

Date: October 30, 2017

From: Leiane Paci, Maui Lani Partners

RE: A BILL FOR AN ORDINANCE ESTABLISHING A NEW CHAPTER 20.40, MAUI COUNTY CODE, DECLARING A MORATORIUM ON SAND MINING

Today a moratorium is being considered to control Maui's sand resources. We all recognize that there is a limited quantity of sand, and it needs to be managed properly. As part of the moratorium, the Council is considering an update of the Maui Inland Sand Resource Quantification Study: a study that quantified the Grade A sand contracts held by Ameron and Hawaiian Cement in 2006. "Grade A" is an industry term for concrete quality sand. This is not a geological study of how much sand is on Maui.

Four private companies were interviewed as a resource for the 2006 Sand Study - Ameron Hawaii Maui (now HC&D), Hawaiian Cement, Maui Lani Partners and A&B Properties.

- In a letter to the IEM Committee Chair, dated August 29, 2017, HC&D stated that we have **"already depleted our stock of Maui sand. We are currently unable to supply our clients' needs..."**
- In a letter to the IEM Committee Chair, dated August 22, 2017, Hawaiian Cement stated that they predict **"current inventory will last us a little over 6 years."** In a follow up email to a customer, named Patricia Cadiz, Hawaiian Cement clarified that **"Although our 6 year supply sounds impressive, it is a relatively small quantity. Because sand is not readily available, we must conserve everything we have for our own operations."**
- In regards to sand resources within the Maui Lani master-planned community, it is anticipated that the potential moratorium and pending legislation could make sand resources inaccessible permanently. **Therefore, there is no quantifiable sand resources within Maui Lani.**
- We predict that A&B properties will also not have quantifiable sand resources.

What will the Council learn from spending \$25,000 on an update to the study? Nothing. Planning Department policy, a potential moratorium, and pending legislation have already artificially constrained the resource. The 2006 study concluded, **"Much of the great Maui inland sand resources that were available 30 years ago are no longer available, due to development on, or preservation of the larger dunes."** It did not conclude that sand resources were lost to excavation. Pending legislation and the proposed moratorium promotes leaving the material onsite under future developments.

As a reminder, the aggregate companies as well as Maui Lani have agreed to keep Maui's sand in Maui County. This is the answer to managing Maui's sand resource for the people of Maui County. Therefore, we do not support the proposed moratorium.