefighting/fire suppressant capability. Thick smoke from an uncontrolled fire can create a hazard to airport operations.
9. HDOT-A wishes to notify OPSD (for information purposes) that a Memorandum of Agreement, Right of Entry, and Joinder has been executed on November 23, 2021, between HDOT and Pulama Lanai for a portion of Miki Road which is just north of the Petition area and within HDOT-A property.

Highways Division (HDOT-HWY)

1. The Petitioner shall improve the Kaunalapau Highway approach on Miki Road prior to any occupancy of the site or submit a schedule acceptable to the HDOT-HWY, Maui District Engineer. Petitioner shall implement, at no cost to the State, all recommended improvements referenced in the Traffic Impact Analysis Report dated June 3, 2021, as follows:
  - 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.
  - c. Add an exclusive left-turn lane in the northbound direction
2. Should traffic issues arise at any time up to one year after all lots sold, the Petitioner shall be responsible for mitigation of any traffic impacts and issues attributable to the industrial park, at no cost to the State, to the satisfaction of the HDOT-HWY, Maui District Engineer.

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](mailto:blayne.h.nikaido@hawaii.gov).