

HONUA'ULA



FINAL ENVIRONMENTAL IMPACT STATEMENT

VOLUME 2 OF 4
(APPENDIX AA COMMENTS AND RESPONSES)

Prepared for:
Accepting Authority
Maui Planning Department / Maui Planning Commission

Applicant:
Honua'ula Partners, LLC

Prepared by:



June 2012

LIST OF APPENDICES

Volume 2 (this volume)

- AA Comments and Responses**
- EA/EISPN Comments and Responses
 - Draft EIS Comments and Responses

Volume 3

- A Design Guidelines**
- B Groundwater Resources Assessments**
- Groundwater Resources Assessment
 - Groundwater – Supplemental Report July 16, 2010
 - Groundwater – Supplemental Report July 20, 2010
- C Golf Course Best Management Practices**
- D Marine Water Quality/Marine Environmental Assessments**
- Marine Water Quality Assessment 2010
 - Marine Water Quality Monitoring Report 2011
 - Marine Environmental Assessment
- E Botanical Surveys**
- Botanical Survey – Honua‘ula
 - Botanical Survey – Wastewaterline
 - Botanical and Wildlife Survey – Waterline
- F Conservation & Stewardship Plan**
- G Landscape Master Plan**
- H Wildlife Surveys**
- Wildlife Survey – Honua‘ula
 - Wildlife Survey – Wastewaterline
- I Archaeological Inventory Surveys**
- Archaeological Inventory Survey – Honua‘ula
 - Archaeological Inventory Survey – Wastewaterline
 - Archaeological Inventory Survey – Waterline
- J Cultural Resources Preservation Plan**
- K Cultural Impact Assessment**
- L Traffic Impact Analysis Report**

Volume 4

- M Transportation Management Plans**
- Transportation Management Plan Approvals
 - Transportation Management Plan – Construction
 - Transportation Management Plan – Permanent
- N Acoustic Study**
- O Air Quality Study**
- P Preliminary Engineering Report**
- Q Market Study, Economic Impact Analysis, and Public Costs/Benefits Assessment**
- R Pi‘ilani Highway Widening Project Final EA**
- S Wailea Ike Drive and Wailea Alanui Drive Intersection Improvements Final EA**

Appendix AA



Comments and Responses





EA / EISPN Comments and Responses



EA/EISPN COMMENTS AND RESPONSES

The EISPN was sent to the following agencies, organizations, and individuals indicated below in the table with a check mark (✓). The EISPN was also available on the OEQC website. The public comment period on the EISPN was from March 8, 2009 to April 7, 2009. Following the EISPN public comment period, further consultation was sought with an additional public comment period on an EA/EISPN. The EA/EISPN was available on the OEQC website and copies of the EA/EISPN were provided to all organizations and individuals who had requested to be a consulted party during the March 8, 2009 to April, 7, 2009 public comment period. The comment period on the EA/EISPN was from October 8, 2009 to November 7, 2009, however comments were accepted up until November 17, 2009 to allow all consulted parties ample time to provide comments. Where indicated (Comment Date), an agency, organization, or individual submitted comments.

	EISPN Sent	Comment Date	
		EISPN	EA/EISPN
State			
Department of Business, Economic Development and Tourism	✓	-	-
DBEDT – Strategic Industries Division	✓	-	-
DBEDT – Office of Planning	✓	-	-
Department of Education	✓	4-6-09	-
Department of Health	✓	4-8-09	-
DOH – Office of Environmental Quality Control	✓	-	-
Department of Land & Natural Resources	✓	4-2-09	-
DLNR – State Historic Preservation Division	✓	-	-
DLNR – Division of Forestry and Wildlife	✓	3-31-09	-
Department of Transportation	✓	4-6-09	-
Office of Hawaiian Affairs	✓	4-8-09	-
University of Hawai’i Environmental Center	✓	-	-
Federal			
US Army Corps of Engineers	✓	3-26-09	-
US Fish & Wildlife Service	✓	4-8-09	-
County of Maui			
County Councilmember Wayne Nishiki*		-	11-16-09
Department of Planning	✓	-	-
Department of Fire & Public Safety	✓	4-14-09	-
Department of Housing & Human Concerns	✓	4-7-09	-
Department of Parks & Recreation	✓	4-6-09	-
Police Department	✓	4-15-09	-
Department of Public Works	✓	3-30-09	-
Department of Environmental Management	✓	5-18-09	-
Department of Water Supply	✓	5-6-09	-

	EISPN Sent	Comment Date	
		EISPN	EA/EISPN
Libraries, Private Companies, Organizations, and Individuals			
Kīhei Public Library	√	-	-
Maui Electric Company, Ltd.	√	3-11-09	-
Hawaiian Telcom	√	-	-
Maui Cultural Lands* (Clare Apana)		-	11-16-09
Maui Meadows Community Association (Madge Shaefer)	√	4-6-09	-
Maui Tomorrow* (Irene Bowie)	√	4-6-09	11-16-09
Maui Unite!* (Elle Cochran)		4-7-09	-
Save Mākena.org* (Angie Hoffman)		4-6-09	-
Save Mākena.org (Elle Cochran)		-	11-13-09
Sierra Club Maui Group* (Lucienne de Naie)		-	11-16-09
Wailea Community Association	√	-	-
Angie Hofmann*		4-2-09	11-12-09
Claire Jordan*		4-6-09	-
Clare Apana*		4-9-09	-
Dale Deneweth*		4-7-09	-
Daniel Kanahale*		3-31-09	-
Dick Mayer		-	11-15-09
George Harker*		4-6-09	-
Gordon Cockett Maui Unite		-	11-13-09
Joe Fell-McDonald*		4-6-09	-
Johnny Be*		4-3-09	-
Joyclynn Costa*		4-9-09	11-16-09
Karrie Silva*		4-3-09	-
Katelin Halligan		4-6-09	-
Katie Romanchuk*		4-3-09	-
Keegan House*		4-4-09	-
Ken Rose*		4-4-09	-
Lee Altenberg		4-7-09	11-17-09
Lucienne de Naie*		4-9-09	-
Madeleine Migenes		4-3-09	-
Mark D'Antonio		4-3-09	-
Mark Hyde*		4-3-09	10-20-09 10-25-09
Michael Howden*		4-3-09	-
Michael & Barbara Gach*		4-3-09	-
Robert Wintner*		4-3-09 4-8-09	-
Robin Knox*		-	11-17-09
Sally Raisbeck		4-6-09	-

	EISPN Sent	Comment Date	
		EISPN	EA/EISPN
Scott Heller*		4-4-09	-
Steve Lafleur*		4-6-09	-
Teri Leonard*		-	11-16-09
Todd Wilson*		4-7-09	-
Wayne Bachman		-	11-4-09

*EIS consulted party

This page intentionally left blank.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

April 6, 2009

Mr. Tom Schnell
PBR, HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawai'i 96813

Dear Mr. Schnell:

Subject: Environmental Impact Statement Preparation Notice for Honua'ula
Mekawao, Maui, TMK 2-1-008:056 and 071

The Department of Education (DOE) has reviewed the environmental impact statement preparation notice (EISPN) for the Honua'ula master-planned community.

The DOE is concerned that although the project will have no more than 1,400 residences, 250 residences will be located at the Ka'ono'ulu Light Industrial Subdivision. There does not appear to be any map of the industrial subdivision or where the homes would be located within the subdivision.

Public school students who will reside in the Honua'ula project would probably attend Kamali'i Elementary School. Students who will reside in the industrial subdivision might attend Kihei Elementary School. In a discussion of impacts of the project on schools, it would be useful to make that distinction.

The DOE is in the process of implementing the state law on school impact fees. We believe school impact fees will be required for new residential units in the Kihei area; however, we do not yet know how much these fees will be. We expect to be prepared to collect impact fees from the Kihei area before the end of 2009. We acknowledge Honua'ula Partners, LLC willingness to comply with the school impact fee law.

The DOE appreciates the opportunity to offer early comments. If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Sincerely yours,

Duane Y. Kashiwai
Duane Y. Kashiwai
Public Works Administrator
Facilities Development Branch

DYK:jmb

c: Bruce Anderson, CAS, Baldwin/Kekaulike/Maui Complex Areas
Katherine Kenloha, Director, OEQC
Jeff Hunt, Maui County Planning Department

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER



PBR HAWAII
& ASSOCIATES, INC.

March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, FASLA, LEED AP
Executive Vice-President

VINCENT SHIGEMORI
Vice-President

FRAN TTE MURAKAMI, AIA, LEED AP
Principal

MI FRANK BRANDELL, ASLA
Chairman Emeritus

Duane Y. Kashiwai
Facilities Development Branch
State of Hawaii
Department of Education
P.O. Box 2360
Honolulu, HI 96804

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Mr. Kashiwai:

Thank you for your letter dated April 6, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We understand that public school students who will reside in Honua'ula would most likely attend Kamali'i Elementary School and students that reside in the Kaonoulu Light industrial subdivision might attend Kihei Elementary School. The focus of the Honua'ula Environmental Impact Statement (EIS) is on Honua'ula as it is that project that triggers the need for an EIS. At this time, there is no known trigger for an environmental assessment or EIS for the homes that will be provided in the Kaonoulu Light industrial subdivision.

In compliance with County of Maui Ordinance No. 3534 (i.e. Honua'ula's Change in Zoning Ordinance), Condition 22, to help address the need for funding of school improvements, Honua'ula Partners, LLC will pay the Department of Education (DOE) \$3,000 per dwelling unit upon issuance of each building permit to be used, to the extent possible, for schools serving the Kihei-Makena Community Plan area; provided that, should the State pass legislation imposing school impact fees that apply to Kihei-Makena Project District 9 (Honua'ula), Honua'ula Partners, LLC will from that point forward comply with the State requirements, or contribute \$3,000 per dwelling unit, whichever is greater.

We are aware that DOE is in the process of implementing the State law regarding school impact fees (HRS Section 302A-1601 et. seq). We have not been informed if it has been determined that the school impact fees to be implemented will cause Honua'ula school impact fees to be greater than \$3,000 per dwelling unit. However, Honua'ula Partners, LLC will comply with all applicable laws regarding school impact fees.

ASSOCIATES
JOM SCHINELL, AIA
Senior Associate

LAMMOND T. HIGA, ASLA
Senior Associate

SEVIN K. NISHIKAWA, ASLA
Associate

UMI MIKAMI YUEN, LEED AP
Associate

SCOTT ALJANA BRIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

JACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5631
Fax: (808) 521-5631
E-mail: planning@pbrhawaii.com

CAPULE OFFICE
101 Kalia Place, Second
Floor, Suite 313
Capule, Hawaii 96737-2005
Tel: (808) 521-5631
Fax: (808) 525-3163

Duane Y. Kashiwai
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

Honua'ula Partners, LLC will implement an agreement with DOE setting forth payment of school impact fees in accordance with HRS Section 302A-1601 et. seq and County of Maui Ordinance No. 3554, Condition 22.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EISPN DOE

LINDA LINGLE
GOVERNOR OF HAWAII



CHYONGE L. FUKUKO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
PO BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EPO-09-037

April 8, 2009

Mr. Tom Schnell
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Schnell

SUBJECT: Environmental Impact Statement Preparation Notice for Honua'ula Project
Makawao, Maui, Hawaii
TMK: (2) 2-1-008: 056 and 071

Thank you for allowing us to review and comment on the subject application. The application was routed to the various branches of the Environmental Health Administration. We have the following Wastewater Branch, Clean Water Branch, Safe Drinking Water Branch and General comments.

Wastewater Branch

The document proposes the creation of Honua'ula – a master-planned community located in the Kihet-Makena region, Island of Maui.

The project is located in the Critical Wastewater Disposal Area (CWDA) where no new cesspools will be allowed.

We have no objections to the proposal as the domestic wastewater needs of the project will be handled either by the development of an on-site treatment plant or connection to the Makena Wastewater Treatment Plant which is located approximately one mile south of Honua'ula.

We encourage the developer to work with the County to utilize recycled wastewater for irrigation and other non-potable water purposes in open space and landscaping areas.

All wastewater plans must meet Department's Rules, HAR Chapter 11-62, "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. If you have any questions, please contact the Planning & Design Section of the

Wastewater Branch at 586-4294.

Clean Water Branch

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject document and offers these comments on your project. Please note that our review is based solely on the information provided in the subject document and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at <http://www.hawaii.gov/health/environmental/env-planning/lanuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:
 - a. Storm water associated with construction activities (including excavation, grading, clearing, demolition, uprooting of vegetation, equipment staging, storage areas, etc.) that will result in the disturbance of one (1) acre or more of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
 - b. Hydrotesting waters or waters used to test the integrity of a tank or pipeline.
 - c. Occasional or unintentional discharges composed entirely of R-1 water, or R-1 water with any combination of storm water or potable water or water used primarily for irrigation, where the R-1 water is supplied from a treatment works and is conveyed or used by a

recycled water system. Note: The NOI for this type of discharge is submitted to the DOH, Wastewater Branch, P.O. Box 3378, Honolulu, HI 96801-3378.

- You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>.
3. For types of wastewater not listed in Item 2 above or wastewater discharging into Class 1 or Class AA waters, you may need an NPDES individual permit. Class 1 waters include, but is not limited to, all State waters in natural reserves, preserves, sanctuaries, and refuges established by the Department of Land and Natural Resources under chapter 195, Hawaii Revised Statutes (HRS), or similar reserves for the protection of aquatic life established under chapter 195, HRS. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html>.
 4. You must also submit a copy of the NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. Please submit a copy of your request for review by SHPD or SHPD's determination letter for the project along with your NOI or NPDES permit application, as applicable.
 5. The EIS should specify all State waters (including the natural gulches on the project site) that will or may be impacted by project construction and operation.
 6. The EIS should specify all types of pollutant discharges to State waters from project construction and operation.
 7. According to the Code of Federal Regulations, Title 40 (Protection of Environment), Part 122.26(b)(14), storm water discharges associated with industrial activity from treatment works (with a design flow of 1.0 MGD or more) used to treat domestic sewage are required to be covered by an NPDES permit. If the option of utilizing the proposed private wastewater treatment facility is chosen and the design flow is 1.0 MGD or more, an NPDES permit for storm water discharges associated with industrial activity will be required.
 8. Any discharge of wastewater effluent from the proposed private wastewater treatment facility to State waters will require NPDES permit coverage.

9. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at 586-4309.

Safe Drinking Water Branch

This project appears to create a new public water system and will therefore be subject to the following comments:

1. Public Water Systems

Federal and state regulations define a public water system as a system that serves 25 or more individuals at least 60 days per year or has at least 15 service connections. All public water system owners and operators are required to comply with Hawaii Administrative Rules, Title 11, Chapter 20, titled "Rules Relating to Potable Water Systems," which include the following major components:

- All new public water systems are required to demonstrate and meet minimum capacity requirements prior to their establishment per Hawaii Administrative Rules, Title 11, Chapter 20-29.5, titled "Capacity Demonstration and Evaluation." This requirement involves demonstration that the system will have satisfactory technical, managerial and financial capacity to enable the system to comply with safe drinking water standards and requirements.
- Projects that propose development of new sources of potable water serving or proposed to serve a public water system must comply with the terms of Section 11-20-29 of Chapter 20. This section requires that all new public water system sources be approved by the Director of Health prior to its use. Such approval is based primarily upon the submission of a satisfactory engineering report which addresses the requirements set in Section 11-20-29.
- The engineering report must identify all potential sources of contamination and evaluate alternative control measures which could be implemented to reduce or eliminate the potential for contamination, including treatment of the water source. In addition, water quality analyses for all regulated contaminants, performed by a laboratory certified by the State Laboratories Division of the state of Hawaii, must be

submitted as part of the report to demonstrate compliance with all drinking water standards. Additional parameters may be required by the Director for this submittal or additional tests required upon his or her review of the information submitted.

- All sources of public water system sources must undergo a source water assessment which will delineate a source water protection area. This process is preliminary to the creation of a source water protection plan for that source and activities which will take place to protect the source of drinking water.
- Projects proposing to develop new public water systems or proposing substantial modifications to existing public water systems must receive construction plans approval by the Director of Health prior to construction of the proposed system or modification in accordance with Hawaii Administrative Rules, Title 11, Chapter 20-30, titled "New and Modified Public Water Systems." These projects include treatment, storage and distribution systems of public water systems.
- All public water systems must be operated by certified distribution system and water treatment plant operators as defined by Hawaii Administrative Rules, Title 11, Chapter 11-25, titled "Rules Pertaining to Certification of Public Water System Operators."
- All projects which propose the use of dual water systems or the use of a non-potable water system in proximity to an existing potable water system to meet irrigation or other needs must be carefully designed and operated to prevent the cross-connection of these systems and prevent the possibility of backflow of water from the non-potable system to the potable system. The two systems must be clearly labeled and physically separated by air gaps or reduced pressure principle backflow prevention devices to avoid contaminating the potable water supply. In addition backflow devices must be tested periodically to assure their proper operation. Further, all non-potable spigots and irrigated areas should be clearly labeled with warning signs to prevent the inadvertent consumption on non-potable water. Compliance with Hawaii Administrative Rules, Title 11, Chapter 11-21, titled "Cross-Connection and Backflow Control" is also required.
- All projects which propose the establishment of a potentially contaminating activity (as identified in the Hawai'i Source Water Assessment Plan) within the source water protection area of an existing source of water for a public water supply should address this potential and activities that will be implemented to prevent or reduce the potential for contamination of the drinking water source.

Mr. Schnell
April 8, 2009
Page 6

2. Underground Injection Control (UIC)

- Injection wells used for the subsurface disposal of wastewater, sewage effluent, or surface runoff are subject to environmental regulation and permitting under Hawai'i Administrative Rules, Title 11, Chapter 11-23, titled "Underground Injection Control" (UIC). The Department of Health's approval must be first obtained before any injection well construction commences. A UIC permit must be issued before any injection well operation occurs.
- Authorization to use an injection well is granted when a UIC permit is issued to the injection well facility. The UIC permit contains discharge and operation limitations, monitoring and reporting requirements, and other facility management and operational conditions. A complete UIC permit application form is needed to apply for a UIC permit.
- A UIC permit can have a valid duration of up to five years. Permit renewal is needed to keep an expiring permit valid for another term.

3. Groundwater Protection Program

- Projects that propose to develop a golf course are asked to use the Guidelines Applicable to Golf Courses in Hawai'i (Version 6) in order to address certain groundwater protection concerns, as well as other environmental concerns.

If you have any questions, please call Michael Miyahira of the Safe Drinking Water Branch at 586-4258.

General

We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project should be adhered to.

Mr. Schnell
April 8, 2009
Page 7

If there are any questions about these comments please contact Jiacaí Liu with the Environmental Planning Office at 586-4346.

Sincerely,



KELVIN H. SUNADA, MANAGER
Environmental Planning Office

c: EPO
WWB
CWB
SDWB
EH-Maui



March 9, 2010

PRINCIPALS
TOM HASS, WITTEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL X. CHUNIS, PASIA, LEED^{AP}
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED^{AP}
Principal

W. FRANK BRANDT, PASIA
Chairman Emeritus

ASSOCIATES
TOM SCINIELLA, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

KIMUKIKAMI YUEN, LEED^{AP}
Associate

SCOTT ALIKA ABRIGO, LEED^{AP}
Associate

SCOTT MURAKAMI, ASIA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3164
Tel: (808) 531-5500
Fax: (808) 531-3102
E-mail: systems@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehaleha Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2065
Tel: (808) 551-5531
Fax: (808) 551-3163

Kelvin Sumada
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 3

2. We acknowledge that a National Pollutant Discharge Elimination System (NPDES) permit is required.
3. We acknowledge that an NPDES individual permit is required. At the appropriate time during the NPDES permit preparation process, the Clean Water Branch will be contacted and an NPDES individual permit application will be submitted at least 180 calendar days before the commencement of discharge.
4. Copies of appropriate permit applications will be submitted to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD) for review.
5. The Draft EIS will discuss State waters that may be impacted by project construction and operation.
6. The Draft EIS will discuss potential pollutant discharges to State waters from project construction and operation.
7. We acknowledge that an NPDES permit is required should the proposed private wastewater treatment facility have a design flow of 1.0 MGD or more.
8. An NPDES permit will be provided should any discharge of wastewater effluent from the proposed private wastewater treatment facility enter State waters.
9. We acknowledge that all discharges related to the project construction or operation activities must comply with the State's Water Quality Standards (Chapter 11-54, HAR) and permitting requirements (Chapter 11-55, HAR).

Safe-Drinking Water Branch

Public Water Systems

We understand that Honua'ula will be subject to regulations as a public water system owner and must comply with HAR, Title 11, Chapter 20, Rules Relating to Potable Water Systems.

Underground Injection Control (UIC)

In compliance with County of Maui Ordinance No. 3554 (i.e. Honua'ula's Change in Zoning Ordinance), Condition 17, water for Honua'ula will not be placed into injection wells.

Groundwater Protection Program

Honua'ula will adhere to the Guidelines Applicable to Golf Courses in Hawai'i (Version 6) for the development of the proposed golf course.

The Draft EIS will include Best Management Practices (BMPs) for the Honua'ula Golf Course. The BMPs will address groundwater protection concerns, as well as other environmental concerns.

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Sumada:

Thank you for your letter dated April 8, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

Wastewater Branch

We acknowledge that the Wastewater Branch has no objections to Honua'ula.

We understand that wastewater plans must meet Hawai'i Administrative Rules (HAR) Chapter 11-62, Wastewater Systems.

Clean Water Branch

We have reviewed the Clean Water Branch's standard comments and Honua'ula will comply with all requirements of Chapters 11-54 and 11-55, HAR.

1. We acknowledge that Honua'ula and its potential impacts to State Waters must meet the following criteria:
 - a. Antidegradation policy (Section 11-54-1.1, HAR)
 - b. Designated uses (Section 11-54-3, HAR), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (Sections 11-54-4 through 11-54-8, HAR)

Although Honua'ula is not located along the shoreline, nearshore water quality monitoring studies have been conducted in 2005, 2006, 2008, and 2009 specifically regarding Honua'ula to obtain pre-construction baseline data. The Draft Environmental Impact Statement (EIS) will contain the most recent assessment report and will be provided to the Department of Health (DOH). After construction commences water quality data will be submitted annually to DOH. Current and future nearshore water quality monitoring assessments will provide water quality data necessary to assess compliance with Chapters 11-54, HAR.

Kelvin Sunada
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 3 of 3

Thank you for reviewing the EISP. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN DOH

LINDA LUNZLE
DIRECTOR OF LAND AND NATURAL RESOURCES



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 2, 2009

PBR Hawaii
ASB Tower Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Attention: Mr. Tom Schnell

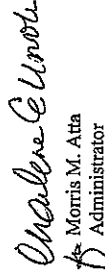
Ladies and Gentlemen:

Subject: Environmental Impact Statement Preparation Notice for Honua'ula

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of Aquatic Resources, Engineering Division, Division of Forestry & Wildlife, Division of State Parks, Commission on Water Resource Management, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,



Morris M. Atta
Administrator

Cc: OBQC
Maui Planning Department



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 611
HONOLULU, HAWAII 96809

March 11, 2009



MEMORANDUM

TO: DLNR Agencies:
x Div. of Aquatic Resources
x Div. of Boating & Ocean Recreation
x Engineering Division
x Div. of Forestry & Wildlife
x Div. of State Parks
x Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division -

FROM: *Laura E. Thiesen*
Lauris M. Atta
SUBJECT: Environmental Impact Statement Preparation Notice for Honua'ula
LOCATION: Makawao, Maui, TMK: (2) 2-1-8-56, 71 and 2-1-8-portion 999
APPLICANT: Honua'ula Partners, LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2009.

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 my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached

Signed: *Laura E. Thiesen*
Date: 3/17/09

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LM/MorrisAtta
REF:DEISPNHonuaula
Maui.452

COMMENTS

- We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone C. The National Flood Insurance Program does not have any regulations for developments within Zone C.
- Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone.
- Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is _____.
- Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyan-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.
- Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:
 - Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
 - Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emter at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
 - Mr. Francis Certo at (808) 270-7771 of the County of Maui, Department of Planning.
 - Mr. Mario Antonio at (808) 241-5620 of the County of Kauai, Department of Public Works.

- The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

Additional Comments: _____

Other: _____

Should you have any questions, please call Ms. Suzie S. Agron of the Planning Branch at 587-0258.

Signed: *Eric T. Hirano*
ERIC T. HIRANO, CHIEF ENGINEER

Date: 3/17/09



RECEIVED
DIVISION
MAY 25 2:26

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
HONOLULU, HAWAII

March 24, 2009

REF: Honua'ula670

TO: Morris Alta, Administrator
Land Division

FROM: Ken C. Kawahara, P.E., Deputy Director
Commission on Water Resource Management

SUBJECT: Honua'ula EIS Prep Notice

FILE NO.: N/A
TMK NO.: (2) 2-1-008:056 & 071, portion :999

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally prioritized water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the internet at <http://www.hawaii.gov/dlnr/cwrn>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/lead>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense/gpd/index.htm>.
- 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/cwrn/initiative/led_bbb.

Morris Alta, Administrator
Page 2
March 24, 2009

- 6. We recommend the use of alternative water sources, wherever practicable.
- 7. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:

Additional information and forms are available at http://hawaii.gov/dlnr/cwrn/resources_permits.htm.

- 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water.
- 9. A Well Construction Permit(s) is (are) required any well construction work begins.
- 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 11. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.
- 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.
- 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 16. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

OTHER:

The water requirements have not been established: the water sources have not been identified (some potential sources have). This development falls in the MDWS Central Maui Service Area (CMSA), served largely from the Iao Ground Water and Wa'ehu Source Water Management Areas, whose resources have already been maximized, meaning that there may not be allocations available. Irrigation requirements in the CMSA are often supplied from local, private irrigation systems. The project should identify both potable and irrigation requirements, make careful provision for conservation measures in water use, and maximize alternative sources such as brackish water and reclaimed water.

If there are any questions, please contact Charley Ice at 687-0216.

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL ST., ROOM 325
HONOLULU, HAWAII 96813
TEL (808) 587-0166 FAX (808) 587-0160

March 31, 2009

Mr. Charlie Jencks
C/O Goodfellow Brothers, Inc.
P.O. Box 220
Kihei, Maui, Hawaii 96753

Dear Mr. Jencks:

Subject: Honua'ula EISP Comments, Makawao, Maui TMK: 2-1-008: 056
and 071 containing 670 acres by Honua'ula Partners, LLC applicants.

DLNR, Division of Forestry and Wildlife appreciates the opportunity to comment on your development located at Wailea, Kihei-Makena, Maui, Hawaii. The following are comments submitted by our wildlife staff on Maui and administration in Honolulu.

Maui wildlife staff:

Page 22. Please fence and maintain the entire Native Plants Preserve perimeter with a 7-foot deer and ungulate exclusion fence; remove all ungulates and maintain ungulate free. If the Honua'ula site were fenced along its perimeter, this would be the preferred option, to exclude ungulates from the entire site, then fence the Native Plants Preserve with hog-wire. The short fencing would afford some protection against human ingress (as the entire preserve is surrounded by housing (MF) development, and allow for signage explaining the preserve and its special needs.

LARRY R. TRIDLER
DIRECTOR
DIVISION OF LAND AND NATURAL RESOURCES
COMMISSIONER OF WATER RESOURCES MANAGEMENT
RUSSELL K. TSUBOI
FIRST DEPUTY DIRECTOR
KEN C. KAWANAKA
FOURTH DEPUTY DIRECTOR
MELISSA A. KAMAYAMA
MANAGER OF CONSERVATION
COMMISSIONER OF FORESTRY AND WILDLIFE
TOMMY L. HOEGLER
COMMISSIONER OF WATER RESOURCES MANAGEMENT
NICHOLE A. FLETCHER
DIRECTOR OF PLANTATION AND FORESTRY
MARTHA A. LEE
DEPUTY DIRECTOR OF PLANTATION AND FORESTRY
STAFF

DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

2009 APR -2 A 8 51

RECEIVED
LAND DIVISION

Page 25. *Manduca blackburni* (Mb) or Blackburn's Sphinx Moth larvae were detected on visits to Honua'ula. The food plants of the moth's larvae are well dispersed in the approximately 130-acre rocky lava region. Food plants for the adult (the moth stage of life), such as the native *Capparis sandwicheana* or *Maiapilo* were also documented. The Developers will need to document how mitigation can be assured for:

- direct harm to Mb,
- direct loss of food plants for the Mb,
- attraction of Mb to development's lighting which could cause take,
- reduction in available Mb habitat

It should be determined by the HCP coordinator (DOFAW administration staff) and ESRC, if HCP planning applies to Honua'ula - if so, it should cover Hawaiian Stilt, Hawaiian Coot, and Hawaiian Goose which will be attracted to the developed site, as well as the Hawaiian Bat and Mb which have already been documented and seen at this site.

Page 40. Lighting should meet the most current Outdoor Lighting Standards Committee recommendations. To reduce attraction to nocturnal seabirds, and Mb, all outdoor lights should be shielded from top and all sides, and be of the lowest necessary intensity. Use of motion sensors on all outside lights should be incorporated wherever possible.

Administration Honolulu:

PBR, Hawaii the consultant for Honua'ula wrongly labeled this project as an EISP instead of notice of preparation of a draft EA. SWCA was contracted to do the biological work when this project was previously called Wailea 670. Therefore, all of the original biological work completed previously is missing in this document including the deer perimeter fence, details on the plant preserves, surveys for pueo, other birds, and *Manduca blackburni* (Mb) or Blackburn's Sphinx Moth larvae. We have expressed concerns about the projects design integrating the homes and other related infrastructures with the rare biological

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

LARAH H. THURLEN
COMMISSIONER
COMMISSION OF WATER RESOURCES MANAGEMENT

AQUATIC RESOURCES 2150

DIRECTOR	
COMM. FISH	
AO RES/ENV	
AO REC	
PLANNER	
STAFF SVCS	
REG/INH	
STATISTICS	
UNEMPLOYED AID	
EDUCATION	
SECRETARY	
OFFICE SVCS	
TECH ASST	X
Return to:	
No. Copies:	
Copy to:	
Due Date:	

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 -



SH

FROM: *Doris M. Atta*
 SUBJECT: Environmental Impact Statement Preparation Notice for Honouliuli
 LOCATION: Makawao, Maui, TMK: (2) 2-1-8-56, 71 and 2-1-8-portion 999
 APPLICANT: Honouliuli Partners, LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2009.

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 my office at 587-0433. Thank you.

Attachments

- () We have no objections.
- () We have no comments.
- (X) Comments are attached.

Signed: *Doris M. Atta*
 Date: 30 March 2009

RECEIVED
 LAND DIVISION
 2009 APR -2 P 3: 51

species present on this property, and how effective mitigation measures will be applied to protect these species from the development.

Should you have questions regarding our review of your proposed development, please call Mr. Fern Duvall, Wildlife Biologist on Maui at (808) 873-3502 or Ms. Betsy Gagne, administration staff in Honolulu at (808) 587-0063. Thank you for allowing us to review your project.


Sincerely yours,

Paul J. Comry
 Paul J. Comry
 Administrator

- C: John Cumming, DOFAW Maui Branch
- Fern Duvall, Maui Wildlife
- Betsy Gagne, NARS Administration
- Paula Hartzell, HCP Coordinator
- DLNR, Land Division
- Tom Schnell, PBR Hawaii
- Jeff Hunt, Maui County Planning Department

Alton Mlyasaka
March 27, 2009
Page 2

DIVISION OF AQUATIC RESOURCES - MAUI
DEPARTMENT OF LAND & NATURAL RESOURCES
130 Mahalanani Street
Wailuku, Hawaii 1 96793
March 27, 2009

To: Alton Mlyasaka, Aquatic Biologist
From:  Skippy Hau, Aquatic Biologist
Subject: EIS Preparation Notice for Honua'ula, Makawao
(DAR 2150) TMK(2) 2-1-8:56, 71 and 2-1-8: portion 999
(Comments to Morris Alta (Land) by April 1, 2008)

(P.20) Water quality monitoring should establish baseline for "groundwater" and not just nearshore water testing. Water testing can exceed established water standards during heavy rains or periods of large swells. Those results are helpful to assess conditions in nearshore water quality.

The USGS study by Charles Hunt have noted increased nutrients about 3.5 times existing groundwater levels from samples below the Kihel wastewater treatment plant.

The proposed golf courses could contribute to existing sources of nutrients in the watershed. Nutrients may also be increased from yard, vegetation, and landscaped areas. Drainage and landscaping plans should minimize sedimentation and runoff from this project, especially during construction.

I recommend that groundwater nutrient concentrations should be monitored before, during and after the proposed development. There may be a cumulative effect by this and other developments in the watershed.

(P.36) The existing water demand should be clearly identified for the Central water system. The amount of "available" water for development should be clearly identified by the Water Department as sources such as "surface-treated" water are being increased. The amount of water needed for this project should be clearly identified along with recycled, non-potable (p.19), and other waters needed to sustain this development.

Will this project have water features, ponds, etc.?

Will the golf courses or parts of this development be using recycled water?
What is the actual potable water demand for this development?

(P.38) There is an expectation of minimal flooding. What happens when "kona" storms hit on the island and more than five inches of rain falls within a 24-hour period. This development will likely increase the amount of impervious surfaces including roads and structures in the project area. Will these additional drainage amounts be addressed with the natural drainage areas? Will vegetation and landscape areas be used to help direct water for water retention and recharge into the ground? Existing drainage ways should be identified and carefully complimented in the final landscaping plans. Hopefully, the drainage plan should address more than drainage increases from development of the property.

Reference:

Ground-Water Nutrient Flux to Coastal Waters and Numerical Simulation of Wastewater Injection at Kihel, Maui, Hawaii By Charles D. Hunt, Jr. Prepared in cooperation with U.S. Department of Commerce, National Oceanic and Atmospheric Administration Scientific Investigations Report 2006-5283



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

IRAN T. MURAKAMI, AICP
Principal

HAIRMAN EMEHITUS
V. FRANK BRANDT, PASLA
Interim Executive Director

ASSOCIATES
YONISCHNELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

FRANK K. NISHIKAWA, ASLA
Associate

IM HANIKAMI YUEN, LEED-AP
Associate

COTT AJIKA, MRINGO
Associate

COTT YURAKAWA, ASLA, LEED-AP
Associate

HACHENG DONG, LEED-AP
Associate

HONOLULU OFFICE
801 Bishop Street
5th Floor, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 523-3400
Fax: (808) 523-3400
E-mail: hysadmin@pbrhawaii.com

HILO OFFICE
611 Aupuni Street
Hilo Eagon Center, Suite 310
Hilo, Hawaii 96720
Tel: (808) 941-3313
Fax: (808) 941-4889

PAILOLO OFFICE
789 Vaila Loop, Suite 4
Palo Alto, Hawaii 96753-1271
Tel: (808) 242-2878

52987
LAURA J. THILLY
BOARD OF LAND AND NATURAL RESOURCES
CHIEF OF DIVISION / ASSISTANT SECRETARY



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 11, 2009

MEMORANDUM

TO: DLNR Agencies:
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commissioner of Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division -

Morris M. Atia

FROM: Morris M. Atia
SUBJECT: Environmental Impact Statement Preparation Notice for Honou'ula
LOCATION: Makawao, Maui, TMK: (2) 2-1-8.56, 71 and 2-1-8-portion 999
APPLICANT: Honou'ula Partners, LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2009.

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 my office at 587-0433. Thank you.

Attachments

- () We have no objections.
- (x) We have no comments.
- () Comments are attached.

Signed: *Morris M. Atia*
Date: 3/12/09

RECEIVED
LAND DIVISION
2009 MAR 13 A 10:31
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

RECEIVED
STATE PARKS DIV
09 MAR 12 AIO 57

DEPT OF LAND & NATURAL RESOURCES

SUBJECT: HONOU'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Atia:

Thank you for your letter dated April 2, 2009 regarding the Honou'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honou'ula Partners, LLC, we are responding to the comments received from each Department of Land and Natural Resources division.

Engineering Division

Thank you for confirming that Honou'ula is located in Flood Insurance Rate Map Zone C. This information will be included in the Draft Environmental Impact Statement (EIS).

Commission on Water Resource Management

Honou'ula will comply with all requirements of Hawai'i Revised Statutes (HRS), Chapter 174C, State Water Code and Hawai'i Administrative Rules (HAR), Chapters 13-167 to 13-171.

1. We will coordinate with the County to incorporate Honou'ula into the County's Water Use and Development Plan

2. Water efficient fixtures will be installed and water efficient practices will be implemented throughout Honou'ula.

3. Best Management Practices (BMP) will be used for storm water management to minimize the impact on the existing area's hydrology.

4. Alternative water sources from the County of Maui's water system will be used.

5. The Draft EIS will identify water sources for Honou'ula.

6. We understand that Honou'ula falls in the Central Maui Service Area where water resources are maximized. The Draft EIS will identify alternative water sources for potable and non-potable requirements. Honou'ula Partners, LLC will develop, maintain, and operate a private water system providing both potable and non-potable water for use within Honou'ula.

Morris Alta
SUBJECT: HONUA 'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

Division of Forestry and Wildlife

Please see the attached letter prepared by Honua'ula Partners, LLC' biological consultant, SWCA Environmental Consultants, in response to the concerns of the Division of Forestry and Wildlife.

Division of Aquatic Resources

Groundwater monitoring will be conducted to establish baseline conditions before construction and on an on-going basis after construction.

BMPs regarding drainage runoff and sedimentation will be implemented. In particular, the golf course will be constructed and operated in compliance with the Department of Health's (DOH) guidelines for new golf course development and DOH's more recent comprehensive guidance document for new golf courses, "Golf Course Best Management Practices."

While Honua'ula is within the Maui Department of Water Supply Central Maui Service area, Honua'ula will develop its own source of potable and non-potable water. Non-potable water will be used for irrigation and will include brackish water from wells and recycled water from a private wastewater treatment plant. The Draft EIS will contain further information regarding water demand and sources.

The Honua'ula golf course will have water features. These features will be lined and will serve as reservoirs for storage of irrigation water and will also function as a drainage assist when necessary.

The average daily potable water demand for Honua'ula is estimated to be 0.34 million gallons per day at build-out. This will be discussed in the Draft EIS.

The Draft EIS will include a Preliminary Engineering Report. The report will discuss a drainage plan that will be prepared to handle a 100-year storm for existing, pre-development, and post-development conditions. Natural drainage areas will be used and supplemented with detention basins. Vegetation and landscape areas will be used to help direct water retention and recharge.

Division of State Parks

We acknowledge that the Division of State Parks has no comments.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

Attachment

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC



Hawaii Office
201 Merchant Street, Suite 2310
Honolulu, HI 96813
Tel 808.548.7922 Fax 808.548.7923
www.swca.com

April 14, 2009

Mr. Paul J. Conry
Administrator
Division of Forestry and Wildlife (DLNR)
1151 Punchbowl St, Rm 325
Honolulu, HI 96813

Subject: Honua'ula EISPN Comments, Makawao, Maui TMK:2-1-008:056 and 071 containing 670 acres by Honua'ula Partners, LLC applicants.

Dear Paul:

At the request of Charlie Jencks, I am responding to your letter of March 31, 2009 addressed to him regarding the Honua'ula EISPN comments.

Maui Wildlife Staff

Page 22. To the best of my knowledge, the entire Honua'ula parcel boundary is currently fenced. Some cattle belonging to Ulupalakua Ranch are being grazed with the permission of Honua'ula Partners LLC on the kiawe-buffgrass lands in the northern portion of the parcel. The boundary between this area and the kiawe-willow scrubland was also recently fenced to protect native plants on the 'a'a lava flow from cattle. SWCA has recommended that Honua'ula Partners LLC upgrade the outer perimeter fence with a 7-foot high deer and ungulate exclusion fence, and then remove ungulates from within the fenced kiawe-willow scrubland where the native plant preserve will be created. This may be done in advance of project construction.

Page 25. SWCA staff biologists have maintained close coordination with DOFAW biologist Paula Hartzell, NARS Director Betsy Gagne, and US Fish and Wildlife Service botanist James Kwon during our intensive studies within the project area. We recommended that Honua'ula Partners LLC prepare a Habitat Conservation Plan (HCP) under Section 10 of the Endangered Species Act to address the issues your Maui staff raised regarding mitigation for endangered Blackburn sphinx moths. In addition, the HCP would also address the Hawaiian hoary bat, all four species of endangered Hawaiian waterbirds, the nene, the Hawaiian petrel, Newell's shearwater, the pueo, and the candidate endangered 'awikawiki plants found within the project area. SWCA biologists have also been collaborating with Paula on the HCP/EA for the Kaheawa Wind Power II project on West Maui over the past year, and have developed a good working knowledge of DOFAW expectations for these assessments.

Page 40. SWCA has recommended that all lighting will meet the current Outdoor Lighting Standards Committee recommendations, be on the lowest necessary intensity, and be shaded to prevent falout of juvenile seabirds.

Administration Honolulu

The notice published by the Office of Environmental Quality Control was indeed an EISPN (Environmental Impact Statement Preparation Notice), and not a notice to prepare a draft EA. Although an EIS was prepared and approved in 1988 for the initial conceptual development at Wailea 670, the current owner has agreed to prepare a new draft and final EIS to address changes in the

proposed development project. All the studies conducted by SWCA and other consultants will appear as appendices to the draft EIS, and their findings and recommendations will be incorporated into the EIS.

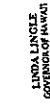
We appreciate your comments and look forward to our continued collaboration with your staff throughout the environmental review process. Their field assistance, constructive suggestions, and cooperation have been exemplary.

Aloha and best regards,



John I. Ford
Program Director / Senior Biologist

C: Tom Schnell, PBR Hawaii
Charlie Jencks, Honua'ula Partners, LLC



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL ST., ROOM 325
HONOLULU, HAWAII 96813
TEL: (808) 587-0166 FAX: (808) 587-0160

March 31, 2009

LAURA H. THIELLEN
CHIEF OF BUREAU
MANAGER OF WATER RESOURCES MANAGEMENT
RUSSELL V. TOUJ
FIRST DEPUTY
KEN C. KAWASUMI
SENIOR DIRECTOR - WATER
AGRICULTURE
WATER RESOURCES
MANAGEMENT
MANAGER OF WATER RESOURCES MANAGEMENT
CONSERVATION AND RESTORATION
FORESTRY AND WILDLIFE
MANAGER OF WATER RESOURCES MANAGEMENT
STATE PARKS

Mr. Charlie Jencks
C/O Goodfellow Brothers, Inc.
P.O. Box 220
Kihei, Maui, Hawaii 96753

Dear Mr. Jencks:

Subject: Honua'ula EISPN Comments, Makawao, Maui TMK: 2-1-008-056
and 071 containing 670 acres by Honua'ula Partners, LLC applicants.

DLNR, Division of Forestry and Wildlife appreciates the opportunity to comment on your development located at Waiea, Kihei-Makena, Maui, Hawaii. The following are comments submitted by our wildlife staff on Maui and administration in Honolulu.

Maui wildlife staff

Page 22. Please fence and maintain the entire Native Plants Preserve perimeter with a 7-foot deer and ungulate exclusion fence; remove all ungulates and maintain ungulate free. If the Honua'ula site were fenced along its perimeter, this would be the preferred option, to exclude ungulates from the entire site, then fence the Native Plants Preserve with hog-wire. The short fencing would afford some protection against human ingress (as the entire preserve is surrounded by housing (MF) development, and allow for signage explaining the preserve and its special needs.

Page 25. *Manduca blackburni* (Mb) or Blackburn's Sphinx Moth larvae were detected on visits to Honua'ula. The food plants of the moth's larvae are well dispersed in the approximately 130-acre rocky lava region. Food plants for the adult (the moth stage of life), such as the native *Capparis sandwichtiana* or *Maiapilo* were also documented. The Developers will need to document how mitigation can be assured for:

- direct harm to Mb,
- direct loss of food plants for the Mb,
- attraction of Mb to development's lighting which could cause take,
- reduction in available Mb habitat

It should be determined by the HCP coordinator (DOFAW administration staff) and ESRC, if HCP planning applies to Honua'ula - if so, it should cover Hawaiian Stilt, Hawaiian Coot, and Hawaiian Goose which will be attracted to the developed site, as well as the Hawaiian Bat and Mb which have already been documented and seen at this site.

Page 40. Lighting should meet the most current Outdoor Lighting Standards Committee recommendations. To reduce attraction to nocturnal seabirds, and Mb, all outdoor lights should be shielded from top and all sides, and be of the lowest necessary intensity. Use of motion sensors on all outside lights should be incorporated wherever possible.

Administration Honolulu:

PBR, Hawaii the consultant for Honua'ula wrongly labeled this project as an EISPN instead of notice of preparation of a draft EA. SWCA was contracted to do the biological work when this project was previously called Wailea 670. Therefore, all of the original biological work completed previously is missing in this document including the deer perimeter fence, details on the plant preserves, surveys for pueo, other birds, and *Manduca blackburni* (Mb) or Blackburn's Sphinx Moth larvae. We have expressed concerns about the projects design integrating the homes and other related infrastructures with the rare biological

species present on this property, and how effective mitigation measures will be applied to protect these species from the development.

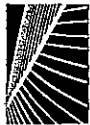
Should you have questions regarding our review of your proposed development, please call Mr. Fern Duvall, Wildlife Biologist on Maui at (808) 873-3502 or Ms. Betsy Gagne, administration staff in Honolulu at (808) 587-0063. Thank you for allowing us to review your project.

Sincerely yours,



Paul J. Conry
Administrator

C: John Cumming, DOFAW Maui Branch
Fern Duvall, Maui Wildlife
Betsy Gagne, NARS Administration
Paula Hartzell, HCP Coordinator
DLNR, Land Division
Tom Schnell, PBR Hawaii
Jeff Hunt, Maui County Planning Department



PBR HAWAII & ASSOCIATES, INC.

March 9, 2010

PRINCIPALS

HONASS WITTEN, ASLA
President

STAN INACAN, ASLA
Executive Vice-President

RUSSELL CHUNG, FASIA, LEED^{AP}
Executive Vice-President

VINCENT SUGERUNI
Vice-President

FRANK BRANDT, ASLA, LEED^{AP}
Principal

FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES

TOM SCHINELL, AICP
Senior Associate

DANMOND T. HIGA, ASLA
Senior Associate

EVIN K. NISHIKAWA, ASLA
Associate

JIMMI KAMIYUEN, LEED^{AP}
Associate

COTT ALIKA-ARRIGO, LEED^{AP}
Associate

COTT MURAKAMI, ASLA, LEED^{AP}
Associate

MACIENG DONG, LEED^{AP}
Associate

ONOLUJU OFFICE
301 Bishop Street, Suite 650
Honolulu, HI 96813-5988
Phone: (808) 521-5531
Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

AWOLEI OFFICE
301 Kamehale Boulevard
Spodei Building, Suite 313
Pepee, Hawaii 96707-2005
Tel: (808) 521-5531
Fax: (808) 535-3163

Paul J. Conry, Administrator

State of Hawaii

Department of Land and Natural Resources

Division of Forestry and Wildlife

1151 Punchbowl St., Room 325

Honolulu, Hawaii 96813

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Conry:

Thank you for your letter dated March 31, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP).

Please see the attached letter prepared by Honua'ula Partners, LLC's biological consultant SWCA Environmental Consultants in response to your concerns.

Thank you for reviewing the EISP. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EISP/ILNR DOPAW

Hawaii Office
201 Merchants Street, Suite 2310
Honolulu, HI 96813
Tel: 808-540-1722 Fax: 808-540-7923
www.swca.com

SWCA
ENVIRONMENTAL CONSULTANTS
Soñid Science Creative Solutions

2/25

April 14, 2009

Mr. Paul J. Conry
Administrator
Division of Forestry and Wildlife (DLNR)
1151 Punchbowl St, Rm 325
Honolulu, HI 96813

Subject: Honua'ula EISP Comments, Makawao, Maui TMK:2-1-008:056 and 071 containing 670 acres by Honua'ula Partners, LLC applicants.

Dear Paul:

At the request of Charlie Jencks, I am responding to your letter of March 31, 2009 addressed to him regarding the Honua'ula EISP comments.

Maui Wildlife Staff

Page 22. To the best of my knowledge, the entire Honua'ula parcel boundary is currently fenced. Some cattle belonging to Ulupalakua Ranch are being grazed with the permission of Honua'ula Partners LLC on the kiawe-wilowilow scrubland in the northern portion of the parcel. The boundary between this area and the kiawe-wilowilow scrubland was also recently fenced to protect native plants on the 'a'ava lava flow from cattle. SWCA has recommended that Honua'ula Partners LLC upgrade the outer perimeter fence with a 7-foot high deer and ungulate exclusion fence, and then remove ungulates from within the fenced kiawe-wilowilow scrubland where the native plant preserve will be created. This may be done in advance of project construction.

Page 25. SWCA staff biologists have maintained close coordination with DOPAW biologist Paula Hartzell, NARS Director Betsy Gagne, and US Fish and Wildlife Service botanist James Kiwon during our intensive studies within the project area. We recommended that Honua'ula Partners LLC prepare a Habitat Conservation Plan (HCP) under Section 10 of the Endangered Species Act to address the issues your Maui staff raised regarding mitigation for endangered Blackburn sphinx moths. In addition, the HCP would also address the Hawaiian hoary bat, all four species of endangered Hawaiian waterbirds, the nene, the Hawaiian petrel, Newell's shearwater, the nūeo, and the candidate endangered 'awikawika plants found within the project area. SWCA biologists have also been collaborating with Paula on the HCP/ESA for the Kaheawa Wind Power II project on West Maui over the past year, and have developed a good working knowledge of DOPAW expectations for these assessments.

Page 40. SWCA has recommended that all lighting will meet the current Outdoor Lighting Standards Committee recommendations, be on the lowest necessary intensity, and be shaded to prevent fallout of juvenile seabirds.

Administration Honolulu

The notice published by the Office of Environmental Quality Control was indeed an EISP (Environmental Impact Statement Preparation Notice), and not a notice to prepare a draft EA. Although an EIS was prepared and approved in 1988 for the initial conceptual development at Wailea 670, the current owner has agreed to prepare a new draft and final EIS to address changes in the

proposed development project. All the studies conducted by SWCA and other consultants will appear as appendices to the draft EIS, and their findings and recommendations will be incorporated into the EIS.

We appreciate your comments and look forward to our continued collaboration with your staff throughout the environmental review process. Their field assistance, constructive suggestions, and cooperation have been exemplary.

Aloha and best regards,



John I. Ford
Program Director / Senior Biologist

C: Tom Schnell, PBR Hawaii
Charlie Jencks, Honua'ula Partners, LLC

LINDA LINSLE
GOVERNOR



BRENNONT MORICKA
DIRECTOR

Deputy Chief of Staff
MICHAEL D. EGGREY
FRANCIS PAUL KEEHO
BRIAN H. SEKERICH
JORDA A. SUJANDA

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
889 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5087

IN REPLY REFER TO:

STP 8.3207

April 6, 2009

Mr. Tom Schnell
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Schnell:

Subject: Honua'ula
Environmental Impact Statement Preparation Notice (EISPN)
TMK: 2-1-008: 056 and 71

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project for the Honua'ula mixed-use development project, located in the Kihel-Makena region of Maui, adjacent to the Wailea Resort.

DOT's previous comments on Honua'ula Partners' related projects, including the project to widen Pihani Highway (letter STP 8.3152, dated March 5, 2009, is attached), are also applicable to the subject project.

DOT staff and the applicant are coordinating a meeting to discuss the proposed projects in the Wailea-Makena area, and the cost-sharing agreement for highway improvements between developers of the three major projects in this area. DOT reserves the right to provide supplemental comments pending the outcome of this meeting.

In the interim, the environmental documents and associated traffic impact assessment report (TIAR) for the subject land development project should be consistent with the TIAR for the Pihani Highway widening project. The applicant should continue consultation with the DOT Highways Division Planning Branch and the Highways Division Maui District Office, and should direct all design and construction plans to these offices.

Mr. Tom Schell
Page 2
April 6, 2009

SPT 8.3207

LINDA LINGLE
GOVERNOR



BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORNEY
FRANCIS PAUL KENO
BRANTH. SENGUCHI
JIRO A. SUMIDA

DOT appreciates the opportunity to provide comments and requests four (4) copies of the project's Draft Environmental Impact Statement (DEIS). If there are any questions, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at (808) 587-2356.

Very truly yours,

BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

Attach.

c: Katherine Kealoha, Office of Environmental Quality Control
Jeffrey Hunt, Maui Planning Department

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

March 5, 2009

IN REPLY REFER TO:
DIR 0199
STP 8.3152

Mr. Mark Roy
Project Manager
305 High Street, Suite 104
Waituku, Hawaii 96793

Dear Mr. Roy:

Subject: Piilani Highway Widening to Four Lanes Between Kilohana Drive and
Wailea Ike Drive – Early Consultation (EC)

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project to widen Piilani Highway from two to four lanes between Kilohana Drive to Wailea Ike Drive. DOT welcomes this consultation process.

DOT understands your firm is working with the DOT Highways Division Planning Branch to arrange a meeting regarding the subject project and the cost-sharing agreement for highway improvements between developers of the three major projects in the Wailea-Makena area. Your firm should continue consultation with the DOT Highways Division Planning Branch and the Highways Division Maui District Office. All plans and designs for the construction of the project should be directed to these offices.

In response to the subject EC and in anticipation of the proposed meeting, the following comments by the DOT Highways Division are offered.

1. The environmental documents related to the proposed widening of Piilani Highway should be submitted to DOT for review and acceptance before being published.
2. The applicant must completely resurface any and all existing highway lanes damaged during the widening of the highway.
3. The design guidelines and/or the basis of design for all widening of Piilani Highway should be included in the Draft Environmental Assessment (DEA).
4. The undergrounding of the existing overhead electric transmission lines should be considered along Piilani Highway.



Mr. Mark Roy
Page 2
March 5, 2009

STP 8.3152

5. Detouring of traffic and/or a temporary closure of Piilani Highway will most likely be required as the excavation of 40 to 50-feet of the rock embankment is anticipated with this proposed widening project. The potential impacts of such detours and/or road closures on adjacent roadways should be considered and appropriately addressed.
 6. A Traffic Impact Assessment Report (TIAR) should be prepared as a part of the DEA. This TIAR should be submitted for DOT's review and acceptance.
 7. The DEA should address the acquisition of right-of-way (ROW) necessary to construct the proposed improvements.
 8. County zoning requires the developer to extend Piilani Highway to Kauhahi Street along an alignment that includes unimproved State highway ROW. Any such proposed improvements on State highway ROW must be submitted for review and approval by DOT. If an extension is being proposed, then it should also be appropriately addressed in the DEA.
- DOT appreciates the opportunity to provide comments and requests that four (4) copies of the project DEA, including the TIAR, be provided. If there are any other questions, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at (808) 587-2356.

Very truly yours,

BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASIA
President

STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL Y. CHUNG FASLA, LEED AP
Executive Vice-President

VINCENT SHIGERUNI
Vice-President

FRANK BRANDT, FASLA
Principal

FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES
TOM SCINNELLA, AICP
Senior Associate

LAWMOND T. HIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

UNI MIKAMI YUKA, LEED AP
Associate

SCOTT ALINA BRIBGO, LEED AP
Associate

KOTTI MUMAMANI, ASIA, LEED AP
Associate

JACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
601 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3104
Tel: (808) 521-5631
Fax: (808) 525-1402
E-mail: systeming@pbrihawaii.com

CAPOLDFIELD OFFICE
301 Kamohila Boulevard
Capitol Hill, Honolulu, HI 96813
Tel: (808) 521-5631
Fax: (808) 525-3163

Brennon T. Morioka, Ph.D., P.E.
State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Morioka,

Thank you for your letter dated April 6, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

Attached please find a letter from Gwen Ohashi Hiraga of Murekiyo & Hiraga, Inc., dated August 28, 2009 which addresses the comments in the Department of Transportation's (DOT) letter dated March 5, 2009, regarding the widening of Pi'ilani Highway (letter STP 8.3152).

We acknowledge the DOT reserves the right to provide supplemental comments regarding the cost-sharing agreement for highway improvements between the developers of the three major projects in the Wailea-Makena area.

The traffic impact analysis report (TIAR) that will be included in the Honua'ula Environmental Impact Statement (EIS) will be consistent with the TIAR for the Pi'ilani Highway widening project. Honua'ula Partners, LLC will continue consultation with the DOT Highways Division Planning Branch and the Highways Division Maui District Office and will direct all design and construction plans to these offices.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS. We will provide DOT with four copies of the Draft EIS when available.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

Attachment

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC



MICHAEL T. MUNEKIYO
 GWEN OHASHI HIRAGA
 MITSURU "MICH" HIRANO
 KARLYNN FUKUDA
 MARK ALEXANDER ROY

August 28, 2009

Brennon Morioka, Director
 Department of Transportation
 869 Punchbowl Street
 Honolulu, Hawaii 96813-5097

SUBJECT: Early Consultation on the Draft Environmental Assessment (EA) for the Pi'ilani Highway Widening to Four (4) Lanes North of Kiochana Drive to Wailea Ike Drive, Wailea, Maui, Hawaii

Dear Mr. Morioka:

Thank you for your letter dated March 5, 2009, in response to your comments, the following are noted:

1. We will submit the Draft Environmental Assessment (EA) to the Department of Transportation (DOT) for review and acceptance before being published.
2. During construction, any and all existing highway lanes damaged during the widening of the highway will be completely re-surfaced.
3. The engineering and traffic consultant, Austin, Tsutsumi & Associates, Inc. have been in discussion with DOT's Planning and Highway branches to ensure that the design for the highway is compliant with DOT's requirements. The basis of design for the highway is included in the Draft EA under Appendix "1-2".
4. Preliminary plans for the proposed highway widening includes relocation of existing above-ground utility poles. It does not currently include undergrounding the existing overhead electrical transmission lines. Further discussion of this matter will be held with the DOT.
5. Prior to initiation of construction consultation with the Police Department, SDOT and adjoining property owners will be conducted to develop measures to mitigate potential construction traffic impacts, especially from detours and road closures.
6. A Traffic Impact Assessment Report (TIAR) has been prepared by Austin, Tsutsumi & Associates, Inc. and is included in the Draft EA.

305 High Street, Suite 104 - Honolulu, Hawaii 96793 - Tel: (808) 734-2013 - Fax: (808) 734-8729 - Planning@tsutsumi-austin.com
 planning@tsutsumi-austin.com
 25
 Printed on Recycled Paper

Brennon Morioka, Director
 August 28, 2009
 Page 2

7. As currently designed, the majority of the work will be located within the existing highway right-of-way. Minor appurtenant improvements outside of the right-of-way are limited to the extension of an existing drain culvert and headwall north of Kiochana Drive, sidewalks, Americans with Disabilities Act (ADA) curb ramps, installation of guard rails, underground utility lines, traffic signal installation, and lane re-striping.
 Coordination of the work outside of the right-of-way will be implemented with adjoining property owners regarding construction of the improvements and easements or land acquisition that may be necessary for improvements outside of the existing highway right-of-way.
8. We acknowledge that Honua'ula Partners, LLC is required to extend Pi'ilani Highway south of Wailea Ike Drive when fifty (50) percent of the Honua'ula project is developed. The extension of Pi'ilani Highway is not part of the scope of the work for the current Pi'ilani Highway Widening project. Prior to initiation of improvements south of Wailea Ike Drive coordination with SDOT will be initiated.
 Should you require additional clarification please call me at (808) 244-2015. A copy of the Draft EA will be forwarded to your agency for review and comment.

Very truly yours,

Gwen Ohashi Hiraga
 Gwen Ohashi Hiraga
 Principal

GOH:yp Charles Jencks, Honua'ula Partners, LLC
 cc: Clyde Murashige, A&B Wailea LLC
 Don Fujimoto, Honua LLC

FILED:\WP\Projects\Widening\SDOT\2009\20090828

PHONE (808) 594-1888

FAX (808) 594-1885



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPTOLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD09/3208D

April 8, 2009

Tom Schnell
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

RE: Environmental Impact Statement Preparation Notice
Honua'ula Development Project
Kihei-Makana, Makawao District, Island of Maui
Tax Map Key Parcel (2)2-1-008-056 and 71; 2-1-008-999 (portion)

Aloha e Tom Schnell,

The Office of Hawaiian Affairs (OHA) is in receipt of your March 8, 2009 letter and attached Environmental Impact Statement Preparation Notice (EISP/N) prepared on the behalf of Honua'ula Partners, LLC for the proposed "Honua'ula" Development project.

OHA has no specific comments on the EISP/N at this time and we look forward to the opportunity to review the draft environmental impact statement and cultural impact assessment for this proposed project. Thank you for initiating consultation at this early stage. Should you have any questions, please contact Keola Lindsey, Lead Advocate-Culture at (808) 594-1904 or keolal@oha.org.

'O wau iho no me ka 'oia'i'o,

Clyde W/Nāmu'o
Administrator

C: OHA Maui CRC office



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

STAN DINGCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG PASLA, LEED*AP
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

FRANK T. MURAKAMI, AICP, LEED*AP
Principal

FRANK BRANDT, PASLA
Chairman Emeritus

ASSOCIATES
TOM SCINNEL, AICP
Senior Associate

RAYMOND T. HIGH, ASLA
Senior Associate

DEVIN K. NISHIKAWA, ASLA
Associate

YOUNG KAM YUEN, LEED*AP
Associate

SCOTT AUKA AURIGO, LEED*AP
Associate

SCOTT MURAKAMI, ASLA, LEED*AP
Associate

JACKIENG DONG, LEED*AP
Associate

HONOLULU OFFICE #60
Honolulu, Hawaii 96813-5484
Tel: (808) 593-5631
Fax: (808) 525-1402
E-mail: syad@pbrhawaii.com

CAPOLEI OFFICE
001 Kamaole Boulevard
Capolei Building, Suite 313
Capolei, Hawaii 96707-2005
Tel: (808) 521-5631
Fax: (808) 535-3160

Clyde W. Nāmu'o, Administrator
State of Hawaii
Office of Hawaiian Affairs
711 Kapi'olani Blvd., Suite 500
Honolulu, HI 96813

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Mr. Nāmu'o:

Thank you for your letter dated April 8, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your letter.

We acknowledge that the Office of Hawaiian Affairs has no comments on the EISP/N at this time. We will provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISP/N. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/N OHA



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT
FORT SHAFTER, HAWAII 96859-5440

March 26, 2009

REPLY TO
ATTENTION OF:

Regulatory Branch

File No. POH-2009-91

Mr. Tom Schnell, AICP
PBR Hawaii
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Schnell,

This letter is in response to your request, received March 10, 2009, for our review of the Environmental Impact Statement Preparation Notice (EISP/N) prepared pursuant to Chapter 343 of the Hawaii Revised Statutes for the proposed Honua'ula Kihei-Makema Community Subdivision project located on the Island of Maui, Hawai'i.

Section 10 of the Rivers and Harbors Act (RHA) of 1899 requires that a Department of Army (DA) permit be obtained for structures or work in or affecting navigable waters (e.g., Pacific Ocean) of the U.S. (33 U.S.C. 403). Section 10 waters are those subject to the ebb and flow of the tide extending shoreward to the mean high water mark. Section 404 of the Clean Water Act (CWA) of 1972 requires that a DA permit be obtained for the discharge (placement) of dredge and/or fill material into waters of the U.S., including jurisdictional wetlands. The Corps defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions.

The semi-arid conditions of the Kihei-Makema, Maui coast tend to limit the occurrence and extent of permanent or relatively permanent surface water resources. There are no known perennial streams or adjacent wetlands located within the proposed project area, however the Wailea Gulch appears to be a drainage feature that collects surface flows during and following heavy rainfall events. According to the environmental documents furnished to our office, surface runoff flows towards the ocean and/ or towards natural drainage paths.

Based on the EISP/N, the infrastructure and utilities engineering plans are not yet complete; however, your document provides potential courses of action for the water, wastewater, drainage, solid waste, and electrical systems. It is our understanding this review will be included in the appendices of the Draft Environmental Impact Statement (DEIS). As it stands it is not possible to determine whether the infrastructure activities will extend beyond the Honua'ula Community Subdivision boundaries identified in the EISP/N. Consequently, we are unable to determine whether the proposed construction activities would involve the discharge (placement) of dredged and/or fill material into jurisdictional waters pursuant to our authorities under Section 404 of the CWA and hence require Department of the Army (DA) Authorization.

As you prepare your Environmental Impact Statement please identify all streams and wetlands on the project site and in the immediate vicinity of the proposed project, characterize the hydrology and ecology of those features, and provide a description of all ground-disturbing activities associated with the project construction occurring on the project site.

Thank you for the opportunity to comment. If you have any questions, please contact Ms. Meris Bantilan-Smith, of my Regulatory staff at 808-438-7701 (FAX: 808-438-4060) or by electronic mail at Meris.Bantilan-Smith@usace.army.mil. Please include File No. POH-2009-91 in any future correspondence regarding this project.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL J. CHUNG, FASLA, LEED AP
Executive Vice-President

VINCENT SHIGERUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANOFF, FASLA
Chairman Emeritus

ASSOCIATES

JOHNSCHINELL, AICP
Senior Associate

RAYMOND T. LUCA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

MI MIKAMI YUEN, LEED AP
Associate

COTT ALIHA ABRIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

XIANGHONG DONG, LEED AP
Associate

HONOLULU OFFICE
001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 521-5631
Fax: (808) 529-1402
E-mail: syadmir@pbrihawaii.com

LAPOLE OFFICE
001 Kaniolu Boulevard
Spauls Building, Suite 319
Spauls, Hawaii 96707-2005
Tel: (808) 535-3103
Fax: (808) 535-3103

PBR HAWAII & ASSOCIATES, INC.

George P. Young, P.E.
Chief, Regulatory Branch
Department of the Army
U.S. Corps of Engineers, Honolulu District
Fort Shafter, Hawaii 96858-5440

ATTN: Meris Bantlian-Smith

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Young:

Thank you for your letter (POH 2009-91) dated March 26, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The rectangular Honua'ula property lies parallel to the shore between 320 ft and 710 ft in elevation, and therefore has no waters subject to the ebb and flow of the tides. The property is crossed by numerous small ephemeral dry gulches that may be inundated infrequently and for only two to three days/year during periods of unusually heavy and prolonged rainfall. Therefore, Honua'ula Partners, LLC's biological consultant, SWCA Environmental Consultants, concludes that the gulches are not considered traditional navigable waters (TNW).

Following extensive biological surveys of the property, SWCA Environmental Consultants have not found any vegetation typically adapted for life in saturated soil conditions, or any evidence of hydric soils or wetland hydrology. There are no wetlands at Honua'ula as jointly defined by the Corps of Engineers (33 CFR 328.3) and Environmental Protection Agency (40 CFR 230.3).

The Draft EIS will discuss ephemeral dry gulches on the Honua'ula property and include discussion on ground-disturbing activities associated with construction.

Thank you for reviewing the EISPN. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



In Reply Refer To:
2009-TA-0172
2009-FA-0073

PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

APR 08 2009

Subject: Request for Technical Assistance for Proposed Honua'ula Subdivision, Kihei, Maui
To Whom it May Concern:

This letter acknowledges the U.S. Fish and Wildlife Service's March 9, 2009, receipt of your request for comments on an Environmental Impact Statement Preparation Notice addressing the proposed development of approximately 670 acres in Kihei, Maui (TMKs (2) 2-1-008:056 and 071 and (2) 2-1-008:999 (port)). The proposed master-planned community would include approximately 1,150 single family homes, commercial mixed uses, and a golf course. The northern 75 percent of the property has historically been managed for livestock grazing and is currently dominated by buffel grass and non-native shrubs. The southern portion of the property is covered by aa lava which contains scattered remnants of native Hawaiian dry forest. A 22-acre native plant preservation area would be conserved. Based on the project information you provided and pertinent information in our files, the threatened Newell's shearwater (*Puffinus newelli*) and the endangered Hawaiian petrel (*Pterodroma phaeopygia sandwicensis*) (collectively referred to as seabirds) are known to traverse the project area. The endangered Blackburn's sphinx moth (*Manduca blackburni*) and the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) may also occur within the project site.

The proposed project is located in a dry area of Maui where wildland fires interdependent with the proposed project may impact resources protected under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (ESA). To assist you, we have drafted a preliminary project action area to delineate the extent of the area which may be impacted by wildland fires associated with the proposed development (Figure 1). The action area is bounded along its north side by areas which are (according to information provided by James Robello, Maui County Executive Director, U.S. Department of Agriculture (USDA) Farm Service Agency, on January 6, 2009) intensively managed for agricultural purposes. The southern perimeter of the action area follows a lava flow which may serve as a fuelbreak. We have requested additional information from USDA regarding the spatial extent of intensive agricultural management in the vicinity of the proposed project area, upon which revisions to the draft action area could be based.



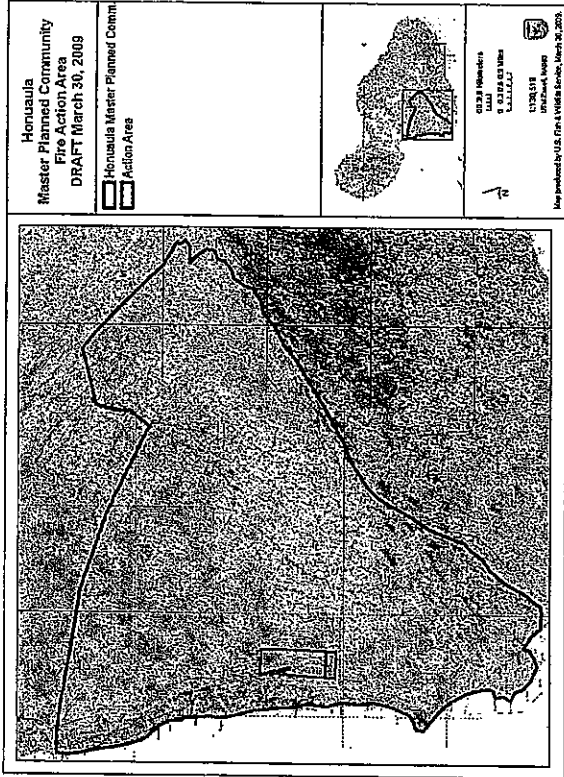


Figure 1. Honouliuli project draft action area.

The draft action area contains five listed animal species, eight listed plant species (Table 1), and designated critical habitat for one insect and five plant taxa (Table 2) occurs within the area which may be impacted by wildland fires resulting from the proposed development.

Table 1. Threatened and endangered species occurring within action area.

Scientific Name	Common Name	Status
<i>Lastiurus cinereus semotus</i>	Hawaiian hoary bat	Endangered
<i>Branta sandvicensis</i>	Hawaiian goose	Endangered
<i>Fulica americana alai</i>	Hawaiian coot	Endangered
<i>Himantopus mexicanus knudseni</i>	Hawaiian stilt	Endangered

Birds

Table 1 (continued). Threatened and endangered species occurring within the draft action area.

Scientific Name	Common Name	Status
<i>Manduca blackburni</i>	Blackburn's sphinx moth	Endangered
<i>Abutilon menziesii</i>	koelos ula	Endangered
<i>Achyranthes splendens var. rotundata</i>	round-leaved chaff-flower	Endangered
<i>Bonania menziesii</i>	no common name	Endangered
<i>Diellia erecta</i>	no common name	Endangered
<i>Diplazium molokaiense</i>	no common name	Endangered
<i>Geranium arboreum</i>	Hawaiian red-flowered geranium	Endangered
<i>Hibiscus brackenridgei</i>	māo hau hele; native yellow hibiscus	Endangered
<i>Melicope knudseni</i>	alāni	Endangered

Table 2. Critical habitat units occurring within the draft action area.

Critical Habitat Unit	Portion of Critical Habitat Unit Within Draft Action Area	
	Hectares (Acres)	Percent of Unit
<i>Manduca blackburni</i> - Maui 1	1503 ha (3715 ac)	94 %
<i>Manduca blackburni</i> - Maui 2	578 ha (1429 ac)	96 %
<i>Argyroxiphium sandwicense ssp. macrocephalum</i> - Unit 9	497 ha (1228 ac)	5%
<i>Bidens micrantha ssp. kalealaha</i> - Unit 9 b	32 ha (80 ac)	2%
<i>Clermontia lindseyana</i> - Unit 9 b	60 ha (148 ac)	100%
<i>Diellia erecta</i> - Unit 9 a	2 ha (5 ac)	100 %
<i>Geranium arboreum</i> - Unit 9 a	145 ha (358 ac)	20 %
<i>Geranium arboreum</i> - Unit 14 b	452 ha (1116 ac)	100 %
<i>Geranium arboreum</i> - Unit 15 c	251 ha (621 ac)	38 %

We recommend the following measures be incorporated into the project's Draft Environmental Impact Statement to minimize potential project impacts to listed species:

- Seabirds may traverse the project area at night during the breeding season (February 1 through December 15). Any outdoor lighting, particularly when used during each year's peak fledging period (September 15 through December 15), could result in seabird disorientation, fallout, and injury or mortality. Potential impacts to seabirds can be minimized by shielding outdoor lights associated with the project, avoiding night-time construction, and providing all project staff and residents with information regarding

seabird fallout. All project lights should be shielded so the bulb can be seen only from below.

- Blackburn's sphinx moth may occur in the project area. The adult moth feeds on nectar from native plants including beach morning glory (*Ipomoea pes-caprae*), ilice (*Plumbago zeylanica*), maiapilo (*Capparis sandwichtiana*), and the larvae feed upon non-native tree tobacco (*Nicotiana glauca*) and the native (*Nothocestrum laifitium*). All of these species may occur on the project site. We recommend you survey the site for the presence of Blackburn's sphinx moth host plants and if host plants are found, contact our office for further assistance.
- To minimize impacts to the endangered Hawaiian hoary bat, woody plants suitable for bat roosting should not be removed or trimmed during the bat birthing and pup rearing season (April to August). If this avoidance measure can not be implemented, bat surveys should be conducted and, if this species is found, our office should be contacted for additional assistance.
- Development may result in an increased fire risk. A number of recent human-caused fires have escaped containment by the available interagency initial attack fire suppression forces, resulting in significant impacts to listed species and critical habitat in the dry areas of Maui. In the project vicinity, intensive grazing may be reducing fuel load and wildland fire threat to listed resources. The Maui Wildland Fire Coordinating Group is partnering with our office to coordinate the development of fuelbreaks, water sources for firefighting, fire prevention projects, and an increased fire suppression response to minimize the impact of human-caused wildfires to listed plants, animals, and critical habitat on Maui. Agricultural practices implemented by private landowners in the project vicinity could be coordinated to minimize fuel load and fire threat. We recommend you coordinate with Maui County Department of Fire and Public Safety, Hawaii Department of Land and Natural Resources, USDA Farm Service Agency, USDA Natural Resource Conservation Service, adjacent landowners, and our office to ensure any wildland fire risk to listed resources, interdependent with the proposed development, is minimized.
- We recommend the use of native plants for landscaping purposes in order to reduce the spread of non-native invasive species. If native plants do not meet your landscaping objectives, we recommend that you choose species that are thought to have a low risk of becoming invasive. The following websites are good resources to use when choosing landscaping plants: Pacific Island Ecosystems at Risk (<http://www.hear.org/Pier/>), Hawaii-Pacific Weed Risk Assessment (http://www.botany.hawaii.edu/faculty/dashley/wra/full_table.asp) and Global Compendium of Weeds (www.hear.org/gcw/).
- To minimize erosion, sedimentation, and other adverse impacts to aquatic fish and wildlife resources and nearby coral reef ecosystems, we recommend that applicable measures identified in the enclosed list of Standard Best Management Practices (BMP) for fish and wildlife be incorporated into the project's BMP Plan.

PBR Hawaii

Implementation of these recommendations does not alleviate your responsibilities pursuant to the ESA, if a listed species may be affected by the proposed action. If the proposed project may affect a listed species and the project is funded, authorized, or carried about by a Federal agency, you should request that the Federal agency consult with us under section 7(a)(2) of the ESA. If there is no Federal nexus for the proposed action you should obtain an incidental take permit pursuant to section 10(a)(2)(B) of the ESA if incidental take of a listed species cannot be avoided. If you have questions or would like additional information, please contact Consultation and Technical Assistance Program Fish and Wildlife Biologist, Dawn Greenlee (phone: 808-792-9400; fax: 808-792-9581).

Sincerely,



Patrick Leonard
Field Supervisor



Enclosure

cc:

Office of Environmental Quality Control, State Land Use Commission, Honolulu, Hawaii
Maui Planning Department, Wailuku, Hawaii

Enclosure

U.S. Fish and Wildlife Service
Recommended Standard Best Management Practices

- The U.S. Fish and Wildlife Service recommends that the following measures be incorporated into projects to minimize the degradation of water quality and impacts to aquatic fish and wildlife resources:
- a. Turbidity and siltation from project-related work will be minimized and contained to within the vicinity of the site through the appropriate use of effective silt containment devices and the curtailment of work during adverse weather conditions;
 - b. Dredging and filling in the aquatic environment will be designed to avoid or minimize the loss special aquatic site habitat (pool/rifle areas, wetlands, etc.) and the unavoidable loss of such habitat will be compensated for;
 - c. All project-related materials and equipment (dredges, barges, backhoes, etc.) to be placed in the water will be cleaned of pollutants prior to use;
 - d. No project-related materials (fill, revetment rock, pipe, etc.) will be stockpiled in the water (stream channels, wetlands, etc.);
 - e. All debris removed from the aquatic environment will be disposed of at an approved upland or ocean dumping site;
 - f. No contamination (trash or debris disposal, alien species introductions, etc.) of adjacent aquatic environments (stream channels, wetlands, etc.) will result from project-related activities;
 - g. Fueling of project-related vehicles and equipment should take place away from the water and a contingency plan to control petroleum products accidentally spilled during the project will be developed. Absorbent pads and containment booms will be stored on-site, if appropriate, to facilitate the clean-up of accidental petroleum releases;
 - h. Any under-layer fills used in the project will be protected from erosion with (rock, core-loc units, etc.) as soon after placement as practicable; and
 - i. Any soil exposed near water as part of the project will be protected from erosion (with plastic sheeting, filter fabric, etc.) after exposure and stabilized as soon as practicable (with vegetation matting, hydroseeding, etc.).



PBR HAWAII
& ASSOCIATES, INC.

March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASLA
President

R. STANBURN, ASLA
Executive Vice-President
RUSSELL Y. CHUNG, FASLA, LEED^{AP}
Executive Vice-President

VINCENT SHIGERKIN
Vice-President

GRANT T. MURKAM, LEED^{AP}
Principal

W. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES
TOM SCINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MIKAMI YUEN, LEED^{AP}
Associate

SCOTT ALIKA-ARIBIGO, LEED^{AP}
Associate

SCOTT MURAKAWA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 521-5453
Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehale Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 571-5631
Fax: (808) 535-3163

Patrick Leonard, Field Supervisor
U.S. Department of the Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Blvd., Room 3-122, Box 50088
Honolulu, HI 96850

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Leonard:

Thank you for your letter dated April 8, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The most recent wildlife survey of the Honua'ula property did not identify any roosting or nesting seabirds within the property; however, we acknowledge that the Newell's shearwater (*Puffinus auricularis newelli*) and the Hawaiian petrel (*Pterodroma phaeopygia*) may transit the property, primarily at night. A discussion of this potential along with appropriate mitigation measures will be included in the Draft Environmental Impact Statement (EIS). A single Hawaiian hoary bat (*Lasiurus cinereus semotus*) was observed transiting the property during the course of our recent wildlife surveys; however, no evidence of bat roosting was found within the low elevation remnant dry shrubland at Honua'ula. These species will be addressed in the Draft EIS along with measures to mitigate construction impacts upon them, including the retention of many existing native trees and shrubs as natural landscaping for potential roosting sites.

Honua'ula Partners, LLC's biological consultant, SWCA Environmental Consultants, have coordinated and conducted several joint surveys of the property together with biologists from the U.S. Fish and Wildlife Service, Bishop Museum Department of Entomology, and Hawaii Department of Land and Natural Resources. Evidence of Blackburn's sphinx moths (*Manduca blackburni*) was found within the Honua'ula property during these surveys, including frass, cut stems and leaves, and live caterpillars. In all cases, sign was limited to a single plant species: the non-native tree tobacco (*Nicotiana glauca*). No adult Blackburn's sphinx moths were observed within the property during our studies. Some, but not all, of the native food plants for the moths are also found on the property.

The presence of Blackburn's sphinx moth (*Manduca blackburni*) caterpillars will be discussed in the Draft EIS. The most recent botanical survey of the property did not identify any Federal or State listed threatened or endangered plant species on the property. However, five individual candidate endangered 'āwīkīwīki (*Canavalia pubescens*) plants were identified and mapped within the property. The most recent wildlife and botanical surveys will be included in the Draft EIS.

Patrick Leonard, Field Supervisor

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010
Page 2 of 2

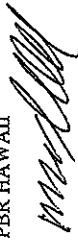
Your recommend mitigation measures to minimize potential impacts to threatened and endangered species will be included in the Draft EIS. At your recommendation, our biologists will address the potential for incidental take of listed and candidate endangered species and prepare a multi-species Habitat Conservation Plan (to include the candidate endangered 'awikawiki plant) under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with the State Department of Land and Natural Resources and the U.S. Fish and Wildlife Service.

Thank you for providing the preliminary project action area to delineate the extent of the area that may be impacted by wild land fires. Actions to mitigate the risk of wildfire and respond to such fires will be addressed in the Draft EIS.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN USPWS

Council Chair
Danny A. Ilesco

Vice-Chair
Michael J. Molina

Council Members
Gladys C. Brax
Jo Anne Johnson
Sol P. Kaho'olalahala
Bill Kaauka Medeiros
Wayne K. Nishiki
Joseph Poniawilla
Michael P. Victorino



COUNTY COUNCIL
COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauigov.net/council

November 16, 2009

PBR Hawaii & Associates
Attn: Mr. Tom Schnell
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
Fax: 808.523.1402
E-mail: sysadmin@pbrhawaii.com

Dear Mr. Schnell,

SUBJECT: Comments on Honua'ula Project (EA/EISPN)

Thank you for the opportunity to comment on the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). I am requesting to be a consulted party for this matter.

In summary, the EISPN: (1) lacks disclosure of all potential environmental impacts and consequences of the proposed action; and, (2) fails to provide the relevant data, necessary studies, and other information necessary "in order that the public can be fully informed and the agency can make a sound decision based upon the full range of responsible opinion on environmental effects." (See, HAR, Title 11, Chapter 200, § 11-200-16). The EISPN simply outlines the general scope of the project, while presenting unclear options without specific details or choices.

It is extremely concerning that this document fails to provide the required information and instead promises that information will be available at a later date. This is the same tactic used by the applicant when the issue was before the Maui County Council – where the applicant assured five members who voted in support of the project that more information would be provided at Phase II.

The document fails to include discussion of funding sources, impacts to ground water resources, traffic, drainage, cultural sites, cultural access and native flora and fauna. Where any hint of this information is mentioned, pertinent information is either omitted or portrayed inaccurately. The status of the required documents is also vague. It is never mentioned that the project has no approved AIS, yet the applicant writes as if all inventory level work has been completed and reviewed.

The document lacks available technical studies and instead merely informs the public that they will be included as appendices to the Draft EIS. For instance, the report submitted to the County Council during Project District Zoning and included as part of the project review under Condition 27 of Ordinance No. 3554, entitled "Remnant Wiliwili Forest Habitat at Wailea 670, should be included in those studies submitted in the DEIS.

Please note that on page 23, the condition to protect native plants and cultural sites (condition 27) is reproduced with an important phrase omitted. Condition 27 states, in relevant part, that it will "comprise the portion of the property south of latitude 20 40' 15.00 N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres."

The applicant's version states, in relevant part, that it will "comprise the portion of the property south of latitude 20 40' 15.00 N, excluding any portions that do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres."

This is a significant omission.

Apparently, the applicant will use the FEIS for the project as an application also for Project District Phase II approval. Both the FEIS and the Phase II approvals are done by the Maui Planning Commission (not the Council). The Commission should be provided sufficient information relating to impact assessment and mitigation reports that must be completed, reviewed and approved by the federal, state, and county agencies prior to Phase II approval.

Numerous conditions were attached to this project by the Maui County Council (Ordinance No. 3554). These conditions, which run with the land, should be a part of all assessments. I have attached a copy of these conditions for your consideration.

Specifically, these include;

A preservation/mitigation plan pursuant to Chapter 6E, HRS that has been approved by SHPD and OHA prior to Phase II approval. (Ordinance No. 3554, Condition 26)

A Cultural Resources Preservation Plan that has received the review and recommendations of SHPD and OHA and the subsequent approval of the Maui County Cultural Resources Commission prior to Phase II approval (Ord. No. 3554, Condition 13)

A Conservation Easement, entitled Native Plant Preservation Area, shall be developed prior to Phase II approval. The report "Remnant Wiliwili Forest Habitat at Wailea 670, Maui, Hawaii by Lee Altenberg, PhD, along with the applicants preservation/mitigation plan, shall receive review and recommendations from DLNR, USFWS and the USCE prior to Phase II

approval. (Ord. 3554, Cond. 27). Please understand that in the one hundred plus acres of the southern portion of the property, there are many rare and endangered native species found nowhere else in the world. The EISPN document fails to disclose that the property holds a pristine remnant native dryland forest with ancient wiliwili trees that represents a portion of the last remaining five percent of native Hawaiian dryland forest habitat to exist.

An assessment and mitigation measures of the endangered Hawaiian Short-eared Owl and the Hawaiian Hoary Bat, in coordination with DLNR, prior to submittal of Phase II processing. (Ord. No. 3554, Condition 9)

Again, each of these assessments must be fully completed in the DEIS.

"An EIS is meaningless without the conscientious application of the EIS process as a whole, and shall not be merely a self-serving recitation of benefits and a rationalization of the proposed action. Agencies shall insure that statements are prepared at the earliest opportunity in the planning and decision making process. This shall insure an early open forum for discussion of adverse effects and available alternatives, and that the decision makers will be enlightened to any environmental consequences of the proposed action" (11-200-14 HAR General Provisions).

Thank you for consideration of my comments. Please contact my office should you have any questions.

If you have any questions please contact my office at: 270.7108.


Mahalo,

WAYNE NISHIKI
Council Member

EXHIBIT "2"

Conditions of Zoning

1. That Honua'ula Partners, LLC, its successors and permitted assigns, shall, at their own cost and expense, develop, maintain, and operate, or cause to be developed, maintained, and operated, a private water source, storage facilities, and transmission lines for the Wailea 670 project in accordance with Department of Water Supply standards and all applicable community plans. Honua'ula Partners, LLC, its successors and permitted assigns, shall comply with all reporting requirements of the State Commission on Water Resource Management.

In addition, Honua'ula Partners, LLC, its successors and permitted assigns, shall comply with applicable water ordinances that pertain to the supply and transmission of water from the island of Maui when such ordinances are enacted.

At the time the project water system is completed, Honua'ula Partners, LLC, its successors and permitted assigns, shall offer to the County the right to purchase the project water system at the cost of development of such system.

The water rates for the residential workforce housing units shall be no higher than the general water consumer rates set by the County in its annual budget, for as long as the units are subject to Chapter 2.96, Maui County Code.

2. That Honua'ula Partners, LLC, its successors and permitted assigns, shall implement the following traffic improvements:

- a. Upgrade Piliāni Highway, from Kilohana Drive to Wailea Ike Drive, to four lanes of traffic. The improvements shall be completed prior to the commencement of any construction on the site, with the exception of grading.
- b. Extend Piliāni Highway for two lanes of traffic from Wailea Ike Drive to Kaukahi Street. The improvement shall be constructed at or prior to the completion of 50 percent of the project. Said improvement shall be maintained by Honua'ula Partners, LLC, its successors and permitted assigns.
- c. Signalize the Piliāni Highway/Okolani Drive/Mikioi Place intersection and provide an exclusive left-turn lane on Okolani Drive prior to occupancy of the first unit in Kihēi-Makēna Project District 9.
- d. Modify the Piliāni Highway/Wailea Ike Drive intersection into a signalized intersection and provide a free right-turn lane from Piliāni Highway to Wailea Ike Drive and a second right-turn lane from

Wailea Ike Drive to northbound Piliāni Highway prior to occupancy of the first unit in Kihēi-Makēna Project District 9.

- e. Modify the Wailea Alanui/Wailea Ike Drive intersection to add a signalized double right-turn movement from northbound to eastbound turning traffic and provide two left-turn lanes for southbound traffic from Wailea Ike Drive prior to occupancy of the first unit in Kihēi-Makēna Project District 9.
- f. Modify the Piliāni Highway/Kilohana Drive/Mapu Place intersection to provide an exclusive left-turn lane, and the southbound Piliāni Highway approach to provide an exclusive right-turn lane into Mapu Place prior to occupancy of the first unit in Kihēi-Makēna Project District 9.
- g. Signalize the Wailea Ike Drive/Kalai Waa Street intersection in coordination with Wailea Resort and Makēna Resort when warranted.
- h. Signalize the Wailea Alanui/Kaukahi Drive/Kaukahi Street intersection in coordination with Wailea Resort and Makēna Resort when warranted.

3. That, as represented, Honua'ula Partners, LLC, its successors and permitted assigns, shall make a contribution to the County for traffic improvements in an amount equal to \$5,000 per unit. The contribution shall be paid to the County prior to issuance of a building permit. Upon adoption of a traffic impact fee ordinance, Honua'ula Partners, LLC, its successors and permitted assigns, shall comply with the ordinance in lieu of this voluntary contribution. Should a traffic impact fee ordinance be adopted prior to the collection of this contribution, the applicable amount shall be the greater of the two. Such contributions or fees shall not be a substitute for any other traffic infrastructure requirements related to the Change in Zoning.

4. That Honua'ula Partners, LLC, its successors and permitted assigns, shall be responsible for all required infrastructural improvements for the project, including water source and system improvements for potable and nonpotable use and fire protection, drainage improvements, traffic-related improvements, wastewater system improvements and utility upgrades, as determined by the appropriate governmental agencies and public utility companies. Except as otherwise provided by more specific conditions of zoning, said improvements shall be constructed and implemented concurrently with the development of each phase of Kihēi-Makēna Project District 9, and shall be completed prior to issuance of any certificate of occupancy or final subdivision approval, unless improvements are bonded by Honua'ula Partners, LLC, its successors and permitted assigns. Honua'ula Partners, LLC shall execute appropriate agreements with governmental agencies regarding participation in improvements of infrastructure and public facilities as determined by the agencies.

5. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide workforce housing in accordance with Chapter 2.96, Maui County Code (the "Residential Workforce Housing Policy"); provided that, 250 of the required workforce housing units shall be located at the Kaonoulu Light Industrial Subdivision and completed prior to any market-rate unit, that 125 of those workforce housing units shall be ownership units, and that 125 of those units shall be rental units. In addition, construction of those workforce housing units shall be commenced within two years, provided all necessary permits can be obtained within that timeframe. Honua'ula Partners, LLC, its successors and permitted assigns, shall provide a minimum two-acre park at the Kaonoulu Light Industrial Subdivision, which shall be credited toward the requirements of Section 18.16.320, Maui County Code, for that subdivision.

6. That a Drainage Master Plan and Phasing Plan of improvements shall be submitted for review and approval during Project District Phase II processing. Said plan shall include the recommended drainage improvements as represented in the Preliminary Drainage Report. The County may require periodic updates of the Drainage Master Plan and Phasing Plan.

7. That Honua'ula Partners, LLC, its successors and permitted assigns, shall prepare an animal management plan that shall be submitted during Project District Phase II processing and approved by the Department of Land and Natural Resources prior to submittal of Project District Phase III processing. Said plan shall include procedures for the management of animal intrusions including, but not limited to, construction of boundary or perimeter fencing, wildlife control permits, and rodent and feral cat control. Honua'ula Partners, LLC, its successors and permitted assigns, shall implement the approved animal management plan. The Department of Land and Natural Resources may require periodic updates of the plan.

8. That Honua'ula Partners, LLC, its successors and permitted assigns, shall inform owners within Kihei-Makana Project District 9 that the area is subject to the intrusion of mammals such as axis deer, pigs, and rodents, and the impacts and management plan associated with such intrusions.

9. That Honua'ula Partners, LLC, its successors and permitted assigns, shall prepare an assessment of the owl (Pueo or Hawaiian Short-eared Owl) and the Hawaiian Hoary Bat in coordination with the Department of Land and Natural Resources, and, if appropriate, mitigative measures shall be incorporated into Kihei-Makana Project District 9. Said assessment shall be prepared prior to submittal of Project District Phase II processing.

10. That, in lieu of the dedication of a Little League Field and related amenities as originally specified in Ordinance No. 2171 (1992), Exhibit "B", Condition No. 8, and based on current land and construction cost estimates for the Little League Field, not less than \$5,000,000 shall be paid to the County upon Project District

Phase II approval for the development of the South Maui Community Park. Said amount shall not be credited against future park assessments.

11. That Honua'ula Partners, LLC is proposing to develop 6 acres of private parks and 84 acres of open space within the development. Said private parks shall be open to the public and privately maintained. Furthermore, said private parks and open space shall not be used to satisfy the park assessment requirements under Section 18.16.320, Maui County Code, or for future credits under said subdivision ordinance. The Director of Parks and Recreation and Honua'ula Partners, LLC agree that the park assessment shall be satisfied with an in-lieu cash contribution for the entire project. The amounts and timing of payment of said in-lieu fees shall be subject to the provisions of Section 18.16.320, Maui County Code.

12. That, as represented by Honua'ula Partners, LLC, the golf course shall be subject to the following conditions:

a. Honua'ula Partners, LLC, its successors and permitted assigns, shall permit one nonprofit organization per quarter of the calendar year, other than Maui Junior Golf Association ("Maui Junior Golf"), the use of the golf course and the clubhouse for a fund-raising activity upon terms mutually agreed upon with said nonprofit organization.

b. Honua'ula Partners, LLC, its successors and permitted assigns, shall: (1) develop an organized instructional program for junior golfers at its facility from September to January each year; (2) permit Maui Junior Golf the use of the golf course in accordance with Honua'ula Partners, LLC's instructional program; and (3) sponsor one Maui Junior Golf fund-raising tournament per year. The terms of the Junior Golf Program by Honua'ula Partners, LLC shall be as follows:

The instructional program will be developed to teach youngsters ages 12 to 18 years of age the fundamentals of golf and how to play the game, while also providing quality instruction/training three days a week from September 1 through January 31, with some blackout dates. This program will support the overall efforts of Maui Junior Golf.

Private lessons will also be available at a discounted rate of 50 percent of the regular rate based on two lessons per junior golfer for a maximum of 50 lessons per month from February through August on a space-available basis.

For the annual fund-raising event for the Maui Junior Golf, the rate per player shall be 50 percent of the regular rate with the number of golfers limited to no more than 144 players per event.

- c. Honua'ula Partners, LLC, its successors and permitted assigns, shall permit the Maui Interscholastic League ("MIL") and the Hawaii High School Athletic Association ("HHSAA") to each use the golf course once per year for an official MIL golf tournament or an official HHSAA golf tournament if requested by the MIL or the HHSAA, or for regular season play-offs if requested by the MIL.
- d. Honua'ula Partners, LLC, its successors and permitted assigns, shall permit Maui residents to play at the golf course on Tuesday of each week. The charge for Maui residents for green fees, including golf cart rental fees, shall not exceed 40 percent of the average market rate for green fees and golf cart rental fees in South Maui, and shall exclude all membership fees.
13. That Honua'ula Partners, LLC, its successors and permitted assigns, shall prepare a Cultural Resources Preservation Plan ("CRPP"), in consultation with: Na Kupuna O Maui; lineal descendants of the area; other Native Hawaiian groups; the Maui County Cultural Resources Commission; the Maui/Lanai Island Burial Council; the Office of Hawaiian Affairs; the State Historic Preservation Division, Department of Land and Natural Resources; the Maui County Council; Na Ala Hele; and all other interested parties. Prior to initiating this consultation process, Honua'ula Partners, LLC, its successors and permitted assigns, shall publish a single public notice in a Maui newspaper and a State-wide newspaper that are published weekly. The CRPP shall consider access to specific sites to be preserved, the manner and method of preservation of sites, the appropriate protocol for visitation to cultural sites, and recognition of public access in accordance with the Constitution of the State of Hawaii, the Hawaii Revised Statutes, and other laws, in Kihai-Makena Project District 9.
14. Upon completion of the CRPP, Honua'ula Partners, LLC, its successors and permitted assigns, shall submit the plan to the State Historic Preservation Division, Department of Land and Natural Resources, and the Office of Hawaiian Affairs for review and recommendations prior to Project District Phase II approval. Upon receipt of the above agencies' comments and recommendations, the CRPP shall be forwarded to the Maui County Cultural Resources Commission for its review and adoption prior to Project District Phase II approval.
14. That a nonpotable water supply system shall be utilized for all irrigation purposes.
15. That, during construction, all dust control shall utilize nonpotable water or effluent, which may be obtained from the Kihai Wastewater Reclamation Facility when available.
16. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide a Sewage Disposal Analysis that has been reviewed and commented on by the State Department of Health, the State Department of Land and Natural Resources,

the County Department of Environmental Management, and the County Department of Water Supply prior to Project District Phase II approval. The Sewage Disposal Analysis, along with reviews and comments, shall be submitted to the Maui County Council for review and the project shall be subject to additional conditions or amendments by the Maui County Council if warranted by the Sewage Disposal Analysis.

17. That Honua'ula Partners, LLC, its successors and permitted assigns, shall construct, maintain, and/or participate in the operation of a private wastewater treatment facility and system that accommodate the needs of the entire Kihai-Makena Project District 9. All reclaimed water from the private wastewater treatment facility shall be utilized for irrigation, dust control, or other nonpotable purposes, and none of the reclaimed water shall be placed into injection wells.
- The sewer rates for the residential workforce housing units shall be no higher than the residential sewer rates set by the County in its annual budget, for as long as the units are subject to Chapter 2.96, Maui County Code.
18. That Honua'ula Partners, LLC, its successors and permitted assigns, shall address in their Project District Phase II application the following:
- a. Condition 1 of the Department of Health's "Twelve Conditions Applicable To All New Golf Course Development" ("12 Conditions") relating to an approved sampling plan, establishment of the baseline groundwater/vadose zone water quality, and if appropriate, nearshore water quality, has been met to the satisfaction of the Director of Health;
 - b. Conditions 2 and 3 of the Department of Health's "12 Conditions" relating to groundwater monitoring have been satisfied by the Director of Health;
 - c. Condition 4 relating to the preliminary proposal of the individual treatment system meets the requirements of the Department of Health, and final design shall be approved at the time of Project District Phase III;
 - d. Condition 5 of the Department of Health's "12 Conditions" relating to use of effluent has been satisfied;
 - e. Condition 6 of the Department of Health's "12 Conditions" relating to golf carts and storage of petroleum has been addressed and incorporated in the design and layout of the buildings;
 - f. Conditions 7, 8, and 11 of the Department of Health's "12 Conditions" relating to fertilizers, biocides, and pesticides and the Integrated Golf Course Management Plan have been reviewed, and comments from the Department of Agriculture and the Department of Health have been incorporated in the design and layout of the golf courses;

assurance measures. The water quality data shall be submitted annually to HDOH for use in the State's Integrated Report of Assessed Waters prepared under Clean Water Act Sections 303(d) and 305(b). If this report lists the receiving waters as impaired and requiring a Total Maximum Daily Load ("TMDL") study, then the monitoring program shall be amended to evaluate land-based pollutants, including: (1) monitoring of surface water and groundwater quality for the pollutants identified as the source of the impairment; and (2) providing estimates of total mass discharge of those pollutants on a daily and annual basis from all sources, including infiltration, injection, and runoff. The results of the land-based pollution water quality monitoring and loading estimate shall be submitted to the HDOH Environmental Planning Office, TMDL Program.

The ecological monitoring shall include ecological assessment in accordance with the Coral Reef Assessment and Monitoring Program protocols used by the Department of Land and Natural Resources. The initial assessment shall use the full protocol. Subsequent annual assessments can use the Rapid Assessment Techniques. Results shall be reported annually to the Aquatic Resources Division, Department of Land and Natural Resources.

21. That all exterior lighting shall be shielded from adjacent residential properties and near shore waters. Lighting requirements in force at the time of building permit application shall be applied.

22. That Honua'ula Partners, LLC, its successors and permitted assigns, shall pay the Department of Education \$3,000 per dwelling unit upon issuance of each building permit to be used, to the extent possible, for schools serving the Kihei-Makana Community Plan area; provided that, should the State pass legislation imposing school impact fees that apply to Kihei-Makana Project District 9, Honua'ula Partners, LLC, its successors and permitted assigns, shall from that point forward comply with the State requirements, or contribute \$3,000 per dwelling unit, whichever is greater.

23. That Honua'ula Partners, LLC, its successors and permitted assigns, shall fund and construct adequate civil defense measures as determined by the State and County of Maui civil defense agencies.

24. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide to the County two acres of land with direct access to the Piilani Highway extension for the development of fire control facilities within the village mixed-use sub-district at the time 50 percent of the total unit/lot count has received either a certificate of occupancy or final subdivision approval. The acreage provided shall have roadway and full utility services provided to the parcel.

g. Condition 9 of the Department of Health's "12 Conditions" relating to noise from maintenance facilities has been addressed through the location and design of the maintenance activities and facilities;

h. Condition 10 of the Department of Health's "12 Conditions" and the County Department of Environmental Management's concerns and recommendations relating to solid waste disposal management activities and facilities are identified and designed;

i. Condition 12 of the Department of Health's "12 Conditions" relating to soil runoff during construction and concerns of the State Department of Transportation; the County Department of Public Works; the State Department of Health; and the Natural Resources Conservation Service of the United States Department of Agriculture relating to drainage are addressed and incorporated in the design and layout of the plans, and a preliminary erosion control and drainage report is included in the application;

j. Confirmation from Maui Electric Company, Ltd. ("MECO") that the proposal to relocate and/or landscape MECO facilities is incorporated in the application and site plan; and

k. Roadway improvements to the satisfaction of the State Department of Transportation and the County Department of Public Works and proposed agreements are incorporated in the application and site plan and finalized as part of Project District Phase II approval.

19. That Honua'ula Partners, LLC, its successors and permitted assigns, shall execute appropriate agreements with the State of Hawaii and County of Maui agencies regarding participation in improvements of infrastructure and public facilities where such improvements are reasonably related to Honua'ula Partners, LLC's project.

20. That marine monitoring programs shall be conducted which include monitoring and assessment of coastal water resources (groundwater and surface water) that receive surface water or groundwater discharges from the hydrologic unit where the project is located. Monitoring programs shall include both water quality and ecological monitoring.

Water Quality Monitoring shall provide water quality data adequate to assess compliance with applicable State water quality standards at Hawaii Administrative Rules Chapter 17-54. Assessment procedures shall be in accordance with the current Hawaii Department of Health ("HDOH") methodology for Clean Water Act Section 305(b) water quality assessment, including use of approved analytical methods and quality control/quality

That Honua'ula Partners, LLC, its successors and permitted assigns, shall contribute \$550,000 to the County for the development of a police station in South Maui, to be paid at the time a contract is entered into for the construction of that police station.

25. That no transient vacation rentals or time shares shall be allowed within Kihai-Makena Project District 9; and further, no special use permit or conditional permit for such accommodations shall be accepted by the Department of Planning.

26. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide a preservation/mitigation plan pursuant to Chapter 6E, Hawaii Revised Statutes, that has been approved by the State Historic Preservation Division, Department of Land and Natural Resources, and the Office of Hawaiian Affairs prior to Project District Phase II approval.

27. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide the report "Remnant Wiliwili Forest Habitat at Wailea 670, Maui, Hawaii by Lee Altenberg, Ph.D.", along with a preservation/mitigation plan, to the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers for review and recommendations prior to Project District Phase II approval. The Maui Planning Commission shall consider adoption of the plan prior to Project District Phase II approval.

Such plan shall include a minimum preservation standard as follows: That Honua'ula Partners, LLC, its successors and permitted assigns, shall establish in perpetuity a Conservation Easement (the "Easement"), entitled "Native Plant Preservation Area", for the conservation of native Hawaiian plants and significant cultural sites in Kihai-Makena Project District 9 as shown on the attached map. The Easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres.

The scope of the Easement shall be set forth in an agreement between Honua'ula Partners, LLC and the County that shall include:

a. A commitment from Honua'ula Partners, LLC, its successors and permitted assigns, to protect and preserve the Easement for the protection of native Hawaiian plants and significant cultural sites worthy of preservation, restoration, and interpretation for public education and enrichment consistent with a Conservation Plan for the Easement developed by Honua'ula Partners, LLC and approved by the State Department of Land and Natural Resources, the United States Geological

Survey, and the United States Fish and Wildlife Service; and with a Cultural Resource Preservation Plan, which includes the management and maintenance of the Easement, developed by Honua'ula Partners, LLC and approved by the State Department of Land and Natural Resources (collectively, the "Conservation/Preservation Plans").

b. That Honua'ula Partners, LLC, its successors and permitted assigns, shall agree to confine use of the Easement to activities consistent with the purpose and intent of the Easement.

c. That Honua'ula Partners, LLC, its successors and permitted assigns, shall be prohibited from development in the Easement other than erecting fences, enhancing trails, and constructing structures for the maintenance needed for the area, in accordance with the Conservation/Preservation Plans.

d. That title to the Easement shall be held by Honua'ula Partners, LLC, its successors and permitted assigns, or conveyed to a land trust that holds other conservation easements. Access to the Easement shall be permitted pursuant to an established schedule specified in the Conservation/Preservation Plans to organizations on Maui dedicated to the preservation of native plants, to help restore and perpetuate native species and to engage in needed research activities. These organizations may enter the Easement at reasonable times for cultural and educational purposes only.

e. Honua'ula Partners, LLC, its successors and permitted assigns, shall be allowed to receive all tax benefits allowable under tax laws applicable to the Easement at the time that said Easement is established in Kihai-Makena Project District 9, which will be evidenced by the recordation of the Easement in the Bureau of Conveyances, State of Hawaii.

28. That, prior to the commencement of any construction activity, Honua'ula Partners, LLC, its successors and permitted assigns, shall develop and submit a Transportation Management Plan ("TMP"), to be reviewed and approved by the State Department of Transportation, the County Department of Public Works, and the County Department of Transportation. The purpose of the TMP shall be to reduce traffic generated by construction activity related to the Kaomoulu Light Industrial Subdivision and Kihai-Makena Project District 9, including traffic generated by the improvements to Pihani Highway between Kijohana Drive and Wailea Ike Drive. The TMP shall provide for programs such as park and ride, shuttles, and/or restrictions on worker access to ongoing construction activity during peak hour traffic. Upon approval, project contractors shall implement the TMP during construction activities. Honua'ula Partners, LLC, its successors and permitted assigns, shall submit an annual report to the State Department of Transportation, the County Department of Public Works, the County Department

of Transportation, and the Maui County Council to document the success of the TMP in meeting its benchmarks of reducing traffic during project construction.

That as part of the Project District Phase II application, Honua'ula Partners, LLC, its successors and permitted assigns, shall submit a TMP to reduce the dependency on individual vehicular transportation modes. The TMP shall be reviewed and approved by the State Department of Transportation, the County Department of Public Works, and the County Department of Transportation prior to Project District Phase II approval.

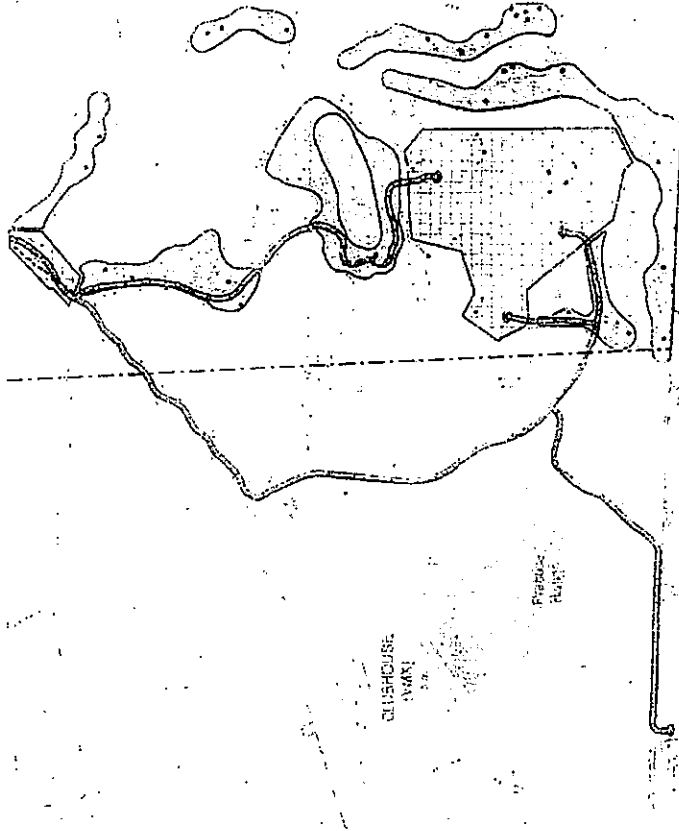
29. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide annual compliance reports to the Department of Planning and the Maui County Council on the status of the project and progress in complying with the conditions imposed, commencing within one year of the effective date of the ordinance.

30. All energy systems for all residential units shall be designed and constructed to meet all applicable ENERGY STAR requirements established by the Climate Protection Division of the United States Environmental Protection Agency in effect at the time of construction. For purposes of this condition, energy systems shall include all hot water systems, roof and attic areas, outside walls, windows, air cooling systems, and heating systems.

All residential units shall be equipped with a primary hot water system at least as energy efficient as a conventional solar panel hot water system, sized to meet at least 80 percent of the hot water demand for the respective units.

All air cooling systems and all heating systems for laundry facilities, swimming pools, and spa areas shall make maximum use of energy-efficient construction and technology.

20°40'15.00"N



20°40'15.00"W

Legend

- Existing Native Plants (Kala) Sites (red)
- Existing Native Plants (green)
- Existing Native Plants (yellow)
- Existing Native Plants (blue)
- Archaeological Sites (To Be Preserved)

Approx. Area (Acres)
Native Plant Preservation Area
Native Plant Management / Botanical Sites Area
Respective Trail (non-Adjacent) (with interpretive signs)
TOTAL: 17.45 AC

All areas used to be held vacant and are used to establish appropriate boundaries that relate to the existing topography, and proposed future wetland plans for the area. All adjacent areas for poll control, erosion and maintenance will be necessary.

Other 5 units of secondary plans that will be prepared.

BOTANICAL HABITAT PRESERVATION PLAN

1:50000

1:50000



0 100 200 300 400 500



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASIA
President

STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL LOHUNG FASILA, LEED[®] AP
Executive Vice-President

VINCENT SHIGERUNI
Vice-President

BRANT T. MURAKAMI, AICP, LEED[®] AP
Principal

FRANK BRANDT, ASIA
Chairman Emeritus

ASSOCIATES

TONY SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

DEVIN K. NISHIKAWA, ASIA
Associate

YIM MIKAMI YUEN, LEED[®] AP
Associate

SCOTT AJIRA BRIGO, LEED[®] AP
Associate

SCOTT MURAKAMI, ASIA, LEED[®] AP
Associate

ACHENG DONG, LEED[®] AP
Associate

HONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-2463
Tel: (808) 521-5631
Fax: (808) 523-1007
E-mail: syed@pbrhawaii.com

CAPOLU OFFICE
101 Kaimoili Boulevard
Spaulds Building, Suite 313
Honolulu, Hawaii 96813-2005
Tel: (808) 521-4531
Fax: (808) 525-3163

ORDINANCE NO. _____
BILL NO. 22 (2008)

A BILL FOR AN ORDINANCE TO REPEAL ORDINANCE NO. 2171 (1992) AND TO ESTABLISH KIHEI-MAKENA PROJECT DISTRICT 9 (WAILAEA 670) ZONING (CONDITIONAL ZONING), FOR APPROXIMATELY 670 ACRES SITUATED AT PAAHAU, PALAUEA, KEAUKOU, MAUI, HAWAII

This bill proposes to repeal Ordinance No. 2171 and to establish Kihei Project District 9 (Wailea 670) zoning (conditional zoning) for property situated at Paaahu, Palauea, Keauhou, Maui, Hawaii, identified for real property tax purposes by Tax Map key Nos. (2) 2-1-008:056 and (2) 2-1-008:071, comprised of approximately 670 acres.

I, ROY T. HIRAGA, County Clerk of the County of Maui, State of Hawaii, DO HEREBY CERTIFY that the foregoing BILL NO. 22 (2008) was passed on First Reading at the February 8, 2008 meeting of the Council of the County of Maui, State of Hawaii, by the following vote:

AYES: Councilmembers Gladys C. Baisa, William J. Medeiros, Michael J. Molina, Joseph Pontanilla, Michael P. Victorino, and Vice-Chair Dennis A. Mateo.

NOES: Councilmembers Michelle Anderson, Jo Anne Johnson, and Chair G. Riki Hokama.

DATED at Waikuku, Maui, Hawaii, this 29th day of February, 2008.

ROY T. HIRAGA, COUNTY CLERK
COUNTY OF MAUI, STATE OF HAWAII

Copies of the foregoing Bill, in full, are on file in the Office of the County Clerk, County of Maui, for use and examination by the public.

Wayne Nishiki, Councilmember
Maui County Council
200 S. High Street
Waikuku, HI 96793

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**

Dear Councilmember Nishiki:

Thank you for your letter dated November 16, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

The EA/EISP/N was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR, and it will contain technical studies as appendices.

The Draft EIS will address issues regarding water, traffic, drainage, cultural sites, trails and access, and native flora and fauna, among other matters.

The Draft EIS will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554. We are aware of the conditions and timing requirements for various plans and studies required under the Conditions in Zoning attached to County of Maui Ordinance No. 3554. The required plans and studies will be provided as appendices to the Draft EIS. These will include: 1) a preservation/mitigation plan pursuant to Chapter 6E, Hawaii Revised Statutes (Condition 26); 2) a Cultural Resources Preservation Plan (Condition 13); 3) a Conservation and Stewardship Plan (Condition 27); and 4) an assessment and mitigation measures for the endangered Hawaiian Owl and Hoary Bat (Condition 9). All of these plans will be prepared in conformance with the requirements of the specific conditions.

In compliance with Condition 27, the report entitled "Remnant Wiliwili Forest Habitat at Wailea 670" by Dr. Lee Allenberg will be submitted to the Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the U.S. Corps of Engineers for review prior to Project District Phase II approval.

Councilmember Wayne Nishiki
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010
Page 2 of 2

In further compliance with Condition 27, Honua'ula Partners, LLC will provide a Native Plant Preservation Area within Honua'ula. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kamaio (876 acres) and 'Ahihi-Kiua'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

Further, the Conservation and Stewardship Plan will set forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Thank you for the clarification regarding the approving body for Project District Phase II application. The Draft Environmental Impact Statement (EIS) will indicate that the Maui Planning Commission is the approving body for Project District Phase II application.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

CHARMAINE TAVARES
MAYOR



COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY
FIRE PREVENTION BUREAU

780 ALUA STREET
WAILUKU, HAWAII 96793
(808) 244-9151
FAX (808) 244-1363

April 14, 2009

Mr. Tom Schnell, AICP
PBR Hawaii & Associates, Inc.
1001 Bishop Street, ASB Tower, Suite 650
Honolulu, Hawaii 96813-3484

Subject: Honua'ula Environmental Impact Statement Preparation Notice (EISPN)
TMK: (2)2-1-008-056 & 071

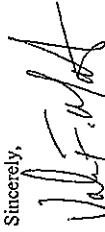
Dear Mr. Schnell,

I thank you for the opportunity to review the Honua'ula EISPN. It appears that the details includes the proposed 2 acres that will be presented to the County of Maui for future fire service facilities when the project reaches 50% completion.

We have no specific concerns at this time. In the future, our office will review the details of commercial and subdivision permits to make sure that they comply with the existing fire codes adopted by the County of Maui.

Please contact me if there are any questions or concerns regarding this issue.

Sincerely,



Valeriano F. Martin
Captain
Fire Prevention Bureau

cc: Office of Environmental Quality Control
Maui County Planning Department



PBR HAWAII
 & ASSOCIATES, INC.

March 9, 2010

DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
 COUNTY OF MAUI



CHARMAINE TAVARES
 Mayor
 LORI TSUJHAKO
 Director
 JO-ANN T. BIDAO
 Deputy Director

2000 MAIN STREET • SUITE 546 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7805 • FAX (808) 270-7165
 MAILING ADDRESS: 200 SOUTH HIGH STREET • WAILUKU, HAWAII 96793 • EMAIL: director.hhc@mauicounty.gov

April 7, 2009

Valeriano F. Martin, Captain
 County of Maui
 Department of Fire and Public Safety
 Fire Prevention Bureau
 780 Alua Street
 Wailuku, HI 96793

PBR HAWAII
 ASB Tower, Suite 650
 1001 Bishop Street
 Honolulu, Hawaii 96813
 Attention: Mr. Tom Schnell

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Captain Martin:

Thank you for your letter dated April 14, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We acknowledge that you have no specific comments at this time and that in the future your office will review the details of commercial and subdivision permits to make sure that they comply with the existing fire codes adopted by the County of Maui.

Thank you for reviewing the EISP/N. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
 Senior Associate

cc: Jeff Hunt, Maui Planning Department
 Charles Jencks, Honua'ula Partners, LLC

1985.08 EA BISP/N Fire Dept

PRINCIPALS
 THOMAS S. WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

KESEL Y. CHUNG, FASLA, LEED^{AP}
Executive Vice-President

INCENT SHIGERU
Vice-President

RANT T. MURAKAMI, AIA, LEED^{AP}
Principal

FRANK BRANDT, FASLA
Partner Emeritus

ASSOCIATES
 TOM SCHINDL, AICP
Senior Associate

AYMOND THIGA, ASLA
Senior Associate

EVYN K. NISHIKAWA, ASLA
Associate

JMI MIKAMI YUEN, LEED^{AP}
Associate

COTT ALIKA ABRIGO, LEED^{AP}
Associate

COTT MURAKAMI, ASLA, LEED^{AP}
Associate

ACHENG DONG, LEED^{AP}
Associate

ONUULU OFFICE
 901 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-3484
 Tel: (808) 521-5631
 Fax: (808) 525-1402
 Email: sps@mhghawaii.com

APOLEI OFFICE
 601 Kamaoia Boulevard
 3rd Floor Building, Suite 313
 Aiea, Hawaii 96707-2085
 Tel: (808) 355-3163

**SUBJECT: Proposed Honua'ula Project
 Draft Environmental Impact Statement**

We have reviewed the Draft Environmental Impact Statement for the proposed Honua'ula project and would like to offer the following comment:

1. Applicant has indicated that it would provide workforce affordable homes in compliance with Chapter 2.96, Maui County Code (MCC) (Residential Workforce Housing Policy).

2. We would like to note that pursuant to Section 2.96.040 of Chapter 2.96, MCC, the applicant is required to enter into a residential workforce housing agreement prior to final subdivision approval or issuance of a building permit for the subject project.

Please call Mr. Wayde Oshiro of our Housing Division at 270-7355 if you have any questions.

Sincerely,

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

cc: Office of Environmental Quality Control
 Maui Planning Department
 Housing Division

TO SUPPORT AND EMPOWER OUR COMMUNITY TO REACH ITS FULLEST POTENTIAL
 FOR PERSONAL WELL-BEING AND SELF-RELIANCE.



March 9, 2010

PRINCIPALS

HOMAS S. WITTEN, ASLA
President

LATAN DUNCAN, ASLA
Executive Vice-President

MUSSELY YI CHUNG PASLA, LEED AP
Executive Vice-President

JINCENT SHIGEKUNI
Vice-President

FRANK T. AURAKAWA, AICP, LEED AP
Principal

FRANK BRANDT PASLA
Chairman Emeritus

ASSOCIATES

TOM SCHNELL, AICP
Senior Associate

AYMOND T. HIGGA, ASLA
Senior Associate

JEVIN K. MISHIKAWA, ASLA
Associate

JIM MIKAMI YUEN, LEED AP
Associate

COTT ALKA ABRIGO, LEED AP
Associate

COTT AURAKAWA, ASLA, LEED AP
Associate

WACHENG DONG, LEED AP
Associate

HONOLULU OFFICE

801 Bishop Street, Suite 660
Honolulu, Hawaii 96813-3484
P: (808) 523-1402
F: (808) 523-1402
M: 808-523-1402
E: info@pbrhawaii.com

KAHOOLAWE OFFICE

801 Keolu Drive, Room 313
Keolu Building, Suite 313
Keolu, Hawaii 96707-2005
P: (808) 521-5631
F: (808) 521-5631
M: (808) 525-3169

Lori Tsubako, LSW, ACSW
County of Maui
Department of Housing and Human Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Tsubako:

Thank you for your letter dated April 7, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

Honua'ula will provide workforce housing in accordance with Chapter 2.96, Maui County Code. Honua'ula Partners, LLC will enter into a residential workforce housing agreement prior to final subdivision approval or issuance of a building permit.

Thank you for reviewing the EISP/N. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/N HHC

CHARMAINE TAVARES
Mayor



TAMARA HORCAJO
Director
ZACHARY Z. HELM
Deputy Director
(808) 270-7230
Fax (808) 270-7934

DEPARTMENT OF PARKS & RECREATION
700 Halli'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

April 6, 2009

PBR HAWAII
ASB Tower, Suite 650
Attention: Tom Schnell
1001 Bishop Street
Honolulu, Hawaii 96813

**SUBJECT: Environmental Impact Statement Preparation Notice (EISP/N)
Proposed Honua'ula Development
TMK (2) 3-5-008: 056 and 071
Wailuku, Maui, Hawaii**

Dear Mr. Schnell:

Based on our review of the proposed Honua'ula Development EISP/N, the Parks & Recreation Department has no objections at this time. The 6 acres of private parks and 84 acres of open space proposed to be developed outside of park assessment requirements, in addition to the agreement to satisfy the provisions of Section 18.16.320, Maui County Code, with an in-lieu cash contribution for the entire project, meets with our approval. The applicant's offer of payment of not less than \$5,000,000 to the County in lieu of the dedication of a Little League Field, upon Project District Phase II approval for the development of the South Maui Community Park is also acceptable. Finally, the applicant's agreement to support Maui Junior Golf, MIL athletic groups and provide reduced rates for kama'aina is a favorable commitment.

We are interested in reviewing more detailed plans for the Park as they are developed.

Please feel free to contact me or Mr. Patrick Matsui, Chief of Parks Planning and Development, at 270-7931 should you have any questions.

Sincerely,

TAMARA HORCAJO
Director

cc: Patrick Matsui, Chief of Parks Planning and Development
TH:PM:ca



March 9, 2010

PRINCIPALS

THOMAS S. WITTEN, ASIA
President

STAN DUNCAN, ASIA
Executive Vice-President

KESELLY L. CHUNG, ASIA, LEED AP
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

RANTU MURAKAMI, AICP, LEED AP
Principal

FRANK BRANDT, ASIA
Vice-President Emeritus

ASSOCIATES

DOMINIC SCHELL, AICP
Senior Associate

WYMOND T. HIGA, ASIA
Senior Associate

EVYN K. NISHIKAWA, ASIA
Associate

JUNI MIKAMI YUEN, LEED AP
Associate

COTT ALUAGA, AICP, LEED AP
Associate

COTT MURAKAMI, ASIA, LEED AP
Associate

MACHENG DONG, LEED AP
Associate

ONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3444
t: (808) 521-5631
f: (808) 529-1492
e: mail@pbrhawaii.com

APOLEI OFFICE

101 Kaimohe Boulevard
Apohele, Hawaii 96707-2005
t: (808) 521-5631
f: (808) 535-3163



CHARMAINE TAVARES
MAYOR

OUR REFERENCE
YOUR REFERENCE

**POLICE DEPARTMENT
COUNTY OF MAUI**

65 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411



THOMAS M. PHILLIPS
CHIEF OF POLICE
GARY A. YABUTA
DEPUTY CHIEF OF POLICE

April 15, 2009

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Horcajo:

Thank you for your letter dated April 6, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We acknowledge that the Department of Parks and Recreation has no objections at this time and that you are in agreement with the proposed parks, cash contribution, and agreement to support Maui Junior Golf.

We will provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Mr. Tom Schnell
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, HI 96813

Dear Mr. Schnell:

**SUBJECT: Environmental Impact Statement Preparation Notice – Honua'ula
TMK: (2) 2-1-008:56 and 71**

Thank you for your letter of March 8, 2009, requesting comments on the above subject.

We have reviewed the EISPN and have enclosed our comments and recommendations. Thank you for giving us the opportunity to comment on the proposed project.

Very truly yours,

Assistant Chief Wayne Ribao
for: Thomas M. Phillips
Chief of Police

Enclosure

c: Captain Lawrence Hudson, Technical Services
Jeffrey Hunt, Director, Maui County Planning Department
Office of Environmental Quality Control

1905.08 EA EISPN DPR

COPY

cc: CAPT. HUNTS

Notes
As of 04/08/09

TO : THOMAS PHILLIPS, CHIEF OF POLICE
VIA : CHANNELS [Signature] 04/08/09
FROM : LESTER WONG, LIEUTENANT (KIHEI DISTRICT)
SUBJECT : REVIEW & COMMENT - HONUA'ULA PROJECT

This memo in response to the request by PBR Hawaii & Associates (consultants for the Honua'ula project) to review and comment upon the proposed Honua'ula project in Wailea and the attached Environmental Impact Statement Preparation Notice (EISPN).
On 04/08/09, I met with Mr. Chatlie Jencks, Owner's Representative for the Honua'ula project. He explained that this is a preliminary notice that they are preparing an Environmental Impact Statement as required by the State of Hawaii. This is the former Wailea 670 project located at the current south end of Pili'ani Highway and along the southern border of the Maui Meadows subdivision.

The project area is intended for a maximum of 1,150 residential units and a golf course. It calls for extensive improvements to Pili'ani Highway (including a southerly extension to Ulupalakua Ranch), the Wailea Iki Drive at Pili'ani Highway intersection, the Wailea Iki Drive intersection with Wailea Alanui Drive, and a new road to connect the extended Pili'ani Highway to Kaukahi Street (next to Diamond Resort).

We will be given an opportunity to review and comment on the Environmental Impact Statement (EIS) upon its release. This document will be in more detail.

In an effort to update the existing information stated in Chapter-4 (Description of the Human Environment, Potential Impacts, and Mitigation Measures); Section 4.9 (Public Services and Facilities); Sub-section 4.9.2 (Police) on page-44, the following is recommended to be included for the EIS.

The Maui Police Department is headquartered at 55 Mahalani Street in Wailuku. Twenty-four hour full time uniformed police service for south Maui (Maalaea, Kihei, Wailea, and Makana) is provided by the Kihei Patrol District which is currently located in a leased storefront within the Kihei Town Center at 1881 South Kihei Road. The Kihei District Police Station has been in this location for the past nine years. It is 3.8 miles northwest of the main entrance to the Honua'ula project.

Currently, the Kihei Police District is commanded by 1-Police Captain, who is assisted by 1-Police Lieutenant, and 1-Civilian Clerk. Staffing for the Kihei District Station includes 7-Police Sergeants who supervise 30-Police Officer positions, 3-Community Police Officer positions, 2-Visitor Oriented Police Officer positions, and 1-School Resource Officer position. There are also 6-Public Safety Aides (civilian employees).

Projected for the near future is the construction of a new Kihei District Police Station to which will be located mauka of the intersection of Pili'ani Highway and Kanani Road. The full service police station will replace the current police station. This location will be 2.8 miles north of the main entrance to the Honua'ula project.

As a point of information within the EISPN document, the County of Maui has entered into a Unilateral Agreement which is mandated by Ordinance No. 3554. It stipulates that Honua'ula Partners, LLC will contribute \$550,000 to the County for the development of a police station in South Maui which will be paid at the time a contract is entered into for the construction of the new police station. Refer to page-44 of the EISPN.

Upon approval of this information, please forward it to the following:

- Consultant: PBR HAWAII (Contact: Tom Schnell)
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813
- State of Hawaii: Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813
- County of Maui: Maui Planning Department (Contact: Jeff Hunt, Director)
250 South High Street
Wailuku, Hawaii 96793

Submitted for your information and approval.

[Signature]
Lt. Lester Wong
04/08/09



March 9, 2010

PRINCIPALS

TIM MASS WITTEN, ASLA
President

R. STANFORD CANAN, ASLA
Executive Vice-President

RUSSELL S. L. CHUNG PASLA, LEED^{AP}
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. AURAKAKAMI, AICP, LEED^{AP}
Principal

W. FRANK BRANDT, PASLA
Chairman Emeritus

ASSOCIATES

YON SCHINELL, AICP
Senior Associate

RAYMOND T. HIGAN, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

RAMUKAMI YUEN, LEED^{AP}
Associate

SCOTT ALIKA ABRIGO, LEED^{AP}
Associate

SCOTT AURAKAKAMI, ASLA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 523-1402
Fax: (808) 523-1402
E-mail: opsadmin@pbrhawaii.com

KAPOLI OFFICE
1001 Kamaole Boulevard
Kapoli Building, Suite 313
Kapoli, Hawaii 96707-2005
Tel: (808) 521-5531
Fax: (808) 525-3164

Wayne Ribao, Assistant Chief
County of Maui
Police Department
55 Mahalani Street
Wailuku, HI 96793

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Ribao:

Thank you for your letter dated April 15, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We appreciate the updated information regarding Maui Police Department operations and staffing and will include this information in the Draft Environmental Impact Statement (EIS).

In compliance with County of Maui Ordinance No. 3554, Condition 24, Honua'ula Partners, LLC will contribute \$550,000 to the County for the development of the new Kihnei District Police station in South Maui, to be paid at the time a contract is entered into for the construction of that police station.

We will provide the Maui Police Department with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP/N. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/N Police Dept

CHARMAINE TAVARES
Mayor
MILTON M. ARAKAWA, A.I.C.P.
Director
MICHAEL M. NIYAMOTO
Deputy Director
Telephone: (808) 270-7846
Fax: (808) 270-7855



COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

March 30, 2009

RALPH NAGAMINE, L.S., P.E.
Development Services Administration
CARY YAMASHITA, P.E.
Engineering Division
BRIAN HASHIRO, P.E.
Highways Division

Mr. Tom Schnell
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Schnell :

**SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE FOR HONUAULA; TMK: (2)-1-008:056 AND 071**

We reviewed the subject application and have the following comments:

1. The applicant shall be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code and rules and regulations.
2. Construction plans shall be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Details for Public Works Construction, 1984, as amended.
3. Worksite traffic-control plans/devices shall conform to Manual on Uniform Traffic Control Devices for Streets and Highways, 2003.
4. Drainage and traffic master plans for the entire development is required. The traffic master plan must analyze regional traffic impacts as well.



Mr. Tom Schnell
March 30, 2009
Page 2

Please call Michael Miyamoto at 270-7845 if you have any questions regarding this letter.

Sincerely,


MILTON M. ARAKAWA, A.I.C.P.
Director of Public Works

MMA:MMM:is

cc: Highways Division
Engineering Division
Office of Environmental Quality Control
Planning Department, County of Maui
S:\LUCACZ\HW-Honuaia_eis_21008656_071_ls.wpd

March 9, 2010

PRINCIPALS

- THOMAS S. WITTEN, ASLA
President
- STEIN DUNCAN, ASLA
Executive Vice-President
- RUSSELL Y. CHUNG, FASLA, LEED*AP
Executive Vice-President
- VINCENT SHIGEKUNI
Vice-President
- FRANT T. MURAKAMI, AICP, LEED*AP
Principal
- W. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES

- TON SCHNELL, AICP
Senior Associate
- RAYMOND T. HIGA, ASLA
Senior Associate
- SEVIN K. NISHIKAWA, ASLA
Associate
- KUMI MIKAMI YUEN, LEED*AP
Associate
- SCOTT ALIKA ABRIGO, LEED*AP
Associate
- SCOTT MURAKAMI, ASLA, LEED*AP
Associate
- DACHENG DONG, LEED*AP
Associate

HONOLULU OFFICE
501 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5104
Tel: (808) 521-6431
Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

CAPOLEI OFFICE
501 Kamehale Boulevard
Capolei Building, Suite 313
Capolei, Hawaii 96707-2005
Tel: (808) 521-5631
Fax: (808) 535-3163

Milton M. Arakawa, A.I.C.P.
Director of Public Works
County of Maui
Department of Public Works
200 South High Street, Room No. 434
Wailuku, Maui, HI 96793

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Arakawa:

Thank you for your letter dated March 30, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

1. We acknowledge that Honua'ula Partners, LLC will be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code, and other rules and regulations.
2. Construction plans will be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standards Details for Public Works Construction, 1984, as amended.
3. Worksite traffic-control plans/devices shall conform to the Manual on Uniform Traffic Control Devices for Streets and Highways, 2003.
4. The Draft Environmental Impact Statement (EIS) will contain a: 1) preliminary engineering report with a drainage plan; and 2) traffic impact analysis report. The drainage plan will address the entire development. The traffic impact analysis report will analyze regional traffic impacts.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHONG, ASLA, LEED AP
Executive Vice-President

VINCENT SHIGERUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES
TONI SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MIKAKAMI YUEN, LEED AP
Associate

SCOTT ALJKA ABRIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 65D
Honolulu, Hawaii 96813-3484
Tel: (808) 521-5631
Fax: (808) 522-1402
E-mail: spainning@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehaha Boulevard
Kapolei Building, Suite 310
Kapolei, Hawaii 96707-3005
Tel: (808) 521-5631
Fax: (808) 525-3163

TRACY TAKAMINE, P.E.
Solid Waste Division
DAVID TAYLOR, P.E.
Wastewater Reclamation
Division



**COUNTY OF MAUI
DEPARTMENT OF
DEPARTMENTAL MANAGEMENT**
2200 MAIN STREET, SUITE 100
WAILUKU, MAUI, HAWAII 96783

May 18, 2009

CHARMAINE TAVARES
Mayor
CHERYL K. OKUMA, Esq.
Director
GREGG KRESGE
Deputy Director

Mr. Tom Schmell
PBR Hawaii & Associates Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, HI 96813

**SUBJECT: HONUA'ULA
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
TMK (2) 2-1-008: 056 AND 071**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:
 - a. None.
2. Wastewater Reclamation Division (WWRD) comments:
 - a. Since the proposed collection and treatment process will be privately owned and maintained we have no comments at this time.

If you have any questions regarding this memorandum, please contact Gregg Kresge at 270-8230.

Sincerely,

Cheryl K. Okuma, Director

xc: Office of Environmental Quality Control

Cheryl K. Okuma, Director
County of Maui
Department of Environmental Management
2200 Main Street, Suite 100
Wailuku, Maui, Hawaii 96793

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Okuma:

Thank you for your letter dated May 18, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your concerns.

Solid Waste Division

We acknowledge that the Solid Waste Division has no comments.

Wastewater Reclamation Division (WWRD)

We acknowledge that the WWRD has no comments at this time since the proposed collection and treatment process will be privately owned and maintained.

Thank you for reviewing the EISPN. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schmell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN DEB

CHARMAINE TAVARES
Mayor



JEFFREY K. ENG
Director
ERIC H. YAMASHIGE, P.E., L.S.
Deputy Director

DEPARTMENT OF WATER SUPPLY

COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793-2155
www.mauiwater.org

May 6, 2009

Mr. Tom Schnell
PER HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Subject: Honua'ula
TMK: (2)2-1-008:056 and 071

Dear Mr. Schnell:

Thank you for the opportunity to comment on this Environmental Impact Statement (EIS) Preparation Notice.

Source Availability and Consumption

We understand the applicant will develop a private water system to serve potable demand for the Honua'ula development. The EISPN is extremely vague regarding the proposed system. The EIS should identify and describe what potable water system, treatment and sources will be utilized and estimated potable and non-potable demand. Based on system standards, daily potable and non-potable demand for this project would be about 1,719,000 gallons. The EISPN notes that "the right to purchase" the system will be offered to the county. Water system development is required to provide service and redundancy according to Department standards. The system should be built to standards and dedicated to the county or indefinitely operated as a private system. Should the system have capacity beyond that required to serve the project with adequate redundancy, the excess capacity may be offered for purchase. The EIS should provide assurances that the source will both be adequate in the long term and no interfere or conflict with county plans for source development in this challenged system. We also note concerns with the growing number of private sources and systems in the county. These create multiple conduits for contamination of aquifers. Some are not adequately funded for long term maintenance and can cause substandard service in the future.

"By Water All Things Find Life"

The Department of Water Supply is an Equal Opportunity provider and employer. To file a complaint of discrimination, write: USDA, Director, Office of Civil Rights, Room 328-W, Willien Building, 14th and Independence Avenue, SW, Washington DC 20250-9410. Or call (202) 726-5964 (voice and TDD)

Printed on recycled paper

Tom Schnell
Page 2

Reporting on resource use is not as frequent with private systems and makes gaging of aquifer status more difficult.

Groundwater Resources and Water Quality

The project is overlying the Kamole aquifer which has a sustainable capacity of 11 MGD. According to the State Commission on Water Resource Management well database, there is 18.86 MGD pump capacity installed in the Kamaole aquifer. The EIS should discuss concerns and mitigation measures for a potential increase in chlorides at downgradient Wailea Golf Course irrigation wells once the Wailea 670 wells 4125-01 and 4125-02 are in production. According to the 2003 "Assessment of the Sources of Irrigation Supply for the three Wailea Resort Company Golf Courses in Wailea, Maui" prepared by Tom Nance, draft from the Wailea 670 wells will intercept and probably adversely impact the water quality of the Wailea Golf Course wells, due to the mauka-to-makai natural flow of groundwater.

System Infrastructure

Two fire hydrants and five stand pipes on 4-inch, 6-inch and 8-inch waterlines in the Maui Meadow subdivision are located North of the property. A 12-inch waterline runs along the North West portion of the property and a 12-inch water line traverses West to East to the Wailea Upper Level storage tank. Despite the proximity of these lines, substantial system improvements would be required to serve the project according to standards, including construction of storage.

Conservation

We note that non-potable water will be used for all irrigation purposes. We recommend that wherever possible, reclaimed water rather than brackish ground water be used for non potable purposes. Conservation measures should be included in the EIS. The following conservation measures should be considered:

Use Climate-adapted Plants: The project is located in the "Maui County Planting Plan" - Plant Zone 3. Native plants adapted to the area conserve water and protect the watersited from degradation due to invasive alien species. We encourage use of native plants for all landscaping purposes. Please distribute the attached planting brochure to future homeowners.

Prevent Over-Watering By Automated Systems: Provide rain-sensors on all automated irrigation controllers in common areas. Check and reset controllers at least once a month to reflect the monthly changes in evapo-transpiration rates at the site. As an alternative, provide the more automated, soil-moisture sensors on controllers.

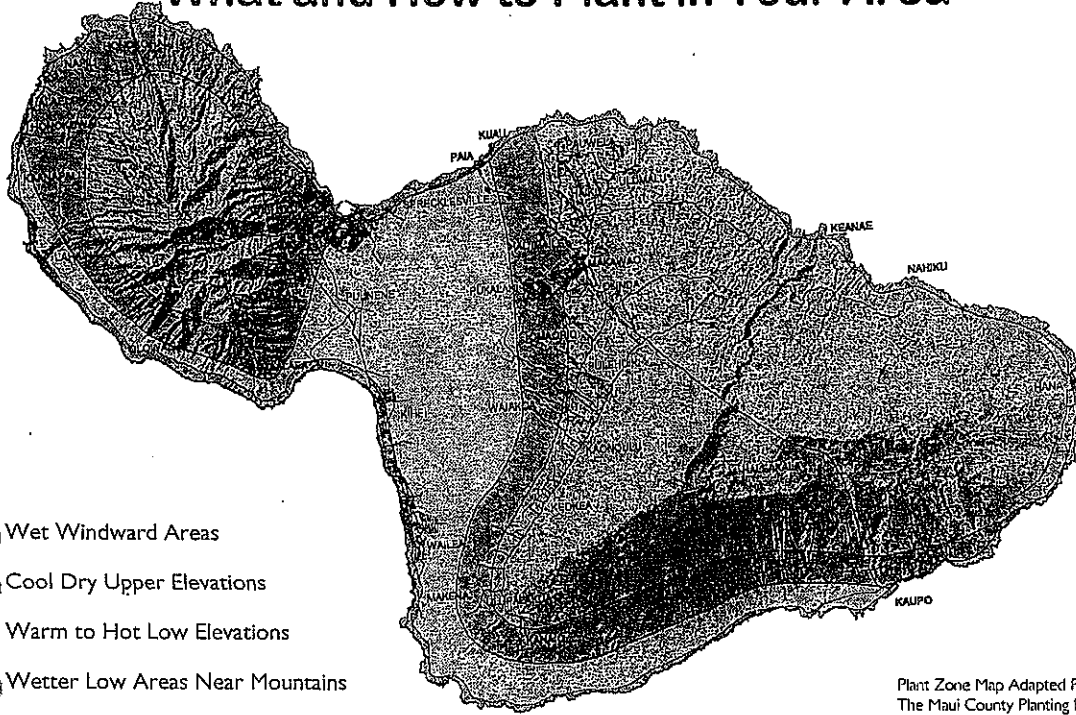
Eliminate Single-Pass Cooling: Single-pass, water-cooled systems should be eliminated per Maui County Code Subsection 14-21.20. Although prohibited by code, single-pass water cooling is still manufactured into some models of air conditioners, freezers, and commercial refrigerators.






Utilize Low-Flow Fixtures and Devices: Maui County Code Subsection 16.20A.680 requires the use of low-flow water fixtures and devices in faucets, showerheads, urinals, water closets, and hose bibs. Water conserving washing machines, ice-makers and other units are also available.

Maintain Fixtures to Prevent Leaks: A simple, regular program of repair and maintenance can prevent the loss of hundreds or even thousands of gallons a day.

Saving Water in The Yard

What and How to Plant in Your Area



-  Wet Windward Areas
-  Cool Dry Upper Elevations
-  Warm to Hot Low Elevations
-  Wetter Low Areas Near Mountains
-  Windward Coastal Salt Spray Zones

Plant Zone Map Adapted From
The Maui County Planting Plan

Tips From The Maui County Department of Water Supply
By Water All Things Find Life

Tom Schnell
Page 3


Pollution Prevention

The EIS should include Best Management Practices designed to minimize infiltration to ground water and runoff. The following mitigation measures should be implemented during construction:

1. Prevent cement products, oil, fuel and other toxic substances from falling or leaching into the water.
2. Properly and promptly dispose of all loosened and excavated soil and debris material from drainage structure work.
3. Retain ground cover until the last possible date.
4. Stabilize denuded areas by sodding or planting as soon as possible. Replanting should include soil amendments and temporary irrigation. Use high seeding rates to ensure rapid stand establishment.
5. Avoid fertilizers and biocides, or apply only during periods of low rainfall to minimize chemical run-off.
6. Keep run-off on site.

Should you have any questions please contact our Water Resources and Planning Division at (808) 244-8550.

Sincerely,



Jeffrey K. Eng, Director
emb

c: Office of Environmental Quality Control
Jeff Hunt, Maui County Department of Planning
engineering division

attachments: (w/original letter)
Plant Brochure: "Saving Water in the Yard"

C:\EA EIS SLUD\Honaunui EIS\PN.wpd

DO NOT PLANT THESE PLANTS !!!!

Common name	Scientific name	Plant family
	<i>Jasminum fluminense</i>	Oleaceae
	<i>Aristolochia ciliatum</i>	Melastomataceae
	<i>Dissotis rotundifolia</i>	Melastomataceae
	<i>Erigeron karvinskianus</i>	Asteraceae
	<i>Eucalyptus robusta</i>	Myrtaceae
	<i>Hedychium gardnerianum</i>	Zingiberaceae
	<i>Juncus planifolius</i>	Juncaceae
	<i>Lophosolen contortus</i>	Myrtaceae
	<i>Medinilla cumingii</i>	Melastomataceae
	<i>Medinilla magnifica</i>	Melastomataceae
	<i>Medinilla venosa</i>	Melastomataceae
	<i>Melastoma candidum</i>	Melastomataceae
	<i>Melinis minutiflora</i>	Poaceae
	<i>Olea europaea</i>	Oleaceae
	<i>Oxyspora paniculata</i>	Melastomataceae
	<i>Panicum maximum</i>	Poaceae
	<i>Paspalum urvillei</i>	Poaceae
	<i>Passiflora edulis</i>	Passifloraceae
	<i>Phormium tenax</i>	Agavaceae
	<i>Pinus taeda</i>	Pinaceae
	<i>Prosopis pallida</i>	Fabaceae
	<i>Pterolepis glomerata</i>	Melastomataceae
	<i>Rhodomyrtus tomentosa</i>	Myrtaceae
	<i>Schefflera actinophylla</i>	Araliaceae
	<i>Syzygium jambos</i>	Myrtaceae
Australian blackwood	<i>Acacia melanoxylon</i>	Mimosaceae
Australian tree fern	<i>Cyathea cooperi</i>	Cyatheaceae
Australian tree fern	<i>Sphaeropteris cooperi</i>	Cyatheaceae
Beggar's tick, Spanish needle	<i>Bidens pilosa</i>	Asteraceae
California grass	<i>Brachiaria mutica</i>	Poaceae
Chinese banyon, Maylayan banyon	<i>Ficus microcarpa</i>	Moraceae
Chinese violet	<i>Asystasia gangetica</i>	Acanthaceae
Christmasberry, Brazilian pepper	<i>Schinus terebinthifolius</i>	Anacardiaceae
Formosan koa	<i>Acacia confusa</i>	Mimosaceae
German ivy	<i>Senecio mikanoides</i>	Asteraceae
Japanese honeysuckle	<i>Lonicera japonica</i>	Caprifoliaceae
Koster's curse	<i>Clidemia hirta</i>	Melastomataceae
Lantana	<i>Lantana camara</i>	Verbenaceae
Mauritius hemp	<i>Furcraea foetida</i>	Agavaceae
Mexican ash, tropical ash	<i>Fraxinus uhdei</i>	Oleaceae
Mexican tulip poppy	<i>Hunnemannia tumanaifolia</i>	Papaveraceae
Mules foot, Madagascar tree fern	<i>AnGIOPTERIS evecta</i>	Marattiaceae
New Zealand laurel, karakaranul	<i>Corynocarpus laevigatus</i>	Corynocarpaceae
New Zealand tea	<i>Lepospermum scoparium</i>	Myrtaceae
Pampas grass	<i>Cortaderia jubata</i>	Poaceae
Panama rubber tree, Mexican rubber tree	<i>Castilloa elastica</i>	Moraceae
Shoebuttan ardisia	<i>Ardisia elliptica</i>	Myrsinaceae
banana poka	<i>Passiflora mollissima</i>	Passifloraceae

DO NOT PLANT THESE PLANTS !!!!

Common name	Scientific name	Plant family
black wattle	<i>Acacia mearnsii</i>	Mimosaceae
blackberry	<i>Rubus argutus</i>	Rosaceae
blue gum	<i>Eucalyptus globulus</i>	Myrtaceae
bocconia	<i>Bocconia frutescens</i>	Papaveraceae
broad-leaved cordia	<i>Cordia alliodora</i>	Boraginaceae
broomsedge, yellow bluestem	<i>Andropogon virginicus</i>	Poaceae
buffelgrass	<i>Cenchrus ciliaris</i>	Poaceae
butterfly bush, smoke bush	<i>Buddleia madagascariensis</i>	Buddleiaceae
cats claw, Mysore thorn, wait-a-bit	<i>Caesalpinia decapetala</i>	Caesalpinaceae
common ironwood	<i>Casuarina equisetifolia</i>	Casuarinaceae
common velvet grass, Yorkshire fog	<i>Holcus lanatus</i>	Poaceae
fiddlewood	<i>Citharexylum spinosum</i>	Verbenaceae
fire tree, faya tree	<i>Myrica faya</i>	Myricaceae
glorybower	<i>Clerodendrum japonicum</i>	Verbenaceae
hairy cat's ear, gnsmore	<i>Hypochoeris radicata</i>	Asteraceae
haole koa	<i>Leucaena leucocephala</i>	Fabaceae
ivy gourd, scarlet-fruited gourd	<i>Coccoloba grandis</i>	Cucurbitaceae
juniper berry	<i>Citharexylum caudatum</i>	Verbenaceae
kahili flower	<i>Grevillea banksii</i>	Proteaceae
klu, popinac	<i>Acacia farnesiana</i>	Mimosaceae
logwood, bloodwood tree	<i>Haematoxylon campechianum</i>	Caesalpinaceae
loquat	<i>Eriobotrya japonica</i>	Rosaceae
meadow ricegrass	<i>Ehrharta stipoides</i>	Poaceae
melaleuca	<i>Melaleuca quinquenervia</i>	Myrtaceae
miconia, velvet leaf	<i>Miconia calvescens</i>	Melastomataceae
narrow-leaved carpetgrass	<i>Axonopus fissifolius</i>	Poaceae
oleaster	<i>Elaeagnus umbellata</i>	Elaeagnaceae
oriental mangrove	<i>Bruquiera gymnorhiza</i>	Rhizophoraceae
padang cassia	<i>Cinnamomum burmannii</i>	Lauraceae
palmgrass	<i>Setaria palmifolia</i>	Poaceae
pearl flower	<i>Heterocentron subtriplinervium</i>	Melastomataceae
quinine tree	<i>Cinchona pubescens</i>	Rubiaceae
satin leaf, caimitillo	<i>Chrysophyllum oliviforme</i>	Sapotaceae
silkwood, Queensland maple	<i>Flindersia brayleyana</i>	Rutaceae
silky oak, silver oak	<i>Grevillea robusta</i>	Proteaceae
strawberry guava	<i>Psidium cattleianum</i>	Myrtaceae
swamp oak, saltmarsh, longleaf ironwood	<i>Casuarina glauca</i>	Casuarinaceae
sweet vernalgrass	<i>Anthoxanthum odoratum</i>	Poaceae
tree of heaven	<i>Ailanthus altissima</i>	Simarubaceae
trumpet tree, guarumo	<i>Cecropia obtusifolia</i>	Cecropiaceae
white ginger	<i>Hedychium coronarium</i>	Zingiberaceae
white moth	<i>Heliconia popayanensis</i>	Tillaceae
yellow ginger	<i>Hedychium flavescens</i>	Zingiberaceae

Selection

As a general rule, it is best to select the largest and healthiest specimens. However, be sure to note that they are not pot-bound. Smaller, younger plants may result in a low rate of plant survival.¹ When selecting native species, consider the site they are to be planted in, and the space that you have to plant. For example: Mountain species such as koa and maile will not grow well in hot coastal areas exposed to strong ocean breezes. Lowland and coastal species such as wiliwili and Kou require abundant sunshine and porous soil. They will not grow well with frequent cloud cover, high rainfall and heavy soil.

Consider too, the size that the species will grow to be. It is not wise to plant trees that will grow too large.² Overplanting tends to be a big problem in the landscape due to the underestimation of a species' height, width or spread.

A large, dense canopied tree such as the kukui is a good shade tree for a lawn. However, it's canopy size and density of shade will limit what can be planted in the surrounding area. Shade cast by a koa and oia lehua is relatively light and will not inhibit growth beneath it.

Keep seasons in mind when you are selecting your plants. Not all plants look good year round, some plants such as ilima will look scraggly after they have flowered and formed seeds. Avoid planting large areas with only one native plant. Mixing plants which naturally grow together will ensure the garden will look good all year round.³ Looking at natural habitats helps to show how plants grow naturally in the landscape.

When planting an area with a mixed-ecosystem, keep in mind the size and ecological requirements of each plant. Start with the hardiest and most easily grown species, but allow space for fragile ones in subsequent plantings.

Acquiring natives

Plants in their wild habitat must be protected and maintained. It is best and easiest to get your plants from nurseries (see list), or friend's gardens. Obtain proper permits from landowners and make sure you follow a few common sense rules:

- ▶ collect sparingly from each plant or area.
- ▶ some plants are on the state or Federal Endangered Species list. Make sure you get permits (see app. A,B)

¹ K. Nagata, P.6

² K. Nagata, P.9

³ Nagata, P.9

Soil

Once you have selected your site and the plants you wish to establish there, you must look at the soil conditions on the site. Proper soil is necessary for the successful growth of most native plants, which perform poorly in hard pan, clay or adobe soils. If natives are to be planted in these types of soil, it would be wise to dig planting holes several times the size of the rootball and backfill with 50-75% compost.⁴ A large planting hole ensures the development of a strong root system. The plant will have a headstart before the roots penetrate the surrounding poor soil.⁵

It is recommended that native plants not be planted in ground that is more dense than potting soil. If there is no alternative, dig a hole in a mound of soil mixed with volcanic cinder which encourages maximum root development. Fill the hole with water, if the water tends to puddle or drain too slowly, dig a deeper hole until the water does not puddle longer than 1 or 2 minutes.⁶ Well-drained soil is one of the most important things when planting natives as you will see in the next section.

Irrigation

Most natives do very poorly in waterlogged conditions. Do not water if the soil is damp. Water when the soil is dry and the plants are wilting. Once established, a good soaking twice a week should suffice. Deep soaking encourages the development of stronger, and deeper root systems. This is better than frequent and shallow watering which encourage weaker, more shallow root systems.

The following is a watering schedule from Kenneth Nagata's Booklet, *How To Plant A Native Hawaiian Garden*:

WATER REQUIREMENT

Heavy
Moderate
Light

WATERING FREQUENCY

3x / week
2x / week
1x / week

Red clay soils hold more water for a longer period of time than sandy soils do. If your area is very sunny or near a beach, things will dry out faster. Even in the area of one garden, there are parts that will need more or less water. Soils can vary and amount of shade and wind differ. After plants are established (a month or two for most plants, up to a year for some trees), you can back off watering.

⁴ Nagata, p. 6.

⁵ Nagata, p. 8

⁶ Nagata, p. 8

Automatic sprinkler systems are expensive to install and must be checked and adjusted regularly. Above-ground systems allow you to monitor how much water is being put out, but you lose a lot due to malfunctioning of sprinkler heads and wind. The most efficient way to save water and make sure your plants get enough water, is to hand-water. This way you are getting our precious water to the right places in the right amounts.⁷

Fertilizer

An all-purpose fertilizer 10-10-10 is adequate for most species. They should be applied at planting time, 3 months later, and 6 months thereafter. Use half the dosage recommended for ornamentals and pay special attention to native ferns which are sensitive to strong fertilizers. Use of organic composts and aged animal manures is suggested instead of chemical fertilizers. In addition, use of cinders for providing trace minerals is strongly recommended.⁸

Natives are plants which were here hundreds of years before the polynesians inhabited the Hawaiian Islands. They were brought here by birds, or survived the harsh ocean conditions to float here. They are well-adapted to Hawaii's varying soil and environmental conditions. This is why they make prime specimens for a xeriscape garden. However, natives will not thrive on their own, especially under harsh conditions. On the other hand, like any other plant, if you over-water and over-fertilize them, they will die. Follow the instructions given to you by the nursery you buy the plant from, or from this booklet. Better yet, buy a book (suggested readings can be found in the bibliography in the back of this pamphlet), read it, and learn more about native plants. I guarantee that you will be pleased with the results.

Propagation

There are many ways to propagate and plant-out native Hawaiian species. One of the most thorough and helpful book is Heidi Bornhorst's book, *Growing Native Hawaiian Plants*. The easiest, and best-way to obtain natives for the novice gardener is to get them from a reputable nursery (see appendix c). That way all you will have to do is know how to transplant (if necessary) and plant-out when you are ready. These are the two methods I have listed here.

Transplanting

1. Use pots that are one size bigger than the potted plant is in
2. Get your potting medium ready

Good potting medium is a ¼, ½ mixture of peat moss and perlite. If the plant is from a dry or coastal area, add chunks of cinder or extra perlite. If it is a wet forest species, add more peat moss or compost. Be aware that peat moss is very acidic and certain plants react severely to acidity.

If the plant is to eventually be planted into the ground, make a mix of equal parts peat moss, perlite, and soil from the area in which the plant is to be planted. Slow-release fertilizer can be mixed into the potting medium.

3. Once pots, potting medium, fertilizer and water are ready, you can begin re-potting. Keep the plant stem at the same depth it was in the original pot. Avoid putting the plant in too large a pot, as the plant may not be able to soak up all the water in the soil and the roots may drown and rot.

Mix potting medium and add slow-release fertilizer at this time. Pre-wet the medium to keep dust down and lessen shock to the plant. Put medium in bottom of pot. Measure for the correct depth in the new pot. Make sure there is from ½ to 2 inches from the top of the pot so the plant can get adequate water. Try to stand the plant upright and center the stem in the middle of the pot.

Water the plant thoroughly after transplanting. A vitamin B-1 transplanting solution can help to lessen the transplant shock. Keep the plant in the same type of environment as it was before, sun or shade. If roots were broken, trim off some of the leaves to compensate for the loss.⁹

Planting out

1. Plant most native Hawaiian plants in a sunny location in soil that is well-drained.
2. Make the planting hole twice as wide as the root ball or present pot, and just as deep. If the soil is clay-like, and drains slowly, mix in some coarse red or bland cinder, coarse perlite or

⁷ Bornhorst, p. 19-20

⁸ Nagata, p. 6

⁹ Bornhorst, p.20-21

coarse compost. Place some slow-release fertilizer at the bottom of the hole.

3. Carefully remove the plant from the container and place it in the hole.

The top of the soil should be at the same level as the top of the hole, if it is too high or too low, adjust the soil level so that the plant is at the right depth.

4. Water thoroughly after you transplant.

Mulch

Most natives cannot compete with weeds, and therefore must be weeded around constantly in order to thrive. Mulch is a practical alternative, which discourages and prevents weeds from growing.

Hawaii's hot, humid climate leads to the breaking down of organic mulches. Thick organic mulches such as wood chips and leaves, may also be hiding places for pests.

Stone mulches are attractive, permanent and can help to improve soil quality. Red or black cedar, blue rock chips, smooth river rocks and coral chips are some natural choices.¹⁰ Macadamia nut hulls are also easy to find and can make a nice mulch.¹¹

Never pile up mulch right next to the stem or trunk of a plant, keep it a few inches away.

ZONES

The Maui County Planting Plan has compiled a system of 5 zones of plant growth for Maui County. The descriptions of zones and maps for these zones are as follows:

Zone 1: Wet areas on the windward side of the island. More than 40 inches of rain per year. Higher than 3,000 feet.

Zone 2: Cool, dry areas in higher elevations (above 1,000 feet). 20 to 40 inches of rain per year.

Zone 3: Low, drier areas, warm to hot. Less than 20 inches of rain per year. Sea level to 1,000 feet.

Zone 4: Lower elevations which are wetter due to proximity of mountains. 1,000 to 3,000 feet.

Zone 5: Salt spray zones in coastal areas on the windward side.

These zones are to be used as a general guide to planting for Maui County. In addition to looking at the maps, read the descriptions of the zones and decide which zone best fits your area. Plants can be listed in more than one zone and can be planted in a variety of conditions. For best results, take notes on the rainfall, wind, sun and salt conditions of your site. Use the zones as a general guide for selection and read about the plants to decide which best fits your needs as far as care and or function.

¹⁰ Bornhorst, p. 24

¹¹ Nagata, p. 7

PLACES TO SEE NATIVES ON MAUI.

The following places propagate native Hawaiian plants from seeds and/or cuttings. Their purpose is to protect and preserve these native plants. Please contact them before going to view the sites, they can provide valuable information and referral to other sources.

1. Hoolawa Farms
P O Box 731
Haiku HI 96708
575-5099
2. The Hawaiian Collection
1127 Manu Street
Kula HI 96790
878-1701
3. Kula Botanical Gardens
RR4, Box 228
Kula HI 96790
878-1715
4. Maui Botanical Gardens
Kanaloa Avenue, Kahului
across from stadium
249-2798
5. Kula Forest Reserve
access road at the end of Waipoli Rd
Call the Maui District Office
984-8100
6. Wailea Point, Private Condominium residence
4000 Wailea Alanui, Kihei
public access points at Four Seasons Resort or
Polo Beach
875-9557
7. Kahanu Gardens, National Tropical Botanical Garden
Alau Place, Hana HI 96713
248-8912
8. Kahului Library Courtyard
20 School Street
Kahului HI 96732
873-3097

PLACES TO BUY NATIVE PLANTS ON MAUI

1. Ho'olawa Farms
Anna Palomino
P O Box 731
Haiku HI 96708
575-5099
2. Kahanu Gardens
National Tropical Botanical
Garden
Alau Place, Hana
248-8912
3. Kihana Nursery
1708 South Kihei Road
Kihei HI 96753
879-1165
4. Kihei Garden and Landscape
Waiko Road, Wailuku
P O Box 1058
Puunene HI 96784
244-3804
5. Kula Ace Hardware and
Nursery
3600 Lower Kula Road
Kula HI 96790
876-0734
6. Kulamau Farms - Ann Carter
Kula HI 96790
878-1801
7. Maui Nui Botanical Gardens
Kanaloa Avenue
(Across from stadium)
Kahului HI 96732
249-2798
8. Native Gardenscapes
Robin McMillan
1330 Lower Kimu Drive
Kula HI 96790
870-1421
9. Native Hawaiian Tree Source
1630 Piipolo Road
Makawao HI 96768
572-6180
10. Native Nursery, LLC
Jonathan Keyser
250-3341
11. New Moon Enterprises - Pat Billy
47 Kaioea Place
Kula HI 96790
878-2441
12. Waiakea Tree Farm - Kua Rogoff
Pukalani HI 96768
Cell - 264-4166

* The largest and best collection of natives in the state. They will deliver, but worth the drive to go and see! Will propagate upon request

* grows native plants and installs landscapes including irrigation.

* many natives in stock
* get most of their plants from Ho'olawa Farms
* they take special requests



Jeffrey K. Eng, Director
 SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
 March 9, 2010
 Page 2 of 2

March 9, 2010

- PRINCIPALS**
 THOMAS WITTEK, ASLA
President
 STAN DUNCAN, ASLA
Executive Vice-President
 SUSSELY J. CHUNG-TASLA, LEED[®] AP
Executive Vice-President
 VINCENT SHIGRANI
Vice-President
 RYAN T. MURAKAMI, AICP, LEED[®] AP
Principal
 FRANK BRANOFF, ASLA
Traffman Emeritus

Jeffrey K. Eng, Director
 County of Maui
 Department of Water Supply
 200 South High Street
 Wailuku, Maui, HI 96793-2155

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
 PREPARATION NOTICE**

Dear Mr. Eng:

Thank you for your letter dated May 6, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

Source Availability and Consumption

The Draft Environmental Impact Statement (EIS) will provide information regarding Honua'ula's water system, treatment, sources, and demands.

Regarding the statement in the EISPN about Honua'ula Partners, LLC offering the County the right to purchase the project water system, this is stated in the EA/EISPN because Condition 1 of the Change in Zoning Ordinance (County of Maui Ordinance 3554) states: "At the time the project water system is completed, Honua'ula Partners, LLC, its successors and permitted assigns, shall offer to the County the right to purchase the project water system at the cost of the development of such system." Honua'ula Partners, LLC, will comply with all conditions of the Change in Zoning Ordinance (County of Maui Ordinance 3554).

The Draft EIS will include discussion regarding the adequacy of the water source and potential interference or conflict with county plans for source development. Specifically, regulatory oversight processes will ensure adequacy of the water source and that water source development will not interfere or conflict with County plans for source development. These include: 1) the State Commission on Water Resource Management well construction and pump installation permits; 2) State Department of Health Engineering and Capacity report approvals; and (3) compliance with the County's Water Availability Policy, codified as Chapter 14.12, Maui County Code.

Groundwater Resources and Water Quality

The Draft EIS will address issues related to water quality including the impacts of Wailea 670 wells 4125-01 and 4125-02 to surrounding wells.

System Infrastructure

We acknowledge the surrounding water system infrastructure capabilities and understand that system improvements are required to serve Honua'ula according to standards.

Conservation

We acknowledge that the Department of Water Supply recommends that whenever possible reclaimed water rather than brackish ground water be used for non-potable purposes. Water conservation measures such as using climate-adapted plants, preventing over-watering by automated systems, eliminating single-pass cooling, utilizing low-flow fixtures and devices, and maintaining fixtures to prevent leaks will be included in the Draft EIS.

Pollution Prevention

The Draft EIS will include discussion of Best Management Practices to minimize infiltration to ground water and runoff.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
 Senior Associate

cc: Jeff Hunt, Maui Planning Department
 Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN.DWS

ONCALL OFFICE
 61 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-3184
 t: (808) 521-5631
 f: (808) 522-1402
 email: speedyngh@pbrhawaii.com

APOLLO OFFICE
 61 Kamehaha Boulevard
 Puhia Building, Suite 310
 Honolulu, Hawaii 96813-3065
 t: (808) 521-5631
 f: (808) 525-3163

Maui Electric Company, Ltd. • 210 West Kamehameha Avenue • PO Box 398 • Kahului, Maui, HI 96733-6988 • (808) 871-8461



March 11, 2009

PBR Hawaii
Attn: Mr. Tom Schnell
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Schnell,

Subject: Environmental Impact Statement Preparation Notice – Honua'ula Subdivision
TMK: (2) 2-1-008:056 and 071
Pi'ilani Highway/Ulupalakua Ranch
Wailea, Maui, Hawaii

Thank you for allowing us to comment on the Environmental Impact Statement Preparation Notice for the subject project.

In reviewing our records and the information received, Maui Electric Company (MECO) will be requiring access and electrical easements for our facilities to serve the subject project site. State of Hawaii permits for work within right-of-ways may also be required prior to any MECO installation.

We would like to clarify statements made regarding the existing conditions of electrical service on page 39 (4.7.5 Electrical System) of the Potential Impacts and Mitigation Measures Section. MECO's transmission and distribution lines are 69 kV (kilovolt) and 12.47 kV (kilovolt) nominal respectively versus KVA (kilovolt-ampere) units. Also the Wailea Substation is currently being fed by transmission lines from the Ma'alaea Power Plant, North-west of the property and from Kealahou Switchyard, mauka of the property.

Since the Wailea Substation is nearly filled to capacity, the addition of this project's anticipated electrical load demand will have a substantial impact to our system. Thus, we highly encourage the customer's electrical consultant to submit the electrical demand requirements, project time schedule, and schedule a meeting with us as soon as practical so that service can be provided on a timely basis.

In addition, we suggest that the developer and/or their consultant make contact with Ray Cibulskis of our Demand Side Management (DSM) group at 872-3226 to review potential energy conservation and efficiency opportunities for their project.

Should you have any questions or concerns, please call me at 871-2340.

Sincerely,


Ray Okazaki
Staff Engineer

c: Office of Environmental Quality Control
County of Maui – Planning Department – Mr. Jeff Hunt, Director





March 9, 2010

PRINCIPALS

TOMAS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

ASSELLY J. CHONG, FASLA, LEED AP
Executive Vice-President

TINCENT SHIGEKUNI
Vice-President

FRANK T. MURAKAMI, AICP, LEED AP
Principal

FRANK BRANDT, FASLA
Partner/Executive

ASSOCIATES

TON SCHNELL, AICP
Senior Associate

AMMOND T. HIGA, ASLA
Senior Associate

EVYN K. NISHIKAWA, ASLA
Associate

DAI MIKAWA, LEED AP
Associate

COTT ALAKA, ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

ACHENG DONG, LEED AP
Associate

ONOLUHU OFFICE
61 Bishop Street, Suite 150
Honolulu, Hawaii 96813-3184
T: (808) 521-5631
F: (808) 529-1102
Email: ypsadmin@pbrhawaii.com

WOLELE OFFICE
61 Kemoaia Boulevard
Poloa Building, Suite 313
Honolulu, Hawaii 96813-3107
T: (808) 521-5631
F: (808) 521-5631

Ray Okazaki, Staff Engineer
Maui Electric Company, Ltd.
P.O. Box 398
Kahului, Maui, HI 96733

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Okazaki:

Thank you for your letter dated March 11, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We acknowledge that Maui Electric Company (MECO) will require access and electrical easements for MECO facilities to serve the site. Honua'ula Partners, LLC will work with you to provide these easements at the appropriate time. We also acknowledge that State of Hawaii permits for work within right-of-ways may also be required before any MECO installation.

Thank you for the clarification regarding the existing conditions of electrical service. The Draft Environmental Impact Statement (EIS) will include this accurate information.

We acknowledge that Honua'ula's anticipated electrical load demand will have a significant impact to MECO's system. Honua'ula Partners, LLC's electrical consultant will schedule a meeting with MECO and provide electrical demand requirements and a time schedule as soon as practical so that service can be provided on a timely basis. In addition, Honua'ula's master plan includes an area for the expansion of the existing substation surrounded Honua'ula, but located on a separate parcel (TMK (2)2-1-08: 043), if expansion is necessary to service demand.

Thank you for reviewing the EISP/N. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Maui Cultural Lands
1087-A Po'okela Road
Makawao, HI 96769
Phone:

November 16, 2009

Tom Schnell, AICP
Senior Associate
PBR Hawaii & Associate, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-1402
Fax: (808) 523-1420
E-mail: sysadmin@pbrhawaii.com

Re: Honua'ula EAEISP/N

Dear Mr. Schnell,

Thank you for forwarding a copy of the Honua'ula Environmental Impact Statement Preparation Notice (EAEISP/N) under cover of your letter dated October 16, 2009.

Chapter 343 of the Hawaii Revised Statutes lays out the process by which the public can weigh in and give input on the Environmental Review for the proposed Honua'ula project. The law requires that there be a full-disclosure at the earliest possible time of all the specifics of this proposed project and all of its potential environmental impacts, both primary and secondary, and how all the adverse impacts will be properly mitigated. Upholding the integrity of this process will enable all concerned parties to have access to the information needed to make informed comments throughout the environmental review process. Maui Cultural Lands is grateful for the opportunity that the law provides to express both our comments and concerns regarding the Honua'ula EAEISP/N.

QUESTION?

Is the Honua'ula EAEISP/N a Draft Environmental Assessment to be followed by a Final Draft Environmental Statement, and then followed by a Draft Environmental Impact Statement, or is it something else? We are confused by how this Environmental Review is being presented. In its present form we find the scope of the discussion in many instances too narrow to permit a sufficient assessment of the environmental impacts of this project on South Maui's cultural resources. Instead of assessing environmental impacts now in the EA it describes conditions that will be discussed later on in the draft EIS. Again, is this a Draft EA or something else? Please clarify. (Reference Section 343-5(a), HRS, & Section 11-200-9, HAR).

REQUEST

Maui Cultural Lands (MCL) participated in the Honua'ula Cultural Resources Preservation Plan (CRPP) consultation process for the 670 acre proposed development project and submitted comments. However, we were not listed among the consulted organizations found under Chapter 8 of this Honua'ula EA/ EISPN document. As a concerned party MCL request to be included as a consulted organization throughout the environmental review process for the Honua'ula project.

PREFACING STATEMENTS

The lands of Pae'ahu, Palau'ea, and Keauhou are culturally important to all of Maui's people. They contain the remains of a way of life far more ancient than the Ming dynasty of China, the age of European discovery and the Aztec civilizations, and they deserve the same respect. The cultural features of these lands are both seen and unseen. They include native plants, animals, insects, geological formations, underground water sources, cultural sites, trails & roads and views of Wahi Pana such as Haleakala, Pu'u I'o, Pu'u Ola'i, Molokini, Kaho'olawe, and of the heavens above both during the day and at night. These lands are deeply connected to all of the surrounding lands and islands and any Cultural Resource Preservation Plan and Environmental impact mitigation plan should recognize and maintain this connection and the need to have a living Hawaiian culture here that is supported by a viable culture landscape. Hawaiian culture is defined and perpetuated by its cultural resources. Land and people are interconnected. Hawaiian people belong on this land as well as the Hawaiian plants and animals.

COMMENTS

1.6 STUDIES CONTRIBUTING TO THE EIS

We would like to ask that more information be given in this document. Other Environmental Assessments we have reviewed contained specific reports on important topics like the extent of cultural and botanical features. None of this information is offered in this EA. Where are the reports listed in Section 1.6 STUDIES CONTRIBUTING TO THE EIS? Why do we have to wait for the Draft EIS to review these studies? Shouldn't they be included in the EA as part of the Project District Phase II approval process? MCL request to all parties concerned that the public be provided at the earliest possible date with all the information they need to make inform comments, rather than having to wait for it later.

SITE PHOTOS FIGURE 4

Site photos of the project area should include photos of botanical and other natural treasures found on this land. We suggest, for example, that photos of the plants of the native dry land forest, areas of the a' a flow, and cultural sites be included to give a more representative picture of what is on the land. The endemic wildlife, cultural sites, and the natural geological formations like the lava fields are among the natural gifts of this land. They should be celebrated and not hid away. Showing photos of fields of buffel grass and non-native Kiawe trees doesn't do justice to the project area nor paint an accurate picture of what one would see if they walked the land of Honua'ula.

GEOLOGY AND TOPOGRAPHY

- The EA does not address the impacts and mitigation measures for the a' a lava flows that cover much of the southern portion of the property. Pohaku or rocks were of great cultural importance to the Hawaiians. They were used to build walls, terraces, platforms, heiau, ahu, etc.. The a' a lava flow should be looked at as a natural, historical, and cultural treasure of these lands. Thousands of people drive to Ahili Kinau in Makana every week to look at the a' a lava flow there. If amazing natural lava formations like those found in Waiea 670 were located in a public park, they would be considered valuable resources. That value shouldn't be dismissed just because they are on private land. If these formations are lost to make a private golf course, we will all lose something very unique. The EA should document these natural and cultural features and discuss how they will be preserved.

GRADING

- We have deep concerns about site alteration. Retaining a sense of place and its uniqueness is a cultural resource. Over grading like too much plastic surgery can change the character of a place and face to the point of not being recognizable anymore. The EA needs to be a more thorough job of addressing impacts and mitigation measures. We hope you will follow other areas that have maintain the character of the land by incorporating the existing topography into the overall design of the development.

GROUNDWATER RESOURCES AND WATER QUALITY

FLORA AND FAUNA

"There's places like Honua'ula...that's still harbor our history. Our natural history. Our cultural history. Those places should be preserved inevitably, for the simple reason. Because these are the last Hawaiian places, Honua'ula, Kahikinui, Kaupo. ...these three moku, in my opinion, are the most culturally significant. Culturally valuable. And it's not just because of the cultural sites that exist there but the botanical treasures. And it separated us, the plants separated us and it allowed us to have a culture. The plants, it is the most vital part of our culture. It defined us, it separated."

Excerpt from interview with Kevin Mahealani Kai'okamalie by Honua'ula cultural consultants for Honua'ula Cultural Impact Assessment (CIA).

- EIS states that "northern 75 percent of the property is characterized as of little botanical interest." Very little of the northern property has actually been surveyed.
- A population of *Hibiscus brackenridgei*, an endangered plant species, is found on lands directly adjacent to the northern property.
- Southern a habitat area described as a "scattered, remnant dry forest ecosystem." All lowland dry-forests are "remnants", since they all have been heavily disturbed and destroyed over the years, making them one of the most critically endangered/rare ecosystems found in Hawaii. Less than 3% of Hawaii's lowland dry-forests remain. What remain are "scattered, remnants." In order to prevent the complete destruction of this ecosystem, maximum protection and restoration efforts need to be afforded to those remnants of this ecosystem that survive.

- No mention of any insects species seen, yet *Manduca blackburnii*, *Plutella* spp. moth, and *Utara blackburnii* butterfly have been identified by biologists on the property.

- *Manduca blackburnii* is a federally listed endangered species. Under federal law an agreement would need to be reached with the landowners to set up a habitat for the moth if it has been documented to be found on the property.

- Good *Manduca blackburnii* habitat found in the Wailea 670, with abundance of *Nicotiana glauca* plants (important host plant for *Manduca* caterpillars) and abundance of plants such as Maiapilo (*Capparis sandwichtiana*), which is a good food plant for adult moths.

- Various *Utara* butterflies where observed visiting *Senna gaudichaudii* flowers.

- *Plutella* moth caterpillars where seen in tiny webs on the undersides of Maiapilo (*Capparis sandwichtiana*) leaves.
- No mention for potential entomological studies, such as one for native bees, which are likely found in the area.
- Wiliwili trees are described as having little value being "infested with the invasive parasitic gall wasp." This is a misleading statement since the gall wasp is rampant in all populations of Wiliwili statewide.
- The gall wasp infestation is a cyclic and seasonal phenomenon.
- During the winter months, after a good rain, many of the Wiliwili on the 670 lands appear healthy and remain untouched for a remainder of time by the gall wasp.
- The wiliwili trees are not all blighted and dying. They have flowers and seeds and are fighting back the pests. Their groves should be mapped and a preservation plan presented in the EA.
- Hundreds of native wiliwili trees and other native plants have lived on this land, probably for thousands of years. They have every right to continue being inhabitants, right where their life began. It is not respectful to describe them as "scrub vegetation".
- Preserving 22 acres of the 150 acre lowland dry forest habitat would greatly reduce its genetic resources, possibly eliminating natural recruit for certain plant species.
- The proposed 22-acre native plant preservation area shown on the project map is much too small. It would mean that hundreds of native plants like the Wiliwili tree and increasingly rare maiapilo would be left unprotected and destroyed.
- The proposed 22-acre native plant preservation area is less than 3.5% of the total land area of the project area. What percent of the project area is currently native plant habitat? If it is substantially more than 3.5% this should be looked at as a red flag.
- We don't know the minimal viable acreage needed for continuation of population recruit of various rare native plants species such as *Lipochaeta rockii*.
- Many Neihe (*Lipochaeta rockii*) are found outside the proposed 22 acre native plant preservation area.

opinion that a much larger area would be needed if the endangered species were to have enough biological diversity. She also pointed out that watering and fertilizer conditions that suited golf courses and landscaping were often very hard on native species and the landscape plants brought in different diseases and bugs to which native plants had no resistance. Dr. Kepler recommended the plants and their natural ecosystem, including even the non-native plants, needed to have a large space to themselves, not be an island in a man-made landscape. None of this important debate is included in the EA.

- "I don't care if you get one hundred endangered species. If you don't have a habitat for those endangered species to exist in, you have no plant. That plant will cease to exist, inevitably. Maybe not today, maybe not tomorrow, maybe not next week, inevitably it will die." Excerpt from interview with Kevin Mahealani Kai'okamalie by Honua'ula cultural consultants for Honua'ula Cultural Impact Assessment (CIA).
- The morphology of the *Lipochaeta rockii* population found at Wailea 670 is unique to this area.
- The Hawaiian bat is mentioned as "not restricted from using altered urbanized landscapes, therefore development of Honua'ula would not restrict them from using this area." This is a very non-conclusive statement, and contradicts the beliefs of many Hawaiian Hoary Bat researchers.
- The Honua'ula cultural consultants in their Cultural Impact Assessment of the lands of Honua'ula said "... we desire that the native plants can be kept in tact as much as possible to retain the ahupua'a's unique identity." This EA should celebrate that fact that many species of native plants, some very rare and beautiful, currently live on this land and need to be protected. Again we would like to see photos included in your EA that highlight the biodiversity and botanical beauty of this land.
- As part of the scope of the Draft Environmental Impact Statement a comprehensive biological and botanical survey/inventory of the biodiversity present on the site should be completed and made available for public review along with the comments of all the reviewing agencies listed in condition 27.
- We aware that there have been many sightings of the Hawaiian Owl or Pueo on the subject property, although none were observed during any of surveys done for the Honua'ula EA/EIS/SPN. The Draft EIS should fully disclose the scope of these surveys and assessments that are required by condition 9. How many where done? How many people involved? What time of day and year were the surveys done? Were any efforts made to contact people who live in adjacent neighborhoods to see if there had been any sightings of the Hawaiian Owl or Hawaiian Hoary Bat? What expertise do those conducting these surveys have with regards to native fauna?

• The County Council wrote a specific condition (no. 27) that required a preserve to be established. In fact, on p. 23 the language of condition 27 has been selectively edited which has the result of misinterpreting the intent of the condition.

Condition 27 is correctly stated in on page 54 in Section 5.2.3. We feel that as a key element of condition 27 that it should also be included on p. 23 so that there will be no misunderstandings as to the intent of this condition. The omitted language is highlighted below:

27. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide the report "Remnant Witiwiti Forest Habitat at Wailea 670, Maui, Hawaii by Lee Altenberg, Ph.D.", along with a preservation/mitigation plan, to the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers for review and recommendations prior to Project District Phase II approval. The Maui Planning Commission shall consider adoption of the plan prior to Project District Phase II approval.

Such plan shall include a minimum preservation standard as follows: That Honua'ula Partners, LLC, its successors and permitted assigns, shall establish in perpetuity a Conservation Easement (the "Easement"), entitled "Native Plant Preservation Area", for the conservation of native Hawaiian plants and significant cultural sites in Kiheti-Makena Project District 9 as shown on the attached map. The Easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres.

- This is a good condition and it makes it clear that state and Federal agencies should be the ones who determine if any of the 130 acres is not needed for native plant and endangered insect habitat. The EA should make this point clear. Letters should be included in the EA from the state and federal wildlife agencies with their comments on the proposed 22-acre preserve. There is no discussion assessing its size and location compared to maps of native plant and insect populations and how it meets condition 27.
- MCL feels based on all we know about the extensive native plant areas in the project area that 22 acres is much too small for the plants to survive and flourish. Instead we feel that 130 acres should be the minimum size of the native plant preserve area. There is nothing in this EA that analysis whether the 22 acre preserve is enough to sustain the botanical ecosystems of the wildlife that now exist in the subject area. Surely habitat size and contiguity, and population size of the species need to be discussed. Respected biologist Dr. Angela Kepler wrote an

ARCHAEOLOGICAL AND HISTORICAL RESOURCES

- The scope of the Draft EIS must contain a complete and updated Archaeological Survey/Inventory of the entire 670 acres that has been reviewed, accepted, and approved by SHPD and ... The preservation plan should provide for cultural landscapes that have adequate buffer zones, and retain the continuity, connection, and interrelationships of the cultural sites. The preservation plan should not fall back on past practices that relegate cultural and historical sites to isolated, disconnected, and inaccessible landscape features on golf courses or private homes.

- Honua'ula / Wailea 670 archaeological review history:

The EA/EISPN does not clearly portray the limited and inadequate level of review the culturally important lands of Pae'ahu, Paluaca and Keaunohu have received during the development review process. An EA should make clear the high potential for discovery of additional cultural sites across the entire 670 acres.

The project's early Archaeological survey's are also not accurately described. They uncovered no sites because they did not even survey the southern 200 acres of the project area. As noted in Sect 4 of the EA/EISPN, seven sites were first documented in the Wailea 670 project area during a 1972 DOT survey (Walton) for the Pit'lani Hwy corridor. The first two inventory surveys never even relocated those sites, yet SHPD signed off on the report.

The inadequacy of the archaeological review prompted the state LUC to condition its approval of a boundary amendment for Wailea 670 on a new archaeological survey being done in the southern portion of the land (LUC DOCKET NO. A93-689, Sept 20, 1994 Findings of Fact, Conclusions of Law no. 65) This is a matter of public record and should be included in the narrative to guide better decision-making.

The survey required by LUC "Prior to filing of the zoning change application" was completed in 2000. The site count doubled from 10 documented sites to 24. According to SHPD correspondence, the agency did not find the survey acceptable, in part, because it referred to, but did not document, "informal structures." SHPD also requested additional survey work in the north of the property.

A brief supplemental survey was done in 2001. Four new sites and several additional features were documented. This brought the total to 28 sites with around 43 features. Only one of these was in the north.

When the Maui County Council was making a decision on the project's rezoning request, Council members asked for a completed Archaeological Inventory Survey for the project that had been reviewed and accepted by OHA and SHPD.

Many kanaka maoli testified that additional sites were present and not documented.

The two surveys from 2000 and 2001 (Sinoto/Pantaleo) were given to the Council. The applicant's archaeologists stated emphatically that this was the complete record and that no significant sites remained unrecorded. The last document the council received before making their decision was a map and data base listing 29 sites and 46 + features.

Without any further explanation, the EA/EISPN now informs us that 40 sites with 60 features, in other words, an additional 11 sites and 14 more features, have now been recorded. This has occurred in the last year or so. The nature of the sites or their relationship to previously documented sites is not discussed. This should be discussed in more detail in the EA.

There is a pattern that we see emerging here. Everytime you look for sites on the project area more sites are found. So why should we feel comfortable about the completeness and adequacy of the archaeological surveys that have been done so far. It is more likely than not that there is more stuff out there that needs to be inventoried.

- Maui Cultural Lands believes that this very culturally significant area holds hundreds of inter-related cultural features that have yet to be formally documented. We believe that a full EA, with complete AIS and CIA should be reviewed by the Maui Cultural Resources Commission and Maui Planning Commission before any new EIS is done. This will better help guide the EIS process and avoid the substandard review that has occurred before.
- The Maui Cultural Resources Commission last reviewed the project after the 2000 survey, when only 24 sites were documented. At that point, NO sites were recommended for preservation. The CRC recommended that 6 sites (which included 2 site complexes) be preserved. This then became the applicant's position. Now that additional sites have been documented, with the likelihood of more to come, the CRC should have a chance to offer it's mana'o to the Planning Commission once again, based upon the updated information.
- Maui Cultural Lands also supports a preservation plan strategy for the sites that allows them to remain in relationship to one another, within a larger cultural landscape area.
- In contrast, it appears that the applicant's plan is to preserve certain select sites as features along the edges of golf course or residential areas. We feel that it is important and culturally appropriate, to have the sites be able to connect and tell a greater story, rather than be isolated features out of their traditional context.
- We note that a over year has passed since County Council meetings on the project ended and still there is no comprehensive AIS in the EA.

- We are also disappointed to see a Cultural Impact statement quoted from that doesn't even mention all the cultural sites that are known in the ahupua'a of Palau'ea, Pae'ahu and Keaehou. These are the ahupua'a where Wailea 670 lies. All these local ahupua'a have lots of cultural sites- heiau, maa, ko'a house sites, wells, shrines, burials, and agricultural complexes. Many of the sites in Palu'ea etc. may directly related to those being found in Wailea 670. This must be researched and discussed in the EA so we don't lose a big part of our history. None of this is even mentioned in the EA or the CIA. Instead there are discussions of Kaupo and Kahikinui (which, by the way, are not part of the moku of Honua'ula, but have their own moku)

CULTURAL RESOURCES

TRADITIONAL ROADS AND TRAILS

- The photos if Figure 4 provides an opportunity for more education. Some of the "dirt roads" that go through the project area have been in use for more than fifty years and are protected as historic roads. The Kanaio-Kalama Park road shown on fig 3 (the tax key map) is one such road. Its existence and history should be noted and discussed in the EA along with plans for preservation.
- The many sections of traditional stepping stone trails across the lava fields of Wailea 670 should be mapped and protected to help future generations understand the places where their kupuna walked the land. Only a few of these sections are on the archaeological survey maps yet. Our South Maui Community Plan has a Policy "number 1" that speaks to historic roads and trails like these:

"Preserve and restore historical roads and paths as cultural resources and require such resources to be available to the public"

VISUAL RESOURCES

- View plans are a cultural resource...

WATER SYSTEMS

- The current owner's commitment to native plants also appears shaky when one reads in the sustainable design features section (p.13) a statement like: "where feasible landscaping will include use of drought-tolerant/and or slow growing hardy grasses, native and indigenous plants, shrubs , etc..." This is a rather meaningless statement in terms of having any measurable goals for Environmentally Responsible building.
- Since Wailea 670/Honua'ula already has 670 acres of native and non-native drought-tolerant landscape with no outside water demand, the EA should assess what portion of that very efficient landscape will be lost to the proposed development and what portion of the project area is expected to utilize native landscape as a mitigation for that loss.
- Water is a cultural resource and according to the State Constitution, it is also a public trust. The scope of the DEIS should fully disclose water source availability, where the water will come from for the projects needs, and what environmental impacts will be and how they will be properly mitigated.



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President
RUSSELL Y. CHUNG, PASIA, LEED^{AP}
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED^{AP}
Principal

W. FRANK BRANDT, PASIA
Chairman Emeritus

ASSOCIATES
TONI SCHELL, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KEVINE NISHIKAWA, ASIA
Associate

KIMI MIZUMI YUEN, LEED^{AP}
Associate

SCOTT ALIKA ABRIGO, LEED^{AP}
Associate

SCOTT MURAKAMI, ASIA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
1011 Kalia Street, Suite 650
Honolulu, HI 96813-3491
Tel: (808) 921-6831
Fax: (808) 921-1402
E-mail: sysadmin@pbrhawaii.com

KAPOLEI OFFICE
1001 Kaunakakai Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 921-5631
Fax: (808) 535-3163

Clare Apana
**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE**
March 9, 2010
Page 2 of 4

Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices.

Request

We will include Maui Cultural Lands as a consulted party and provide you with a copy of the Draft EIS when it is available.

Prefacing Statements

We acknowledge that the lands of Paeahu, Palaua, and Keauhou are culturally important. The Draft EIS will address issues regarding native plants, animals, insects, geological formations, underground water sources, cultural sites, trails and roads, and visual resources.

Studies Contributing to the EIS

The Draft EIS will contain technical studies contributing to the EIS and in compliance with conditions and timing requirements for various plans and studies required under County of Maui Ordinance No. 3554.

Site Photos

The Draft EIS will include photographs of the property that capture the natural environment and characteristics of the land. Additional photos of botanical and other natural features found on the Property will be included in the various studies contributing to the EIS.

Geology and Topography

A principal design and planning goal is to preserve defining features of Honua'ula as much as possible. To this extent the Draft EIS will include Design Guidelines and a Landscape Master Plan that both call for the integration of lava rock as a defining element of Honua'ula. To the extent practicable, improvements will conform to the contours of the land, limiting the need for extensive grading. All ground-altering activity will be conducted in accordance with Chapter 20-08, Maui County Code (Soil Erosion and Sedimentation Control).

Flora and Fauna

The Draft EIS will contain botanical and wildlife surveys that list all plant and animal species currently found on the property.

Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**

Dear Ms. Apana:

Thank you for your letter dated November 16, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN public comment period, Honua'ula Partners, LLC consulted with the Office of Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8, 2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills all the requirements and components [of] an environmental assessment." Pursuant to the instructions of the OEQC Director, the Maui County Planning Department subsequently submitted an Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) to OEQC on September 18, 2009.

The EA/EISPN is a notice document and is intended to set forth the proposed scope of the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR) support the functioning of the EISPN as an EA in situations where projects go directly to the more stringent full disclosure requirements of the EIS. This has been a long recognized and established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that the EA/EISPN does not contain every detailed element specified within HRS Chapter 343 for an EA does not take away from the fact that the completed EIS will be a full disclosure document having to comply with the requirements of HRS Chapter 343.

The Draft EIS is the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR).

Clare Apana

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010

Page 3 of 4

Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanaio (876 acres) and 'Ahibi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Honua'ula is not expected to significantly impact any endangered species. Several wildlife surveys of the Property have been conducted since 1988, with the most recent completed in 2009. Evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the Property in the most recent survey (although not in previous surveys). The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures, including a multi-species Habitat Conservation Plan (to also include the candidate endangered 'awikwiki plant) prepared under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with DLNR and USFWS.

The *Udara blackburni* butterfly was not detected during SWCA's survey of the property; however, it may occur there. The butterfly is not on the Federal USFWS or State of Hawai'i lists of candidate, proposed, or listed endangered or threatened species. In fact, it is widespread among the islands.

Archaeological and Historical Resources

The Draft EIS will contain an Archaeological Inventory Survey, a Cultural Impact Assessment, and a Cultural Resources Preservation Plan (CRPP).

The Archaeological Inventory Survey identifies archaeological sites such as multiple stone feature complexes and trails, as well as settlement patterns.

The cultural impact assessment identifies traditional customary practices and historical accounts of the Honua'ula area and includes interviews local residents. The complete transcript for each interview will be included as an appendix.

The CRPP was prepared in consultation with interested and concerned parties, cultural advisors, Nā Kūpuna O Maui, the Maui County Cultural Resources Commission, the Maui/Lāna'i Island Burial Council, State Historic Preservation Division, Department of Land and Natural Resources

Clare Apana

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010

Page 4 of 4

Nā Ala Hele, Office of Hawaiian Affairs and various knowledgeable individuals. The CRPP provides specific preservation and mitigation measures based on community input and the findings of the Cultural Impact Assessment and Archaeological Inventory Survey.

Trails and Access

The Draft EIS will include discussion on: 1) steppingstone trail segments within the property; 2) the Kanaio-Kalana road; and 3) recommendations from the Cultural Impact Assessment regarding traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the *ala i ke kula* (pathway to the uplands)).

Visual Resources

Honua'ula will not impinge upon any significant public scenic view corridors and Honua'ula will have no significant impacts on views toward the ocean or Haleakalā.

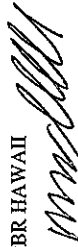
Water Systems

The Draft EIS will include information on Honua'ula's water system, including information on source, supply, and distribution. Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 1 by providing a private water system.

Thank you for reviewing the EA/EIS/SPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Maui Meadows Neighborhood Association
520 Mikotoi Place
Kihei, HI 96753
(808)874-9293

April 6, 2009

PPR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, HI 96813

RE: EISPN Honua'ula (Maui)

Gentlemen:

I am writing on behalf of the Board of Directors of Maui Meadows Neighborhood Association. Maui Meadows subdivision is located adjacent to the Honua'ula project and will suffer many of the impacts of this development. We appreciate the opportunity to voice our concerns once again. We have been monitoring and commenting on this proposal since 2001.

We will be reading with interest the EIS reports on the following issues:

- (1) Increased traffic both during and after construction will create serious consequences for residents and must be addressed. Traffic noise studies should take measurements along Akala Drive and random points above Akala Drive. Mitigation measures where noise exceeds healthy limits should be suggested.
- (2) Construction noise is stated as being "short term". Please define.
- (3) Construction noise on site should be sensitive to the proximities to Maui Meadows. Batch plants, construction equipment storage, employee parking should be oriented away from our perimeters.
- (4) We look for a discussion of street lighting and its light pollution affect on our night sky.
- (5) A past reference as to height limitations of buildings on the property referred to "30 feet from finished grade". That could have serious impacts on the views from homes in Maui Meadows. Is the correct definition "30 feet from natural grade"?
- (6) Fugitive dust during construction remains a great concern even though the previous environmental documents stated there was very little wind on the property. We look for a detailed plan as to how fugitive dust will be controlled.
- (7) Erosion protection, especially during the rainy season, must be well planned to keep mud and debris out of our drainage systems and the ocean. Catchment basins?
- (8) A discussion of chemicals that will be used to fertilize the golf course and their impacts to the ocean waters adjacent to that runoff is needed. How will those impacts be mitigated?
- (9) Over the years, we have urged the development of an upcountry link for the Piliani Highway thru this project. What is the status of that plan? It should be part of the traffic circulation plan.
- (10) We urge that the cultural heritage sites be sensitively preserved after careful consideration of the interests of all parties. History is an important part of our future.
- (11) Regarding the on site sewer treatment plant, an evaluation of odor control methods and how sludge or other sewage spills will be handled should be thoroughly discussed.

Page 2

(12) Water storage facilities that are above grade should be out of Maui Meadows view shed and well landscaped.

(13) Originally, lots of similar size to Maui Meadows were proposed on the perimeter of the project adjacent to Maui Meadows. A single loaded street across from the 116 foot landscaped buffer. Has that changed? Will there be a fence installed along the property line?

(14) Will blasting be necessary? If so, a geology report needs to be prepared to evaluate the impacts of blasting veins of blue rock to properties along those veins adjacent to the site. What kind of notice will be given before blasting?

(15) What are the impacts to public services (police, fire) and how will the additional services be paid for? Will the project be gated? Will there be crash gates on the Maui Meadows side?

We would appreciate receiving copies of the draft EIS when it is completed. At that stage, more issues may be introduced but at this time we believe we have addressed major concerns.

Sincerely,



Madge Schaefer, President
Maui Meadows Neighborhood Association

Cc: Board of Directors



March 9, 2010

PRINCIPALS

TOMAS S. WITTEK, A.S.I.A.
President

STAN DYCKAN, A.S.I.A.
Executive Vice-President

ISSELL Y. LUCHUNG, F.A.S.I.A., LEED® AP
Executive Vice-President

TACENT SHIGERINDI
Vice-President

RANITTA MURAKAMI, A.S.I.A., LEED® AP
Principal

FRANK BRANDT, F.A.S.I.A.
Interim Executive

ASSOCIATES

OMI SCHINELL, M.C.P.
Senior Associate

AYMOND T. HIGA, A.S.I.A.
Senior Associate

EYVYN K. NISHIKAWA, A.S.I.A.
Associate

DAI MIKAMI, YUEN, LEED® AP
Associate

COTT ALIKA ABRIGO, LEED® AP
Associate

ZOTT MURAKAMI, A.S.I.A., LEED® AP
Associate

ACHENG DOONG, LEED® AP
Associate

ONOHUJU OFFICE
61 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3154
P: (808) 531-5631
F: (808) 531-5631
M: (808) 531-5631
E: onohuju@pbrhawaii.com

MOLELE OFFICE
61 Kamaelea, Boloakoa
Koloa Building, Suite 313
Koloa, Hawaii 96707-2605
P: (808) 531-5631
F: (808) 531-5631
M: (808) 531-5631
E: molele@pbrhawaii.com

Madge Schaefer, President
SUBJECT: HONU'A'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 3

6. **Fugitive Dust.** All construction activities will comply with the provisions of Chapter 11-60.1-33, HAR regarding Fugitive Dust. Measures to control dust during construction may include:

- Planning phases of construction to minimize the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of least impact;
- Watering active work areas and any temporary unpaved work roads daily;
- Landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;
- Minimizing dust from shoulders and access roads;
- Providing adequate dust control measures during weekends, after hours and before daily start-up of construction activities;
- Controlling dust from debris being hauled away;
- Using wind screens and/or limiting the area of disturbance at any given time;
- Covering dirt-hauling trucks traveling on roadways;
- Preventing trucks from tracking dirt onto paved roadway by routine road cleaning and/or tire washing;
- Establishing landscaping early in the construction schedule; and
- Monitoring dust at the Property boundary during the construction period as a means to evaluate the effectiveness of the dust control program, and adjusting the program if necessary.

7. **Erosion Control.** All construction activities will comply with all applicable federal, State, and County regulations and rules for erosion control, including Chapter 20.08 (Soil Erosion and Sedimentation Control), MCC. Measures to control erosion will include:

- Minimizing the time of construction;
- Retaining existing ground cover as long as possible;
- Constructing drainage control features early;
- Using temporary area sprinklers in non-active construction areas when ground cover is removed;
- Providing a water truck on site during the construction period to provide for immediate sprinkling, as needed;
- Using temporary berms and cut-off ditches, where needed, for control of erosion;
- Watering graded areas when construction activity for each day has ceased;
- Grassing or planting all cut and fill slopes immediately after grading work has been completed; and
- Installing silt screens, where appropriate.

8. **Golf Course Management.** The Draft EIS will include Best Management Practices (BMPs) for the Honua'ula Golf Course. The BMPs will contain discussion of chemicals used to fertilize the golf course, potential impacts to ground and ocean waters, and proposed mitigation measures.

9. **Upcounty Link/Pi'ihani Highway Extension.** The Honua'ula property, is bisected by a portion of a right-of-way previously reserved for a planned extension of Pi'ihani Highway to the Upcounty area; however, the State Department of Transportation is no longer planning to use the right-of-way for the extension of Pi'ihani Highway.

SUBJECT: HONU'A'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Schaefer:

Thank you for your letter dated April 6, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will provide more detailed information regarding the issues you cite in your letter. Specifically:

1. **Traffic and Noise.** The Draft EIS will include a Traffic Impact Analysis Report (TIAR), which will contain information regarding existing traffic conditions, projected future conditions, and proposed mitigation measures. The Draft EIS will also contain a Transportation Management Plan (TMP) to propose traffic management strategies during and after construction. The Draft EIS will further contain a noise study to evaluate potential noise impacts and recommend mitigation measures. The noise study will be prepared in accordance with the requirements of the U.S. Department of Housing and Urban Development, the State of Hawaii Department of Transportation, and the U.S. Federal Highways Administration.
2. **Short Term Construction Noise.** "Short term" refers to noise that may be present during various phases of construction. Increased noise due to construction will be limited to daytime hours and persist only during the construction period.
3. **Construction Noise.** All noise from construction activities will comply with State Department of Health (DOH) noise regulations (Chapter 11-46, Community Noise Control, Hawaii Administrative Rules (HAR)).
4. **Street Lighting and Light Pollution.** All exterior lighting will meet or exceed the requirements of Chapter 20.35, Maui County Code (Maui County Code) to minimize light pollution.
5. **Building Height.** The height of any structure within Honua'ula shall be measured in accordance with Section 19.04.040, MCC. Specifically, building "height" means the vertical distance measured from a point on the top of a structure to a corresponding point directly below on the natural or finish grade, whichever is lower.

Copy to: PDK Hawaii, Maui. 1011 11111111

Madge Schaefer, President
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 3 of 3

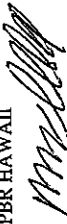
- 10. **Cultural Resources.** The Draft EIS will contain a Cultural Resources Preservation Plan (CRPP). The CRPP was prepared in consultation with Hawaiian groups and other interested parties and includes recommendations for the protection of cultural and archaeological resources on the property.
- 11. **Wastewater Treatment Plant.** The Draft EIS will include a discussion of the proposed alternatives for wastewater treatment, including an on-site treatment plant. Operation of the proposed plant will be discussed.
- 12. **Water Storage Facilities.** The Draft EIS will include discussion of Honua'ula's water demands and sources, including discussion on water storage facilities and potential locations.
- 13. **Lots Next to Maui Meadows.** A minimum 100 foot wide fire buffer area, with a minimum 50 foot wide landscape buffer area within it, will be provided between the boundary of Maui Meadows and Honua'ula. Lot sizes within Honua'ula may vary; lots for single-family homes must be a minimum of 7,500 square feet, but may be larger; lots for multifamily buildings must be a minimum of 10,000 square feet, but may be larger.
- 14. **Blasting.** It has not been determined if blasting will be necessary during construction. All noise from construction activities will comply with DOH noise regulations (Chapter 11-46, Community Noise Control, HAR. When construction noise exceeds, or is expected to exceed the DOH's allowable limits, a permit must be obtained from the DOH. All notification requirements will be met.
- 15. **Public Services and Other Concerns.** The Draft EIS will contain a discussion of impacts to public services, including police and fire protection services. Overall Honua'ula will not be a gated community; however some individual neighborhoods may be gated. Some streets within Honua'ula may allow for a connection with Maui Meadows; however these connections are proposed to be blocked so as to allow Maui Meadows residents to decide at a later date if they wish a through street.

We will provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Maui Meadows Association

MAUI TOMORROW FOUNDATION, INC.

Protecting Maui's Future

April 6, 2009

Mr. Charles Jencks
c/o Goodfellow Brothers, Inc.
PO Box 220
Kihei, Hawaii 96753
Fax: 808.879.2557

Re: Honua'ula Environmental Impact Statement Preparation Notice

Aloha Mr. Jencks,

Thank you for the opportunity to comment on the Wailea 670/ Honua'ula Environmental Impact Statement Preparation Notice (EISPN). Maui Tomorrow Foundation, Inc. wishes to be a consulted party in the review of the Environmental Impact Statement (EIS) process.

It is our understanding that the Final version of the EIS, described in the prep notice, is intended by the applicant to also serve as an application for Honua'ula Project District Phase II approval. Both the Final EIS and the Phase II approvals will be reviewed and accepted by the Maui Planning Commission.

The EISPN inaccurately indicates the Maui County Council as the approving agency for Phase II approval. (EISPN, page 56) Does this indicate that the applicant is intending to return to the County Council to request amendments from the Council for its Project District Ordinance?

Project District zoning for this project includes many requirements for impact assessment and mitigation reports to be completed, reviewed and approved by federal, state and county agencies prior to Phase II approval. It was stated during the rezoning hearings that these conditions would all be addressed and met during Phase II approval.

Specifically, these include:

- Mark
Shudson
President
- Bob
Parsons
Vice President
- Trp
Lynch
Treasurer
- Judith
Michals
Secretary
- Lance
Haller
- Richard
Michals
- Mauri
King
- Elle
Cocharan
- Michael
Haberstein
- Eli
Yishiki
- Tene
Jonke
Executive Director

Pg. 2 Honuaʻula EISPN comments cont'd.

A preservation/mitigation plan pursuant to Chapter 6E, HRS that has been approved by State Historic Preservation Division (SHPD) and Office of Hawaiian Affairs (OHA) prior to Phase II approval. (Ordinance No 3554, condition 28)

A Cultural Resources Preservation Plan that has received the review and recommendations of SHPD and OHA and the subsequent approval of the Maui County Cultural Resources Commission prior to Phase II approval (Ordinance No. 3554, condition 13)

A Conservation Easement, entitled Native Plant Preservation Area, shall be developed prior to Phase II approval. The report "Remnant Wiliwili Forest Habitat at Wailea 670, Maui, Hawaii by Lee Altenberg, PhD, along with the applicant's preservation/mitigation plan, shall receive review and recommendations from DLNR, USFWS and the USCE prior to Phase II approval. (Ordinance 3554, condition 27)

An assessment and mitigation measures for the endangered Hawaiian Short-eared Owl and the Hawaiian Hoary Bat, in coordination with DLNR, prior to submittal of Phase II processing. (Ordinance 3554, condition 9)

Each of these assessments involve a number of environmental impacts likely to be the direct result of the proposed project and must be fully completed in the Draft EIS (DEIS). The EISPN does not give clear indication of the depth of these required assessments.

The DEIS should include the report by Dr. Lee Altenberg entitled "Remnant Wiliwili Forest Habitat at Wailea 670", which provides a current assessment of the many rare and native species found in the 100+ acres of the southern portion of the property. The applicant does not disclose in the EISPN document that the property holds a pristine remnant native dryland forest with ancient wiliwili trees that represents a portion of the remaining five percent of native Hawaiian dryland forest habitats to exist.

The applicant should enter discussions with US Fish & Wildlife regarding the habitat preservation/mitigation plan for the Blackburn Sphinx moth, a federally listed endangered species, which habitat has been documented in various locations on the Wailea 670/Honuaʻula lands prior to the submittal of the DEIS.

Pg. 3 Honuaʻula EISPN comments cont'd.

Maui Tomorrow Foundation requests that all these requirements be fully met when the DEIS is released.

Sincerely,

Irene Bowie

Irene Bowie
Executive Director

Cc:
PBR Hawaii, 1001 Bishop Street, ASB Tower, Suite 650, Hon. HI 96813; contact: Tom Schnell, AICP, Senior Associate

County of Maui Planning Department, 250 South High Street, Wailuku, HI 96793; contact: Jeff Hunt

Office of Environmental Quality Control, 235 South Beretania Street, Suite 702, Honolulu, Hawaii 96813

MAUI TOMORROW

Protecting Maui's Future

November 16, 2009

Mr. Tom Schnell, AICP
PBR Hawaii
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
Fax: 808.523.1402
e-mail: sysadmin@pbrhawaii.com

Re: Honua'ula Project (EA/EISPN) comments

Aloha Mr. Schnell,

Thank you for providing Maui Tomorrow Foundation with a copy of the EA/EISPN for the proposed Honua'ula project. We ask to remain a consulted party and offer the following comments regarding this EA/EISPN document.

Maui Tomorrow Foundation has long had concerns that this project has not been forthcoming in revealing, discussing or mitigating some of the very likely impacts of this large project proposed for an environmentally sensitive area.

HAR 11-200-9 B, Section 4, 5, and 7, and 11-200-11.2 require that the EISPN be filed with a supporting final environmental assessment report. This document does not conform to the requirements listed in the Office of Environmental Quality Control's (OEQC) Draft and Final Environmental Assessment Checklist and the standards put forth to regulate Environmental Assessments in HAR, Sec. 11-200-10 thru 13.

The OEQC Bulletin clearly describes the process in its "Frequently Asked Questions" column on July, 8, 2008.

QUESTION: Is an environmental assessment required if an agency determines at the outset of a proposed project that it will prepare an EIS? *

OEQC staff replies:

"The answer is YES. Section 343-5(a), Hawaii Revised Statutes clearly states that *"[e]xcept as otherwise provided, an environmental assessment shall be prepared... for the nine instances articulated therein. The above exception refers to statutory exemptions, and the administrative exemption process set forth in Section 11-200-8, Hawaii Administrative Rules (HAR)*

Section 11-200-9, HAR clearly requires the preparation of an environmental assessment when an agency determines that a proposed action may have significant impact, requiring the preparation of an environmental impact statement. The notice of determination known as an EISPN (analogous to the FONSI) is simply a conclusion premised on the environmental assessment that supports it."

This project does not qualify for any of the exemptions listed under 11-200-8, Hawaii Administrative Rules (HAR).

It does not appear that this document fulfills the requirements for content set by HAR 11-200-9, HRS 343 and the OEQC. In fact, this EA/EISPN document appears to be identical to the EISPN document which was dated March 8, 2009.

COMMENTS ON THE HONUA'ULA EA/EISPN IN RELATIONSHIP TO REQUIREMENTS LISTED ON THE OEQC DOCUMENT:

"DRAFT AND FINAL ENVIRONMENTAL ASSESSMENT CHECKLIST" found at the OEQC website:

In order to qualify as an EA, this document would need to include an agency submittal, letter and anticipated determination. No such letter is included.

An EA would need to include the project's funding source. It does not.

An EA would need to discuss impacts to cultural practices and resources, past and current, to satisfy Act 50, and proposed mitigations of any impacts. This document does not include a Cultural Impact Assessment (CIA), but merely notes that one is being prepared. Without a CIA no assessment can be made of potential impacts to cultural practices and resources and needed mitigations, yet potential impacts and preliminary recommendations for mitigations are discussed (p.30).

This document also does not make clear that a CIA was prepared by Hana Pono LLC dated August 6, 2008. The same CIA titled "Honua'ula Final Report" was presented to the Maui County Council on November 6, 2007. This CIA, which fails to discuss the well known cultural significance of the ahupua'a of Pae'ahu, Palau'ea and Keaouhou where the project is located, is referred to as "the preliminary CIA report" (p. 30).

Has the CIA document been reviewed and accepted by Office of Hawaiian Affairs and State Historic Preservation Division? This important information is not revealed or discussed. Will the future CIA make reference to the over 200 cultural sites found in Palau'ea less than a half mile seaward of the proposed project? Will it discuss Pae'ahu's significant burial complex (over 344 individuals) just downhill at the Grand Wailea and the cluster of ceremonial and burial sites found both in Palau'ea and Keaouhou? None of this information is currently discussed in either the EA/EISPN's Cultural Resources section or the existing CIA, yet it is very important to the assessment of the area's overall cultural significance.

An EA would need to include identification and summary of impacts and proposed mitigation measures.

The EA makes no mention of the presence of an endangered species of native Hawaiian moth on site or the presence of several rare species of endemic plants. In fact, just the opposite statement is made in section 7.1 (9) where it is "anticipated that the proposed Honua'ula community "Will not substantially affect a rare, threatened or endangered species or its habitat."

This conclusion cannot be drawn from the minimal amount of information provided in the document. It is disturbing that any reference to these well documented endemic species of flora and fauna is either downplayed or omitted.

release of this document and responded. Rules require both an EA and an EISPN to include those comments.

An EA would need to include discussion of Alternatives to the Project that were considered.

Since information is not provided on which to base a true assessment, the Alternatives section does not discuss many other viable options. These would include:

- A proposed action with a smaller developed footprint
- A project with the recommended 130 acre habitat preserve included
- A project with a reduced irrigated golf course area to mitigate the adequacy of water supply concerns

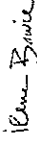
An EA would have a discussion of findings and reasons supporting the agency anticipated determination. The Findings and Determination listed in section 7 only refer to the state Highway ROW and private sewage plant as triggers for an EIS.

In truth, there are a number of other serious impacts that remain unresolved with this project. An EA should include a full analysis of impacts to:

- native flora and fauna
- groundwater supplies
- cultural sites and practices
- historic and traditional roads and trails
- marine environment, due to runoff/drainage impacts from major gulches
- traffic

Thank you for the opportunity to offer these comments. We hope that the Maui County Planning Department and the OEQC will request a full and complete EA for this project allowing its impacts and benefits to be accurately assessed and mitigated.

Sincerely,



Irene Bowie
Executive Director

55 N. Church Street, Suite A-5, Wailuku, Hawaii 96732 (808)244-7570 director@maui-tomorrow.org

The EA/EISPN also fails to reveal that biologists have already commented that the proposed 22-acre preserve is inadequate for habitat needs of the endangered moth and rare plant communities. There is no justification for the decision of proposing such a small preservation area (.03% of the total land) for native species which currently have the right to exist on roughly 30% of the land. There is no information given why other areas of the property rich in native species and cultural sites were not included in the preservation area.

It is also unfortunate that this document omits important language (underlined below) when describing the Maui County Council's condition number 27 (section 3.6). This language specifies that the proposed Native Plant Habitat Easement of up to 130 acres:

"...will comprise the portion of the property south of latitude 20 40' 15.00 N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres."

It is important that members of the public or agency staff reviewing this document have an accurate description of the review being required by this condition. The language used in the EA/EISPN would lead a reviewer to believe that the applicant will be deciding which sections of the proposed 130 acre habitat area "do not merit preservation."

The Council condition is very clear, that this responsibility falls upon state and local wildlife agencies and the Army Corps. Early consultation letters are available from those agencies. They should be included in this EA/EISPN, according to OEQC requirements.

In many instances this document refers to future studies on water, wastewater, cultural resources, botanical resources, Marine Water Quality Assessment, Traffic Impact Assessment Report, Market Assessment, etc which would provide information to help accurately assess future impacts. Instead, this document proposes mitigations without any assessment of the impacts. To be in compliance with HAR 11-200-9, an EA must actually provide enough information to make an assessment of potential impacts.

The "mitigations" proposed in this document are usually the unilateral conditions which were required by the Maui County Council during the rezoning process. Many necessary studies were unavailable to the Council before they adopted their recommended mitigations. While Council members made their recommended conditions with the best information they had, additional mitigations are likely to be warranted once more specifics are known about the project.

HRS 343 requires this information to be made available at the earliest opportunity in the environmental review process. Any mitigations proposed would be based upon an assessment of the specific proposed actions. This document does not conform to that requirement, since most specifics are missing.

Council members were repeatedly told by the applicant that the missing information on the project's specific plans would be provided during Project District Phase II Review. This is the first document of that Phase II Review. That information should be included in order to have a valid EA.

An EA would need to include written comments and responses to the comments under the early consultation under HAR 11-200-9(a)(1), 11-200-9(b)(1), or 11-200-15. It is acknowledged that a number of agencies and organizations were consulted prior to the



March 9, 2010

PRINCIPALS

THOMAS S. WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, PASLA, LEED® AP
Executive Vice-President

VINCENT SHIGIKUNI
Vice-President

GRANT T. AURAKAMAI, AICP, LEED® AP
Principal

W. FRANK BRANDT, PASLA
Chairman Emeritus

ASSOCIATES
TONY SCHWELI, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KYVON K. NISHIKAWA, ASLA
Associate

KIM MUKAHYI YUEN, LEED® AP
Associate

SCOTT ALIKA ABRIGO, LEED® AP
Associate

SCOTT AURAKAMAI, ASLA, LEED® AP
Associate

DACHENG DONG, LEED® AP
Associate

HONOLULU OFFICE
100 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5164
Tel: (808) 521-1031
Fax: (808) 521-1402
E-mail: sysandmg@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamolea Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 521-5651
Fax: (808) 528-3163

Irene Bowie
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 3

The Draft EIS also will contain:

- An executive summary that identifies and summarizes potential impacts and proposed mitigation measures, which will be more fully explained in the body of the Draft EIS;
- Written comments received on EISPN and the EA/EISPN and responses;
- Discussion of alternatives considered;
- Botanical and wildlife surveys that list all plant and animal species currently found on the property, along with discussion of potential impacts and proposed mitigation measures;
- Assessment of the potential impact on water resources, which includes discussion on: 1) Honua'ula's water use; 2) potential impacts to downgradient wells; and 3) proposed mitigation measures;
- An Archaeological Inventory Survey, Cultural Impact Assessment, and Cultural Resources Preservation Plan; along with discussion of potential impacts and proposed mitigation measures;
- Discussion on: 1) steppingstone trail segments within the property; 2) the Kanaio-Kalama road; and 3) recommendations from the Cultural Impact Assessment regarding traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the *ala i ke kula* (pathway to the uplands));
- A nearshore water quality assessment and a marine ecological monitoring report to assess current conditions and propose mitigation measures as appropriate; and
- A Traffic Impact Analysis Report, along with discussion of potential impacts and proposed mitigation measures

Thank you for the clarification regarding the approving agency for Project District Phase II application. The Draft Environmental Impact Statement (EIS) will indicate that the Maui Planning Commission is the approving agency for Project District Phase II application. Honua'ula Partners, LLC does not intend to return to the Maui Council to request amendments to the Project District Ordinance.

We are aware of the conditions and timing requirements for various plans and studies required under the Unilateral Agreement attached to County of Maui Ordinance No. 3554. The Draft EIS will contain a discussion of compliance with the conditions. In addition, various required plans and studies will be provided as appendices to the Draft EIS. These will include: 1) a preservation/mitigation plan pursuant to Chapter 6E, Hawaii Revised Statutes (Condition 26); 2) a Cultural Resources Preservation Plan (Condition 13); 3) a Conservation and Stewardship Plan (Condition 27); and 4) an assessment and mitigation measures for the endangered Hawaiian Owl and Hoary Bat (Condition 9). All of these plans will be prepared in conformance with the requirements of the specific conditions.

In compliance with Condition 27, the report entitled "Remnant Wiliwili Forest Habitat at Wailea 670" by Dr. Lee Altenberg will be submitted to the Department of Land and Natural Resources, the U.S. Fish and Wildlife Service (USFWS), and the U.S. Corps of Engineers for review.

In further compliance with Condition 27, Honua'ula Partners, LLC will provide a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and

Maui Tomorrow Foundation, Inc.
c/o Irene Bowie
P.O. Box 299
Makawao, HI 96768

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE

Dear Ms. Bowie:

Thank you for your letter dated April 6, 2009 faxed to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN) and your letter dated November 16, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN public comment period, Honua'ula Partners, LLC consulted with the Office of Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8, 2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills all the requirements and components [of] an environmental assessment." Pursuant to the instructions of the OEQC Director, the Maui County Planning Department subsequently submitted an Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) to OEQC on September 18, 2009.

With respect to your statements regarding alleged deficiencies of the EA/EISPN, please note that the EA/EISPN is a notice document and is intended to set forth the proposed scope of the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR) support the functioning of the EISPN as an EA in situations where projects go directly to the more stringent full disclosure requirements of the EIS. This has been a long recognized and established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that the EA/EISPN does not contain every detailed element specified within HRS Chapter 343 for an EA does not take away from the fact that the completed EIS will be a full disclosure document having to comply with the requirements of HRS Chapter 343.

The Draft EIS is the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices.

Irene Bowie
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE
March 9, 2010
Page 3 of 3

location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Anwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanaio (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Honua'ula is not expected to significantly impact any endangered species. Several wildlife surveys of the Property have been conducted since 1988, with the most recent completed in 2009. Evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the Property in the most recent survey (although not in previous surveys). The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures, including a multi-species Habitat Conservation Plan (to also include the candidate endangered 'āwīkīwīki plant) prepared under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with DLNR and USFWS.

We will include Maui Tomorrow as a consulted party and provide a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Maui Tomorrow

>>> Elle Cochran <ellecochran@gmail.com> 4/7/2009 9:06 PM >>>
To whom it may concern: The community group Maui Unite! would like to be a consulted party during the EIS Prep Notice process for Wailea 670/Honua'ula project.

On behalf of Maui Unite! please send any information to:
Elle Cochran
553 Office Rd.
Lahaina, HI. 96761

808-281-7709

Mahalo for this opportunity to be involved,
Elle Cochran
President
Maui Unite!



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

ISSELL Y. L. CHING FASLA, LEED AP
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

FRANK BRANDT FASLA
Chiefman Emeritus

FRANK BRANDT FASLA
Chiefman Emeritus

ASSOCIATES

TONY SCHELL, AICP
Senior Associate

ALFONSO T. HIGA, ASLA
Senior Associate

EVYNN NISHIKAWA, ASLA
Associate

IRUHIKAMI YUEN, LEED AP
Associate

COTT ALIKA ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

WACHENG DONG, LEED AP
Associate

ONOLU LUO OFFICE
20 Bishop Street, Suite 600
Honolulu, HI 96813-3404
Tel: (808) 521-5631
Fax: (808) 523-1802
Email: psd@pbrhawaii.com

ADOLETTE OFFICE
41 Kamaelea Boulevard
Ipaolu Building, Suite 313
Ipaolu, Hawaii 96707-2685
Tel: (808) 521-5631
Fax: (808) 523-3163

Maui Unite
c/o Elle Cochran
553 Office Rd.
Lahaina, HI 96761

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Cochran:

Thank you for your e-mail dated April 7, 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include Maui Unite as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISP/N. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905 08 EA EISP/N Elle Cochran Maui Unite

From: Save Makena.org
c/o Angie Hoffman
37 Lana Street
Paia, HI 96779

April 6, 2009

Re: Honua'ula Project (EISP/N)

To: Honua'ula c/o Goodfellow Brothers, Inc.
P.O. Box 220, Kihei, HI 96753.
Attention: Charlie Jencks Fax: 879-2557

Aloha Mr Jencks

Mahalo for this opportunity to comment. Save Makena.org requests to be a consulted party during the EIS process for Wailea 670/Honua'ula project.

We are requesting that a the Draft EIS address the lack of in depth, specific information that was apparent during the County Council Phase 1 project district review of this project. It was promised that this information would be supplied during Phase II review, which we would assume, includes the proposed DEIS.

Specific information that we would like to see provided are the analyses described in the county's change in zoning ordinance (Title 19 chapter 19..510 MCC)

- 1) Water source, supply and distribution analysis
- 2) Sewage disposal analysis
- 3) Traffic impact analysis
- 4) A complete Archaeological inventory Survey, reviewed and approved by OHA, SHPD, Maui-Lanal Burial council, Maui CRC and lineal descendants of these lands. The AIS should include cultural and historic sites on the proposed project and their relationship to sites on surrounding lands.
- 5) Identification of traditional beach and mountain access trails and additional trails which may be required for public access to the beaches and mountains, and if applicable, preservation/mitigation plan, and comments from the department of Land and Natural Resources and the Office of Hawaiian Affairs;
- 6) Analysis of the secondary impacts of the proposed project on surrounding uses.

We are also concerned that nearly a year has passed since Honua'ula LLC has received rezoning approvals based upon the unilateral conditions adopted by the Maui County council, but it does not appear to be following those conditions in the preparation of its DEIS. The Botanical-Cultural preserve area shown in the



EISPN map appears to ignore condition number 27 which calls for the area of the preserve to be set in consultation with conservation agencies such as USFWS.

We look forward to reviewing the Draft EIS.

Mahalo Nui

Angie Hoffman
For Save Makena.org

Cc:
County of Maui, Planning Department, 250 South High Street, Wailuku, HI 96793. Jeff Hunt Fax: 270-7634
PBR HAWAII, 1001 Bishop Street, A5B Tower, Suite 650, Honolulu, HI 96813.
Tom Schnell 808 523-1402

State Office of Environmental Quality:
Fax. 586-4186

March 9, 2010

PRINCIPALS
THOMAS WITTER, ASIA
Principal
R. STAN BUNGNAN, ASIA
Executive Vice President
RUSSELL YI-CHUNG FASIA, LEED[®] AP
Executive Vice-President
VINCENT SHIGERANI
Vice-President

GRANT T. NURAKAMI, AIA, LEED[®] AP
Principal
W. FRANK BRANDT, FASIA
Chairman Emeritus

ASSOCIATES
TOM SCHINELL, AIA, LEED[®] AP
Senior Associate
RAYMOND T. HIGA, ASIA
Senior Associate
KEVIN K. NISHIKAWA, ASIA
Associate
KIMI MIKAMI YUEN, LEED[®] AP
Associate
SCOTT ALJKA ABRIGO, LEED[®] AP
Associate
SCOTT NURAKAMI, ASIA, LEED[®] AP
Associate
DACHENG DONG, LEED[®] AP
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5484
Tel: (808) 521-5631
Fax: (808) 523-1402
E-mail: systems@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehale Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 521-5631
Fax: (808) 359-3166

Save Mākena
c/o Angie Hoffman
37 Lana Street
Paia, HI 96779

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Hoffman:

Thank you for your letter dated April 6, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will be a full disclosure document prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices.

The Draft EIS will include:

1. Information regarding Honua'ula's private water system, including information on source, supply, and distribution;
2. Information on Honua'ula's proposed wastewater system;
3. A Traffic Impact Analysis Report;
4. An Archaeological Inventory Survey, Cultural Impact Assessment, and Cultural Resources Preservation Plan;
5. Discussion on: a) steppingstone trail segments within the property; b) the Kanaloa-Kalauna road; and c) recommendations from the Cultural Impact Assessment regarding traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the *ala i ke kula* (pathway to the uplands));
6. An analysis on cumulative and secondary impacts.

Draft EIS will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554, including Condition 27, which requires the establishment of a Native Plant Preservation Area subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and, and the U.S. Corps of Engineers.

We will include Save Makena as a consulted party and provide a copy of the Draft EIS when it is available.

Angie Hoffman
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

Thank you for reviewing the EISP. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP Angie Hoffmann Save Makana 4-6-09

Save Makana.org
November 13, 2009

To: PBR Hawaii & Associates
1001 Bishop St, Suite 650
Honolulu, HI 96813-3484
Attention: Tom Schnell

Re: Comments on Honua'ula Project (EA/EISP)

Aloha Honua'ula Project 'Ohana.

Save Makana, on behalf of many local residents and especially our youth, say mahalo for this chance to offer our comments on Wailea 670/ Honua'ula EA and EISP.

First we would like to ask that more information be given in this document. We have reviewed other Environmental Assessments that actually contained specific reports on important topics. Topics like: extent of cultural and natural features; traffic analysis; police or fire personnel needed; number of jobs created; school children that would need to be accommodated. None of this information is offered in this EA.

This Assessment should have the reports described in Section 1.6 (p. 3) already included in it. We sat through many hours of public hearings where we heard that all the specific studies were going to be done as part of Phase II of this project. This is Phase II, and now we are being told to wait for another document. We respectfully request the County of Maui Planning Commission and staff to insist that the public get the information they need earlier in the review process, rather than later.

We also would like this Assessment and any future environmental documents regarding Wailea 670/Honua'ula to describe the land and its existing resources more respectfully.

A few examples we would like to see changed:

Section 1, page 1 "Existing use" is described as: "Vacant, open land with scrub vegetation and lava rock."

Hundreds of native wiliwili trees and other native plants have lived on this land, probably for thousands of years. They have every right to continue being

inhabitants, right where their life began. It is not respectful to describe them as "scrub vegetation".

Yes, they are mixed with non-native species, but so are the plants at protected preserves like Pu'u o Kali, Auwahi and Pu'u Mahoe. The wiliwili trees are not all blighted and dying. They have flowers and seeds and are fighting back the pests. Their groves should be mapped and a preservation plan presented in the EA.

The proposed 22-acre native plant preservation area shown on the project map is much too small. It would mean that hundreds of native plants like the increasingly rare maiopilo would be left unprotected and destroyed.

The "lava rock" also is worthwhile of our respect and admiration. People fly thousands of miles to go see Haleakala crater for its striking lava formations. The natural shapes and colors of the lava formations in Wailea 670- in the gulches of Pae'ahu and the lands of Palauea, Keauhou are equally worthy.

Some of the pohaku are shaped like natural chairs, or have puka all the way through them, or look like "faces." Please include pictures of the real natural wonders of these lands, not just the ocean views that can be sold.

If amazing natural lava formations like those found in Wailea 670 were located in a public park, they would be considered valuable resources. That value shouldn't be dismissed just because they are on private land. If these formations are lost to make a private golf course, we will all lose something very unique. The EA should document these natural and cultural features and discuss how they will be preserved.

Site Photos need to show more sides of the land.

The Site Photographs in figure 4 should include more images and include scenes that acknowledge the many amazingly beautiful native plants that live in the area.

The area in picture number 3, labeled "buffelgrass" for example probably has native pill grass intermixed. There are a number of meadows across Wailea 670 that have abundant pill grass and this fact shouldn't be hidden or downplayed.

The Honua'ula cultural advisors said in section 4, that they want to see as many of the native plants as possible left undisturbed. This EA should celebrate that fact that 78 species of native plants, some very rare and beautiful, currently live on this land and need to be protected. We need to have pictures that show the real story so the Planning Commission can make a sound recommendation and sensible mitigations.

Picture number 4 gives another opportunity for more education. Some of the "dirt roads" that go through the project area have been in use for more than fifty years and are protected as historic roads. The Kanaio-Kalama Park road shown on fig 3 (the tax key map) is one such road. Its existence and history should be noted and discussed in the EA along with plans for preservation.

The many sections of traditional stepping stone trails across the lava fields of Wailea 670 should be mapped and protected to help future generations understand the places where their kupuna walked the land. Only a few of these sections are on the archaeological survey maps yet. Our South Maui Community Plan has a Policy "number 7" that speaks to historic roads and trails like these:

"Preserve and restore historical roads and paths as cultural resources and require such resources to be available to the public."

While the EA/EISP/N states that the project will be in compliance with the Community Plan, it never discusses the historic roads and trails, but seems to pretend that none exist. Once again, this is a topic where the cultural advisors felt that the way to the ocean and the way to the mountains should remain open.

Save Makena has many young supporters who want to be able to know the actual roads and trails handed down over time. They do not want a substitute trail created where it is convenient, while the authentic ones are destroyed and lost forever, as has happened so many places on Maui. This topic should be clarified in the EA.

Cultural sites

Save Makena has long called for better research and documentation of cultural sites in Wailea 670 and their preservation as a cultural landscape, not in isolated buffer zones on golf courses. We note that a over year has passed since County Council meetings on the project ended and still there is no comprehensive AIS in the EA.

We are also disappointed to see a Cultural Impact statement quoted from that doesn't even mention all the cultural sites that are known the ahupuaa of Palauea, Pae'ahu and Keauhou. These are the ahupua'a where Wailea 670 lies.

All these local ahupua'a have lots of cultural sites- heiau, mua, ko'a house sites, wells, shrines, burials, and agricultural complexes. Many of the sites in Palu'ea etc. may directly related to those being found in Wailea 670. This must be researched and discussed in the EA so we don't lose a big part of our history. None of this is even mentioned in the EA or the CIA. Instead there are discussions of Kaupo and Kahikinui (which are not part of the moku of Honua'ula, but have their own moku)

Native plants and creatures

In section 3.6 the native plant habitat is described, but there is no mention there, or anyone else that a beautiful and highly endangered native creature, the Blackburn Sphinx moth, is known to live and breed on the Waialea 670 lands. We have had people come to our Save Makena meetings who have seen the moth in the vicinity.

We have spoken to US Fish and Wildlife Service who explained that the moth has been documented on the land and under federal law, an agreement would need to be reached with the landowners to set up a habitat for it.

It doesn't seem entirely accurate to have the EA state on p. 22 that Honua'ula LLC "voluntarily decided to conserve portions of Honua'ula and attempt propagation of selected remnant native dryland forest plants located onsite.."

The County Council wrote a specific condition (no. 27) that required a preserve to be established. In fact, on p. 23 the language of condition 27 has been selectively edited which has the result of mis-interpreting the intent of the condition. Save Makena Members sat through many years of meetings discussing Waialea 670.

We remember the public meetings and hearings back in 2002 where the plan for Waialea 670 was to move native plants into the gulches. Then later there was an 8-acre preserve proposed. That became a 16 acre preserve and then the County Council passed condition 27 that specified:

27. That Honua'ula Partners, LLC, its successors and permitted assigns, shall provide the report "Remnant Wilivili Forest Habitat at Waialea 670, Maui, Hawaii by Lee Altenberg, Ph.D.", along with a preservation/mitigation plan, to the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers for review and recommendations prior to Project District Phase II approval. The Maui Planning Commission shall consider adoption of the plan prior to Project District Phase II approval.

Such plan shall include a minimum preservation standard as follows: That Honua'ula Partners, LLC, its successors and permitted assigns, shall establish in perpetuity a Conservation Easement (the "Easement"), entitled "Native Plant Preservation Area", for the conservation of native Hawaiian plants and significant cultural sites in Kihai-Makena Project District 9 as shown on the attached map. The Easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130 acres.

This is a good condition and it makes it clear that state and Federal agencies should be the ones who determine if any of the 130 acres is not needed for native plant and endangered insect habitat. The EA should make this point clear. Letters should be included in the EA from the state and federal wildlife agencies with their comments on the proposed 22-acre preserve. There is no discussion assessing its size and location compared to maps of native plant and insect populations and how it meets condition 27.

Save Makena feels that based on all we know about the extensive native plant areas in Waialea 670, 22 acres is much too small for the plants to survive and flourish. Respected biologist Dr. Angela Kepler wrote an opinion that a much larger area would be needed if the endangered species were to have enough biological diversity.

She also pointed out that watering and fertilizer conditions that suited golf courses and landscaping were often very hard on native species and the landscape plants brought in different diseases and bugs to which native plants had no resistance. Dr Kepler recommended the plants and their natural ecosystem, including even the non-native plants, needed to have a large space to themselves, not be an island in a man-made landscape. None of this important debate is included in the EA.

The EA should report things honestly and reveal that a number of the rarest native plants found in Waialea 670, the 'awikiwiki plant, have already been destroyed through careless grading by previous owners.

The current owner's commitment to native plants also appears shaky when one reads in the sustainable design features section (p.13) a statement like: "where feasible landscaping will include use of drought tolerant/and or slow growing hardy grasses, native and indigenous plants, shrubs , etc..." This is a rather meaningless statement in terms of having any measurable goals for Environmentally Responsible building.

Since Waialea 670/Honua'ula already has 670 acres of native and non-native drought-tolerant landscape with no outside water demand, the EA should assess what portion of that very efficient landscape will be lost to the proposed development and what portion of the project area is expected to utilize native landscape as a mitigation for that loss.

On page 40, the discussion of mitigating increased energy demands lists "energy saving methods and technologies." These are described, but the project makes no commitment to any of them except to say that "they will be "considered." It would not appear that "considering" any of these methods etc would qualify as any kind of mitigation at all. A mitigation is an action.



On p. 44 the mitigation for increased need for police services is a contribution towards the new police station. We have heard police representatives testify that a large subdivision like Wailea 670 increases the need for more police officers, as well as more station space. The EA should discuss how many more officers are needed at what buildout levels and whether the development will generate enough revenues to meet that need.

Save Makena would ask the officials and agencies reviewing this document to have it reissued with more in depth information and honest discussion of the actual impacts to existing resources.

This would include looking at some alternative designs for the project itself. The impacts associated with the proposed offsite affordable housing in north Kihei should also be discussed in the EA.

Mahalo for a chance to comment.
 Elle Cochran
 Member Save Makena.org
 55 N. Market St. Suite # A-5
 Waialuku, HI. 96793

March 9, 2010

PRINCIPALS

- THOMAS S. WITTEN, A.S.L.A.
President
- LESLIE DUNNAN, A.S.L.A.
Executive Vice-President
- RUSSELL Y. L. CHUNG PASLA, LEED[®] AP
Executive Vice-President
- VINCENT SHIGEKUNI
Vice-President
- FRANK T. NURAKANI, AICP, LEED[®] AP
Principal
- W. FRANK BRANDT, PASLA
Chairman Emeritus

ASSOCIATES

- TON SOJINELL, AICP
Senior Associate
- RAYMOND T. HIGA, A.S.L.A.
Senior Associate
- DEVIN L. NISHIKAWA, A.S.L.A.
Associate
- UMAIRAH AH YUEN, LEED[®] AP
Associate
- SCOTT ALJAKA, ABRIGO, LEED[®] AP
Associate
- KOTT NURAKANI, A.S.L.A., LEED[®] AP
Associate
- JACHENG DONG, LEED[®] AP
Associate

HONOLULU OFFICE
 601 Jiliny Street, Suite 405
 Honolulu, Hawaii 96813-3184
 Tel: (808) 521-5631
 Fax: (808) 523-1402
 E-mail: spadmin@pbrhawaii.com

CAPOLLE OFFICE
 601 Kamaokila Boulevard
 Spaldt Building, Suite 313
 Capolea, Hawaii 96707-2065
 Tel: (808) 521-5631
 Fax: (808) 523-5163

Save Mākena
 c/o Elle Cochran
 55 N. Market Street, Suite A-5
 Waialuku, HI 96793

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Ms. Cochran:

Thank you for your letter dated November 13, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your concerns.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Technical studies provided in Draft EIS will include, among other studies, a:

- Botanical Survey
- Wildlife Survey
- Conservation and Stewardship Plan
- Archaeological Inventory Survey
- Cultural Impact Assessment
- Cultural Resources Preservation Plan
- Traffic Impact Analysis Report
- Economic Impact Analysis and Public Costs/Benefits Assessment.

Wording of Draft EIS. We hope you find that the Draft EIS describes the land and its resources respectfully.

Williwi Trees. Regarding your concern about native williwi trees, the Draft EIS will include discussion on these trees as well as other native and non-native plants on the property. The Botanical Survey, included as an appendix, will include more in-depth discussion.

Lava Rock. Regarding lava rock and other features, a principal design and planning goal is to preserve defining features of Honua'ula as much as possible. To this extent the Draft EIS

Elle Cochran

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010

Page 2 of 3

will include Design Guidelines and a Landscape Master Plan, that both call for the integration of lava rock as a defining element of Honua'ula.

Site Photos. The Draft EIS will include photographs of the property that capture the natural environment and characteristics of the land. Additional photos of botanical and other natural features found on the Property will be included in the various studies contributing to the EIS.

Trails and Roads. The Draft EIS will include discussion on: 1) steppingstone trail segments within the property; 2) the Kanaloa-Kalama road; and 3) recommendations from the Cultural Impact Assessment regarding traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the *ala i ke kula* (pathway to the uplands)).

Cultural Resources. The Draft EIS will contain an Archaeological Inventory Survey, a Cultural Impact Assessment, and a Cultural Resources Preservation Plan, which provides specific preservation and mitigation measures based on community input and the findings of the Cultural Impact Assessment and Archaeological Inventory Survey. The Cultural Impact Assessment and Cultural Resources Preservation Plan provide historical accounts of the Honua'ula moku and discussion on each of the ahupua'a that span the property. The Archaeological Inventory Survey identifies archaeological sites such as the steppingstone trail segments, multiple stone feature complexes, and historic rock walls; however no heiau, hale mua, shrines, or burials have been identified on the property.

Native Plants and Creatures. Several wildlife surveys of the property have been conducted since 1988, with the most recent completed in 2009. Although not found in previous surveys, evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the Property in the most recent survey. The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures, including a multi-species Habitat Conservation Plan (to also include the candidate endangered 'āwikiwiki plant) prepared under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with DLNR and USFWS. The Draft EIS will include the most recent wildlife survey.

Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kamalo (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native

Elle Cochran

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

March 9, 2010

Page 3 of 3

Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Energy Demands. Honua'ula Partners, LLC is committed to limiting the environmental impact of Honua'ula by reducing energy consumption. As will be discussed in the Draft EIS, all energy systems for all residential units will meet all applicable ENERGY STAR requirements established by the EPA in effect at the time of construction. All homes will be equipped with a primary hot water system at least as energy efficient as a conventional solar panel hot water system and other energy-saving concepts and devices will be encouraged in the design of Honua'ula. Design standards will also specify low-impact lighting and encourage energy-efficient building design and site development practices.

Public Services. The Draft EIS will include an Economic Impact Analysis and Public Costs/Benefits Assessment. Honua'ula will contribute to increased State and County revenues in the form of increased property taxes, general excise taxes, and increased income taxes from increased employment. Should the State and County choose to allocate these additional tax revenues to fund more services to protect public health, welfare, and safety, any cost to the public that may result will be effectively minimized. Honua'ula will also contribute significantly to the provision of public services by directly providing:

- \$5,000,000 to the County for the development of the South Maui Community Park and a in-lieu cash contribution to satisfy the park assessment requirements under Section 18.16.320, MCC (currently set at \$17,240 per residential unit) in addition to providing parks within Honua'ula that are open to the public but privately maintained;
- \$3,000 per dwelling unit (totaling \$3.45 million) to the Department of Education for schools serving the Kihiet-Mākena Community Plan area;
- Two acres of land to the County of Maui for the development of a fire station; and
- \$550,000 to the County for the development of a police station in South Maui.

We will include Save Mākena as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EIS/SPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Sierra Club Maui Group
PO Box 791180
Pa'ia, HI 96779
November 16, 2009

Tom Schnell, AICP
Senior Associate
PBR Hawaii & Associate, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-1402
Fax: (808) 523-1420
E-mail: svsadmim@pbhawaii.com

Re: Honua'ula EA/EISP/N

Dear Mr. Schnell,

Thank you for the opportunity to review this document. We would request to continue being a consulted party in this process. We would also request that your firm and your client, Honua'ula LLC clarify to agencies and the public if this document is meant to be a Draft EA? It appears to be the same as the earlier EISP/N that was released earlier this year.

Sierra Club Maui Group is a branch of the nation's oldest environmental education and advocacy organization, founded by John Muir in 1892. The Maui Group has been established over 30 years, since 1976. In that time Maui group volunteers have read and commented on over one hundred environmental documents. We wish to offer the following comments:

ADEQUACY OF PROPOSED EA/EISP/N

Based upon our long organizational experience and in consultation with Hawaii Revised Statutes and Hawaii Administrative Rules, we would request that the applicant withdraw this document and replace it with an actual Draft EA which follows the requirements of HAR 11-200-9 B, Section 4, 5, and 7, and 11-200-11.2. These rules require that the EISP/N be filed with a supporting final environmental assessment report. The document entitled EA/EISP/N does not meet the standards required of an FEA.

The OEQC, which is responsible for administering the state's environmental review process has a list of requirements that must be met in the completion of environmental documents. This document lacks important information to meet the requirements of either an EA or an EISP/N. This information includes comment letters from agencies and community groups during early consultation process, a discussion of project funding and, in the case of a Draft EA, a specific description of anticipated actions, impacts and mitigations.

It would appear that this project may be trying to avoid any level of disclosure that would reveal the need for environmental review based upon more conditions than the two

mandated triggers listed. Construction of a private wastewater plant and use of state or county land are certainly undeniable triggers for an EIS. A factually accurate EA which disclosed the many new discoveries and changing conditions surrounding the project, would rightfully conclude that the level of investigation needed to examine the possible impacts would trigger EIS review.

An EA would need to assess the impacts of these new aspects of this 20-year old project:

- 1) A growing number of significant archaeological sites, when none were formerly acknowledged.
- 2) A change in the project's anticipated water supply from public to private, the addition of off site wells and possible need for a desal facility
- 3) New documentation indicating the land serves as habitat area for 24 native plants, some very rare, and a number of native insects, including one endangered species (*Manduca*, *Blackburn Sphinx moth*) and several candidates for federal threatened species (*'awikiwiki* and *Maiapilo plants*)
- 4) Increased information regarding impairment of nearshore marine waters down slope from the project
- 5) Presence of historic roads and trails onsite, never before acknowledged.
- 6) Change from public to private wastewater disposal
- 7) The inclusion of off site housing in a specific North Kihei Industrial site to satisfy a portion of affordable housing requirements.

Adequacy of Topics Reviewed in the EA

The EA gives inadequate and sometimes even inaccurate information in a number of areas required by the HRS Ch 343 process to be reviewed and assessed. Detailed remarks will be reserved for the actual Draft EA when it is released, as we trust it will be.

Cultural Resources

There remain many more cultural sites to be documented in the rugged landscape of Palau'ea, Keauhou and Pae'ahu also known as Wailea 670/Honua'ula. The 22 acre Palau'ea Cultural Preserve and its four heiau/shrines and more than 250 cultural features, located immediately downhill from the project area, is not even discussed in the EA. Nor is it referred to in the fragments of the project's CIA that are quoted in the EA. This is a huge gap in cultural review.

A number of cultural site clusters, with over a hundred features, were documented in Palau'ea and Keauhou in the 1990's by Gosser et al before construction of the Wailea Emerald and Gold golf courses that border the proposed project. These site clusters included agricultural and habitation complexes (one with more than 50 features), multiple burials, terraces, ceremonial sites, cave shelters, pathways and major boundary walls. Some of these sites continued mauka into Wailea 670 lands.

In the makai portion of Pae'ahu ahupua'a (Wailea) over 300 burials have been documented and numerous other features have been recorded such as the Wailea Point complex. Carbon dates show continuous use of this area from 1300 AD or earlier. The gulches that terminate at the sea along the wailea coast are the same ones which

Flora & Fauna

The EA and every document or study produced to date by the applicant have significantly down played the presence and importance of native plant habitat on the site. A description from a 2003 National Park Service study points out the biological value of a similar a'a lava flow ecosystem a few miles further south along Keoneoia bay:

"The study area contains a single site of the extremely rare 'Akoko (Chamaesyce celastroides) Coastal Dry Shrubland community. There is also a very small population of the rare herb 'ini (Portulaca villosa) and a large population of the rare mai'apilo shrub (Capparis sandwicheana). The mai'apilo is considered to be rare on the other main Hawaiian islands. Both the native mai'opilo and the native 'ili are currently candidate species for endangered status. The presence of rare native plants plus the presence of a very small population of 'Akoko may give certain portions of the study area significance in terms of native vegetation at the state level."

The southern portion of Wailea 670/ Honua'ula also has the presence of the very rare 'akoko plant and a very large population (perhaps more extensive than that further south) of the candidate species mai'apilo. The report notes the presence of the rare nehe, 'anunu and uluhi and the candidate 'awikiwiki, but fails to mention the need for an extensive habitat preserve area.

The ENEISPN describes the remarkable collection of native plants present on the site as "scattered remnants." The document does not explain that native dryland forests are the most threatened of Hawaiian ecosystems and only exists as "remnants." There is no mention that mai'apilo, abundant and healthy throughout the southern 200 acres of the project area, is now so rare on every other Hawaiian Island that it is proposed as a candidate for federal listing.

The northern portion of Wailea 670 also has some documented native species, such as pili grass and possibly more. What appears very clear is the need to not just list the number of past studies conducted as proof that biological resources have been well documented. In truth, these past studies left most of the resources undocumented. Instead, the EA should include a far more thorough review of the rugged area, to accord it the full biological value and protection it deserves.

As a comparison, Kaiboko/Honokohau National Historic Park, which had extensive plant studies done in the mid 1990's, has a very similar species mix of introduced aliens (69%) and native dryland forest (29%) species plants. While 24 native species have been recorded thus far at Wailea 670, mostly in the southernmost 200 acres, the more thorough National Park studies documented 42 species of indigenous and endemic plants in the 1160-acre Kaloko park.

If Wailea 670 were public land, it is likely that large areas of it would be proposed for critical habitat and native species recovery management. The fact that it is private land, should not diminish its biological value. In the light of what is currently known, a minimum of 130 acres of habitat should be preserved for native flora and fauna, including the endangered manduca. The 22 acres proposed would condemn hundreds of healthy native wilwilii, maiopilo and other plants to destruction or severe habitat degradation.

traverse Wailea 670. Very little effort appears to have been spent surveying the gulches of the project area.

In general, no effort has been made at all by this project to "connect the dots" of the extensive archaeological research that has been done immediately down slope in the same ahupua'a of Pae'ahu, Palau'ea and Keaunohu.

In contrast, the nearby Keoneo'io coastline has been the focus of a half dozen cultural studies over the last 80 years. The 2003 National Park assessment report on the area noted:

"Altogether, about 34 individual archeological sites, containing about 1,100 known features, have been recorded within the study area. Nearly all of the recorded sites and features are comprised exclusively of rock construction and occur in complexes of at least eight and as many as 150 features.."

Professional archeologists believe that additional more intensive surveys would identify as many as twice the known number of features within the study area."

Much the same level of site density holds true for the rugged lands of neighboring Makana Resort (where 600 sites with over 1000 features have been documented) and Wailea 670. If a thorough effort can not be made to document the complexes of sites there, at least a large area should be left undisturbed to allow future researchers the opportunity to protect the region's historical legacy.

Historic Roads and Trails

Sierra Club Maui Group would urge the county Planning commission and county staff to require the applicant to map and identify the many segments of traditional stone trails present in the Wailea 670 property. Any cultural preservation plan should include a complete account of these extremely valuable cultural resources, not just the few fragments that are now recorded. Each survey has revealed more trail segments. Unfortunately, most lie in areas proposed for development, unless a more realistic native plant and cultural preserve area, such as that proposed by the County Council, is set aside.

The historic Kanaio-Kalama park pictured in Figure 3 of the EA needs to be acknowledged as a historic road and trail. It was in public use eighty years ago or more, but later appears to have been, rightly or wrongly, subsumed into the private parcels of Wailea 670. The status of this road, should be clarified during the EA process. If it existed and was in public use during the earlier part of the century, should it be preserved, to allow traditional access, regardless of ownership claims?

The road's history was discussed by local Kupuna Uncle Edward Chang Jr. when he testified to the Public Works committee of Maui County Council July 2, 2001. He stated:

"The road from Kihei to Ulupalakua Junction was rebuilt in WWII. There was never a road, when I was a kid (1930s) from Ulupalakua Junction in Makana to Kalama Park, but there was a trail. And that trail has since been privatized and bought out."

Drainage

We have never reviewed an acceptable EA which gave no figures for pre and post development runoff volumes. This EA has no data on this critical topic.

The Master Drainage Plan required by conditions of rezoning should be included in the EA. Drainage plans are usually theoretical documents formulated by engineers in faraway offices who have very little contact with the land. To avoid poor choices, nearby residents who observe drainage patterns as they occur everyday should be given as much opportunity as possible to review plans and comment. The EIS process will give them one opportunity only.

The lands of Wailea 670 are steep with numerous well incised, bluerock lined gulches. There is plenty of evidence that large amounts of water are periodically carried through the gulches. In the southern portion of the land there are historic dams and diversion features made of concrete to divert gulch flows into storage areas, presumably for livestock. None of these features are discussed in cultural/historic review documents nor is their existence mentioned in relationship to drainage impacts. Vague references have been made in past presentations about the project to retention basins in existing gulches. The EA should include a geological report on the feasibility of this proposed drainage solution.

Water Supply

The EA/EISP/N does not specify how much water the 1150 unit development and golf course is expected to use. Nor does it specify where that water will originate.

The EA/EISP/N in Section 4.7.1 describes the public water system which supplies the surrounding neighborhoods, although information supplied is somewhat out of date (e.g. the Hamakuapoko wells are not being proposed for utilization in the Central Maui system.) Under Potential Impacts and Mitigations sections, the EA discusses the existing rezoning conditions it will meet in developing a private water system. No details of the system, impacts or mitigations related to this system are revealed, except to state that a private water company will be formed and will distribute potable and non-potable water.

There is no further analyses of the viability of this brand new private system to meet the needs of 1150 hookups. Will it be sold to a larger utility, managed by homeowners or held and managed by the present ownership partnership?

Comparable, well-established private water delivery systems on Maui do not serve that volume. Kapalua Water Co. serves around 850 residences (only 200 are occupied full time) and two hotels, and Hawaii Water Co., the former Ka'anapali Water Co., serves 700 hookups, including a number of major resorts.

Marine Resources Water Quality

The EA/EISP/N should provide actual data on the marine water monitoring program that it was required to undertake. The EA does not reveal the impairment status of the waters down slope of the project. This is key information to be revealed.

The main intention of rezoning condition number 20 was to help improve water quality by tying development impacts and monitoring into the Clean Water Act 303(d) water quality assessment process.

The "no-impact" conclusions regarding land-based impacts to marine water quality presented in Section 3.5.2 should have more extensive data. It defies common sense that the Wailea-Makena area has had natural groundwater with high levels of contaminants seeping into the ocean for the past hundred years or several centuries.

Does the consultant suggest that the region developed its outstanding reef habitat over the last several centuries, reefs and waters renowned for their abundant fisheries and sea life, under these conditions?

If the contaminants in groundwater are present, are they really "natural?" Where did they originate, and what can be done to minimize the intrusion of unnatural levels of nitrogen and other chemicals into the groundwater. These are topics that should be discussed in the EA.

Mahalo for the opportunity to offer these comments

Sierra Club Maui Group

Lucienne de Naie, for the Conservation Committee



March 9, 2010

PRINCIPALS

THOMAS WITTER, ASLA
President

LEIAN DUNGAN, ASLA
Executive Vice-President

KESEL YI CHUNG FASLA, LEED® AP
Executive Vice-President

INCENT SHEPHERD
Vice-President

RAN T. MURAWAN, LEED® AP
Principal

V. FRANK BRANDT, FASLA
Treatment Emeritus

ASSOCIATES

DAVID SCINELL, AICP
Senior Associate

AYMOND T. HIGA, ASLA
Senior Associate

JYVINA MISHIKAWA, ASLA
Associate

JIM MIKAMAYUEN, LEED® AP
Associate

COTT ALIKA, AIBI, GEO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

WACHENG DONG, LEED® AP
Associate

GNOLLU OFFICE
301 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5194
P: (808) 525-1072
mail: gnollu@pbrhawaii.com

MOPELE OFFICE
101 Kalia Road, Suite 500
Kalihi Building, Suite 313
Honolulu, Hawaii 96817-2005
P: (808) 521-5631
F: (808) 535-3163

Sierra Club Maui Group
c/o Lucienne de Naie
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 3

It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in
County of Maui Ordinance No. 3554.

Archaeological and Cultural Resources

The Draft EIS will contain an Archaeological Inventory Survey, a Cultural Impact Assessment, and
a Cultural Resources Preservation Plan (CRPP).

Historic Roads and Trails

The Draft EIS will include discussion on: 1) steppingstone trail segments within the property; 2) the
Kanaio-Kalama road; and 3) recommendations from the Cultural Impact Assessment regarding
traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the
ala i ke kula (pathway to the uplands)).

Flora and Fauna

The Draft EIS will contain botanical and wildlife surveys that list all plant and animal species
currently found on the property.

Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27
regarding providing a Native Plant Preservation Area. The proposed size and location of the Native
Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA
Environmental Consultants to aid in defining areas where preservation could be most effective. The
Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of
latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high
conservation priority. The size and location of the Native Plant Preservation Area are also based
upon scientific research that suggests even small restoration efforts can help provide habitat for
native species when managed in combination with regional preserve areas. As such Honua'ula's
Native Plant Preservation Area must be considered in the context of the significant conservation
efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pa'u o Kali (236
acres) Forest Reserves and the Kanaio (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area
Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation
easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants.
Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management
of native plant species at Honua'ula. These conservation measures, including the size of the Native
Plant Preservation Area easement, will be subject to concurrence by the State Department of Land
and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of
Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive
stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE

Dear Ms. de Naie:

Thank you for your letter dated November 16, 2009 regarding the Honua'ula Environmental
Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the
planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your
comments.

Adequacy of EA/EISPN

The EISPN was a written evaluation to determine whether Honua'ula may have a significant
environmental effect and was intended for the purpose of seeking comment on the proposed
scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN
public comment period, Honua'ula Partners, LLC consulted with the Office of
Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory
requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8,
2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills
all the requirements and components [of] an environmental assessment." Pursuant to the
instructions of the OEQC Director, the Maui County Planning Department subsequently
submitted an Environmental Assessment/Environmental Impact Statement Preparation
Notice (EA/EISPN) to OEQC on September 18, 2009.

With respect to your statements regarding alleged deficiencies of the EA/EISPN, please note
that the EA/EISPN is a notice document and is intended to set forth the proposed scope of
the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of
the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR)
support the functioning of the EISPN as an EA in situations where projects go directly to the
more stringent full disclosure requirements of the EIS. This has been a long recognized and
established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that
the EA/EISPN does not contain every detailed element specified within HRS Chapter 343
for an EA does not take away from the fact that the completed EIS will be a full disclosure
document having to comply with the requirements of HRS Chapter 343.

The Draft EIS is the full disclosure document and will be prepared in conformance with State
of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR).
Specifically the Draft EIS will be prepared according to the content requirements for a draft
EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices.

Sierra Club Maui Group
c/o Lucienne de Naie
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 3 of 3

>>> Angelika Hofmann <angelichofmaui@hotmail.com> 4/2/2009 3:39 PM >>>

Drainage

The Draft EIS will include a Preliminary Engineering Report that discusses drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions.

Water Supply

The Draft EIS will include discussion of Honua'ula's water demands and sources.

Marine Resources and Water Quality

The Draft EIS will include a Nearshore Water Quality Assessment and a marine ecological monitoring report in compliance with County of Maui Ordinance No. 3554 Condition 20 to assess current conditions and propose mitigation measures as appropriate. The Nearshore Water Quality Assessment will include the results of water quality monitoring studies conducted for Honua'ula in 2005, 2006, 2008, and 2009 to establish baseline water quality conditions. Honua'ula will also maintain on-going water quality monitoring in compliance with County of Maui Ordinance No. 3554 Condition 20.

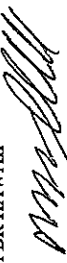
The Draft EIS also will include discussion regarding: 1) the 2006 State of Hawaii Water Quality Monitoring and Assessment Report: Integrated Report to the U.S. Environmental Protection Agency and the U.S. Congress Pursuant to Sections §303(D) and §305(B), Clean Water Act (P.L. 97-117); 2) the State Department of Health's compliance with the requirements of Clean Water Act regarding Total Maximum Daily Loads; and 3) Honua'ula's compliance with County of Maui Ordinance No. 3554 Condition 20, which pertains to these issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Aloha,
I would like to be a consulted party on the Wailea 670(Honua'ula) EIS.
Mahalo, Argie Hofmann
37 Lana St.
Paia, HI 96779
808 357-3134

Tom Schell, AICP
Senior Associate
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-1402
Fax: (808) 523-1420
E-mail: syssadmin@pbhawaii.com

Thursday, November 12th, 2009

Re: Comments on Honua'ula Project (EA/EISPN)

Aloha Honua'ula, LLC and Planning Commissioners,

I have testified many times during the Wailea 670 process and appreciate the opportunity to offer comments on this long awaited new environmental document.

Wailea 670 received approval for rezoning in April of 2008. It is 18 months later and the public is being offered an environmental document that is still missing most specific information about what is planned for this land with its natural and cultural treasures.

The EA seems to be the same thing that as issued in March of this year and called an EISPN. It also seems to be avoiding a lot of the same topics that were avoided during the County council rezoning review.

I was hoping that an Environmental Assessment would have revised project maps showing the boundaries of a proposed 130-acre preserve. Instead there's a map that shows a 22-acre preserve surrounded by houses and golf course.

This is not a good idea. It's like a prison area for the plants that were once free to have their seeds and pollen spread over hundreds of acres. There is no explanation about why this location or amount of acres was chosen. Even worse, the EA misquotes the Council's clear condition to have state and federal wildlife experts decide if any land of the proposed 130 acres is not needed. Instead, the landowner is saying only 22 acres is needed. The condition written by the council should be enforced. I was at the meetings. They worked hard on it.

I was hoping there would be a detailed discussion of the water sources for the future houses, businesses and golf course. How will the water be piped in from the new wells north of Maui Meadows we heard about during the council meetings?

Are these wells still the water source? They aren't mentioned. Instead there is discussion of central Maui water from sources like Hamakuaoko wells. The report doesn't mention that these wells are closed. Then there are the Kupa'a wells. According to the Mayor, these wells won't increase water supply, but will spread out the impacts of pumping water from the aquifer. Back to the question: where's the water for this very large development?
This should be explained in the EA.

If the brackish, off sites wells are used, will there be a desal plant? Where will be located? Will it be operated by the homeowners? A private utility? Where does the brine go after the water is filtered? Will there be injection wells? Will the brine affect native plants that are used to a certain natural quality of water? When will any of this information be made public?

Section 3.5.2 discusses marine water quality. There were long discussions at the council on the need to protect the ocean and reefs downlope of Wailea 670 from the increased runoff. The water quality report referred to in the EA, discussed tests done in 2005 and 2006. It's almost the end of 2009. Why doesn't the EA refer to any more recent test results?

There is an Environmental Risk Assessment and Integrated Golf Course Management Plan referred to. Why is it not included in the EA? How can residents who have lived in this area for years and know the area comment if they have no idea what is being proposed? This Plan may be good, or it may be full of holes? The proposed plan needs to be easily available. I remember how hard it was for the County Council to get real information about this project. Let's not let this keep happening.

I worked at Ahihi-Kihau NARS and have read about water quality testing. If I read the conclusions of the marine water quality researcher correctly, they're saying that the reason the ocean water at the various test sites off of Wailea-Makena coast have levels of nitrogen and other chemicals that are higher than DOH standards is because all these pollutants were just naturally in the ground water? This conclusion lacks actual data.

The consultant mentioned that "exceedances" also occurred at the test site (Ahihi-Kihau), but gave no details.

Were the exceedances at the test site at the same level as those of other sites? Could the contaminants have drifted down coast into the test site area? Were levels similar at every site? There is no basic data given to let the public know if the consultant is drawing a well-supported conclusion, or just saying what his clients want to hear.

Were the upper elevation ground waters tested to confirm his theory? Why aren't all the results included as part of the EA. Isn't it supposed to show an assessment of the possible impacts backed by facts that can be reviewed and commented on?

Huge gulches run through Wailea 670 land. Several of them have pipes big enough to walk through that carry the runoff under Piliant highway to the existing Wailea golf course. Even now, we have floods and coastal runoff that can occur during heavy rains at Wailea and Palaua beaches. The golf course just can't absorb it all.

Will the proposed detention basins help? There is no mention in this EA of any figures for pre-development and post development discharge of water. Without any information, how can drainage impacts be "assessed"?

It seems that the EA mostly is just repeating old, possibly outdated information.

I grew up in Kihui. We have heard so many promises of landowners who would build this or that if their project was approved. When I attended Kihui School in the 1980's the owners of Wailea 670 promised they would build a 13 acre Little League field on the Wailea 670 site. All they



wanted was approvals to rezone their land. Lots of kids growing up in South Kihici and Maui Meadows could have enjoyed that field. The former owners got their land use change and made a big profit selling off the land to yet another owner. The kids never got a park or a ball field.

Please, Planning Commissioners who read this EA, don't accept it until it has real facts that can be confirmed and not more vague descriptions and promises with no commitment behind them.

Angie Hofmann
P.O. Box 766
Makawao, HI 96768
angelcheffsmaui@hotmail.com

March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASLA
President
R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, ASLA, LEED AP
Executive Vice-President
VINCENT SHIGEKUNI
Vice-President
GRANT T. MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES
TOM SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA ABRIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

SUBJECT: HONUUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Hofmann:

Thank you for your e-mail dated April 2, 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your e-mail.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Joncks, Honua'ula Partners, LLC

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3884
Tel: (808) 521-2631
Fax: (808) 521-1022
E-mail: admin@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehaha Boulevard
Kapolei Building, Suite 213
Kapolei, Hawaii 96707-2805
Tel: (808) 521-5631
Fax: (808) 535-3163

1905.08 EA EISPN Angie Hofmann 4-2-09



Angie Hofmann
 SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
 IMPACT STATEMENT PREPARATION NOTICE
 March 9, 2010
 Page 2 of 3

March 9, 2010

PRINCIPALS
 THOMAS S. WITTEN, ASLA
 President

R. STAN DUNCAN, ASLA
 Executive Vice-President

RUSSELL Y. CHUNG, ASLA, LEED® AP
 Executive Vice-President

VINCENT SHIGERUKI
 Vice-President

GRANT T. MURKAMAI, AICP, LEED® AP
 Principal

W. FRANK BRANDT, ASLA
 Chairman, Emeritus

ASSOCIATES

TOM SCHELL, AICP
 Senior Associate

RAYMOND T. HIGA, ASLA
 Senior Associate

KEVIN K. NISHIKAWA, ASLA
 Associate

KIMI MIKAMI YUEN, LEED® AP
 Associate

SCOTT A. IJKA, AIRREGO, LEED® AP
 Associate

SCOTT MURKAMAI, ASLA, LEED® AP
 Associate

DACHUNG DONG, LEED® AP
 Associate

HONOLULU OFFICE
 1001 Babbins Street, Suite 650
 Honolulu, Hawaii 96813-3384
 Tel: (808) 521-4561
 Fax: (808) 521-4422
 E-mail: syshindling@pbrhawaii.com

KAPOLEI OFFICE
 1001 Kamehika Boulevard
 Kapolei Building, Suite 318
 Honolulu, Hawaii 96707-2865
 Tel: (808) 521-5683
 Fax: (808) 521-5683

Angie Hofmann
 P.O. Box 766
 Makawao, HI 96768

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Ms. Hofmann:

Thank you for your letter dated November 12, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN public comment period, Honua'ula Partners, LLC consulted with the Office of Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8, 2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills all the requirements and components [of an environmental assessment]." Pursuant to the instructions of the OEQC Director, the Maui County Planning Department subsequently submitted an Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) to OEQC on September 18, 2009.

With respect to your statements regarding alleged deficiencies of the EA/EISPN, please note that the EA/EISPN is a notice document and is intended to set forth the proposed scope of the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR) support the functioning of the EISPN as an EA in situations where projects go directly to the more stringent full disclosure requirements of the EIS. This has been a long recognized and established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that the EA/EISPN does not contain every detailed element specified within HRS Chapter 343 for an EA does not take away from the fact that the completed EIS will be a full disclosure document having to comply with the requirements of HRS Chapter 343.

The Draft EIS is the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR).

Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Native Plant Preservation Area. Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanaio (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Water. The Draft EIS will include information on Honua'ula's water system, including information on source, supply, and distribution. Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 1 by providing a private water system.

Marine Water Quality. The Draft EIS will include a marine water quality study and a marine ecological monitoring report in compliance with County of Maui Ordinance No. 3554 Condition 20 to assess current conditions and propose mitigation measures as appropriate. The marine water quality study will include the results of water quality monitoring studies conducted for Honua'ula in 2005, 2006, 2008, and 2009 to establish baseline water quality conditions. The results of the marine water quality study and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. Honua'ula will also maintain on-going water quality monitoring in compliance with County of Maui Ordinance No. 3554 Condition 20.

Golf Course. The Draft EIS will include a Best Management Practices document for the Honua'ula Golf Course which will contain discussion of chemicals used to fertilize the golf

Angie Hofmann
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 3 of 3

course, potential impacts to ground and ocean waters, grounds maintenance, and proposed mitigation measures.

Drainage. The Draft EIS will include a Preliminary Engineering Report that discusses drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions.

Little League Field. In compliance with County of Maui Ordinance No. 3554 Condition 10, in lieu of the dedication of a Little League Field, Honua'ula Partners, LLC will contribute not less than \$5,000,000 to the County for the development of the South Maui Community Park.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EA/EIS/SPN. Your e-mail and letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jeneks, Honua'ula Partners, LLC

>>> Claire Jordan <clairej@wahoo.com> 4/6/2009 7:42 PM >>>
Dear Sir, Please include me as a consulted party in the EIS process regarding Wailea 670. It is crucial that a meaningful study be conducted in respect to traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impact to beaches and compliance with Kihati- Makena community Plan policies before this precious area is destroyed.
Regards, Claire
All the worlds problems can be solved in a garden.



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

B. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, ASLA, LEED AP
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MUKAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES
TOM SCHNELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KUWIKI, NISHIKAWA, ASLA
Associate

KIMI MIKAMIYUEN, LEED AP
Associate

SCOTT ALIKA AIRIGO, LEED AP
Associate

SCOTT MARIKAWA, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3189
Telephone: (808) 531-5500
Fax: (808) 531-1402
E-mail: sysadmin@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehala Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 593-5631
Fax: (808) 535-3164

Claire Jordan
63 Olinda Rd.
Makawao, HI 96768

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Jordan:

Thank you for your e-mail dated April 6, 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kīhei-Mākena Community Plan, among other issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Claire Jordan

To whom it may concern,

I would like to be consulted about Wailea 670 development. I am concerned about

1. The chain of ownership that was not produced for the county council.
2. Land ownership is still being questioned by Kanaka landowners.
3. Golf course is planned on cultural sites. Inadequate archeological reporting and preservation of cultural and wildlife are also part of this concern.
4. Inadequate benefit to the local population with this development.

Claire Apana

260 Halenani Dr

Wailuku, HI 96793

ph 242-4189

Project Applicant (Goodfellow Brós c/o Charlie Jencks) Charlie Jencks
Fax: 879-2557

with copies to:

County of Maui Planning Dept: Jeff Hunt, Planning Director "Jeff Hunt"
Fax: 270-7634



March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL Y. CHUNG, FLSA, LEED^{AP}
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, AIA, LEED^{AP}
Principal

W. FRANK BRANDT, ASIA
Chairman Emeritus

ASSOCIATES

TOM SCINNEL, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

NIMI MIKAMI YUEN, LEED^{AP}
Associate

SCOTT ALIKA ABRIGO, LEED^{AP}
Associate

SCOTT MURAKAMI, ASIA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3185
Tel: (808) 521-5031
Fax: (808) 525-1402
E-mail: system@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehalehale Road
Suite 102
Kapolei, Hawaii 96707-2805
Tel: (808) 241-5631
Fax: (808) 536-3101

Wailea 670 EIS

>>> "Dale" <dalekinedale@aol.com> 4/7/2009 11:58 AM >>>

Project Name: Honua'ula

Location: Wailea, Kehei-Makena, Maui

To Those This May Concern,

I would like to be a consulted party concerning Honua'ula Project, aka; Wailea 670 and any future plans concerning the southwest slopes of Haleakala that include all lands in the "modern district of Makawao".

I have concerns in regards to the current proposal for the area known as the Honua'ula Project and those are as follows.

To insure the integrity of all future planning for the areas of Maui County the projects should be generated by the inhabitants of Maui and not off island investors, land speculators and profiteers who's interests continue to destroy the natural habitat, both land and sea, for profit.

As stated in the "project" proposal the water to be used to mitigate dust during the early phases of construction will be "effluent" or grey water that will contribute to algae blooms once it enters the ocean after heavy seasonal rain run off having a devastating effect on Maui's reef system.

If housing is actually warranted then affordable housing is what should be built and not the expensive and exclusive dwellings as described in the proposed project. There is no need for more golf courses that actually strain the natural environment because of the use of fertilizers, pesticides, herbicides, etc..

There is the constant use of power equipment for the maintenance of the golf course grounds and landscaped dwellings that include diesel tractors, lawn mowers, ATVs (all terrain vehicles), leaf blowers, weed trimmers and petroleum based equipment to spray pesticides and herbicides. This constant use of power equipment not only contributes to air pollution but adds to the oil dependency we are trying to avoid.

The parks and "quasi public areas" as mentioned are inside the exclusive communities and are only available to the owner/inhabitants of those gated communities. It appears the term "quasi public" areas refers to facilities such as a fire station, water pumping or electric generating facility and would not actually be open for public use.

Waste water facilities need to be built prior to any dwelling construction begins and should be adequate enough for future development and built in a fashion to avoid any overflow issues during heavy seasonal rain fall. Once constructed to strict standards and guidelines the facilities should be turned over to the County.

The existing road system to access the beaches from Puu'oli to La Perouse is perfect and would remain so without the future over crowding recommendations set forth by land speculators and developers. But if the roads are to be widened to allow for more traffic and congestion as suggested by the project plans the need for wildlife corridors or tunnels under the busy highways should be installed at the time of construction. The Island feel of Maui's beaches will be lost forever once this development expansion begins and tourism will decline.

There is not enough reef health data accumulated to do any future comparison analysis. There are no solid "baseline" studies for comparison and those should be started before any new development begins.

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Apana:

Thank you for your letter dated April 9, 2009 faxed to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will address issues related to, preservation of archaeological and cultural resources, wildlife, and benefits to the surrounding community, among other issues.

Regarding land ownership, the Honua'ula Project District Phase II application will include a property deed that shows that Honua'ula Partners, LLC is the legal property owner.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/SPN Clare Apana



Since there is a "paucity" of rules for preserving Hawaiian Cultural Resources the consensus is that the "project" should be stopped until specific and strict guidelines are established before the undertaking begins. Under the conditions set forth to develop a comprehensive plan for the "preservation and interpretation of cultural resources in the project area" the plan should include minimizing the number and types of homes constructed and include downsizing the size of the project area. The number and types of homes for the project area could be 500 affordable houses to facilitate the labor force needed for the existing Maikena area resorts, golf course communities and beach facilities. This would shorten the commute miles and times for the existing work force and hopefully remove some highway traffic from the outlying areas and lessen fuel consumption and dependency on imported oil.

There is an existing dormant golf course mauka from Puu Olai that is an area disturbance that may or may not have had the proper EIS completed before the golf cart paths, restrooms, sand traps and other ground disturbances had been completed. Is this the golf course mentioned in the Honua'ula Project proposal or an extension or addition to the proposed golf course?

These are just a few of my concerns as I notice the entire area has already been divided into future projects by Alhambra Corp., Halea Resort Corp., Ltd., Maui Prince and Dowling Corp. Please add my name and concerns to the public input and comments.

Thank you and sincerely,

Dale Deneweth
Box 1236
Wailuku, HI. 96793

March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASIA
President
L. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL YI CHUNG, ASIA, LEED* AP
Executive Vice-President
VINCENT SHIGERUINI
Vice-President

FRANK T. MURAKAMI, AIA, LEED* AP
Principal
FRANK BRANDT, ASIA
Chairman Emeritus

ASSOCIATES
TOM SCHINELL, AIA/CP
Senior Associate

LAWMOND T. HIGA, ASIA
Senior Associate

SEVIN K. NISHIKAWA, ASIA
Associate

SIMU MIKAMI YUEN, LEED* AP
Associate

SCOTT ALIKA ABRIGO, LEED* AP
Associate

SCOTT MURAKAMI, ASIA, LEED* AP
Associate

DACHENG DONG, LEED* AP
Associate

HONOLULU OFFICE
 101 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-3184
 Tel: (808) 521-5631
 Fax: (808) 521-5632
 Email: info@pbrhawaii.com

CAPULEI OFFICE
 201 Samaha Road
 Capulei, Hawaii 96721-3113
 Capulei, Hawaii 96727-2085
 Tel: (808) 521-5631
 Fax: (808) 535-3163

Dale Deneweth
Box 1236
Wailuku, HI 96793

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Deneweth:

Thank you for your e-mail dated April 7, 2009 sent to Jeff Hunt of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

Dust Control with Non-Potable Water. County of Maui Ordinance No. 3554 (Condition 15), requires the use of non-potable water or effluent for dust control and states that this water may be obtained from the Kihai Wastewater Reclamation Facility. Honua'ula Partners, LLC will comply with all conditions required under County of Maui Ordinance No. 3554. In addition, measures to control fugitive dust during construction will comply with the provisions of Chapter 11-60.1-33, Fugitive Dust, Hawaii Administrative Rules (HAR).

Marine Water Quality and Coral Reefs. The Draft EIS will include a marine water quality study and a marine ecological monitoring report in compliance with County of Maui Ordinance No. 3554 Condition 20 to assess current conditions and propose mitigation measures as appropriate. The marine water quality study will include the results of water quality monitoring studies conducted for Honua'ula in 2005, 2006, 2008, and 2009 to establish baseline water quality conditions. The results of the marine water quality study and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. Honua'ula will also maintain on-going water quality monitoring in compliance with County of Maui Ordinance No. 3554 Condition 20.

Affordable Housing. Honua'ula will include workforce affordable homes in compliance with Chapter 2.96, Maui County Code (MCC) (Residential Workforce Housing Policy).

Golf Course. The Draft EIS will include a Best Management Practices document for the Honua'ula Golf Course which will contain discussion of chemicals used to fertilize the golf course, potential impacts to ground and ocean waters, grounds maintenance, and proposed mitigation measures. In response to your question regarding the existing golf course mauka of Pu'u Ola'i, the Honua'ula golf course will be a new and separate course.

APR-01-2009 05:58 PM

Dale Deneweth
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

March 31, 2009

Parks and Public Facilities. Honua'ula will six acres of private parks and 84 acres of open space. The private parks will be open to the public and privately maintained. Overall, Honua'ula will not be a gated community, however some individual neighborhoods may be gated if the residents of the individual areas choose so.

Wastewater Facilities. The Draft EIS will include discussion on Honua'ula's wastewater system. Honua'ula Partners, LLC will either: 1) transport wastewater to the Makena Wastewater Reclamation Facility (WWRFF) for treatment; or 2) develop, maintain, and operate a private on-site WWRFF. Sufficient golf course land is available within both Honua'ula and the Makena Resort to reuse 100 percent of the recycled water for irrigation. Wastewater system design, and construction, and operation will be in accordance with State and County standards.

Traffic. The Draft EIS will include a Traffic Impact Analysis Report (TIAR), which will contain information regarding existing traffic conditions, projected future conditions, and proposed mitigation measures. One objective of Honua'ula is to provide homes near regional employment centers, thereby decreasing commuting time and increasing quality of life

Cultural Resources. The Draft EIS will contain a Cultural Resources Preservation Plan (CRPP). The CRPP was prepared in consultation with Hawaiian groups and other interested parties and includes recommendations for the protection of cultural and archaeological resources on the property.

We will include as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Dale Deneweth

To: **Honua'ula, LLC**; Fax (808) 879-2557
and **PBR HAWAII**; Fax (808) 523-1402
and **The County of Maui Planning Department (808) 270-7634**

From: **Daniel K. Kanahele**
PO Box 648
Kihei, HI 96753
Phone: (808) 879-2239

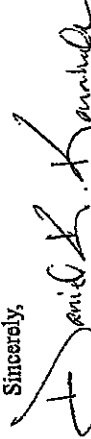
RE: Comments on Honua'ula Environmental Impact Statement date March 2009

To Whom It May Concern:

I am concerned that the Honua'ula Environment Impact Statement (EIS) dated March 2009 does not adequately address many issues affecting the South Maui District, i.e., water, native plant and cultural site preservation, community and traditional access, and etc..

As a concerned citizen living adjacent to the proposed project area, I would like to be a consulting party to the Honua'ula EIS process.

Sincerely,



Daniel K. Kanahele



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

OSSELL YI CHUNG, FASLA, LEED AP
Executive Vice-President

INCHINT SINGH KUNTI
Vice-President

RANTY MURAKAMI, AIA, LEED AP
Vice-President

FRANK BRANDT, FASLA
Assistant Director

ASSOCIATES
DAN SCHNELL, AICP
Senior Associate

ANDREW F. HIGA, ASLA
Senior Associate

EVIN K. NISHIKAWA, ASLA
Associate

JAN MIKAMI YUEN, LEED AP
Associate

COTT ALIKA AMRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

HACHENG DONG, LEED AP
Associate

ONOLULU OFFICE
101 Bishop Street, Suite 620
Honolulu, Hawaii 96813-3141
P: (808) 521-5531
F: (808) 521-5531
www.pbrhawaii.com

KAHOOLAWE OFFICE
1010 Kilauea Avenue
Kilauea, Hawaii 96750-2205
P: (808) 521-5531
F: (808) 521-5531

Daniel K. Kanahele
P.O. Box 648
Kihei, HI 96753

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Kanahele:

Thank you for your letter dated March 31, 2009 regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to water, native plants, cultural sites, and traditional access, among other issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Daniel Kanahele

TO: Mr. Charlie Jencks, c/o Goodfellow Brothers, Inc.
Mr. Jeff Hunt, Maui Planning Department
Mr. Tom Schnell, PBR HAWAII

From: Dick Mayer
1111 Lower Kimo Drive Kula, HI 96790
Tel 808-878-1874 email: dickmayer@earthlink.net

RE: Comments on the HONUJALA (Wailea 670) EA-EISPN:
http://seec.doh.hawaii.gov/SharePoint/20Documents/EA_and_EIS_Offline_Library/Maui/2009-10-09-MA-EA-EISPN-Honuaula.pdf

Applicant: Honuaula c/o Goodfellow Brothers, Inc., Charlie Jencks, 879-5205
Accepting Authority: County of Maui, Planning Dept, Jeff Hunt
Consultant: PBR HAWAII, Tom Schnell, 521-5631

My comments are very brief, but demand a response in the Environmental Review which must include a complete and accurate description of the location of the water sources and the water transmission lines for this whole project.

Previous information located the sources as being just north of the Maui Meadows subdivision. If this is the case, there must be a map and description of the water transmission lines from the well(s) to the Honuaula (Wailea 670) project.

The transmission lines are NOT legally allowed to pass through any part of the Upcountry (Makawao-Pukalani-Kula) Community Plan District and then back into the South (Kihei-Makena) Community Plan District. This is based on requirements contained on Page 36 of the Upcountry Plan.

- 4. Restrict the use of any water developed within or imported to the Upcountry region to consumption within the Upcountry region, with exception provided for agricultural use.

If the water transmission line was to go mauka of the Maui Meadows sub-division, it would be passing through the Upcountry District and then back into the South Maui District. The County previously attorney ruled that "illegal."

I was the Vice-Chair of the Upcountry Community Plan Advisory Committee and understand the intent and the legal interpretation that has been given to the above referenced policy.



March 9, 2010

PRINCIPALS

HOMAS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

USSELY, CHUNG, PASLA, LEED AP
Executive Vice-President

TINCENT SHIGEKUNI
Vice-President

HANTY, MURAKAMI, ACE, LEED AP
Principal

FRANK BRANDT, PASLA
Staffman Emeritus

ASSOCIATES

ON SCHINELL, AICP
Senior Associate

AMOND T. HIGA, ASLA
Senior Associate

EVN K. NISHIKAWA, ASLA
Associate

JMI MIKAMI YUEN, LEED AP
Associate

COTT ALIKA ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

HCHENG DONG, LEED AP
Associate

ONOLULU OFFICE
31 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
tel: (808) 521-5631
tel: (808) 525-1102
mail: yps@pbrhawaii.com

APOLE OFFICE
411 Kaimoili Boulevard
Honolulu, Hawaii 96814
tel: (808) 521-5631
tel: (808) 525-1163

Dick Mayer
1111 Lower Kimo Drive
Kula, HI 96790

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**

Dear Mr. Mayer:

Thank you for your e-mail dated November 15, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft EIS will include information regarding Honua'ula's off-site wells, which are within an area north of Maui Meadows below the 600 foot contour and within the Kihei-Mākena Community Plan region. The Draft EIS will also include maps showing: 1) the location of Honua'ula's off-site wells; and 2) waterlines necessary to convey water to Honua'ula. Honua'ula's water system will be in accordance with Department of Water Supply standards and all applicable community plans.

Thank you for reviewing the EA/EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Dick Mayer

>>> <DrLeisure@aol.com> 4/6/2009 6:12 AM >>>

Dear Sir: I would like to be a consulted party in the EIS process for the 670 project and have emailed to all three addresses below my contact information which also appears below:

Charlie Jencks: Charlie@GBIMAU.I.COM (mailto:Charlie@GBIMAU.I.COM)
Jeff Hunt, Planning Director: Jeff.Hunt@co.maui.hi.us_ (mailto:Jeff.Hunt@co.maui.hi.us)
Office of Environmental Quality: oeq@doh.hawaii.gov_ (mailto:oeq@doh.hawaii.gov)

George R. Harker
Dr. Leisure
PO Box 1137
Kihei, HI 96753

808-298-5399
DrLeisure@aol.com
DrLeisure.com

PBR HAWAII & ASSOCIATES, INC.

March 9, 2010

PRINCIPALS

THOMAS S. WITTEN, ASLA
President

L. STAN DUNGAN, ASLA
Executive Vice-President

URSSELL V. CHUNG, FASLA, LEED AP
Executive Vice-President

FRANCOIS SHIGERAKI
Vice-President

FRANETTE MURAKAMI, AICP, LEED AP
Principal

K. FRANK BRANDE, FASLA
Chairman Emeritus

ASSOCIATES

OMI SCHINELL, AICP
Senior Associate

ANDREW T. HIGA, ASLA
Senior Associate

FRANK N. NISHIKAWA, ASLA
Associate

JUNI MIKAMI YUEN, LEED AP
Associate

COTT ALIKA ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

HACHENG DONG, LEED AP
Associate

ONOLULU OFFICE

401 Bishop Street, Suite 660
Honolulu, Hawaii 96813-3184
P: (808) 521-5661
F: (808) 521-1402
E: mail.system@pbrhawaii.com

APOLEI OFFICE

401 Kamehale Boulevard
Apohele, Hawaii 96705
P: (808) 521-5631
F: (808) 521-5631

Mr. Tom Schnell, AICP 11/13/2009

Senior Associate
PBR Hawaii & Associate, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-1402

Re: EIS on Wailea 670

Dear Mr. Schnell:

I submit the following as a native of the Island of Maui and Vice-President of Maui Unite:

At last we have an EIS but it is generally lacking in several respects. For one, it doesn't conform with state environmental laws. (Sec. 343-5(a) HRS, & Sec. 11-200-9, HAR).

The scope of the discussion in the EA is too narrow to permit a sufficient assessment of the environmental impacts of this project on South Maui's people and resources. Instead of assessing environmental impacts now in the EA it describes conditions that will be discussed later on in the draft EIS. It is also missing required information such as letters from consulted agencies and parties, studies required by County Rezoning Conditions, and a discussion of project funding.

Secondly, there is not enough information on key topics like water supplies, traffic, protection of marine environment from run-off, protection of cultural sites and rare and endangered species for the public or decision makers to be able to assess any impacts and comment on them. Some topics, such as the presence of an endangered native moth on site, environmental review for the 250 off-site affordable units in the Kihel industrial area and protection of historic roads and trails, are entirely left out.

The subject of water sources is not discussed except to recycle some old and outdated information about the Maui County water system. Report pretends that the two brackish wells on site will provide enough water for the proposed golf course. Consultant John Mink warned 10 years ago that this was unlikely. The off-site wells on Haleakala Ranch lands are not referred to at all.

**SUBJECT: HONUUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Harker:

Thank you for your e-mail dated April 6, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISP. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP George Harker

The subject of Affordable Housing concerns me. It seems like 250 units will be in the industrial area but there is no indication that all 250 units will still be shoe-horned into a 5 acre parcel. (50 units per acre is 3 times the density of Iao Parkside!) The other affordable units onsite will be tied to the workforce housing ordinance, which, as we all know, is under attack. The report's housing demand and price figures (p. 59) are based on outdated, pre-recession estimates and sources.

Native plants and animals have really been downplayed. True accounting of the number of species present is not given. Native plants are described as "remnants", wiliwili trees are said to be attacked by wasps, and native owls and bats may "fly over and forage" but is not really their habitat. Awikiwiki vines, nehe and other plants are described as "being in the South West corner" when, in truth, they are in various parts of the southern 200 acres and it is not mentioned that the plants in the SW corner have already been destroyed. Also, it is never mentioned that the native moth is an endangered species.

Maui County council conditions of rezoning had language that former councilwoman Michelle Anderson worked to get that required a 130 acre native flora and fauna preserve, unless state & federal biologists say it's not needed. This language is not included except in the appendix as part of a laundry list of conditions.

Saying that a 22 acre preserve will take care of everything means that hundreds of native wiliwili trees and other plants will not be included and will likely be destroyed.

13 of 40 cultural sites may be preserved and 19 more will have "data recovery". A review of archaeological resource inventory or preservation by OHA is downplayed. A review by Na Kupuna o Maui is emphasized. Mention is made of preserving cultural access but for who is unclear. There is no mention of preserving historic roads and trails as required in the Kihei-Makena community plan. There is also no mention of a construction traffic route.

The report admits that 15 natural drainage ways exist on the site but goes on to indicate that since it doesn't rain much it shouldn't be a problem. Everything will go into the golf course or retention basins. Has anyone witnessed a rain storm in South Maui? I think not! There is no mention of

the major drainage pipes that currently go from Wailea 670 lands under Piilani Highway in several locations and where that water ends up.

Further, the report sets a goal of minimum disturbance of land forms by grading but does not honestly portray how rugged the land really is and what a huge amount of grading would need to be done.

Thank you for allowing me to state my concerns, Mr. Schnell, for I sincerely believe everything I've tried to say here is the truth.

Sincerely,

Gordon C. Cockett
PO Box 385,
Lahaina, HI 96767
agcockett@yahoo.com



Gordon Cockett
 SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
 March 9, 2010
 Page 2 of 4

March 9, 2010

PRINCIPALS
 THOMAS WITTEN, ASLA
 President

R. STAN DUNCAN, ASLA
 Executive Vice-President

RUSSELL V. CHUNG, ASLA, LEED® AP
 Executive Vice-President

VINCENT SHIGEKUNI
 Vice-President

JEANETTE MURAKAMI, AICP, LEED® AP
 Principal

W. FRANK BRANDT, ASLA
 Chairman Emeritus

ASSOCIATES

JOHN SCHNELL, AICP
 Senior Associate

RAYMOND C. LUCCA, ASLA
 Senior Associate

DEVIN K. NISHIKAWA, ASLA
 Associate

JIMI MIKANEI YUEN, LEED® AP
 Associate

COTT ALUKA ABRIGO, LEED® AP
 Associate

KOTT MURAKAMI, ASLA, LEED® AP
 Associate

JACHENG DONG, LEED® AP
 Associate

INDIAN LULU OFFICE
 601 Iolani Mall, Suite 650
 Honolulu, Hawaii 96813-3484
 tel: (808) 521-5631
 fax: (808) 529-1402
 e-mail: ysw@indianlulu.com

APOLLO OFFICE
 901 Kaimukila Boulevard
 Apollo Building, Suite 313
 Honolulu, Hawaii 96817-2065
 tel: (808) 535-3165

Gordon Cockett
 P.O. Box 385
 Lahaina, HI 96767

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Mr. Cockett:

Thank you for your letter dated November 13, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN public comment period, Honua'ula Partners, LLC consulted with the Office of Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8, 2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills all the requirements and components [of] an environmental assessment." Pursuant to the instructions of the OEQC Director, the Maui County Planning Department subsequently submitted an Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) to OEQC on September 18, 2009.

With respect to your statements regarding alleged deficiencies of the EA/EISPN, please note that the EA/EISPN is a notice document and is intended to set forth the proposed scope of the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR) support the functioning of the EISPN as an EA in situations where projects go directly to the more stringent full disclosure requirements of the EIS. This has been a long recognized and established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that the EA/EISPN does not contain every detailed element specified within HRS Chapter 343 for an EA does not take away from the fact that the completed EIS will be a full disclosure document having to comply with the requirements of HRS Chapter 343.

The Draft EIS is the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR). Specifically the Draft EIS will be prepared according to the content requirements for a

draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Water Sources. The Draft EIS will include information on Honua'ula's water system, including information on source, supply, and distribution.

Affordable Housing. Honua'ula will include workforce affordable homes in compliance with Chapter 2.96, Maui County Code (MCC) (Residential Workforce Housing Policy). This will be discussed in the Draft EIS. The Draft EIS will include information on 2009 year-end Maui housing prices and will also contain an in-depth market study that discusses housing demand.

Native Plants and Animals. The Draft EIS will contain botanical and wildlife surveys that list all plant and animal species currently found on the property. Although not found in previous wildlife surveys, evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the property in the most recent survey. The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures, including a multi-species Habitat Conservation Plan (to also include the candidate endangered 'awikiwiki plant) prepared under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with DLNR and USFWS.

Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanaio (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Gordon Cockett
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
March 9, 2010
Page 3 of 4

Cultural Sites. The Draft EIS will contain an Archaeological Inventory Survey, Cultural Impact Assessment, and Cultural Resources Preservation Plan. Based on the findings of the Archaeological Inventory Survey, the Cultural Impact Assessment, and community input, the Cultural Resources Preservation Plan sets forth (among other things) selection criteria for sites to be preserved and short- and long-term preservation measures, including buffer zones and interpretative signs, as appropriate, for each site to be preserved.

Trails and Roads. The Draft EIS will include discussion on: 1) steppingstone trail segments within the property; 2) the Kanaio-Kalama road; and 3) recommendations from the Cultural Impact Assessment regarding traditional native Hawaiian mauka-makai access trails (*ala i ke kai* (pathway to the ocean) and the *ala i ke kula* (pathway to the uplands)).

Construction Related Traffic. The Draft EIS will include Transportation Management Plans (TMPs) that propose transportation management strategies to reduce: 1) construction-related traffic; and 2) dependency on individual vehicles by Honua'ula residents, employees, and visitors after construction.

Drainage and Runoff. The Draft EIS will include a Preliminary Engineering Report that discusses drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions.

All construction activities will comply with all applicable federal, State, and County regulations and rules for erosion control, including Chapter 20.08 (Soil Erosion and Sedimentation Control), MCC. Measures to control erosion will include:

- Minimizing the time of construction;
- Retaining existing ground cover as long as possible;
- Constructing drainage control features early;
- Using temporary area sprinklers in non-active construction areas when ground cover is removed;
- Providing a water truck on site during the construction period to provide for immediate sprinkling, as needed;
- Using temporary berms and cut-off ditches, where needed, for control of erosion;
- Watering graded areas when construction activity for each day has ceased;
- Grassing or planting all cut and fill slopes immediately after grading work has been completed; and
- Installing silt screens, where appropriate.

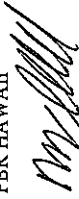
Grading. The topography is a key defining feature of Honua'ula, and one of the principal design and planning goals is to preserve and utilize this topography as much as possible. To the extent practicable, improvements will conform to the contours of the land, limiting the need for extensive grading of the property.

Gordon Cockett
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
March 9, 2010
Page 4 of 4

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, FASLA, LEED AP
Executive Vice-President

VINCENTI SHIGEKUNI
Vice-President

GRANT MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES

TOM SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMURIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA AURIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5194
Tel: (808) 523-1002
Fax: (808) 523-1002
E-mail: admin@pbrhawaii.com

KAUAI OFFICE
1001 Kamehale Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96706-2806
Tel: (808) 523-1002
Fax: (808) 523-1002

>>> Joe Fell-McDonald <lounge@tiki.net> 4/6/2009 4:24 PM >>>
please involve me in the EIS process and the EIS notice relating to the Development at
Wailea 670

thank you for your time
joe mcdonald

Joseph Fell-McDonald
160 Keonakai Road #16-201
Kihei, HI 96753

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Fell-McDonald:

Thank you for your e-mail dated April 6, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISP. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905 08 EA EISP Joe Fell-McDonald



>>> Johnny Be <feellovewithin@yahoo.com> 4/3/2009 9:58 AM >>>
I am asking there to be a consulted party in the EIS process, thank you.

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kiheti-makena community Plan policies, are not addressed in the EISPN, which instead avoids meaningful comment on the topic. Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.

March 9, 2010

PRINCIPALS
ROSS WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President

USSELL CHUNG, FASLA, LEED AP
Executive Vice-President

TINCENT SHIGAKUNI
Vice-President

RYAN T. MURAKAMI, AICP, LEED AP
Principal

FRANK BRANDT, FASLA
Interim Emeritus

ASSOCIATES
TOM SCHNELL, AICP
Senior Associate

AVNON T. HIGA, ASLA
Senior Associate

EVINK NISHIKAWA, ASLA
Associate

JAMI MIKAMI YUEN, LEED AP
Associate

COTT ALIKA ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

ACHENG DONG, LEED AP
Associate

ONOHU OFFICE
301 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
tel: (808) 521-5631
fax: (808) 522-1402
email: yspadmla@pbrhawaii.com

APOLEI OFFICE
301 Kamailea Boulevard
Apolet Building, Suite 315
Honolulu, Hawaii 96813-3086
tel: (808) 521-5631
fax: (808) 525-3103

Johnny Be
feellovewithin@yahoo.com

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Mr. Be:

Thank you for your e-mail dated April 3, 2009 sent to Maui Planning Department Director Jeff Hunt, regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft Environmental Impact Statement (EIS) will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kiheti-Makena Community Plan, among other issues.

We will include you as a consulted party. Since you did not provide a mailing address, we will notify you by e-mail when the Draft EIS is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Johnny Be

Aloha

My name is Joyclynn Costa and I would like to be consulted pertaining to the project known as Wailea 670. There seems to be unanswered questions and concerns that have yet to be addressed. I feel transparency and open communication will be key to the success of any endeavor. It is also important to never forget the host culture whom, still has interest in all the aina of Hawaii nei. I look forward to witnessing your process.

Joyclynn Costa



D.O. Box 777
Hoiiku 96708
Pt. # 264-4290

260 Halenani Dr.
Wailuku, HI 96793
ph 242-4189
Project Applicant (Goodfellow Bros c/o Charlie Jencks) Charlie Jencks
Fax: 879-2557

with copies to:

County of Maui Planning Dept: Jeff Hunt, Planning Director "Jeff Hunt"
Fax: 270-7634
PBR Hawaii, Tom Schnell
Fax: 808 523-1402
State Office of Environmental Quality:
Fax: 586-4186

Aloha,

Please receive my response to the Ea/EISPN sent under your cover letter dated October 16, 2009.
November 16, 2009

Tom Schnell, AICP
Senior Associate
PBR Hawaii & Associate, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-1402
Fax: (808) 523-1420

Re: Honua'ula EA/EISPN

Dear Mr. Schnell

My name is Joyclynn Costa. I would like to thank you for allowing my participation as a consultant on the Honua'ula Environmental Impact Statement Preparation Notice.

On February 20-27 of this year I participated in the torch march around the island of Maui known as the Ka'apuni. At the conclusion of the march we gathered in Kihei to view a power point and summarize what we gathered from the families we encountered in all the ahupua'a. Not surprising the families spoke to the displacement or attempt to displace them from their ancestral land. Another thing was the use of others to speak of the history of their ancestral lands and the gates that lock them out of their gathering rights. (ie. archaeologist interpretation)

2.1 Background Information
Pg 5 para. 2 "Historically the Honua'ula Property has been used for cattle grazing..."

This statement gives the idea that the beginning of this place was cattle. Yet when you turn to:

4.2 Cultural Resources pg 29
"Ranching has been blamed for many of the district's environmental problems. Cattle and goats stripped the land of its native flora while destroying ancient Hawaiian temples and graves sites. Ranching operation took over land previously owned by Hawaiian families."

This very contradiction is the very concern our native Hawaiian families spoke about. The maps provided within Honua'ula Assessment omits the possibility of Kuleana's within. At the Maui land tax office there are maps that possess un-located parcels.

4.2 Cultural Resources pg29
"Some Hawaiians left the area and were not aware of it when ranchers took their lands through the process of quiet title or adverse possession."

How does one quiet an un-located parcel? Were all the families located and notified? What is the civil case no. to the quiet title action and the final judgment?



March 9, 2010

PRINCIPALS
 THOMAS WITTEN, ASLA
 President

LESLIE MCKEAN, ASLA
 Executive Vice-President

RUSSELL Y. CHUNG, FASLA, LEED AP
 Executive Vice-President

WINCENT SHIGEKUNI
 Vice-President

BRANT T. MURKAKAHU, LEED AP
 Principal

FRANK BRANDT, FASLA
 Chairman Emeritus

ASSOCIATES

CON SCHNEILL, AICP
 Senior Associate

RAYMOND T. HIGA, ASLA
 Senior Associate

SEWIK, NISHIKAWA, ASLA
 Associate

TAMI MIKAMI YUEN, LEED AP
 Associate

SCOTT ALIKA, BRIGGO, LEED AP
 Associate

SCOTT MURKAKAHU, ASLA, LEED AP
 Associate

MACHENGONG, LEED AP
 Associate

HONOLULU OFFICE
 801 Hahaione Street, Suite 600
 Honolulu, Hawaii 96813-3184
 Tel: (808) 591-5631
 Tel: (808) 523-1472
 E-mail: syadain@pbrhawaii.com

CAPOLEI OFFICE
 801 Kumuhoia Boulevard
 Capolei Building, Suite 313
 Capolei, Hawaii 96707-2505
 Tel: (808) 591-5631
 Tel: (808) 935-3163

pg 30
 "In the various ahupua'a of Honua'ula, there are many heiau and little alters of stones where people prayed to Lono and to Hina for rain and ample crops since the area was primarily used for planting and farming." (NOT CATTLE)
 Our February march around the island discovered families in this very area as well as surrounding area who feel a sense of loss and lack of recognition of existence.
 The "CRPP" being prepared with consultation groups include "lineal descendants of the area" whom might these people be? Would Honua'ula LLC partners be open to new introduced descendants? If yes, would their possible interest be threatened and or compromised? Keep in mind:

pg 30 par. 1
 "other ceremonial sites include many fishing shrines (ho'a), a hula platform(?) and a place of refuge (pu'uhonua)."
 This is a safe place. (pu'uhonua) A place for which people can go to and be safe. Makahiki also becomes important for such a use of the place. That is never mentioned. The story of the place has been grossly absent in this report and focuses primarily on the alteration of the place. Lacking is a full inventory of the delicate features spread out throughout the entire 670 acres that has survived the cattle which possess an existence well before ranchers. What is the story or reference to the hula platform? Where did that mo'olelo come from?

There is a lack of information as to the pre-contact history. There seems to be an intentional focus on ranching which could not speak of the original people of the place. Has the culture been whittled down to the representation of a cowboy? Who are the awardees of the patents to the land?
 A request be both myself and the Maui County Council to the extensive title examination tracing the title all the way back to the original awardee. The representative of the project agreed to provide the information but nothing has been forthcoming.

The very concerns of the Kuleana was received as we marched around the island. Being a consultant in this process can now provide a venue of which we can ask these very questions directly to the source. The report lacks substance and due diligent in discovering the stories. Where is the native testimonies. Where are the probates? Where are the families?
 Response to these concerns and questions can be arranged in a dialog with the marchers of the Ka'apuni. Several people participated in this great traditional practice including Na Kupuna O Maui and Bully.

Malama Pono
 Joycelyn Costa
 President Ka'apuni

Joycelyn Costa
 P.O. Box 777
 Haiku, HI 96708

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Ms. Costa:

Thank you for your letter dated April 9, 2009 faxed to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN) and your e-mail dated November 16, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EAE/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Background Information

Page 5. This statement was intended to provide a general description of the property in the post-contact context, as opposed to a more comprehensive statement about its history. No disrespect was intended regarding the property's pre-contact history. Further discussion regarding historical resources of the Property—including discussion of the Property's history dating back to post-contact times—will be included in the Draft EIS.

Cultural Resources

Page 29. The Draft EIS will discuss Kuleana lands in the vicinity of Paeahu, Palanea, and Keaouhu ahupua'a.

Joyclynn Costa
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 2

Page 30. The partial sentence that you quote was referencing archaeological sites found in the various ahupua'a of the Honua'ula moku (district) and not specifically found within the Honua'ula property. The Draft EIS will contain an Archaeological Inventory Survey, a Cultural Impact Assessment, and a Cultural Resources Preservation Plan (CRPP).

The Archaeological Inventory Survey identifies archaeological sites such as multiple stone feature complexes and trails, as well as settlement patterns.

The cultural impact assessment identifies traditional customary practices and historical accounts of the Honua'ula area and includes interviews local residents. The complete transcript for each interview will be included as an appendix.

The CRPP was prepared in consultation with interested and concerned parties, cultural advisors, Na Kupuna O Maui, the Maui County Cultural Resources Commission, the Maui/Lāna'i Island Burial Council, State Historic Preservation Division, Department of Land and Natural Resources Na Ala Hele, Office of Hawaiian Affairs and various knowledgeable individuals. The CRPP provides specific preservation and mitigation measures based on community input and the findings of the Cultural Impact Assessment and Archaeological Inventory Survey.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter and e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Joyclynn Costa

>>> Karie Silva <karielue@gmail.com> 4/3/2009 12:34 PM >>>
*To whom it may concern;

I am asking there to be a consulted party in the EIS process, thank you.<<http://us.mc01g.mail.yahoo.com/mc/compose?to=oeqc@doh.hawaii.gov>>

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kihel-makena community Plan policies, are not addressed in the EISPN, which instead avoids meaningful comment on the topic.Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.*



March 9, 2010

PRINCIPALS

HONNASS WITTEN, ASLA
President

L STANINDANAN, ASLA
Executive Vice-President

RUSSELL YI CHUNG, FASLA, LEED® AP
Executive Vice-President

JINCENT SHIGEKUNI
Vice-President

FRANK T. MURAKAMI, AICP, LEED® AP
Principal

FRANK BRANDT, PASLA
Chairman Emeritus

ASSOCIATES

ON SCHELL, AICP
Senior Associate

AYMOND T. HIGA, ASLA
Senior Associate

LEVIN K. NISHIKAWA, ASLA
Associate

JIM MIKAMI YUEN, LEED® AP
Associate

COTY ALJANA AIRRIGO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

HACHENG DONG, LEED® AP
Associate

ONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-164
t: (808) 522-5633
f: (808) 523-1472
e-mail: sysadmin@pbrhawaii.com

HAOLEI OFFICE
101 Kamehaha Boulevard
Spiegel Building, Suite 313
Honolulu, Hawaii 96876-2005
t: (808) 521-5631
f: (808) 525-3163

Karrie Silva
35A Oluolu mau Place
Haiku, HI 96708

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Silva:

Thank you for your e-mail dated April 3 2009 sent to Jeff Hunt of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kihei-Mākena Community Plan, among other issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Karrie Silva

>>> katelin.halligan <haynay111@hotmail.com> 4/6/2009 9:37 AM >>>

Date: Fri, 3 Apr 2009 13:26:45 -0700

To whom it may concern;

I am asking there to be a consulted party in the EIS process, thank you.

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kihei-makena community Plan policies, are not addressed in the EISPN, which instead avoids meaningful comment on the topic. Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

B. STAN BRANCIAN, ASLA
Executive Vice-President

RUSSELL Y. LUNG, FASLA, LEED^{AP}
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED^{AP}
Principal

W. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES

TOM SCHINELL, AICP
Senior Associate

RAYMOND F. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MIKAMITUEN, LEED^{AP}
Associate

SCOTT ALIKA ARRIGO, LEED^{AP}
Associate

SCOTT MURAKAMI, ASLA, LEED^{AP}
Associate

DACHENG DONG, LEED^{AP}
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 604
Honolulu, Hawaii 96813-3184
Tel: (808) 521-1102
E-mail: systems@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamehale Roadway
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2655
Tel: (808) 521-5663
Fax: (808) 526-3163

Katelin Halligan
Haynay111@hotmail.com

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Halligan:

Thank you for your e-mail dated April 6, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISP/N was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to traffic, water, trails and access, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kihei-Mākena Community Plan, among other issues.

We will include you as a consulted party. Since you did not provide a mailing address, we will notify you by e-mail when a Draft EIS is available.

Thank you for reviewing the EA/EISP/N. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/N Katelin Halligan

>>> Katie Romanchuk <chialani@hawaiiartel.net> 4/3/2009 12:24 PM >>>
Dear Sirs

Please keep me informed regarding the EIS for Wailea 670.

I am a Maui citizen, for 25 years. I am very concerned about the impacts of Wailea670 on the surrounding community, environment, marine-life, traffic, native plant preservation and cultural sites in this area, not to mention Maui as a whole, with the magnitude of this development. Please think long-term, for what this little island can maintain for community health and safety as well as the environment and culture we all depend on in so many different ways here.

Thank you, Katie Romanchuk

575-9540



March 9, 2010

PRINCIPALS
HOMASS. WITTEN, ASLA
resident

STAN DUNCAN, ASLA
executive Vice-President

USSELL Y. CHUNG, PASLA, LEED^{AP}
executive Vice-President

INCENT/SINGEKUNI
Vice-President

RANTY MURAKAMI, AIA, LEED^{AP}
Principal

FRANK BRANDT, PASLA
Assistant Director

ASSOCIATES
ON SCHNELL, AICP
Senior Associate

ALMOND T. HIGA, ASLA
Senior Associate

EVINK, NISHIKAWA, ASLA
Associate

IMAIKAMI YUEN, LEED^{AP}
Associate

JOTT ALIKA, ABRIGO, LEED^{AP}
Associate

JOTT MURAKAMI, ASLA, LEED^{AP}
Associate

ACHENG DONG, LEED^{AP}
Associate

MOLOKAI OFFICE
01 Bishop Street, Suite 650
Molokai, Hawaii 96813-3484
t (808) 521-5031
c (808) 523-1402
mail: psodm@pbrhawaii.com

IPOLEI OFFICE
31 Kamaoia Boulevard
Poole Building - Suite 519
Honolulu, Hawaii 96817-2665
t (808) 521-5431
c (808) 523-3163

Katie Romanchuk
1401 W. Kuiaha Rd.
Haiku, HI 96708

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Romanchuk:

Thank you for your e-mail dated April 3 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will address issues related to the surrounding community, the environment, marine water quality, traffic, native plants, and cultural sites, among other things.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP Katie Romanchuk

>>> Keegan House <keegal42@hotmail.com> 4/4/2009 11:38 AM >>>

To whom it may concern:

I am asking there to be a consulted party in the EIS process, thank you.

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kihel-makena community Plan policies, are not addressed in the EISP, which instead avoids meaningful comment on the topic. Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.



March 9, 2010

PRINCIPALS

THOMAS S. WITTEN, ASLA
President
L. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL X. CHUNG FASLA, LEED® AP
Executive Vice-President
ONCENT SHIGEKUNI
Vice-President

FRANT T. MURAKAMI, AICP, LEED® AP
Vice-President

V. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES

TON SCHEWELL, AICP
Senior Associate

JAYMOND T. IHIGA, ASLA
Senior Associate

EVYIN K. MSHIKAWA, ASLA
Associate

JIM MIKAMI YUEN, LEED® AP
Associate

COTT ALIKA, AIBRGO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

WACHING DONG, LEED® AP
Associate

ONOLU LU OFFICE
80 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
t: (808) 525-3400
f: (808) 525-3400
email: pycadmi@pbrhawaii.com

MOLEI OFFICE
4000 Kalia Road
Spoker Building, Suite 313
Kipapa, Hawaii 96707-2005
t: (808) 521-5631
f: (808) 525-3163

Keegan House
keega142@hotmail.com

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. House:

Thank you for your e-mail dated April 4, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kūhei-Mākena Community Plan, among other issues.

We will include you as a consulted party. Since you did not provide a mailing address, we will notify you by e-mail when the Draft EIS is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

>>> "ken rose" <rosek108@hawaii.rr.com> 4/4/2009 10:23 AM >>>
I am concerned that the EIS will not cover a broad band of possibilities.

Blessings.....Ken Rose

1905.08 EA EISPN Keegan House



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

LESTAN DUNCAN, ASLA
Executive Vice-President

WESLEY CHUNG, FNSIA, LEED AP
Executive Vice-President

INCENT SHIGEKUNI
Vice-President

BRANT MURAKAMI, AICP, LEED AP
Principal

FRANK BRANDOLINA
Treatment Engineer

ASSOCIATES

OMI SCINELL AICP
Senior Associate

AYMOND F. HIGA, ASLA
Senior Associate

EVYN NISHIKAWA, ASLA
Associate

JUNI MIKAMITUEN, LEED AP
Associate

COTT ALIKA ABRIGO, LEED AP
Associate

COTT MURAKAMI, ASLA, LEED AP
Associate

ACHENG DONG, LEED AP
Associate

HONOLULU OFFICE

30 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3883
Tel: (808) 523-1422
Fax: (808) 523-1422
Email: systems@pbrhawaii.com

APOLEI OFFICE

40 Kamehaha Boulevard
Special Building, Suite 313
Apohe, Hawaii 96707-2005
Tel: (808) 521-5631
Fax: (808) 521-5631

PBR HAWAII
& ASSOCIATES, INC.

Ken Rose
rosek108@hawaii.rr.com

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Rose:

Thank you for your e-mail dated April 4, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comment.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

We will include you as a consulted party. Since you did not provide a mailing address, we will notify you by e-mail when the Draft EIS is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Ken Rose

Comments on Honua'ula EISPN

Re: TMK: (2)-1-0856 and 71
Applicant: Honua'ula c/o Goodfellow Brothers, Inc., P.O. Box 220, Kihai, HI 96753, Charlie Jencks, 876-5205 Charlie@GBHMAUI.COM
Accepting Authority: County of Maui, Planning Department, 250 South High Street, Wailuku, HI 96793, Jeff Hunt, 270-7735 Fax: (808) 270-7634 jeff.hunt@mauicounty.gov, Maui Planning Commission Jonathan Slarr, jslarr@maui.net
Consultant: PBR HAWAII, 1001 Bishop Street, ASB Tower, Suite 650, Honolulu, HI 96813, Tom Schnell, 521-5631

Comments: EISPN pending 30-day comment. Address comments to the Applicant, with copies to the Accepting Authority, Consultant and OEQC
Office of Environmental Quality Control, 235 South Beretania Street, Suite 702, Honolulu, Hawaii 96813, Ph. 586-4185, Fax. 586-4186
Email: oeqc@doh.hawaii.gov

To: Honua'ula Partner, LLC, Applicant
Cc: Accepting Authority, Consultant, and OEQC

I am submitting my comments on *Honua'ula Environmental Impact Statement Preparation Notice*

downloadable from:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Maui/2009s/09-03-08-MA-EISPN-Honuaula.pdf

My comments concern the impact of the project on Hawaiian biodiversity. The EISPN accurately states that "The southern area contains scattered remnants of a native Hawaiian dry forest ecosystem." Fully 90-95% of Hawaiian dry forest ecosystems have already been destroyed, and the remaining 5-10% survives in varying degrees of degradation. In order to prevent the complete destruction of this ecosystem, maximum protection and restoration efforts need to be afforded to those remnants of this ecosystem that survive.

Therefore, any sound assessment of the impact of the project on biodiversity requires the following components:

- 1) A comprehensive inventory of the biodiversity present on the site;
 - 1a) In Hawaii, there is a tendency for endemic and indigenous species to evolve extremely localized variants. Therefore, to understand the impacts on biodiversity requires that, in addition to simple species identification, local populations be examined for any morphological or genetic variation that may be unique to the populations on the project site.
- 2) An assessment of the total remaining inventory of that type of native ecosystem within Hawaii, and what its loss within the project area would mean to that total inventory, and the role that its preservation would play in total efforts to preserve the remnants of that Hawaiian ecosystem.
 - 2a) In particular, an assessment needs to be made of whether the habitat can be of use for the recovery of endangered species even if they are not found within the property, but which are known to survive on other examples of this habitat.

3) An evaluation of how the development and its mitigation measures will allow the remnant ecosystem to be sustainable.

The botanical and faunal surveys quoted in the EISPN, augmented by transect surveys described in my report, "Remnant Wiliwili Forest Habitat at Wailea 670, Maui" (RWFHW670), accomplish much of 1).

However, recent unpublished discoveries of the listed endangered species *Manduca blackburni* show that there may yet be additional native biodiversity to be documented within the project area. Honua'ula Partners is certainly aware of the discovery of *Manduca blackburni* on the site, but the EISPN neglects to discuss it. Moreover, the summary statement in section 3.7 on Fauna, "No rare, endangered, or threatened avifauna and feral mammal species were found during the surveys," is written so as to remain silent on native invertebrates. Again in Section 3.7 p. 42 (numbered page 24), it uses language that is silent on listed endangered invertebrates by using the word 'avifauna': "Honua'ula is not expected to impact any rare, endangered, or threatened avifauna and feral mammal species as none were found within the Property (Bruner, 1988, 1993, and 2004)."

Regarding 1a), the morphological uniqueness of the populations of Rock's netle, *Lipochaeta rockii*, found on the site, as described in RWFHW670, merits further elucidation of the population's genetic and phenotypic characteristics.

Component 2) however, has not received any attention in any of the surveys or other materials released by the developers, including this EISPN and the *Honua'ula/Wailea 670 Conservation and Stewardship Plan (2006)*. The place that the habitat holds within the total remaining inventory of low elevation Hawaiian dry forest on Maui must be assessed.

Component 3) has never been given more than cursory treatment in any material released by the developer, including this EISPN. The sustainability of ecosystem remnants has been shown by numerous studies in conservation biology to be critically dependent on habitat size and contiguity, and population sizes of the species. Maximal sustainability requires preservation of the largest contiguous areas of habitat, and maximizing the populations rare species. No analysis of the effects of habitat loss, population loss, and habitat fragmentation has been included in this EISPN.

On p. 9, the EISPN states as one of the development's design achievements, the "protection of important habitat and natural features". However, no studies that support this claim are provided.

A fundamental anomaly of this EISPN is that the site plan presented bears no relation to Condition #27 of the rezoning bill, which Honua'ula Farmers unilaterally agreed to. Instead of the 130 acre conservation easement described in Condition #27, the EISPN presents a 22 acre "Native Plant Preservation Area"; this plan is similar to one that were proposed by Honua'ula Partners before the rezoning bill was passed.

In contrast, Condition #27 states: (online at <http://www.comaui.hi.us/DocumentView.asp?DID=7475>)

"The easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit preservation, but shall not be less than 18 acres and shall not exceed 130-acres."

and

"That Honua'ula Partners, LLC, its successors and permitted assigns, shall be prohibited from development in the Easement other than erecting fences, enhancing trails, and constructing structures for the maintenance needed for the area, in accordance with the Conservation/Preservation Plans."

The failure of the site plan in the EISPN to comply with the description of the conservation easement described in Condition #27 cannot be due to inadvertent inattention to the details of Condition #27. Indeed, the EISPN goes to the trouble of adulterating the language of Condition #27 when it quotes it on p. 23. They change the actual text, which reads:

"The Easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit reservation, but shall not be less than 18 acres and shall not exceed 130 acres."

to read:

"The Easement will comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that do not merit preservation, but will not be less than 18 acres and will not exceed 130 acres."

Therefore, the language of the EISPN conceals the condition that three independent government agencies provide findings to remove any areas from the 130-acre conservation easement south of latitude 20°40'15.00"N.

An additional omission from the EISPN is that the map that accompanies Condition #27 in the Unilateral Agreement, which overlays the latitude 20°40'15.00"N line on the site plan. None of the maps provide in the EISPN show the latitude 20°40'15.00"N line.

In summary, the EISPN presents a site plan that is in contradiction to the Condition #27 in the unilateral agreement signed by Honua'ula Partners. It fails completely to address whether its site plan is based on sound conservation biology for the endangered Hawaiian dry forest ecosystem. And it evades discussion of endangered invertebrate fauna which have been documented on the site. All of these deficiencies must be cured in order for the public and government agencies to possess an adequate assessment of the environmental impacts of the proposed project.

Sincerely,

Dr. Lee Altenberg

Lee Altenberg, Ph.D.
2605 Lioholo Place, Kihei, Maui, Hawaii 96753-7118
Phone: (808) 875-0745, Fax: call to arrange. E-mail: altenber@hawaii.edu
Web: <http://dynamics.org/Altenberg/>

-----Original Message-----

From: Lee Altenberg [<mailto:altenber@hawaii.edu>]
Sent: Tuesday, November 17, 2009 12:38 PM
To: Charlie Jencks
Cc: Jeff hunt@mauicounty.gov; Jonathan Starr; Lee Altenberg; Tom Schnell; oeqc@doh.hawaii.gov
Subject: Re: Comments on Honua'ula EISPN

The October 2009 EISPN is identical to the March 2009 EISPN except that "Environmental Assessment" has been added. Therefore, my comments submitted April 7, 2009 are still applicable.

To these I would only add that the proposed plan will result in the death of the vast majority of the population of endemic and indigenous species remaining on the property, and the loss of the vast majority of the habitat upon which they currently survive. There is no justification in terms of conservation for inflicting these losses; these losses are contrary to any conservation goals that may be stated.

Sincerely,
Dr. Lee Altenberg

On Apr 7, 2009, at 5:43 PM, Lee Altenberg wrote:

- > Re: TMK: (2) 2-1-08:56 and 71
- > Applicant: Honua'ula c/o Goodfellow Brothers, Inc., P.O. Box 220,
- > Kihei, HI 96753. Charlie Jencks, 879-5205 Charlie@GBIMAUJ.COM
- > Accepting Authority: County of Maui, Planning Department, 250 South
- > High Street, Wailuku, HI 96793. Jeff Hunt, 270-
- > 7735 Fax: (808) 270-7634 Jeff.hunt@mauicounty.gov, Maui Planning
- > Commission Jonathan Starr kalepa@maui.net
- > Consultant: PBR HAWAII, 1001 Bishop Street, ASB Tower, Suite 650,
- > Honolulu, HI 96813. Tom Schnell, 521-
- > 5631
- > Comments: EISPN pending 30-day comment. Address comments to the
- > Applicant, with copies to the Accepting Authority, Consultant and OEQC
- > Office of Environmental Quality Control, 235 South Beretania Street,
- > Suite 702, Honolulu, Hawaii 96813, Ph. 586-4185, Fax. 586-4186
- > Email: oeqc@doh.hawaii.gov
- >
- > To: Honua'ula Partner, LLC, Applicant
- > Cc: Accepting Authority, Consultant, and OEQC
- >
- >
- > I am submitting my comments on Honua'ula Environmental Impact
- > Statement Preparation Notice downloadable from:
- > [http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library](http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/y/Maui/2009/2009-03-08-MA-EISPN-Honuaula.pdf)
- > [y/Maui/2009/2009-03-08-MA-EISPN-Honuaula.pdf](http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/y/Maui/2009/2009-03-08-MA-EISPN-Honuaula.pdf)
- >
- > My comments concern the impact of the project on Hawaiian
- > biodiversity. The EISPN accurately states that "The southern area
- > contains scattered remnants of a native Hawaiian dry forest
- > ecosystem." Fully 90-95% of Hawaiian dry forest ecosystems have
- > already been destroyed, and the remaining 5-10% survives in varying
- > degrees of degradation. In order to prevent the complete destruction
- > of this ecosystem, maximum protection and restoration efforts need to
- > be afforded to those remnants of this ecosystem that survive.
- >

- > Therefore, any sound assessment of the impact of the project on
- > biodiversity requires the following components:
- > 1) A comprehensive inventory of the biodiversity present on the site;
 - 1a) In Hawaii, there is a tendency for endemic and indigenous species to evolve extremely localized variants. Therefore, to understand the impacts on biodiversity requires that, in addition to simple species identification, local populations be examined for any morphological or genetic variation that may be unique to the populations on the project site.
- > 2) An assessment of the total remaining inventory of that type of native ecosystem within Hawaii, and what its loss within the project area would mean to that total inventory, and the role that its preservation would play in total efforts to preserve the remnants of that Hawaiian ecosystem.
 - 2a) In particular, an assessment needs to be made of whether the habitat can be of use for the recovery of endangered species even if they are not found within the property, but which are known to survive on other examples of this habitat.
- > 3) An evaluation of how the development and its mitigation measures will allow the remnant ecosystem to be sustainable.
- > The botanical and faunal surveys quoted in the EISPN, augmented by transect surveys described in my report, "Remnant Wiliwili Forest Habitat at Waialea 670, Maui" (RWFHW670), accomplish much of 1).
- > However, recent unpublished discoveries of the listed endangered species *Manduca blackburni* show that there may yet be additional native biodiversity to be documented within the project area.
- > Honua'ula Partners is certainly aware of the discovery of *Manduca blackburni* on the site, but the EISPN neglects to discuss it.
- > Moreover, the summary statement in section 3.7 on Fauna, "No rare, endangered, or threatened avifauna and feral mammal species were found during the surveys," is written so as to remain silent on native invertebrates. Again in Section 3.7 p. 42 (numbered page 24), it uses language that is silent on listed endangered invertebrates by using the word "avifauna": "Honua'ula is not expected to impact any rare, endangered, or threatened avifauna and feral mammal species as none were found within the Property (Bruner, 1988, 1983, and 2004)."
- > Regarding 1a), the morphological uniqueness of the populations of *Rock's nehe*, *Lipochaeta rockii*, found on the site, as described in RWFHW670, merits further elucidation of the population's genetic and phenotypic characteristics.
- > Component 2) however, has not received any attention in any of the surveys or other materials released by the developers, including this EISPN and the Honua'ua/Waialea 670 Conservation and Stewardship Plan (2006). The place that the habitat holds within the total remaining inventory of low elevation Hawaiian dry forest on Maui must be assessed.
- > Component 3) has never been given more than cursory treatment in any material released by the developer, including this EISPN. The sustainability of ecosystem remnants has been shown by numerous studies in conservation biology to be critically dependent on habitat size and contiguity, and population sizes of the species.
- > Maximal sustainability requires preservation of the largest contiguous areas of habitat, and maximizing the populations of rare species. No analysis of the effects of habitat loss, population loss, and habitat fragmentation has been included in this EISPN.
- > On p. 9, the EISPN states as one of the development's design achievements, the "protection of important habitat and natural features". However, no studies that support this claim are provided.
- > A fundamental anomaly of this EISPN is that the site plan presented bears no relation to Condition #27 of the rezoning bill, which Honua'ula Partners unilaterally agreed to. Instead of the 130 acre conservation easement described in Condition #27, the EISPN presents a 22 acre "Native Plant Preservation Area"; this plan is similar to one that was proposed by Honua'ula Partners before the rezoning bill was passed.
- > In contrast, Condition #27 states:
- > (online at <http://www.co.maui.hi.us/DocumentView.asp?DID=7475>)
- > "The easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not exceed 130-acres."
- > and
- > "That Honua'ula Partners, LLC, its successors and permitted assigns, shall be prohibited from development in the Easement other than erecting fences, enhancing trails, and constructing structures for the maintenance needed for the area, in accordance with the Conservation/Preservation Plans."
- > The failure of the site plan in the EISPN to comply with the description of the conservation easement described in Condition #27 cannot be due to inadvertent inattention to the details of Condition #27. Indeed, the EISPN goes to the trouble of adulterating the language of Condition #27 when it quotes it on p. 23. They change the actual text, which reads:
- > "The Easement shall comprise the portion of the property south of latitude 20°40'15.00"N, excluding any portions that the State Department of Land and Natural Resources, the United States Fish and Wildlife Service, and the United States Corps of Engineers find do not merit reservation, but shall not be less than 18 acres and shall not exceed 130 acres."
- > to read:



> "The Easement will comprise the portion of the property south of
 > latitude 20°40'15.00"N, excluding any portions that do not merit
 > preservation, but will not be less than 18 acres and will not exceed
 > 130 acres."

> Therefore, the language of the EISP/N conceals the condition that three
 > independent government agencies provide findings to remove any areas
 > from the 130-acre conservation easement south of latitude
 > 20°40'15.00"N.

> An additional omission from the EISP/N is that the map that accompanies
 > Condition #27 in the Unilateral Agreement, which overlays the latitude
 > 20°40'15.00"N line on the site plan. None of the maps provide in the
 > EISP/N show the latitude 20°40'15.00"N line.

> In summary, the EISP/N presents a site plan that is in contradiction to
 > the Condition #27 in the unilateral agreement signed by Honua'ula
 > Partners. It fails completely to address whether its site plan is
 > based on sound conservation biology for the endangered Hawaiian dry
 > forest ecosystem. And it evades discussion of endangered invertebrate
 > fauna which have been documented on the site. All of these
 > deficiencies must be cured in order for the public and government
 > agencies to possess an adequate assessment of the environmental
 > impacts of the proposed project.

> Sincerely,

> Dr. Lee Altenberg

Lee Altenberg, Ph.D.
 Phone: (808) 875-0745, Cell: (808) 344-1113, E-mail: altenber@hawaii.edu
 Web: <http://dynamics.org/Altenberg/>

March 9, 2010

PRINCIPALS
 HOMAS S. WITTEN, ASLA
President

STAN DUNCAN, ASLA
Executive Vice-President
 JESSEL E. CHUNG, ASLA, LEED® AP
Executive Vice-President

INCENTI SHIGEKUNI
Vice-President
 BRANT E. MURAKAWA, LEED® AP
Principal

FRANK BRANDT, ASLA
Interim Executive

ASSOCIATES
 TOM SCHINELL, AICP
Senior Associate

ATYMOND THIGA, ASLA
Senior Associate

RYN K. NISHIKAWA, ASLA
Associate

MUMIKAMI YUEN, LEED® AP
Associate

COTT ALIKA, AIBRIGO, LEED® AP
Associate

COTT MURAKAWA, ASLA, LEED® AP
Associate

ACHENG DONG, LEED® AP
Associate

HONOLULU OFFICE
 301 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-5964
 tel: (808) 521-5533
 fax: (808) 523-1402
 e-mail: sysadmin@pbrhawaii.com

KAPOLEI OFFICE
 301 Kamehaha Boulevard
 Kapolei Building, Suite 313
 Kapolei, Hawaii 96707-2005
 tel: (808) 521-5531
 fax: (808) 535-3103

Lee Altenberg, Ph.D.
 2605 Lioholo Place
 Kihei, Maui, HI 96753-7118

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Mr. Altenberg:

Thank you for your e-mail sent April 7, 2009 to the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N) and your e-mail sent November 17, 2009 to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

SWCA Environmental Consultants (SWCA) has conducted an inventory of the plants and animals present on the Honua'ula property (TMK (2) 2-1-08:056 and TMK (2) 2-1-08:71). Their reports will be included as appendices to the Draft Environmental Impact Statement (EIS). The objectives of their surveys were to: 1) characterize the plants and animals of the area with special attention to native, unique, and listed threatened or endangered species; 2) identify the location(s) of rare plants and animals; 3) develop conservation and management recommendations; and 4) provide recommendations for long-term monitoring and ecological research.

SWCA has also prepared a conservation and stewardship plan (CSP) which recommends specific actions to protect rare plant species native to the Honua'ula area, propagate native dry shrubland plants from seeds gathered from the area, and landscape Honua'ula with native plant species native to the area. The CSP includes a discussion of Hawaiian dry forest ecosystems and their status, an evaluation of the remnant coastal dry shrubland community at Honua'ula, an inventory of dry forest restoration efforts underway statewide (reserves and preserves), and an evaluation of lessons learned that are applicable to the proposed preservation easement and related conservation efforts at Honua'ula. It will also address proposed ungulate management and related measures to protect the remnant native plants within the preservation easement, conservation areas, and Honua'ula at large from grazing pressure. SWCA biologists have reviewed current literature on conservation biology and consulted with acknowledged experts in Hawaiian dry forest ecology during preparation of the CSP. The CSP will be included as an appendix to the Draft EIS.

The remnant native coastal dry shrubland at Honua'ula is a fragment of the original ecosystem. If left undeveloped and without active management it will continue to be threatened by invasive species of plants and animals, wildfire, and grazing by feral ungulates. Under those circumstances, there would be no guarantee that the shrubland would be able to recover from decades of disturbance or retain its existing characteristics in perpetuity.

Lee Altenberg, Ph.D.
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 2

Honua'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honua'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanaio (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honua'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honua'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

SWCA biologists coordinated and conducted several joint surveys of the parcel together with biologists from the U.S. Fish and Wildlife Service, Bishop Museum Department of Entomology, and Hawaii Department of Land and Natural Resources. Evidence of Blackburn's sphinx moths (*Manduca blackburni*) was found within the Honua'ula property during these surveys, including frass, cut stems and leaves, and live caterpillars. In all cases, sign was limited to a single species of non-native weed: the tree tobacco (*Nicotiana glauca*). No adult Blackburn's sphinx moths were observed within the property during the SWCA studies. Some, but not all, of the native food plants for the moths are also found on the property. The presence of Blackburn's sphinx moth (*Manduca blackburni*) caterpillars will be discussed in the Draft EIS. Furthermore, a multi-species Habitat Conservation Plan (to include the candidate endangered 'awikawiki plant) will be prepared under Section 10(a)(1)(B) of the Endangered Species Act and in collaboration with the State Department of Land and Natural Resources and the U.S. Fish and Wildlife Service.

Thank you for reviewing the EISPN and the EA/EISPN. Your e-mails will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

April 9, 2009

From: Lucienne de Neale
PO Box 610 Haiku, HI 96708

To: Honua'ula c/o Goodfellow Brothers, Inc.
P.O. Box 220, Kihei, HI 96753.
Attention: Charlie Jencks

Comments on Honua'ula EISPN

Mahalo for the opportunity to comment on this preparation notice. I have tracked the plans and promises regarding this development for over a decade and wish to continue to be a consulted party. I am disappointed that, once again, a minimal effort appears to be underway to comply with the environmental review process as it applies to this project. This lack of complete information makes it far more difficult for Planning Commissioners who will receive the Draft EIS and the eventual Phase II project District Application to accurately assess and review the project and its impacts.

The document entitled "Environmental Impact Statement Notice" (EISPN) does not fulfill statutory and regulatory requirements. HAR 11-200-9 B, Section 4, 5, and 7, and 11-200-11.2 require that the EISPN be filed with a supporting final environmental assessment report. The document entitled EISPN does not meet the standards required of an FEA.

The EISPN merely outlines the broad general scope of the project. It presents vague options without specific details or choices. It does not identify enough specifics to assess potential impacts of each component of the project or to identify any mitigative measures as required in a FEA. It postpones any real disclosure of project specifics, impact assessment or proposed mitigation, although HEPA's intent is to present information as early in the process as possible.

There are many technical studies that have already been done that could have supported a FEA, but are not revealed in the EISPN. Instead, the applicant informs the public that they will be included as appendices to the Draft EIS. The report submitted to the County Council during Project District Zoning and included as part of the project review under Condition 27 of Ordinance No. 3554, entitled "Remnant Williwili Forest Habitat at Wailea 670, should also be included in those studies submitted in the DEIS.

An FEA would have revealed all of these studies, along with potential impacts and mitigation. The EISPN does not meet the requirements of an FEA and therefore does not meet the requirements for a legal notice.

To submit and accept an EISPN without the required FEA, deprives the public of early consultation and review and prevents decision makers, agencies and the public from full disclosure of potential project impacts early in the review process. A FEA would have included written comments and responses to the comments under the early consultation provisions of sections 11-200-9(b). (HAR 11-200-10-L)

"An EIS is meaningless without the conscientious application of the EIS process as a whole, and shall not be merely a self-serving recitation of benefits and a rationalization of the proposed action. Agencies shall insure that statements are prepared at the earliest opportunity in the planning and decision making process. This shall insure an



early open forum for discussion of adverse effects and available alternatives, and that the decision makers will be enlightened to any environmental consequences of the proposed action" (11-200-14 HAR General Provisions)

Internal departmental policy should not substitute for or circumvent adopted regulations for the processing of environmental impact statements.

Additionally, the EISPN states on page 3 that "creation of Honua'ula may involve or impact State and/or County lands or funds relating to infrastructure improvements for public facilities, roadways, water, sewer, utility, drainage, or other facilities. While the specific nature of each improvement is not known at this time, the EIS is intended to address all current and future instances involving the use of State and/or County land and funds relating to Honua'ula."

The specific nature of all improvements, their potential impacts and possible mitigation measures, must be addressed in full in the DEIS, including any current or foreseen triggers.

It is unfortunate that the pre-consultation process that would identify areas to address in the DEIS seems to have been limited to a select group. It would also be helpful, in the list of "previously consulted parties" to note the date(s) when the parties were actually consulted. And whether or not the parties were actually consulted directly in the process of preparing the EISPN document and had a chance to offer their feedback.

I would like to request that the OEQC closely examine the insufficiency of this EISPN and require a process that conforms with both the letter and spirit of Chapter 343 and Section 11-200-14 HAR. This would allow the discussion of specific impacts and mitigations to be viewed and discussed by the public, public agencies, and decisionmakers, which is the intent of the environmental review process.

Thanks for this opportunity to comment.

Lucienne de Naie
Concerned Citizen

March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

L. STAN DUNCAN, ASLA
Executive Vice-President

NESSIE L. CHUNG, FASLA, LEED AP
Executive Vice-President

WINCENT SHIGERUKU
Vice-President

FRANTZ MURAKAWA, AICP, LEED AP
Principal

W. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES
TOM SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA ARIBIGO, LEED AP
Associate

SCOTT MURAKAWA, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
600 Bishop Street, Suite 650
Honolulu, Hawaii 96813-5191
Tel: (808) 521-5631
Fax: (808) 523-1472
E-mail: systems@pbrhawaii.com

CAPOLEI OFFICE
901 Kamehale Boulevard
Capolei Building, Suite 313
Capolei, Hawaii 96707-2005
Tel: (808) 521-5631
Fax: (808) 335-3163

Lucienne de Naie
P.O. Box 610
Haiku, HI 96708
**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. de Naie:

Thank you for your letter dated April 9, 2009 e-mailed to Charlie Jencks of Honua'ula Partners, LLC on April 8, 2009, regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). Following the EISPN public comment period, Honua'ula Partners, LLC consulted with the Office of Environmental Quality Control (OEQC) to ensure that all applicable statutory and regulatory requirements were fulfilled.

Regarding the EISPN dated March 2009, notice of which was published in the March 8, 2009 Environmental Notice, the OEQC Director stated: "...the published document fulfills all the requirements and components [of] an environmental assessment." Pursuant to the instructions of the OEQC Director, the Maui County Planning Department subsequently submitted an Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) to OEQC on September 18, 2009. You received a copy of the EA/EISPN and provided comments to PBR Hawaii dated November 16, 2009 on behalf of the Sierra Club Maui Group. We will respond to that comment letter separately.

With respect to your statements regarding alleged deficiencies of the EA/EISPN, please note that the EA/EISPN is a notice document and is intended to set forth the proposed scope of the Draft EIS for the purpose of seeking comment. According to the OEQC, Chapter 343 of the Hawaii Revised Statutes (HRS) and the applicable Hawaii Administrative Rules (HAR) support the functioning of the EISPN as an EA in situations where projects go directly to the more stringent full disclosure requirements of the EIS. This has been a long recognized and established practice in the State of Hawaii. The OEQC stated that in such cases, the fact that the EA/EISPN does not contain every detailed element specified within HRS Chapter 343 for an EA does not take away from the fact that the completed EIS will be a full disclosure document having to comply with the requirements of HRS Chapter 343.

Lucienne de Naie
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

The Draft EIS is the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws and rules (HRS Chapter 343, and Title 11, Chapter 200, HAR). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

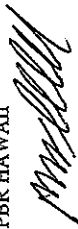
The Draft EIS will also include a list of individuals, community organizations, private groups, and government agencies consulted in the course of planning Honua'ula since 2001 and a separate list of individuals, community organizations, private groups, and government agencies consulted during the EIS process.

We will include you as a consulted party and we will provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Lucienne de Naie

EIS does not address the most important issues for Makenadevelopment

>>> madeleine migenes <madmig@hotmail.com> 4/3/2009 9:42 PM >>>

Madeleine Migenes
2590 Alohia Road, Haiku, HI 96708
Mailing address: PO Box 791211, Paia, HI 96779
madmig@hotmail.com

Charlie Jencks
Jeff Hunt, Planning Director
Office of Environmental Quality

Dear Mr. Jencks, Mr. Hunt, and OEC;

I join other Maui citizens in outrage about the proposed Makena development.
Water is the most obvious issue that fails to be addressed in any logical way.
I agree with the following statement:

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kihei-makena community Plan policies, are not addressed in the EISPN, which instead avoids meaningful comment on the topic.

Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.

From HAR:

"An EIS is meaningless without the conscientious application of the EIS process as a whole, and shall not be merely a self-serving recitation of benefits and a rationalization of the proposed action. Agencies shall insure that statements are prepared at the earliest opportunity in the planning and decision making process. This shall insure an early open forum for discussion of adverse effects and available alternatives, and that the decision makers will be enlightened to any environmental consequences of the proposed action" (11-200-14 HAR General Provisions)

Mahalo for your concern for the greater good for our fragile eco-system, and the needs of the greater public.

aloha, Madeleine Migenes



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASIA
President

STANISLAW ASIA
Executive Vice-President

USSELL YI CHUNG FAN, ASIA, LEED^{AP}
Executive Vice-President

ANCENT SHIGERAIKI
Vice-President

RANTT MURAKAMI, AICP, LEED^{AP}
Principal

FRANK BRANDT, ASIA
Interim Executive

ASSOCIATES

OMI SCHINELL, AICP
Senior Associate

ANMOND T. HIGA, ASIA
Senior Associate

EVIN K. NISHIKAWA, ASIA
Associate

JUNI MUKAMI YUEN, LEED^{AP}
Associate

COTT ALINA ABRIGO, LEED^{AP}
Associate

COTT MURAKAMI, ASIA, LEED^{AP}
Associate

HACHENG DONG, LEED^{AP}
Associate

ONOLUJU OFFICE
30 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3164
t: (808) 521-5631
f: (808) 523-1022
e: mail-sysadm@pbrhawaii.com

ATOLELE OFFICE
40 Kamohala Boulevard
Spalding Building, Suite 313
Spalding, Hawaii 96797-2005
t: (808) 521-5631
f: (808) 535-3163

>>> D'Antonio Mark <mark@mauiprintshop.com> 4/3/2009 12:52 PM >>>

To whom it may concern;

I am asking there to be a consulted party in the EIS process, thank you.

Our concerns about traffic, water, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, impacts to beaches, and compliance with Kihai-makena community plan policies, are not addressed in the EISP, which instead avoids meaningful comment on the topic.

Hawaii's Administrative Rules (HAR) make it clear that an EIS needs to be developed through a thorough process. This EIS Prep notice is vague, contradictory and evasive. Not a good start.

Mark D'Antonio
Maui Print Shop

p. 808.298.5692

mark@mauiprintshop.com
www.MauiPrintShop.com

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Ms. Migenes:

Thank you for your e-mail dated April 3, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISP was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kihai-Makena Community Plan, among other issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charlie Jencks, Honua'ula Partners, LLC

1905.08 EA EISP Madeline Migenes



March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
President

LISA PUNGAN, ASLA
Secretary / Vice-President

RUSSELL CHONG PASA, LEED® AP
Executive Vice-President

WINCENT SHIGEKUNI
Vice-President

TRANT T. MURAKAMI, AICP, LEED® AP
Principal

FRANK BRANDT, ASLA
Treatment Specialist

ASSOCIATES

ON SCHELL, AICP
Senior Associate

JAYMOND T. HIGASHI, ASLA
Senior Associate

EVYN K. NISHIKAWA, ASLA
Associate

JUNI MIKAMI YUEN, LEED® AP
Associate

COTT ALIUKA, AUBICO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

WACHENG DONG, LEED® AP
Associate

ONOLU LU OFFICE
50 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3169
P: (808) 523-1470
F: (808) 523-1470
email: onolululu@pbrhawaii.com

POLICE OFFICE
601 Kalia Boulevard
Hotel Building, Suite 313
Honolulu, Hawaii 96709-2005
P: (808) 521-6631
F: (808) 525-3163

Mark D'Antonio
Haymay111@hotmail.com

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. D'Antonio:

Thank you for your e-mail dated April 3, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

The Draft EIS will address issues related to traffic, water, trails and access, native plants, cultural sites, adequate buffers from Maui Meadows, marine water quality, and compliance with the Kiheti-Makena Community Plan.

We will include you as a consulted party. Since you did not provide a mailing address, we will notify you by e-mail when the Draft EIS is available.

Thank you for reviewing the EISPN. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

Wailea 670 EIS - Request to be Consulted

>>> "Mark Hyde" <hydem001@hawaii.rr.com> 4/3/2009 5:15 PM >>>
I would like to be consulted regarding the EIS for Wailea 670. I am a fulltime resident of Wailea (Golf Villas) and have an interest in water sources for the project and the impact the project's proposed water plan may/will have on down gradient wells and users.

Some of my concerns:

It is my understanding that an agreement has been made between Wailea 670 and at least one Wailea golf course, if not more, providing for damages in the event the use of Kamaole aquifer water causes well water for the golf courses to become unusable due to increased salinity. What are the terms of this agreement or agreements and how might this affect Wailea and other water users? At a minimum, these agreements should be made public and discussed in the EIS document.

I do not believe adequate studies have been conducted to test the effect the project's water usage may have on other existing, successful wells in the area; this needs to be assessed and base-line data established for other local wells in terms of draw and salinity. What will these other well water users do in the event Wailea 670's draw causes their well water to become unusable - will they then try to draw upon the Iao aquifer source that is already at capacity?

Finally, I think the study should address this project's proposed water draw will have on other probable future water users (which may be of greater social and economic utility) such as a south Maui hospital, a Kiheti high school, a long term care facility, etc. If Wailea 670 uses up the limited utility of the Kamaole aquifer, will the social fabric of our community be deprived of alternative, higher value installations? This needs to be discussed, weighed, considered and assessed as part of the EIS document.

Mark Hyde
4320 E. Waiala Loop
Wailea, Hawaii 96753
hydem001@hawaii.rr.com
(808) 874-3839 (home)
(808) 344-3358 (cell)

Mark G. Hyde
4320 E. Waiala Loop
Wailea, Hawaii 96753
(808) 874-3839
Hydem001@hawaii.rr.com

October 20, 2009

Tom Schnell, AICP
Senior Associate
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-1402

Re: Honua'ula EIS

Dear Mr. Schnell,

Thank you for forwarding a copy of the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) under cover of your letter dated October 16, 2009.

According to Hawaii Administrative Rules ("Rules"), the purpose of the EIS process is to "ensure that environmental concerns are given appropriate consideration in decision making. (11-200-1.) The Rules define "environmental impact" as "an effect of any kind, whether immediate or delayed, on any component of the environment." (11-200-2.) Significant environmental impacts include those that detrimentally affect water quality, etc. (11-200-12.) With these concepts in mind, the scope of discussion of water suggested in the EA/EISPN (4.7.1 Water System) is too narrow to permit a sufficient assessment of the environmental impact of this project on south Maui water resources: it appears from the EA/EISPN you intend to restrict your assessment to the conditions contained in County of Maui Ordinance No. 3554. While compliance with county requirements is relevant, confining your work to these limited criteria would defeat the broader purposes of Hawaii's environmental law. Your duty is to define all environmental impacts, primary and secondary, assess their significance and propose appropriate mitigation.

Without limitation, there are at least three specific areas of inquiry that must be included in any assessment of the Honua'ula project's impact on water resources. They are:

1. Impact of the project's water source plans on down-gradient wells in Wailea currently being used for golf course irrigation.

I am informed that a written agreement (or agreements) exists between Honua'ula project owners and down-gradient Wailea golf courses. These were apparently executed in anticipation that Honua'ula's

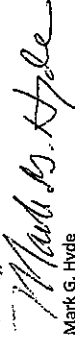
water sourcing plans might negatively impact the quality of water currently available for golf course irrigation since the golf courses rely on Kamaole aquifer well water. They apparently outline specific actions or remedies that will arise in the event negative impact on water quality is experienced by the golf courses. The mere existence of these agreements bespeaks the possibility, if not probability, of negative impact on these users. Furthermore, the remedies that will result in the event water quality is degraded need to be understood and examined to determine what impact they will have on the development and the surrounding environment should they be triggered.

2. The impact of the project's water sourcing plans on other down-gradient well users throughout Kihei. Numerous wells located in the Kihei area currently draw water from the Kamaole aquifer, presumably for landscape irrigation. These wells are largely a matter of public record and are noted on maps maintained by Maui County Department of Water Supply. To the extent water extraction by Honua'ula at locations above these wells degrades the quality of currently operating wells in the area, negative environmental impact may occur that must be understood and probable negative consequences anticipated and mitigated. To make this assessment, I believe you need to identify the number and location of these wells, measure the quantity and quality of water currently being extracted from each, calculate probable impact on them arising from Honua'ula's proposed up-gradient usage and propose mitigation strategies or remedies in the event of degradation.

3. Address/mitigate disposition of waste from the desalination process, including consequent impact on affected disposal sites.

Thank you in advance for taking the above matters into consideration.

Sincerely,



Mark G. Hyde



Mark G. Hyde
4320 E. Waiola Loop
Wailea, Hawaii 96753
(808) 874-3839
Hydem001@hawaii.rr.com

October 25, 2009

Tom Schnell, AICP
Senior Associate
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-1402

Re: Honua'ula EIS, Supplement # 1

Dear Mr. Schnell,

This supplements my letter to you dated October 20, 2009 regarding the above matter.

1. Conveyance of Water to Site:

It is my understanding that the well(s) intended to serve the project are located north of Honua'ula. Please identify the exact location of the well(s) and the intended route to be taken to transport water to the subject property from the well(s). Please assess the environmental impact inherent in transporting water from the well(s) to the subject property via the route selected, and if through the upcountry zone, explain whether the upcountry community plan permits water to be transported through its area of governance. If the route will not traverse the upcountry zone, what alternative route will be taken and what will the impacts be?

2. Endangered Species:

You write that there are no endangered species on the property. This is incorrect. Please be advised that Blackburn's sphinx moth, an endangered insect, has been identified within Honua'ula's boundaries and has been recently photographed *in situ*. Your report should note the presence of this endangered moth, identify its habitat and propose mitigation.

Thank you in advance for taking the above matters into consideration.

Sincerely,

Mark G. Hyde

March 9, 2010

PRINCIPALS
THOMAS S. WYTTEN, ASLA
President
R. STAN DUNCAN, ASLA
Executive Vice-President
ROSSELL Y. J. CHENG, FASLA, LEED* AP
Executive Vice-President
VINCENT SHIGERUKI
Vice-President
FRANK T. NURAKAMI, AICP, LEED* AP
Principal
R. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES
TON SCHNELL, AICP
Senior Associate
RAYMOND T. HIGA, ASLA
Senior Associate
SEVIN K. NISHIKAWA, ASLA
Associate
TAMMIKAMI YUEN, LEED* AP
Associate
SCOTT ALIKA ABRIGO, LEED* AP
Associate
SCOTT NURAKAMI, ASLA, LEED* AP
Associate
MACHING DONG, LEED* AP
Associate

HONOLULU OFFICE
601 Bishop Street, Suite 650
Honolulu, Hawaii 96813-1411
Tel: (808) 521-3851
Fax: (808) 521-3850
E-mail: hydem@pbrhawaii.com

CAPOLLEI OFFICE
3001 Kalia Road, Suite 313
Capolei, Hawaii 96707-2805
Tel: (808) 521-5631
Fax: (808) 525-3163

Mark Hyde
4320 E. Waiola Loop
Wailea, Hawaii 96753

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**

Dear Mr. Hyde:

Thank you for your e-mail dated April 3, 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N) and for your letters dated October 20 and 25, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The EISP/N was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR, and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Potential Impact on Groundwater Resources. The Draft EIS will include an Assessment of the Potential Impact on Water Resources, which includes discussion on: 1) Honua'ula's water use; 2) the use of brine concentrate, which is a product of the desalination process necessary to produce potable water; 3) potential impacts to downgradient wells; and 4) proposed mitigation measures.

All existing Honua'ula wells are fully permitted by the State Commission on Water Resource Management (CWRM). Any new wells that may be necessary on Water developed in compliance with all requirements of Chapter 174C, HRS (State Water Code) and Chapters 13-167 to 13-171, HAR as applicable, pertaining to CWRM and administration of the State Water Code.

There is no agreement between Honua'ula Partners, LLC and the owners of the downgradient Wailea Resort wells.

Mark Hyde
SUBJECT: HONUUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT
March 9, 2010
Page 2 of 2

In 1990, the Commission on Water Resource Management (CWRM) set the sustainable yield of the Kama'ole Aquifer at 11 million gallons per day (MGD). The most recent data from the CWRM indicates that the existing pumpage from the Kama'ole Aquifer is 1,859 MGD. Honua'ula's water engineer estimates that current actual pumpage is approximately 4.0 MGD. At full build out, Honua'ula's total average withdrawal from brackish wells is estimated to be 1.7 MGD. Therefore there will be substantial capacity from Kama'ole Aquifer for other future water users even with Honua'ula's Kama'ole Aquifer water use. The Draft Environmental Impact Statement (EIS) will include the above information regarding: 1) the Kama'ole Aquifer sustainable yield; 2) current actual aquifer pumpage; and 3) Honua'ula's total average withdrawal from brackish wells.

Conveyance of Water to the Site. The Draft EIS will include information regarding Honua'ula's off-site wells, which are within an area north of Maui Meadows below the 600 foot contour and within the Kihet-Makena Community Plan region. The Draft EIS will also include maps showing: 1) the location of Honua'ula's off-site wells; and 2) waterlines necessary to convey water to Honua'ula. Honua'ula's water system will be in accordance with Department of Water Supply standards and all applicable community plans.

Endangered Species. Honua'ula is not expected to significantly impact any endangered species. Several wildlife surveys of the Property have been conducted since 1988, with the most recent completed in 2009. Evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the Property in the most recent survey (although not in previous surveys). The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your e-mail and letters will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Mark Hyde

Preparatory EIS on "Honua'ula"

>>> Michael Howden <pdouhy@doublecheeks@gmail.com> 4/3/2009 4:02 PM >>>

Dear Mr. Jencks, Mr. Hunt and other concerned parties: I would like to be a consulted party for the EIS for Honua'ula. I lived and farmed at Kanahena Farm & Nursery, a six-acre dryland Permaculture demonstration site, for close to 26 years, which is makai of the Kanalo-Kalama Park RD and mauka of the proposed development. As I had permission from the Erdmann family, I would often walk to the ocean through these areas and am familiar with the immense number of cultural and historical sites, historic roads and trails, and numerous native plants. I feel it would be an extreme disservice to the cultural importance of the area, for development to proceed without thorough, much more careful inventorying of sites within these areas, and respect for what still exists here, and in general, compliance with the Kihet-Makena Community Plan with regard to impacts of this project upon the community at large.

Thank you for your consideration of these concerns, Michael S. Howden



March 9, 2010

PRINCIPALS

HOMAS S. WITTEN, ASLA
resident

STAN DUNCAN, ASLA
Executive Vice-President

USSELL Y. CHONG PASA, LEED® AP
Executive Vice-President

TINCENT SHIGEKUNI
Vice-President

RYAN T. MURAKAMI, AICP, LEED® AP
Principal

FRANK BRANDT, PASA
Treatment Emeritus

ASSOCIATES

OWEN SCHNELL, AICP
Senior Associate

AYMOND T. HIGA, ASLA
Senior Associate

EVYK. NISHIKAWA, ASLA
Associate

IMI MIKAMI YUEN, LEED® AP
Associate

COTT ALINA ABRIGO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

ACHENG DONG, LEED® AP
Associate

ONOHU OFFICE
01 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
t: (808) 571-5631
x: (808) 523-1492
mail: pbr@pbrhawaii.com

APOLLEI OFFICE
01 Kamaoia Boulevard
Kapaemahu Building, Suite 315
Honolulu, Hawaii 96813-3605
t: (808) 521-5631
x: (808) 525-3163

Michael Howden
P.O. Box 267
Kula, HI, 96790

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Howden:

Thank you for your e-mail dated April 3, 2009 sent to Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will address issues related to archaeological and cultural sites, historic trails, native plants, compliance with the Kinei-Mākena Community Plan, and impacts to the community at large, among other things.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP/N. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP/N Michael Howden

>>> Michael Reed Gach <mr@gach@aatt.net> 4/3/2009 12:10 PM >>>
To the Office of Environmental Quality, Jeff, and Charlie,

We had many concerns during the hearing process and thus wish to be a consulted party in the EIS process. Specifically, we are concerned about traffic, water availability, water quality, protection of existing historic roads and trails, native plants and cultural sites, adequate buffers from Maui Meadows, the environmental impacts to beaches, and compliance with Kinei-makena community plans and policies.

MAHALO,

Barbara T. Gach
Michael Reed Gach Ph.D.
2198 Auluna Place
Kihei, HI 96753

mr@gach@aatt.net
808-874-8191



March 9, 2010

PRINCIPALS
THOMAS WITTEN, ASLA
President

LSTAN INGCAN, ASLA
Executive Vice-President

USSELL Y. I. CHUNG, FASLA, LEED^{AP}
Executive Vice-President

INCENT SHIGEKUNI
Vice-President

FRANK T. AURAKAWA, AICP, LEED^{AP}
Principal

FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES
DON SCHINELL, AICP
Senior Associate

ANDREW T. HUGH, ASLA
Senior Associate

EVANS, NISHIKAWA, ASLA
Associate

IMMUKAHI YUEN, LEED^{AP}
Associate

COTT ALIKA AIRRIGO, LEED^{AP}
Associate

COTT AURAKAWA, ASLA, LEED^{AP}
Associate

MCHENG DONG, LEED^{AP}
Associate

ONOLU LUU OFFICE
81 King Street, 450
Aloha Building, Suite 313
Honolulu, Hawaii 96813-5181
P: (808) 521-5631
F: (808) 521-1402
Email: sysadmin@pbrhawaii.com

POLEI OFFICE
91 Kapaeha Road
Polei Building, Suite 313
Honolulu, Hawaii 96879-2905
P: (808) 521-5631
F: (808) 335-5181

Barbara T. Gach
Michael Reed Gach Ph.D.
2198 Auiina Place
Kihei, HI 96753

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. & Mrs. Gach:

Thank you for your e-mail dated April 3, 2009 sent to the Office of Environmental Quality Control, Jeff Hunt, and Charlie Jencks regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

The Draft Environmental Impact Statement (EIS) will address issues related to traffic, water, protection of historic trails, native plants, cultural sites, adequate buffers from Maui Meadows, environmental impacts to ocean water quality, and compliance with the Kiheti-Mākena Community Plan, among other things.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISP. Your e-mail will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISP Michael Reed Gach

>>> Robert Wintner <robertw@snorkelbob.com> 4/3/2009 1:47 PM >>>
My concern are purely focused on Wailea 670. Dowling spoke of good intentions and failed. Wailea 670 speaks the same language. The hard fact here is that development changes a place forever, beginning with traffic, dust and noise. Makena should not be the place, because THAT is not appropriate.

Robert Wintner

>>> Robert Wintner <robertw@snorkelbob.com> 4/3/2009 6:47 AM >>>
April 3, 2009

Aloha,

I am most concerned that development of Wailea 670 will end tranquility in the area for many years. The best example of the mess this will generate is Everett Dowling's partial development at Maluaka.

Now we have many acres near the reef completely exposed to runoff, and the reef at Black Sand Beach is being smothered by silt. The turtles are now gone from that reef, because their food source was killed off by the silt. Dowling's response: "That's not my runoff, and you can't prove that it is!"

Meanwhile, a very minor part of the Dowling juggernaut at Maluaka was to scalp the old golf course on Makena road and move the sod to somewhere else. This simple project alone required constant traffic of 14-yard trucks going back and forth up the road. Flaggers stopped Dowling's big trucks, as if Dowling's project should take precedence over the daily lives of residents.

Some days, with no flaggers to stop traffic, the big trucks pulled into traffic when they could. I observed them many times doing 40-45 mph or better. Riding a bicycle along Makena Road became hazardous at best and a noxious, life-threatening challenge at worst. I complained to Dowling managers who assured me they would take care of the problem. I called the Maui police. Everyone is busy with better things to do--the trucks would then slow down & the flaggers reappear for a few days, so the traffic could sit and wait.

Now Dowling is done, and so are his promises of jobs & megabillions in profit for Lehman Brothers.

Now we have Wailea 670 promising the same damn stuff, with no way on God's brown earth these things can be delivered. Wailea 670 will end peace and quiet in the area for years, so that a few people can try to make some big money.

I have seen no reasonable response to these concerns from Wailea 670, only a troublingly familiar blend of smoke and mirrors.

Robert Wintner, Makena



>>> Robert Wintner <robertw@snorkelbob.com> 4/8/2009 9:17 AM >>>
 Thank you. My intent is to continue stating for the record what is here now and what will be lost at Makena with development. I further intend to resist any project that will change Makena for the worse, forever, especially a project that will make money for a few people and cost irreplaceable wilderness.

Yes, I would like to be a consulted party. My mailing address is 6689 Makena Road, Kihel, 96753

March 9, 2010

PRINCIPALS

THOMAS WITTER, ASLA
 President

J. STAN DUNCAN, ASLA
 Executive Vice-President

ROSSELL YI, CHONG, FASLA, LEED AP
 Executive Vice-President

VINCENT SHIGERUNI
 Vice-President

FRANK MURAKAMI, AICP, LEED AP
 Principal

X. FRANK BRANDT, FASLA
 Chairman Emeritus

ASSOCIATES

TON SCJINELL, AICP
 Senior Associate

LAWMOND T. HUGA, ASLA
 Senior Associate

SEVIN K. NISHIKAWA, ASLA
 Associate

YUMI MIKAMI YUEN, LEED AP
 Associate

SCOTT ALUKA ABRIGO, LEED AP
 Associate

SCOTT MURAKAMI, ASLA, LEED AP
 Associate

DACHENG DONG, LEED AP
 Associate

HONOLULU OFFICE
 601 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-3194
 Tel: (808) 521-5611
 Fax: (808) 521-1609
 Email: frank@pbrhawaii.com

CAPOLEI OFFICE
 601 Kamehameha Boulevard
 Suite 313
 Capolei, Hawaii 96707-2085
 Tel: (808) 521-5631
 Fax: (808) 535-3163

Robert Wintner
 6689 Makena Road
 Kihel, HI 96753

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr Wintner:

Thank you for your emails dated April 3, 2009 sent to the Jeff Hunt and Ann Cua of the Maui Planning Department and April 8, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

We understand you are concerned with the loss of tranquility in the area, particularly regarding traffic from construction activities. The Draft Environmental Impact Statement (EIS) will include a Transportation Management Plan (TMP) to propose traffic management strategies to reduce construction related traffic during construction of Honua'ula and related infrastructure. The plan will include transportation, parking, and construction management policies and practices geared toward consolidating and reducing peak hour vehicle trips generated by construction activity.

Regarding dust and noise, all noise from construction activities will comply with State Department of Health (DOH): 1) noise regulations (Chapter 11-46, Community Noise Control, Hawaii Administrative Rules (HAR); and 2) regulations regarding fugitive dust (Chapter 11-60.1-33, Fugitive Dust, HAR).

Regarding your concern about coral reefs and runoff, the Draft EIS will include a marine water quality study and a marine ecological monitoring report to assess current conditions and propose mitigation measures as appropriate.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EISPN. Your e-mails will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
 Senior Associate

cc: Jeff Hunt, Maui Planning Department
 Charles Jencks, Honua'ula Partners, LLC

mitigation measures will be taken to limit the mass of pollutants in stormwater to levels that will not cause or contribute to violations of water quality standards in the receiving waters? What monitoring of stormwater runoff and pollutant mass loading is planned?

728A Kupula Drive

Kihei, HI 96753

November 17, 2009

PBR Hawaii
1001 Bishop Street Suite 650
Honolulu, Hawaii 96813-8484

Dear Sir or Madam:

My name is Robin Knox. I am an environmental consultant and resident of Maui Meadows subdivision in Kihei, Hawaii. I am requesting that you add me to the list of consulted parties for Honua'ula environmental assessment (EA) and environmental impact statement (EIS). I only yesterday became aware that the public comment period for the environmental assessment is ending today. Therefore I can only provide a brief list of things I am concerned about, as I have not had time to fully elucidate my concerns.

1. Four lanes of the Pihani Highway from Kilohana to Wailea Ike – This would be a major project with considerable short term and long term impacts. If the traffic analysis report has not yet been done, how do you know that this broadening of the highway is warranted?
2. The EA mentions extensive grading and construction activity including "earthmoving activity, excavating, trenching and filling. Do the planned activities also include use of blasting? If so how what are the potential impacts and how will they be mitigated?"
3. The EA indicates that to protect cultural resources there will be a cultural resources management plan for the project. I am requesting that there also be a water quality management plan for the project to protect water resources from impacts during and post construction.
4. Stormwater Quality – What will be the quality of runoff from the project during and post construction. What will be the mass of pollutants leaving the project site in stormwater runoff? What

5. Include an analysis of potential water quality impacts from the combined pollutant loading attributable stormwater and wastewater discharges including injection, infiltration, and runoff. Provide an engineering or scientific analysis that demonstrates that there is no reasonable potential for the releases from the project site to cause or contribute to violations of state water quality standards in the ocean waters receiving the pollutant loads. If there is a reasonable potential for causing or contributing to violations of standards, then discuss what can be done to mitigate the effects, and what the mass loading of pollutants would be after such mitigation. If water reuse is part of the planned disposal or mitigation, then estimate the pollutant load available for export to the sea from the land after accounting for uptake or transformation of pollutants by plants and soils.
6. Wastewater – The environmental assessment is inadequate in that it does not quantify the wastewater flows, influent loading, level of treatment, and effluent mass loading of wastewater constituents of concern including biochemical oxygen demand, total suspended solids, total nitrogen, and nitrate nitrogen. The EA discusses phasing in of the project. Please provide influent and effluent flow and pollutant loading estimates, and treatment level proposed for each phase.
7. Provide a water balance for the site, and explain how wastewater will be managed without using injection wells for disposal (ie discuss wastewater application rates, required storage volumes etc.)
8. Demonstrate that the wastewater treatment process will produce effluent of quality suitable for reuse plan.
9. Where will sewage sludges (biosolids) from the treatment process go? How much will be produced from this project?
10. Please provide more detail about the drainage plan. The EA mentions that there are 15 natural drainage ways on the project site. Natural systems have assimilative capacity for cycling materials such as solids or nitrogen; changes to natural systems can upset ecological

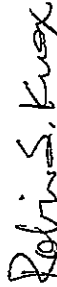
balance by adding pollutant load, accelerating rate of delivery of pollutants, and loss of natural assimilative capacity. Drainage plans should be discussed not only in terms of volumes of water, but also in terms ecological functions and pounds of pollution exported from the project site.

11. Full disclosure of water quality problems is required. The EA mentions that the existing ocean monitoring data does show water column concentrations that exceed state water quality concentration criteria. The applicant fails to mention that the Department of Health has reported to the US Congress that the coastal waters of the Kihiki coast are impaired due to exceedances of water chemistry criteria concentrations, and that the DOH and EPA are now required to establish a Total Maximum Daily Load (TMDL) for pollutants causing impairments. A TMDL looks at pollutants from a mass (lbs/day) loading perspective in addition to concentration (e.g. mg/L). The applicant states that "There is no consistent increase in concentration of nutrients in the nearshore that could result from the existing Wailea Resort golf courses". Concentration in the nearshore can change based upon a large number of variables including flows of groundwater, ocean conditions, and amount of pollutants released. Concentration in the nearshore should not be relied upon as the sole metric for assessing potential for impact. The EA speculates that natural groundwater can cause water chemistry to exceed DOH standards. Water chemistry concentrations which exceed water quality criteria due to natural background loading are not considered violations of the standards, whereas concentrations exceeding criteria that are attributable to domestic, industrial, or other controllable sources of pollutants are considered violations. Under the mass balance approaches used to manage water quality, the presence of a larger background mass load means there is less pollutant mass available to allocate to sources such as runoff and wastewater management. Higher background loads mean fewer pounds of pollutant discharges that can be allowed from controllable point and nonpoint sources and still attains the water quality standards.

In closing, I wish to be consulted by the applicant in the environmental review process. These comments may not reflect all of my concerns given the limited time I had to review the EA and develop comments. My contact information is:

Robin S. Knox
728A Kupuahu Dr,
Kihei, HI 96753
(808)281-6416

Sincerely



Robin S. Knox
President, Water Quality Consulting,
Resident Kihei, Maui

[STREET ADDRESS] • [CITY/STATE] •
[ZIP/POSTAL CODE]



March 9, 2010

PRINCIPALS

THOMAS WITTEK, ASIA
President

ESTAN BUNGAN, ASIA
Executive Vice-President

RUSSELL Y. CHUNG, FASIA, LEED® AP
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

SHANTY MURAKAMI, AICR, LEED® AP
Principal

W. FRANK BRANT, JASIA
Chairman Emeritus

ASSOCIATES

FIONA SCINELLA, AICP
Senior Associate

NAYMOND T. IJIGA, ASIA
Senior Associate

GENYVA N. NISHIKAWA, ASIA
Associate

GUH NIKAAMI TUEN, LEED® AP
Associate

SCOTT ALIKA, ARHIGCO, LEED® AP
Associate

SCOTT MURAKAMI, ASIA, LEED® AP
Associate

XACHENG DONG, LEED® AP
Associate

IONOLAHU OFFICE
601 Bishop Street, Suite 609
Honolulu, Hawaii 96813-3484
Tel: (808) 532-1402
Fax: (808) 532-1402
Email: syadams@pbhawaii.com

MOLE OFFICE
101 Kamehale Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2005
Tel: (808) 571-5631
Fax: (808) 532-3163

Robin Knox
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 3

5. **Pollution Prevention.** The results of the Nearshore Water Quality Assessment and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. The Nearshore Water Quality Assessment also concludes: "there will be no adverse affect to groundwater resources in areas in the vicinity of the project." The Assessment of the Potential Impact on Water Resources includes an analysis of the use of recycled water. In compliance with County of Maui Ordinance No. 3554 (Condition 17), no recycled water will be placed into injection wells. The Draft EIS will include the Nearshore Water Quality Assessment and the Assessment of the Potential Impact on Water Resources.

6. **Wastewater.** The Draft EIS will include: 1) a Preliminary Engineering Report, which includes information on the quantity of expected wastewater flows; 2) an Assessment of the Potential Impact on Water Resources, which includes analysis of potential impacts to groundwater.

7. **Injection Wells.** The Draft EIS will include an explanation of Honua'ula's private water system, including projected potable and non-potable water use, water storage facilities, and how wastewater will be managed without using injection wells.

8. **Wastewater Treatment.** Wastewater will be treated to produce R-1 quality water and wastewater system design, and construction, and operation will be in accordance with County standards and all wastewater plans and facilities will conform to applicable provisions of Chapter 11-62, Hawaii Administrative Rules (HAR) (Wastewater Systems) and Section 11-62-27, HAR (Recycled Water Systems).

9. **Biosolids.** In compliance with County of Maui Ordinance No. 3554 (Condition 17), Honua'ula Partners, LLC will either transport wastewater to the Makena Wastewater Reclamation Facility (WWRF) for treatment or provide a WWRF on-site. The Makena WWRF uses an extended aeration activated sludge process for the processing of biosolids. If an on-site WWRF is provided within Honua'ula, a membrane bioreactor wastewater treatment system is proposed; biosolids from this system would be taken to the County landfill for composting by EKO Compost, which operates a composting facility at the landfill.

10. **Drainage Plan.** The Draft EIS will include a Preliminary Engineering Report that discusses drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions. The results of the Nearshore Water Quality Assessment and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. The Draft EIS will include the Nearshore Water Quality Assessment.

11. **Water Quality Data.** The Draft EIS will include a Nearshore Water Quality Assessment, which includes the results of nearshore water quality monitoring studies conducted for Honua'ula since 2005. All ocean water samples obtained for all Honua'ula nearshore water

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**

Dear Ms. Knox:

Thank you for your letter dated November 17, 2009, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your comments.

1. **Pihlani Highway Widening.** Widening Pihlani Highway from Kilohana Drive to Wailea Ike Drive is a requirement of Honua'ula's Change in Zoning approval, County of Maui Ordinance No. 3554 (Condition 2a). Honua'ula Partners LLC will comply with all conditions specified in County of Maui Ordinance No. 3554.

2. **Grading.** All ground-altering activity will be conducted in accordance with Chapter 20.08, Maui County Code (Soil Erosion and Sedimentation Control). It has not been determined if blasting will be necessary during construction.

3. **Water Quality Monitoring.** The Draft EIS will include: 1) an Assessment of the Potential Impact on Water Resources; and 2) a Nearshore Water Quality Assessment, which includes the results of nearshore water quality monitoring studies conducted for Honua'ula since 2005. In compliance with County of Maui Ordinance No. 3554: 1) a groundwater monitoring program will be established (Condition 18a and 18b); and 2) the current nearshore water quality monitoring program already in place will continue (Condition 20).

4. **Drainage and Runoff.** The Draft EIS will include a Preliminary Engineering Report that discusses drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions. The results of the Nearshore Water Quality Assessment and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. The Draft EIS will include the Nearshore Water Quality Assessment.

Robin Knox
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 3 of 3

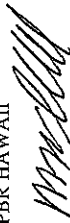
quality monitoring studies were analyzed for water quality criteria specified by DOH water quality standards for Class A open coastal waters (Section 11-54-06, HAR). The Draft EIS also will include discussion regarding: 1) the 2006 State of Hawaii Water Quality Monitoring and Assessment Report; Integrated Report to the U.S. Environmental Protection Agency and the U.S. Congress Pursuant to Sections §303(D) and §305(B), Clean Water Act (P.L. 97-117); 2) the State Department of Health's compliance with the requirements of Clean Water Act regarding Total Maximum Daily Loads; and 3) Honua'ula's compliance with County of Maui Ordinance No. 3554 (Condition 20), which pertains to these issues.

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft Environmental Impact Statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Robin Knox

EIS PREPARATION NOTICE FOR HONUA'ULA

>>> Sally Raisbeck <sallyraisbeck@earthlink.net> 4/16/2009 6:13 PM >>>

To: Maui Planning Department
Maui Planning Commission
Honua'ula Partners
Maui County Council
Maui News
Gary Kubota
Christie Wilson
Honolulu Weekly
cc: Lee Altenberg

From: Sally Raisbeck
427 Liholiho Street, Wailuku HI 96793
808-244-9604

Re: EIS Preparation Notice for Honua'ula

Gentlemen:

Lee Altenberg wrote in the Sunday Maui News that the EIS Preparation Notice for Honua'ula stated INCORRECTLY that the portion of Honua'ula to be preserved by a conservation easement was 22 acres.

He pointed out that Condition 27 of the Planning Commission conditions was that a MINIMUM conservation easement was to be "as shown on the attached map." "The easement shall comprise the portion of the property south of latitude 20 degrees 40 minutes 15 seconds north", minus any portions that three agencies find "do not merit preservation". The three agencies are the State DLNR, the US Fish and Wildlife Service, AND the US Corps of Engineers.
(http://osecc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Maui/2000s/2009-03-08-MA-EISPN-Honua'ula.pdf)

The portion indicated is 130 acres. The three agencies referred to have made no determination that any portion of this area "does not merit preservation".

Therefore, the Planning Commission condition, in its original form, must be substituted for the incorrect statement that the easement comprises only 22 acres. Until further notice, it is 130 acres.

Sally Raisbeck
427 Liholiho Street, Wailuku HI 96793
244-9604

n.b. The Maui News article contains an obvious misprint, saying "2040 degrees 15 minutes north latitude".
The correct latitude is "20 degrees 40 minutes 15 seconds north".



Should the regional location map (page 2) show directions and degrees?
 >>> Sally Raisbeck <sallyraisbeck@earthlink.net> 4/6/2009 8:15 PM >>>

To: Maui Planning Department
 Maui Planning Commission
 Honou'ula Partners
 Maui County Council
 Maui News
 Gary Kubota
 Christie Wilson
 Honolulu Weekly
 Lee Altenberg

From: Sally Raisbeck
 427 Liholiho Street, Wailuku HI 96793
 808-244-9604

Re: Map of location of Honou'ula does not show compass directions or latitude and longitude

Gentlemen:

The regional location map (page 2) of the Honou'ula EISPN does not clearly show the directions (north, south, east, west) nor the latitude and longitude.

This makes it impossible to show the area described in Condition 27 of the Planning Commission conditions. ("the portion of the property south of latitude 20 degrees 40 minutes 15 sec N")

From topographic maps, we see that on page 2, north is to the left and south is to the right.

Since 130 acres is approximately 20 percent of 670 acres, I assume that on the page 2 map, the area referred to by Condition 27 is the right 1/5 of the area.

If we look at Figure 1, the Conceptual Map, we see that the right 1/5 of the Honou'ula area is shown as MF, SF, and golf course holes 11, 12, 13, 14, 15, 16, and 17.

Surely this is not in accordance with Condition 27? Surely multi-family, single family, and a golf course will not preserve the endangered native plants? Condition 27 also says that "no development within the Easement shall be permitted except for fences, trails, and constructing structures necessary for the maintenance of the region".

http://oecq.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Mau/2000s/2009-03-08-MA-EISPN-Honou'ula.pdf#and

And surely the maps should show compass directions and latitude and longitude?

Sally Raisbeck
 427 Liholiho Street Wailuku HI 96793
 808-244-9604

March 9, 2010

PRINCIPALS
 THOMAS WITTEN, ASLA
President
 R. STAN DUNCAN, ASLA
Executive Vice-President
 RUSSELL Y. L. CHUNG, ASLA, LEED® AP
Executive Vice-President
 VINCENT SHIGERUNI
Vice-President

GRANT T. MURAKAMI, AICP, LEED® AP
Principal
 W. FRANK BRANDT, ASLA
Chairman, Emeritus

ASSOCIATES
 TOM SCINILLI, AICP
Senior Associate
 RAYMOND F. HIGA, ASLA
Senior Associate
 KEVIN K. NISHIKAWA, ASLA
Associate
 KIMI MUKAMI YUEN, LEED® AP
Associate
 SCOTT ALUKA ABRIGO, LEED® AP
Associate

SCOTT MURAKAMI, ASLA, LEED® AP
Associate
 DACHANG DONG, LEED® AP
Associate

HONOLULU OFFICE
 1001 Kapiolani Boulevard, 6th
 Honolulu, Hawaii 96813-3184
 Tel: (808) 521-5633
 Fax: (808) 521-1102
 E-mail: systeming@pbhawaii.com

KAPOLEI OFFICE
 1001 Kapiolani Boulevard
 Kapolei Building, Suite 313
 Kapolei, Hawaii 96707-2065
 Tel: (808) 356-3144
 Fax: (808) 356-3161

Sally Raisbeck
 427 Liholiho Street
 Wailuku, HI 96793
**SUBJECT: HONOU'ULA ENVIRONMENTAL IMPACT STATEMENT
 PREPARATION NOTICE**

Dear Ms. Raisbeck:

Thank you for your e-mails dated April 6, 2009 sent to the Maui Planning Department regarding the Honou'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honou'ula Partners, LLC, we are responding to your comments.

The Regional Location Map of the EISPN (Figure 2) has a north arrow at the bottom of the right side of the page. The north arrow indicates that the map is orientated so that north is to the left of the page. Correspondingly east would be to the top of the page, south would be to the right of the page, and west would be to the bottom of the page.

In the Draft EIS, Figure 1 (Conceptual Master Plan) will include the 1 20° 40' 15.00"N latitude line so that it can be seen that the Native Plant Preservation Area is to the south of the 1 20° 40' 15.00"N latitude line.

Honou'ula Partners, LLC will comply with County of Maui Ordinance No. 3554 Condition 27 regarding providing a Native Plant Preservation Area. The proposed size and location of the Native Plant Preservation Area are based, in part, upon a vegetation density analysis conducted by SWCA Environmental Consultants to aid in defining areas where preservation could be most effective. The Native Plant Preservation Area encompasses a contiguous 22-acre portion of the property south of latitude 20°40'15.00"N with the highest densities of selected endemic/native plants having high conservation priority. The size and location of the Native Plant Preservation Area are also based upon scientific research that suggests even small restoration efforts can help provide habitat for native species when managed in combination with regional preserve areas. As such Honou'ula's Native Plant Preservation Area must be considered in the context of the significant conservation efforts already in existence in South Maui such as the 'Auwahi (10 acres) and Pu'u o Kali (236 acres) Forest Reserves and the Kanai (876 acres) and 'Ahihi-Kina'u (1,238 acres) Natural Area Reserves.

In addition to the Native Plant Preservation Area, which will be established through a conservation easement, Honou'ula Partners, LLC will provide additional areas for the protection of native plants. Altogether, 143 acres are proposed for the preservation, conservation, propagation, and management of native plant species at Honou'ula. These conservation measures, including the size of the Native Plant Preservation Area easement, will be subject to concurrence by the State Department of Land and Natural Resources, the U.S. Fish and Wildlife Service, and the United States Corps of Engineers.

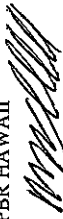
Sally Raisbeck
SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 9, 2010
Page 2 of 2

The Draft EIS will also contain a Conservation and Stewardship Plan that sets forth proactive stewardship actions to manage the Native Plant Preservation Area and other native plant areas.

Thank you for reviewing the EISPN. Your e-mails will be included in the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Sally Raisbeck

Wailea 670 eis

>>> Scott Heller <scottieheller@hawaii.rr.com> 4/4/2009 7:03 AM >>>
I am a longtime Maui resident and am leary of the "usual" process of
granting projects because we need to support the construction industry.
I would like to be informed of all phases of the EIS process.

scottieheller@hawaii.rr.com
Mahalos,
Scott Heller
POB 790950
Paia, HI 96779

Wailea 670 EIS

>>> Scott Heller <scottieheller@hawaii.rr.com> 4/4/2009 7:09 AM >>>
Please keep me informed of all phases of the Wailea 670 EIS process.

scottieheller@hawaii.rr.com
Mahalos,
Scott Heller
POB 790950
Paia, HI 96779



March 9, 2010

PRINCIPALS
THOMAS S. WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL YI CHUNG FASLA, LEED AP
Executive Vice-President

VINCENT SHERIDANI
Vice-President

GRANT T. MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, FASLA
Chairman Emeritus

ASSOCIATES
TOM SCINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIM MIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA ABRIGO, LEED AP
Associate

SCOTT MURAKAMI, ASLA, LEED AP
Associate

DACHENG DONG, LEED AP
Associate

HONOLULU OFFICE
1001 Kalia Road, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5671
Fax: (808) 523-1402
E-mail: systems@pbrhawaii.com

KAPOLEI OFFICE
1001 Kamekita Boulevard
Kapolei Building, Suite 313
Kapolei, Hawaii 96707-2835
Tel: (808) 523-1402
Fax: (808) 525-2163

>>> steve lafeur <lafeurj@me.com> 4/16/2009 9:39 AM >>>
Subject: make me a consulted party

Scott Heller
P.O. Box 790950
Paia, HI 96779

**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Heller:

Thank you for your e-mails dated April 4, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC and Ann Cua of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISPN. Your e-mails will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Scott Heller



March 9, 2010

PRINCIPALS

THOMAS S. WITTEN, ASLA
President

L. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. F. CHONG, ASLA, LEED® AP
Executive Vice-President

VINCENT SHIGKUNI
Vice-President

FRANZ T. MURAKAMI, AICP, LEED® AP
Principal

K. FRANK BRANDT, ASLA
Chairman Emeritus

ASSOCIATES

TOM SCHNELL, AICP
Senior Associate

LAYMOND T. HIGA, ASLA
Senior Associate

DEVIN K. INSHIKAWA, ASLA
Associate

JUNI MIKAMI YUEN, LEED® AP
Associate

COTY ALIKA ABRIGO, LEED® AP
Associate

COTT MURAKAMI, ASLA, LEED® AP
Associate

WACHUNG DONG, LEED® AP
Associate

HONOLULU OFFICE
301 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3181
e: (808) 592-5631
f: (808) 522-1492
m: ysplanning@pbrhawaii.com

APOKEI OFFICE
301 Kamaoia Boulevard
Apokei Building, Suite 313
Honolulu, Hawaii 96813-3181
e: (808) 535-3163

November 16, 2009

Aloha To Whom It May Concern,

My name is Teri Leonard. Although I speak for and represent myself, I am the Chair of the Reef Sustainability Committee of South Maui Sustainability, Co-Chair of the Clean Water Committee of the Maui Nui Marine Resources Council, member of the Maui Reef Fund, member of the Kihei Community Association, and the manager of Maui Dreams Dive Co. in Kihei where I have been employed for over 10 years.

I formally request to be a consulted party for the Honua'ula Project. Please find my mailing and email addresses below.

After reading the Honua'ula Environmental Impact Statement Process I have several concerns:

- The law requires full disclosure of all aspects of the project, including potential environmental impacts, and how those impacts will be mitigated. I believe this report is lacking vital information.
- What watershed is the Honua'ula Project located in and what coastal segment will it drain into? How will the reef be impacted by sedimentation and other pollutants?
- There is no inclusion of the fact that all South Maui beaches waters are considered impaired. This EIS report erroneously states "if they are listed as impaired."
- Although mass of pollutants (not concentration) into our waters matters, according to the Honua'ula Project EIS concentrations of pollutants into our waters are exceeding allowed amounts.
- Exactly which chemical compounds entering our waters exceed specified limits for geometric means (and by how much) is this report referring to?
- If, as the Honua'ula EIS project states, the natural background or other sources are contributing to, and causing, the exceeded levels of allowed amounts of nitrogen and other pollutants into our waters, according to the Clean Water Act, the Honua'ula Project must mitigate adding to the load. In detail, how will this be achieved?
- In detail, what is the plan for the ground water and near-shore water quality monitoring, assessing, reporting and action program for the Honua'ula Project, including for the duration of all phases of the construction as well as post-construction maintenance of the project?

Respectfully,

Teri Leonard
3500A Keihala Dr.
Kihei, HI 96753
teri@southmauisustainability.org

SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Mr. Lafleur:

Thank you for your e-mails dated April 6, 2009 sent to Charlie Jencks of Honua'ula Partners, LLC and Jeff Hunt of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISPN. Your e-mails will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Steve Lafleur



March 9, 2010

TERI LEONARD
Principal

STAN DUNCAN, AIA
Executive Vice-President

ASSELL Y. L. CHUNG, FASLA, LEED® AP
Creative Vice-President

INCENT BHIGFRUNT
Vice-President

BRANT T. MURAKAMI, AICP, LEED® AP
Principal

FRANK BRANDT, FASLA
Fieldman Emeritus

ASSOCIATES
Senior Associate

AYMOND T. LUCA, AIA
Senior Associate

EVIN K. NISHIKAWA, AIA
Associate

IRI MIKAMI YUEN, LEED® AP
Associate

TOTT ALUKA ABRIGO, LEED® AP
Associate

TOTT MURAKAMI, AIA, LEED® AP
Associate

ACHENG DONG, LEED® AP
Associate

INDUO LLO OFFICE
1000 Ala Moana Blvd #600
Honolulu, Hawaii 96813-5484
t: (808) 521-5631
f: (808) 524-1402
mail: systems@pbrhawaii.com

POLEI OFFICE
21 Kamohiuli Boulevard
Pohia Building, Suite 313
Pohia, Hawaii 96707-2805
t: (808) 953-3131
f: (808) 555-3165

Teri Leonard
SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE
March 9, 2010
Page 2 of 2

Water Quality Data - All ocean water samples obtained for all Honua'ula nearshore water quality monitoring assessments were analyzed for water quality criteria specified by DOH water quality standards for Class A open coastal waters (Section 11-54-06, HAR). The Draft EIS will include discussion regarding: 1) the 2006 State of Hawaii Water Quality Monitoring and Assessment Report; Integrated Report to the U.S. Environmental Protection Agency and the U.S. Congress Pursuant to Sections §303(D) and §305(B), Clean Water Act (P.L. 97-117); 2) the State Department of Health's compliance with the requirements of Clean Water Act regarding Total Maximum Daily Loads; and 3) Honua'ula's compliance with County of Maui Ordinance No. 3554 Condition 20, which pertains to these issues.

Water Quality Monitoring - The Draft EIS will include: 1) an Assessment of the Potential Impact on Water Resources; and 2) a Nearshore Water Quality Assessment, which includes the results of nearshore water quality monitoring studies conducted for Honua'ula since 2005. In compliance with County of Maui Ordinance No. 3554: 1) a groundwater monitoring program will be established (Condition 18a and 18b); and 2) the current nearshore water quality monitoring program already in place will continue (Condition 20).

We will include you as a consulted party and provide you with a copy of the Draft EIS when it is available.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

1905.08 EA EISPN Teri Leonard

SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE

Dear Ms. Leonard:

Thank you for your letter dated November 16, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your concerns.

Environmental Impact Statement (EIS) Process. The EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Drainage and Runoff. The Draft EIS will include a Preliminary Engineering Report that discusses watersheds, drainage pre-development conditions, expected post-development conditions, and drainage improvements for post-development runoff. All drainage improvements will be designed in accordance with the County of Maui's "Rules for the Design of Storm Drainage Facilities" so that there will be no increase in the peak rate of storm water runoff leaving the Property compared to existing conditions.

Marine Water Quality and Coral Reefs. The Draft EIS will include a Nearshore Water Quality Assessment and a marine ecological monitoring report in compliance with County of Maui Ordinance No. 3554 Condition 20 to assess current conditions and propose mitigation measures as appropriate. The Nearshore Water Quality Assessment will include the results of water quality monitoring studies conducted for Honua'ula in 2005, 2006, 2008, and 2009 to establish baseline water quality conditions. The results of the Nearshore Water Quality Assessment and evaluation of the potential changes to groundwater composition indicate that there is little or no potential for alteration of the marine environment or negative impacts to marine waters due to Honua'ula. Honua'ula will also maintain on-going water quality monitoring in compliance with County of Maui Ordinance No. 3554 Condition 20.



Request
>>> Todd Wilson <twilson@seaburyhall.org> 4/7/2009 2:04 PM >>>

Hello Mr. Hunt,
Please add my name and information to the consulted party list that will be used during the EIS process for Wailea 670.

Thank you.
Todd Wilson
44 Laenui Place
Paia, HI 96779
ojazo@hotmail.com

March 9, 2010

PRINCIPALS
THOMAS S. WHITTEN, ASLA
President
L. STAN DUNCAN, ASLA
Executive Vice-President
RUSSELL Y. CHUNG, FASLA, LEED AP
Executive Vice-President
VINCENT SHIGEKUNI
Vice-President
JEANETTE MURAKAMI, AICP, LEED AP
Principal

W. FRANK BRANDT, TABLA
Chairman Emeritus
ASSOCIATES
TOM SCHNELL, AICP
Senior Associate
LAWMOND T. HIGA, ASLA
Senior Associate
KEVIN K. NISHIKAWA, ASLA
Associate
KIMI MIKAMI YUEN, LEED AP
Associate
SCOTT ALJKA ABRIGO, LEED AP
Associate
SCOTT MURAKAMI, ASLA, LEED AP
Associate
DACHENG DONG, LEED AP
Associate

Todd Wilson
44 Laenui Place
Paia, HI 96779
**SUBJECT: HONUA'ULA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Wilson:
Thank you for your e-mail dated April 7, 2009 sent to Jeff Hunt of the Maui Planning Department regarding the Honua'ula Environmental Impact Statement Preparation Notice (EISP/N). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to you.

We will include you as a consulted party and provide you with a copy of the Draft Environmental Impact Statement (EIS) when it is available.

Thank you for reviewing the EISP/N. Your e-mail will be included in the Draft EIS.

Sincerely,
PBR HAWAII

Tom Schnell, AICP
Senior Associate

cc: Jeff Hunt, Maui Planning Department
Charles Jencks, Honua'ula Partners, LLC

HONOLULU OFFICE
101 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5631
Fax: (808) 522-1622
E-mail: admin@pbrhawaii.com

CAPOLEI OFFICE
101 Kamehaha Boulevard
Capolei Building, Suite 318
Capolei, Maui 96727-3065
Tel: (808) 521-5631
Fax: (808) 525-3163

1905.08 EA EISP/N Todd Wilson

Mr. Wayne R. Bachman
3545 Lanhou Pt.
Khei, Maui, HI, 96753

Geos

November 4, 2009

Mr. Tom Schnell
Senior Associate
PBR Hawaii & Associates, Inc.
1001 Bishop St., Suite 650
Honolulu, HI, 96813-1402

Re.: Honua'ula proposed EIS

Dear Mr. Schnell:

Following are several comments regarding the proposed EIS for the project designated Honua'ula, on the island of Maui, Hawaii.

First, the issue of the Kamaole aquifer. The aquifer is described as a non-potable water source with a recharge rate of about 11 mgd. This rate of recharge is described as occurring along a coastal strip several miles in breadth. This arid south Maui coastal strip is heavily developed in golf courses, hotels, and condominiums. Records from the State Commission of Water Resource Management (CWRM) indicate numerous shallow wells drawing from the subject aquifer for purposes of landscape maintenance. These records also indicate that the wells are becoming increasingly saline, some to the point of being shut in. Therefore, there is reason to believe that the aquifer, near the coastal strip is being produced at a non-sustainable rate.

The Honua'ula project is on record stating the need for 2.5mgd of this water for its project. This up-gradient interception (of this volume of water) will likely have negative impacts on downgradient users – both in quality and quantity. Besides the two on-site wells, the project has drilled new wells intended to produce from the same aquifer approximately a mile from the subject site to the north at about 550-600' msl.

If the project is approved, and the Kamaole aquifer is utilized for project development, I believe coastal strip baseline studies for downgradient water quality and quantity need to be established to protect current users. Existing wells can be used for head levels and chlorides counts.

Second, drilling records (Mink) for the subject site's two wells, indicate reasonable productivity from 48 hour pump tests. The water quality was marginal at best, and long term sustainability at stable chlorides levels was not proven. Furthermore, in light of the fact that the wells are only 300' apart, no record could be found of a long-term (i.e., one week) sustainable yield test with both wells operated simultaneously in conjunction. Without such a test, the project's contention of 1mgd sustainable yield from the two wells is unfounded.

Finally, faunal studies cited are erroneous and incomplete. During the years 2007-2008, the presence of the federally listed endangered Blackburn's Sphinx Moth (*Manuca blackburni*) was established on the subject site within the unique southern a "dryland forest" habitat encompassing approximately 130 contiguous acres. Photographic evidence and subsequent site visits by members of the Honolulu branch of the U.S. Fish and Wildlife Service (USFWS) corroborate the moth's presence.

November 4, 2009
Page 2

Citing the October, 2003 "Draft Recovery Plan for the Blackburn's Sphinx Moth" issued by the USFWS, Dr. Art Medeiros – well known Maui biologist – is quoted from a personal communication. He says, "Impacts to the moth's habitat from urban and agricultural development, invasion by non-native plant species, HABITAT FRAGMENTATION AND DEGRADATION, (my emphasis)... have significantly reduced the species' range."

At this point in time, as I read it, the EISPN for Honua'ula project is at best cursory. I have chosen to elaborate on only three of the errors or omissions I feel most qualified to discuss.

Copies of these comments will be forwarded to: USFWS, Honolulu branch; State Water Commission, Honolulu; Maui County Planning Dept.

Sincerely,



Wayne R. Bachman
M.S., geology



Wayne Bachman
 SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
 IMPACT STATEMENT PREPARATION NOTICE
 March 9, 2010
 Page 2 of 2

March 9, 2010

PRINCIPALS

THOMAS WITTEN, ASLA
 President

R. STAN DUNCAN, ASLA
 Executive Vice-President

RUSSELL Y. L. CHUNG, FASLA, LEED® AP
 Executive Vice-President

VINCENT SHIGHRINI
 Vice-President

GRANT T. AUBRANAME, AICP, LEED® AP
 Principal

W. FRANK BRANDT, FASLA
 Chairman Emeritus

ASSOCIATES

TONI SCINNELLA, AICP
 Senior Associate

RAYMOND T. HIGA, ASLA
 Senior Associate

KEVIN K. NEKIHUKAWA, ASLA
 Associate

KAMI KUKANI YUEN, LEED® AP
 Associate

SCOTT A. ALIKA ABRIGO, LEED® AP
 Associate

SCOTT MURKIN, ASLA, LEED® AP
 Associate

DACHUNG DONG, LEED® AP
 Associate

HONOLULU OFFICE
 100 Bishop Street, Suite 650
 Honolulu, HI 96813-5165
 Tel: (808) 521-5661
 Fax: (808) 523-1102
 E-mail: systems@pbrhawaii.com

KAPOLEI OFFICE
 1081 Kamuela Boulevard
 Kapolei Building, Suite 313
 Kapolei, Hawaii 96707-2005
 Tel: (808) 571-5661
 Fax: (808) 558-5163

Wayne Bachman
 3545 Lanikou Place
 Kīhei, HI 96753

**SUBJECT: HONUA'ULA ENVIRONMENTAL ASSESSMENT/
 ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE**

Dear Mr. Bachman:

Thank you for your letter dated November 4, 2009 regarding the Honua'ula Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN). As the planning consultant for the landowner, Honua'ula Partners, LLC, we are responding to your concerns.

The EA/EISPN was a written evaluation to determine whether Honua'ula may have a significant environmental effect and was intended for the purpose of seeking comment on the proposed scope of the forthcoming Draft Environmental Impact Statement (EIS). The Draft EIS will be the full disclosure document and will be prepared in conformance with State of Hawaii EIS laws (Chapter 343, Hawaii Revised Statutes (HRS)) and rules (Chapter 200, Hawaii Administrative Rules (HAR)). Specifically the Draft EIS will be prepared according to the content requirements for a draft EIS specified in Section 11-200-17, HAR and it will contain technical studies as appendices. It will also address compliance with Honua'ula's Change in Zoning conditions, as provided in County of Maui Ordinance No. 3554.

Kama'ole Aquifer. In 1990, the Commission on Water Resource Management (CWRM) set the sustainable yield of the Kama'ole Aquifer at 11 million gallons per day (MGD). The most recent data from the CWRM indicates that the existing pumpage from the Kama'ole Aquifer is 1.859 MGD. Honua'ula's water engineer estimates that current actual pumpage is approximately 4.0 MGD. At full build out, Honua'ula's total average withdrawal from brackish wells is estimated to be 1.7 MGD. Therefore there will be substantial capacity from Kama'ole Aquifer for other future water users even with Honua'ula's Kama'ole Aquifer water use. The Draft Environmental Impact Statement (EIS) will include the above information regarding: 1) the Kama'ole Aquifer sustainable yield; 2) current actual aquifer pumpage; and 3) Honua'ula's total average withdrawal from brackish wells.

Potential Impact on Groundwater Resources. The Draft EIS will include an Assessment of the Potential Impact on Water Resources, which includes discussion on: 1) Honua'ula's water use; 2) potential impacts to downgradient wells; and 3) proposed mitigation measures.

All existing Honua'ula wells are fully permitted by the State Commission on Water Resource Management (CWRM). Any new wells that may be necessary will be developed in compliance with all requirements of Chapter 174C, HRS (State Water Code) and Chapters 13-167 to 13-171, HAR as applicable, pertaining to CWRM and administration of the State Water Code.

Native Plants and Animals. The Draft EIS will contain botanical and wildlife surveys that list all plant and animal species currently found on the property. Although not found in previous wildlife surveys, evidence of the endangered Blackburn's sphinx moth (*Manduca blackburni*) was found within the property in the most recent survey. The Draft EIS will include discussion regarding the Blackburn's sphinx moth and propose appropriate mitigation measures, including a multi-species Habitat Conservation Plan (to also include the candidate endangered 'āwīkiwīki plant) prepared under Section 10(0)(1)(B) of the Endangered Species Act and in collaboration with DLNR and USFWS.

Thank you for reviewing the EA/EISPN. Your letter will be included in the Draft EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
 Senior Associate

cc: Jeff Hunt, Maui Planning Department
 Charles Jencks, Honua'ula Partners, LLC

1905 08 EA EISPN Wayne Bachman