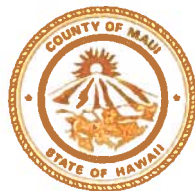


MICHAEL P. VICTORINO
Mayor

MICHELE CHOUTEAU MCLEAN, AICP
Director

JACKY TAKAKURA
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

December 16, 2022

Ms. Michele Leong
Group 70- Planner
111 S. King Street, Suite 170
Honolulu, Hawaii 96813

Dear Ms. Leong:

RE: REVIEW OF THE PROPOSED KAHULUI CIVIC CENTER MIXED-USE COMPLEX PROJECT, 153 WEST KAAHUMANU AVENUE, KAHULUI, AHUPUAA OF WAILUKU, TMK (2) 3-7-004:003 (POR.)

At its December 1, 2022 meeting, the Maui County Cultural Resources Commission (Commission) reviewed and provided comments on; 1) the Conceptual Plans and View Studies, 2) the Historic Resource Evaluation Report, 3) the Archaeological Inventory Survey Report and, 4) the Cultural Impact Assessment.

The Commission recommended to:

- Accept the findings and observations in the subject staff report (attached) and transmit to project proponents;
- Reduce the overall size of the proposed project in massing, scale and especially height;
- Have an archaeological monitoring plan in place for ground disturbing activities;
- Preserve the historic legacy and characteristics of the surrounding area such as the historic rock wall and historic administrative building (former Kahului School);
- Explore alternate site locations that include vacant properties that could be revitalized and reused to reduce the number of units and overall footprint of the proposed project and;
- Return to the Commission when proposed designs, alternatives and renderings are further developed.

Should you have any questions or require additional clarification, please contact Kawika Farm, Cultural Resources Planner, at Kawika.K.Farm@co.maui.hi.us or phone (808) 270-5565.

Ms. Michele Leong
December 16, 2022
Page 2

Sincerely,



MICHELE CHOUTEAU MCLEAN, AICP
Planning Director

Attachment: Staff Report (PDF)

xc: Jeff Overton, G70 Principal, HHFDCoutreach@g70.design (PDF)
Current Planning Division (PDF)
Dr. Janet Six, Department of Management (PDF)
Andrew McCallister, SHPD, Andrew.mccallister@hawaii.gov (PDF)
Mary Kodama, SHPD, mary.kodama@hawaii.gov (PDF)

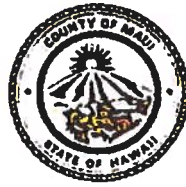
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Project\Comment Letter to Michele Leong G70.doc

MICHAEL P. VICTORINO
Mayor

MICHELE CHOUTEAU MCLEAN, AICP
Director

JACKY TAKAKURA
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

December 1, 2022

MEMORANDUM

TO: Chair Brandis Sarich and Members of the Cultural Resources Commission

FROM: *fr* Michele Chouteau McLean, AICP, Planning Director *just*

SUBJECT: REVIEW OF THE PROPOSED KAHULUI CIVIC CENTER MIXED-USE COMPLEX PROJECT, 153 WEST KA'AHUMANU AVENUE, KAHULUI, AHUPUA'A OF WAILUKU, TMK (2) 3-7-004:003 (POR.)

REQUEST

Michele Leong of G70, consultant, on behalf of the applicant, Hawai'i Housing Finance and Development Corporation (HHFDC), requests the Cultural Resources Commission's (Commission) comments on the proposed Kahului Civic Center Mixed-Use project (Project). An Environmental Assessment (EA) was prepared in support of the Project.

With respect to the EA, the Commission is specifically being asked to comment on:

- The Conceptual Plans and View Studies in Appendix A;
- The Historical Resource Evaluation Report in Appendix J;
- The Archaeological Inventory Survey (AIS) Report in Appendix K; and
- The Cultural Impact Assessment (CIA) in Appendix L.

Printed copies of the relevant appendices (referenced above) are being provided to Commissioners. A digital copy of the complete EA document can be accessed using the links provided in the Commission's December 1, 2022 agenda.

AUTHORITY

The Commission is authorized to provide design review for plans affecting any district eligible for the Hawai'i or National Registers of Historic Places under Subsection 2.88.060.F, Maui County Code.

The Commission is authorized to review and comment on the AIS report and CIA prepared in support of this Project under Subsection 2.88.060.K, Maui County Code.

The Commission is also authorized to advise HHFDC on carrying out its historic preservation responsibilities as they relate to this Project under Subsection 2.88.060.A, Maui County Code.

BACKGROUND

The Project site was once the Kahului School campus. It is located in the Kahului Historic District (SIHP #50-50-04-01607). In 1974, this district was surveyed, determined to be eligible for listing in the Hawai'i Register of Historic Places (having a moderate level of importance as a site type), and assigned a State Inventory of Historic Places (SIHP) number. While it was entered into the SIHP, it was never formally listed in the Hawai'i or National Registers of Historic Places.

According to the EA, the Project "is a collaborative effort between HHFDC and the Department of Accounting and General Services to primarily address the affordable housing shortage and State office space shortage on Maui." The Project involves construction of affordable and market-rate multi-family housing and a civic center on a 5.542-acre lot. The current County zoning for this lot is B-2 Community Business. The development standards for this zoning district are established in Chapter 19.18, Maui County Code.

The EA's proposed action (or preferred alternative) contemplates the following:

- Construction of two six-story apartment buildings with a total of approximately 315,000 square feet of floor area and 300 dwelling units.
- A four-story, 66,000 square foot civic center to include:
- Roughly 38,000 to 43,000 square feet of State office space;
- Approximately 7,000 square feet of classroom and support space for McKinley Community School for Adults; and
- Approximately 16,000 square feet for the Kahului Public Library.
- Roughly 596 parking stalls for the apartment buildings and the civic center via two three-level parking decks and surface parking.
- Other Project components including:
- Demolition of existing buildings and structures, and partial removal of a stone wall.
- Installation of new landscaping and vehicular and pedestrian facilities (on and off site).

The Project site is owned by the State of Hawai'i. The Project triggered an EA because it will use State and County lands for on and off-site improvements. It will also use State funds. A final EA was prepared, and the applicant (HHFDC) issued a Finding of No Significant Impact (FONSI).

The EA notes that the Project will require a Special Management Area Use (SM1) Permit. The Maui Planning Commission (MPC) will be the approving authority for this permit once it is filed. Once the permit has been filed and it is ready for MPC review, the Commission's comments will be forwarded to the MPC for consideration.

In addition to State environmental law (Chapter 343, Hawai‘i Revised Statutes), the Project triggers compliance with state historic preservation laws. Because it is proposed by a State agency (HHFDC) the Project must comply with Section 6E-8, Hawai‘i Revised Statutes. The regulations that implement Section 6E-8 are established in Chapter 13-275, Hawai‘i Administrative Rules. These regulations require County and State agencies to identify significant historic properties in their “project areas,” and develop and execute plans to handle effects on these properties.

STAFF FINDINGS AND OBSERVATIONS

This portion of the staff report includes findings and observations that staff noted while reviewing applicable appendices of the EA prepared in support of the subject Project. The Commission may consider these findings and observations as it reviews the Project.

Conceptual Plans and View Studies in (Appendix A)

This section analyzes conceptual plans and view studies in Appendix A. Appendix A includes conceptual plans for the EA’s preferred alternative (labeled Proposed Action) as well as 3 alternative plans (labeled Alternatives D (Options 1 and 2) and Alternative E (Option 1)).

As stipulated in Subsection 2.88.060.F, Maui County Code, the Commission is guided by the Secretary of the Interior’s Standards for Rehabilitation (Standards) when performing design review for projects affecting historic districts eligible for listing in the Hawai‘i or National Registers of Historic Places.

The Standards are a set of ten nationally accepted principles used by historic preservation commissions and other agencies across the U.S. to review projects affecting historic buildings and districts. These principles are aimed at preserving historic character. Of these standards, the following apply most to the Project:

- Standard #8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Analysis: Archeological concerns are addressed in following sections of this staff report.

- Standard #9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Analysis: The current and former buildings associated with the Project site are Plantation Vernacular and Neoclassical in style. They are one story in height except for the main classroom building for Kahului School, which was demolished in 1996. A large portion of the Project site has an open and grassy yard with mature trees and ornamentals that are typical of the Plantation/Territorial era, including Niu (coconut tree), Chinese Banyan, Monkeypod, Plumeria, Croton, and Mock Orange. Also found on the site are Kī (ti) and ‘Ulu (breadfruit).

Within the Kahului Historic District is a mix of architectural styles and periods. Directly across the street from the Project site are two Mid-Century Modern hotels, the Maui Seaside Hotel (formerly known as the Maui Hukilau Hotel, built in 1960) and the Maui Beach Hotel (built between 1968-1969). Both hotel properties have multiple buildings with smaller footprints and lower roof heights. The arrangement of the buildings on their respective lots also provides views between them.

Ka'ahumanu Avenue, especially the portion that runs through Kahului Historic District, is characterized by a sense of openness. It features low-profile buildings with generous front and side setbacks.

The Proposed Action depicts two apartment buildings that essentially fill the entire northern portion of the Project site. This large footprint combined with a tall roofline (six stories), creates boxy massing that overwhelms the Project site. While buildings with similar heights and footprints have recently been constructed in the area, none directly abut Ka'ahumanu Avenue. If constructed, the Proposed Action would affect the setting and feeling of the former Kahului School property and the larger Kahului Historic District. The openness of this area would be diminished by the Proposed Action.

Of all alternatives in Appendix A, Alternative E is most consistent with Standard # 9. Not only is Alternative E's massing more compatible with neighboring historic properties in the Kahului Historic District, this alternative retains/preserves a significant historic building that occupies the site. Alternative E could be further modified to provide a greater front setback for the proposed multi-family housing. Additionally, the number of parking spaces could be reduced since this development is close to jobs, stores, doctors' offices, etc., and the proposed Civic Center's parking area could be sited behind the building so that it does not abut the main road. It is not clear how much of the original landscaping, especially the Niu, 'Ulu, Kī, Plumeria, and other major character-defining trees/plants will be retained in Alternative E. It will be important for any alternative the State selects to preserve as much as possible and to implement the CIA's recommendations about landscaping (See page I of Appendix K).

Historical Resource Evaluation Report in Appendix J

This document, titled *Historical Resource Evaluation Report*, was prepared by Edward Yarbrough of Yarbrough Architectural Resources in January of 2022. This report identifies and evaluates the significance of historic properties that currently exist on the Project site.

According to page 33, there are four above-ground historic properties on the Project site:

1. A stone and mortar wall;
2. A building identified as the "Administrative Building;"
3. A building identified as the "Cafeteria Building;" and
4. A utility shed.

Information on each historic property is provided on pages 30-32. The description of the “Administrative Building” on page 31 identifies the structure as a “school” that was built in 1920. Based on a 1936 survey of County of Maui schools, staff believes that this building was the former Homemaking Cottage and that it was built in 1932, not 1920. Page 31 also notes that the building has a hip roof, photos indicate that the roof is gable-on-hip.

Page 33-36 identify the “Administrative Building” and the stone and mortar wall as eligible for listing in the Hawai‘i and National Registers of Historic Places under criteria A and C.

Page 37 notes that potential mitigation measures will be determined in consultation with the State Historic Preservation Division (SHPD). Most, if not all, of the historic wall should be retained. Demolishing portions of that wall, especially near the highly visible intersection of West Ka‘ahumanu Avenue and Kāne Street is not appropriate. Highly visible and intact portions of the wall should remain.

It is unfortunate that the State wishes to demolish the last intact building of significance associated with Kahului School (the “Administrative Building”). If the State is unwilling to preserve this building on site, the State should document it according to Historic American Building Survey (HABS) standards and make a demonstrated effort to preserve it by relocating it to another site. This would allow it to be adaptively reused and give it a new life at a new location.

Archaeological Inventory Survey (AIS) Report (Appendix K)

In general, an AIS is performed whenever a development is planned to determine if there are any archaeological historic properties in a project area. The results of AISs are typically reported through AIS reports. AISs and AIS reports are governed by Chapter 13-276, Hawai‘i Administrative Rules. SHPD is the ultimate accepting agency for AIS reports, however, as previously mentioned, the Commission is authorized to comment on these documents under Chapter 2.88, Maui County Code.

The subject AIS report, titled *REVISED DRAFT – Archaeological Inventory Survey for the Kahului Civic Center Mixed-Use Complex Project*, was prepared by Windy Keala McElroy, PhD, Max Pinsonneault, MA, and Leandra Medina, BA of Keala Pono in January of 2022.

Page 1 references Wailuku as an ahupua‘a. However, Pata (2022) notes that Wailuku is “the name of one of three moku of West Maui, as well as the name of an ahupua‘a and river in the same moku. Wailuku is the one of the four “wai” of Nāwai‘ehā” (Pata 2022, 351). The moku of Wailuku includes the ahupua‘a of Wailuku, Waikapū, and Waihe‘e, and the kalana of Waiehu (which consists of five ahupua‘a) (Pata 2022, 348-351). Page 1 also refers to Kā‘anapali, Lāhainā, and Hāmākuapoko as ahupua‘a. However, staff believes this could be a reference to the different moku that border the Wailuku Moku.

Pages 6-7 discuss place names associated with the study area. To enhance this section of the AIS report, staff is providing the following excerpts on Kahului from Pata (2022) and Pata and Pimentel (2022):

From Pata (2022):

Kahului
Ka-hului

Literally, the hului: “hului. 1. nvi. A kind of bag fish net; to drag such a net.” /HD/

Although generalized as a large urban area in the ahupua‘a of Wailuku, Kahului was originally a region of small fishing villages found mostly in the ‘ili of Kaihuwa‘a, ‘Owā, Kalua, and the Ka‘a region around what was once Kahului Bay, now known as Kahului Harbor. Also, Kahului is the name of a beach just south of the western jetty of Kahului Harbor.

“I ke one aloha o Kahului e, Ua haaheo wale i ka ia hukikolo la... [*Along the beloved sands of Kahului, Made proud through the fish dragged to shore...*]” /*Ka Hoku o ka Pakipika*, Buke 2, Helu 23, 19 Malaki 1863/

“The harbor is formed by two breakwaters extending out over shoals; one northeasterly from the west side, and the other northwesterly from the northeast side [Hobron Point] of the bay.’ It is the principal harbor on Maui and can accommodate container ships and cruise ships.” /Place Names (ULUK)/

Kahului is also the name of a division of the Wailuku Fishery directly offshore of the ‘ili of ‘Owā. From west to east, the divisions of the fishery are: Ka‘ehu a ka Mō‘ī, Paukūkalo, Malaeha‘akoa (Malehaakoa on the original map), Kaihuwa‘a, Makawela, Kahului, Pu‘uiki, Kaipu‘ula, Kanahā, Pala‘eke, Kalua, Ka‘a, Hopuko‘a Nui, Hopuko‘a Iki, Papa‘ula, Kapahu, Palaha, Wawa‘u (Kawau on the original map), Kānepa‘ina, and Kahue. /H.K.L. & R.L., 1947/

Varaint: Kaikuono o Kahului (Pata 2022, 250).

From Pata and Pimentel (2022):

Wailuku ahupua‘a has been inhabited by Native Hawaiians for centuries. Once the ahupua‘a’s bay, Kahului (along the lower reaches of the ‘ili of Kalua & ‘Owā), was developed into a harbor, Wailuku Ahupua‘a quickly became important as a commercial center (Pata and Pimentel 2022, 113).

Staff is unsure whether the Project site falls in Kalua, ‘Owā, or another ‘ili. If possible, the AIS report should determine Project site’s ‘ili using historical maps and other archival resources. Providing this information would enhance the reader’s understanding of the Project area’s history.

Pages 7-8 of the AIS report discuss subsistence and traditional land uses in Wailuku. To enhance this section of the AIS report, staff is providing the following excerpts on traditional land use in Wailuku/Kahului from Pata and Pimentel (2022):

... the sand dunes of Makanipālua and Kakanilua – both also within the ‘ili of ‘Owā and Kalua in .5 mile focus radius – are a well known burial grounds for commoners and warriors, and that the royal burial caves in nearby ‘Īao Valley were the sepulchres for the highest ali‘i (Pata and Pimentel 2022, 98).

Makanipālua separates the fertile kalo lands on the south side of the Wailuku River from the dry sand dunes of the lower regions of the ‘ili of ‘Owā and Kalua. The dune ridge runs west inland from just above the Kaihuwa‘a region of Wailuku Ahupua‘a to the Pāpōhaku ‘Ili region where it veers south and continues all the way into the dune systems of Waikapū Ahupua‘a. These dunes are well

known burial grounds for generations of Kānaka Maoli prior to modern day cemetery burial practices (Pata and Pimentel 2022, 23).

Because the favored food of this goddess [Hi‘iakaikapoliopole] and her traveling companions is pē‘ū [*ceremonially prepared, salted, and cooked lū‘au leaf*], it can be assumed that such foods were on hand in the regions she was welcomed. That she was denied the hospitality she and her companion sought in the home of ‘Olepau by his wife, whose name Kapo‘ipo‘i became that of a seaside region of Kahului in Wailuku Ahupua‘a, may indicate that the seaside area along Kahului Bay did not support the growth of taro (Pata and Pimentel 2022, 23).

Pages 8-9 of the CIA identify mo‘olelo associated with Maui and Wailuku. This section could be supplemented by the Wailuku-related mo‘olelo ka‘ao Pata and Pimentel (2022) identified using Hawaiian language sources, including:

- Hi‘iakaikapoliopole – “Pele’s favorite younger sister”;
- Makanikeoe – “a god of love and agriculture who traveled in his wind form across the archipelago for his beloved sister, Lauka‘ie‘ie”;
- Kapoi and ‘A‘apueo – “the battle between whom gave the Wailuku ahupua‘a its name during the reign of Kanēnēnuiakawaikalu”;
- Kamaakamahi‘ai – “the hero who installed Kamalālāwalu as the mō‘ī (king) of Maui”; and
- Ao Kuewa – “Kama‘oma‘o (included in the region now known by the superimposed term “Wailuku Commons37”), and which is depicted in ka‘ao and tradition as an ao kuewa (“realm of homeless spirits” [HD]). The resident akua of the plains of Kama‘oma‘o is known to be named ‘Ōlohe. The isthmus region region where this ao kuewa is located also includes the regions of Papalekaili‘u, Kakanilua, Kalua‘ōlohe, Ka‘ōpala, and Pu‘ulima” (Pata and Pimentel 2022, 47).

See pages 44-98 of Pata and Pimentel (2022) for more on these mo‘olelo and what they tell us about Wailuku.

Page 9 of the AIS report includes ‘ōlelo no‘eau associated with Wailuku. This section could be supplemented by the Wailuku-related ‘ōlelo no‘eau identified by Pata and Pimentel (2022) on pages 145-148 of *Malu i ke Ao: Native Hawaiian Culture in the Wailuku Region of Maui – Hawaiian Cultural Impact Assessment Prepared by Kumu Hula Cody Pueo Pata & Megan Kapua Pimentel for the County of Maui & the Hālau of ‘Ōiwi Art at Pe‘epe‘e, Wailuku, Maui*.

Pages 11-14 of the AIS report discuss Wailuku’s history during the 19th and 20th centuries, including the Māhele. These sections could be supplemented by the research presented on pages 110-134 of Pata and Pimentel (2022). These pages provide historical data on:

- Environmental degradation of Wailuku caused by sugar and ranching (110-112);
- Development of Kahului Bay into Kahului Harbor (112-116); and
- The questionable acquisition of Princess Ke‘elikōlani’s claims to Crown lands (24,000 acres – most of the Wailuku Ahupua‘a) by Claus Spreckels in the 1880s (117-134).

Several individuals who were interviewed for the Project’s CIA mentioned former sand dunes in the vicinity of the Project site as well as the potential for iwi kūpuna and archaeological

sites within and near the Project site. Like the CIA, the AIS report might benefit from a consultation process with individuals who are knowledgeable about the Project area's history, as required under Subsection 13-276-5(g), Hawai'i Administrative Rules. Potential candidates for this consultation process might include Native Hawaiian Organizations such as 'Aha Moku o Maui and Mālama Kakanilua as well as individuals with genealogical/generational ties to Wailuku/the Project area.

Given the cultural history of Wailuku and the Pu'uone sand (PZUE) soil type in the southwest half of the Project site, supplemental archaeological testing may be warranted, if individuals who are knowledgeable about the area's history, the Commission, the County Archaeologist, or SHPD determine the need for it. This supplemental testing (especially in areas where heavy ground disturbance is proposed) could be in the form of additional test trenches or non-destructive methods like ground penetrating radar (if appropriate for conditions at the Project site). Consultation with these parties might also indicate whether archaeological monitoring is warranted for this Project.

Cultural Impact Assessment (CIA) (Appendix L)

In addition to the AIS Report, a CIA was prepared to analyze the Project's potential to affect cultural practices and features associated with the Project site. CIAs are governed by the Guidelines for Assessing Cultural Impacts (Guidelines), which was adopted by the State of Hawai'i Environmental Council on November 19, 1997. The Guidelines establish a methodology for completing CIAs as well as standards for their content.

The Project's CIA, titled *REVISED FINAL – Cultural Impact Assessment for the Kahului Civic Center and Mixed-Use Complex Project*, was prepared by Dietrix J.U. Duhaylonsod, BA, Windy Keala McElroy, PhD, Kālenalani McElroy, MA, and Leandra Medina, BA of Keala Pono in January of 2022.

Because most of the CIA repeats the historical information from the AIS report, staff's previous comments on place names, subsistence practices and traditional land use, mo'olelo, 'ōlelo no'eau, Wailuku in the 19th and 20th centuries, and Māhele land tenure apply to the CIA as well.

Page 25 notes that 15 potential interviewees were contacted. Page 26 provides the names of the potential interviewees. A total of three interviews were completed. Summaries of these interviews are provided on pages 26-27 and the related transcripts are contained in Appendices D, E, and F of the CIA. To supplement these interviews, staff recommends contacting additional potential interviewees, including Wailuku Moku representatives of 'Aha Moku o Maui and individuals with generational/genealogical ties to Wailuku.

Page 68 identifies the cultural practice of gathering plumeria from the Project site. To supplement this section of the CIA, staff is providing the following excerpt on on-going traditional cultural practices in Wailuku from Pata and Pimentel (2022):

Despite all of the challenges Native Hawaiians have historically faced, continuity in various Hawaiian cultural practices has existed within the 21 'ili of the report scope zone, and immediate

vicinity beyond, from ancient times until the present. These include: 'Ohana living preferences III; Hawaiian Kingdom holiday observations; observation of the 1893 Overthrow of the Hawaiian Kingdom; observation of State holidays that honor past ali'i and/or their actions; formal preservation and transmission of Hawaiian history; Hawaiian language church services and hymns; instruction through the medium of Hawaiian language; Hawaiian naming practices; transmission and presentations of formal and informal Hula; Hula competitions; various types of ceremonies; trainings in various types of ceremonial practices; traditional healing practices; ho'oponopono (traditional mediation) practices; 'aha'aina & lū'au celebrations; Hawaiian music presentations & concerts; training in music &/or chant; haku mele (lyric/music composition); cross- and inter-generational transmission of cultural mo'olelo; intergenerational transmission of family histories; lei making; traditional fiber arts practices; featherwork; stone and wood working; traditional forms of farming & gardening; kilo (culture-based environmental observations) practices; Makahiki sports; access of the Wailuku river for recreation and fishing; traditional foods and forms of food preparation; Hawaiian culture-based rallies & demonstrations; iwi kupuna protection & advocacy Hawaiian language courses; Hawaiian Studies courses; contemporary design and tailoring of Hawaiian attire; Aloha Festivals events; and, May Day performances (Pata and Pimentel 2022, 154-155).

Based on the project area's proximity to the ocean and Pata's (2022) entries on the place name of Kahului, fishing may also be taking place near the Project site. If additional interviews reveal this to be true, then it might be appropriate to include information on how the Project will minimize harm to the nearshore environment during construction. It would also be good to understand whether the Project has the potential to affect culturally important viewsheds and how that might be addressed through design modifications.

Page i includes the following recommendations, which the Project should address and incorporate:

- Have a cultural monitor on site during construction;
- Allow access to the facilities for all community members rather than a members only facility;
- Keep open communication with the community regarding the project;
- Plant useful foliage on the property such as plumeria, laua'e, palapalai, noni, kalo, and naupaka for the community to gather, and to hold cultural classes on the property, such as lei-making, to make good use of the plants;
- Use native plants instead of invasives for landscaping on the grounds;
- If any trees on the property are being cut down, consult the community to see if the trees can be utilized by community members.

Additional Observations

There should be some analysis of the Project's potential to both directly and indirectly affect the character of surrounding historic properties and the Kahului Historic District.

While a finding of no significant impact (FONSI) has been issued for the project's EA, staff believes that the issues raised in this staff report should be further addressed and resolved before HHFDC files an SM1 application and the MPC considers the application.

REFERENCES

Pata, Cody Kapueola'ākeanui. 2022. *'Olu'olu nā Mauna o 'E'eka: Place Names of Maui Komohana*. Lāhainā: North Beach-West Maui Benefit Fund, Inc.

Pata, Cody Pueo and Megan Kapua Pimentel. 2022. *Malu i ke Ao: Native Hawaiian Culture in the Wailuku Region of Maui – Hawaiian Cultural Impact Assessment Prepared by Kumu Hula Cody Pueo Pata & Megan Kapua Pimentel for the County of Maui & the Hālau of 'Ōiwi Art at Pe'epe'e, Wailuku, Maui*. Wailuku: County of Maui.

County of Maui. 1936. *Public Schools of the County of Maui*. Wailuku: County Engineer.

xc: Michele Leong, G70, michelc@g70.design, HHFDCOutreach@g70.design (PDF)
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