

Pulelehua

A NEW TRADITIONAL COMMUNITY



FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME 1 OF 2

PREPARED BY:



PREPARED FOR:

ACCEPTING AUTHORITY,
STATE OF HAWAII LAND USE COMMISSION
DOCKET NO. A04-751



MAUI LAND & PINEAPPLE COMPANY INC.

TOWN PLAN

PREPARED BY:

DOVER, KOHL & PARTNERS

AUGUST 2005

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This final environmental impact statement and all ancillary documents were prepared under my direction or supervision and the information submitted, to the best of my knowledge, fully addresses document content requirements as set forth in Section 11-200-17 and Section 11-200-18, Hawaii Administrative Rules.

A handwritten signature in black ink, appearing to read "Randall H. Endo", written over a horizontal line.

Randall H. Endo, Vice President
Maui Land & Pineapple Company Inc.

August 2005

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INTRODUCTION & SUMMARY



1.0 INTRODUCTION AND SUMMARY

This ~~Draft~~ Final Environmental Impact Statement (EIS) is prepared pursuant to Chapter 343, *Hawaii Revised Statutes* (HRS), and Title 11, Chapter 200, *Hawaii Administrative Rules* (HAR), Department of Health, State of Hawai'i. Proposed is an applicant action by Maui Land & Pineapple Company, Inc., for the creation of Pulelehua, an affordable new traditional community located in the Māhinahina region of West Maui between Kā'anapali and Kapalua.

1.1 INTRODUCTION

1.1.1 Project Profile

Project Name:	Pulelehua
Location:	Māhinahina, West Maui, Maui
Judicial District:	Lahaina
Landowner:	Maui Land & Pineapple Company, Inc.
Applicant:	Maui Land & Pineapple Company, Inc.
Tax Map Key:	(2) 4-3-01:31 (portion)
Property Area:	Approximately 312 <u>310.44</u> acres
Existing Uses:	Pineapple cultivation and fallow fields
Proposed Use:	Traditional Neighborhood Design, mixed use, affordable community
Land Use Designations:	State Land Use: Agricultural County Zoning: Agricultural Community Plan: Agricultural, Open Space, Park Special Management Area (SMA): Not in the SMA
Permits/Approvals Required:	State Land Use District Boundary Amendment Community Plan Amendment Project District Phase I/Change in Zoning Project District Phases II and III Compliance with Chapter 343, HRS Compliance with Chapter 6E, HRS National Pollutant Discharge Elimination System (NPDES) Subdivision Approval Grading and Building Permits

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1.2 LOCATION

The proposed Pulelehua community will be located in the Māhinahina region of West Maui between Kā'anapali and Kapalua. The Pulelehua community site is mauka of Honoapi'ilani Highway between Honoapi'ilani Highway and the Kapalua West Maui Airport.

1.3 EXISTING USE

The Pulelehua community site currently contains cultivated pineapple fields and fallow fields formerly used for pineapple cultivation.

1.4 LAND OWNERSHIP

Maui Land & Pineapple Company, Inc., owns the Pulelehua community site. This property is identified as TMK: 4-3-01:31 (portion). Akahela Street, which bisects the site and connects the Kapalua West Maui Airport to Honoapi'ilani Highway, is owned by the State of Hawai'i.

1.5 APPLICANT

The applicant is Maui Land & Pineapple Company, Inc.

Contact Person: Bob McNatt, Executive Vice President/General Manager
Community Development
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Maui, Hawai'i 96761
Telephone: (808) 669-5625
Facsimile: (808) 669-5454

1.6 ENVIRONMENTAL CONSULTANT

Maui Land & Pineapple Company, Inc.'s environmental and entitlement planning consultant for the Pulelehua community is PBR HAWAII.

Contact Person: Tom Schnell, AICP
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawai'i 96813
Telephone: (808) 521-5631
Facsimile: (808) 523-1402

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1.7 ACCEPTING AUTHORITY

The State of Hawai'i Land Use Commission (LUC) is the accepting authority for the EIS. Determination of the LUC as the accepting authority is in accordance with Chapter 343, HRS, which states that privately initiated EIS documents must be accepted by the government agency empowered to issue permits for the project.

Contact Person: Anthony Ching, Executive Officer
State Land Use Commission
P.O. Box 2359
Honolulu, Hawai'i 96804
Telephone: (808) 587-3822
Fax: (808) 587-3827

1.7.1 Compliance with State of Hawai'i and County of Maui Environmental Laws

This document has been prepared in accordance with the provisions of Chapter 343, HRS, (Environmental Impact Statement Law) and Title 11, Chapter 200, HAR, Environmental Impact Statement Rules.

Section 343-5, HRS, establishes nine "triggers" that require the preparation of an environmental assessment or environmental impact statement. One of these triggers is any action that amends a County general plan or community plan when such an amendment is not part of a comprehensive community plan update.

A community plan amendment is required to designate the Pulelehua site to Project District 5. Accordingly, this environmental impact statement is prepared in compliance with Section 343-5, HRS, along with other requirements.

Section 343-5, HRS also requires an environmental assessment or environmental impact statement for projects involving the use of State or County funds or lands. Use of State or County lands or funds could include the proposed public school and medical center on the site and on- and off- site infrastructure improvements relating to roadway, traffic, water, sewer, utility and drainage facilities affecting State and/or County roadways or other lands. While the specific nature of all potential improvements is not known at this time, the EIS is intended to address all current and future instances involving the use of State or County lands or funds relating to Pulelehua.

This ~~draft~~ final EIS was preceded by ~~the~~:

- 1) The Pulelehua Environmental Impact Statement Preparation Notice (EISPN). The EISPN was submitted to the Office of Environmental Quality Control (OEQC) on ~~June 28~~ July 14, 2004. Notice of the availability of the EISPN was published in the

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July 8 ~~23~~, 2004 edition of OEQC's *The Environmental Notice*. Copies of the EISPN were provided to appropriate government agencies and other organizations (See Chapter 11). The public comment period for the EISPN ended August 23, 2004. Comments on the EISPN ~~have been~~ were incorporated in ~~this~~ the draft EIS.

2) The *Pulelehua Draft Environmental Impact Statement* (EIS). The Draft EIS was submitted to OEQC on March 11, 2005. Notice of the availability of the Draft EIS was published in the March 23, 2005 edition of OEQC's *The Environmental Notice*. Copies of the DEIS were provided to appropriate government agencies and other organizations (See Chapter 12). The public comment period for the Draft EIS was from March 23, 2005 to May 6, 2005. Comments on the Draft EIS have been incorporated in this final EIS.

1.8 STUDIES CONTRIBUTING TO THIS ENVIRONMENTAL IMPACT STATEMENT

A number of specific technical studies were prepared for Pulelehua. These include:

- Archaeological Inventory Survey Report (Archaeological Services Hawaii)
- Botanical Resources Assessment Study (Winona Char)
- Avifaunal and Feral Mammal Field Survey (Phil Bruner)
- Cultural Impact Study/Assessment (Maria Ka'imipono Orr)
- Transportation Report (Hall Planning & Engineering)
- Environmental Noise Assessment Report (D. L. Adams Associates)
- Airport Noise Assessment Report (Mestre Graves Associates and Edward K. Noda & Associates)
- Air Quality Study (B. D. Neal & Associates)
- Market Study and Economic Impact Analysis (The Hallstrom Group)
- Public Costs/Benefits Assessment (The Hallstrom Group)
- Preliminary Engineering Report (Otomo Engineering)
- Preliminary Drainage Report (Otomo Engineering)
- Marine Environment Assessment Report (Marine Research Consultants)

The complete studies are included as appendices to this environmental impact statement. Most of these studies were based on the original unit count of 882 single and multi-family units and 318 potential ohana units. All studies assumed 318 ohana units would be constructed; however, Maui Land & Pineapple Company Inc., will not build any ohana units and the construction of ohanas will be at the discretion of individual owners.

The current plan for Pulelehua contains a total of 267 potential ohana units. With the reduction in potential ohana units and the potential that some of the ohana units may not ever be constructed by individual owners, the impact from ohana units will be overstated in the reports. Thus utility demands, traffic, air emissions, and solid waste generation are all conservative figures compared to what might actually exist in the future.

In addition, one of the unresolved issues pertains to a potential medical center within the Pulelehua community. This hospital, and related facilities, could occupy up to 15 acres. In the event the medical center concept is implemented, and based on current conceptual information, the medical facility will generate less demand for water, sewer and electricity than the houses that would be replaced in the plan. Other potential impacts would also be reduced accordingly.

1.9 EXECUTIVE SUMMARY

1.9.1 Pulelehua Summary Description

The holistic concept of Pulelehua provides for a complete community in a compact area. Maui Land & Pineapple Company, Inc., has chosen the use of the “Traditional Neighborhood Design” (TND) model for Pulelehua to build a holistic community that meets the individual and community needs of all residents (Figure 1).

Several aspects of the TND model contribute to creating a rewarding living experience for residents of Pulelehua. The community will include a mix of residential, commercial and public uses. Parks, open space, a neighborhood school, biking and walking paths, a town center, pedestrian friendly streets and inviting and accessible public spaces are just some benefits of the TND design.

These components combine to form a community that encourages residents to build relationships with each other, rely less on cars for transportation, walk and bicycle more often, enjoy the outdoor surroundings and actively engage in civic life.

The residents of Pulelehua will enjoy an increased quality of life through the features of a TND community. People will live close to work, and thereby decrease time lost during a daily commute, decrease traffic congestion, reduce stress, provide for more family and recreation time, and lessen pollution. The narrow streets will encourage slower driving speeds which provides for pedestrian friendly, and thus safer neighborhood.

The TND model differs from conventional neighborhoods in aesthetic and practical ways. Homes are oriented toward the street, which is pedestrian friendly and bordered by wide sidewalks; porches and lanais that invite neighbors to talk; affordable and market rate homes are mixed together and do not differ in quality or appearance; and streets connect the other neighborhoods and the town center rather than end in cul-de-sacs, inviting interaction with the community.

Traditional neighborhood design results in compact communities that preserve rather than consume the surrounding open space. This is particularly significant for Pulelehua and West Maui, where open space will continue to be dedicated to agriculture and

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conservation. This is an integral component of Maui Land & Pineapple Company, Inc.'s vision to create holistic communities.

Most importantly, the TND model is in harmony with the hopes and aspirations that community members shared with us throughout the design and planning process. The elements most commonly requested by prospective Pulelehua residents and neighbors are elements of TND, such as walking and biking trails, a neighborhood school, parks, community gathering places, and of course, affordable housing.

Of the total Pulelehua community site of approximately ~~312~~ 310 acres, about 31 percent (97 acres) of the community will be used for homes and other built uses. Community recreation areas, neighborhood parks, and open space will encompass approximately ~~34~~ 32 percent (98 acres) of the community. A public elementary school with playgrounds and fields will be provided on approximately four percent (13 acres) of the site. Other areas will include rights of way (21 percent or 66 acres) and the deep gulches (10 percent or 32 acres).

The Pulelehua community will consist of 882 multi-family and single family homes, including 23 lots that will be built by residents. At least 51 percent of the homes will be ~~made available for sale or rent to low, low moderate and gap group income Maui residents~~ affordable to families making between 50 to 140 percent of the median income. There will also be approximately 100 moderate-rate (i.e. "gap") homes available for sale. The community will also be designed for as many as 267 ohana dwellings that could be potentially built by residents.

In addition, the Pulelehua community will include 21,475 square feet of retail space, 54,000 square feet of specialty retail/office space and 20,300 square feet of workplace edge commercial space. Maui Land & Pineapple Company, Inc., is making 13 acres of land available to the State of Hawai'i, Department of Education (DOE) for an elementary school. Finally, Pulelehua will include four civic lots, where churches or other civic buildings could be built.

1.9.2 Summary of Potential Impacts and Proposed Mitigation Measures

Creation of the Pulelehua community will transform the pineapple fields of the site into a holistic, mixed-use community. For areas of environmental concern, appropriate mitigation measures have been planned as part of the community. For areas of particular concern, the following summarizes the associated mitigation measures that are either recommended or planned to ensure that potential adverse impacts are minimized or mitigated.

Botanical Resources. Since no threatened or endangered species or species of concern are known to occur on the Pulelehua site, the botanical survey concludes that the proposed use of the site for the Pulelehua community is not expected to have a significant



Legend

NEIGHBORHOOD CORE (Main Street and Live/Work)		NEIGHBORHOOD EDGE (Lower Density Residential)	
NEIGHBORHOOD CENTER (Main Street, Live/Work, and Higher Density Residential)		ESTATE EDGE (Estate House Lots)	
NEIGHBORHOOD GENERAL (Live/Work, Corner Store, and a Mix of Residential Units)		WORKPLACE EDGE (Workshop / Loft Buildings)	

Town Plan by:
DOVER, KOHL & PARTNERS
 town planning

Figure 1
 Illustrative Master Plan

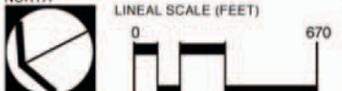
Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. Island of Maui

NORTH

LINEAL SCALE (FEET)

0 670




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negative impact on botanical resources. The survey further concludes that “there are no botanical reasons to impose any restrictions, conditions, or impediments to the proposed development of the site.”

Wildlife Resources. The Pulelehua community is not expected to impact threatened, endangered, or native species of wildlife, since none were observed on the site. All of the birds and mammals found on the site are alien species. In addition, most of the mammals on site, or believed to be on site, are often regarded as pests (i.e., mongooses, rats, and mice).

Agricultural Impact. Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use. This amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd. (a subsidiary of Maui Land & Pineapple Company, Inc.).

Maui Land & Pineapple Company, Inc., has a long-term commitment to agriculture. Strengthening agricultural operations is one of the Company’s long-term goals. In addition to pineapple, Maui Land & Pineapple Company, Inc., is currently exploring a wide array of diversified agricultural opportunities. The creation of Pulelehua will not lead to a decrease in Maui Land & Pineapple Company, Inc.’s agricultural viability.

Archaeological Resources. The Pulelehua community is not expected to have an impact on archaeological resources. The results of the archaeological inventory survey of the Pulelehua community site (Archaeological Services Hawaii, LLC 2004) did not reveal any significant surface cultural manifestations with the exception a plantation-era irrigation flume and isolated surface artifacts. Historical research indicates that historical residential structures or compounds, while present in adjacent coastal areas, were probably never located within the Pulelehua community site.

Based on the negative results of subsurface testing, together with evidence of previous disturbances in the area from pineapple cultivation, Archaeological Services Hawaii does not recommend further inventory-level archaeological work for the Pulelehua community site.

State Historic Preservation Division reviewed the archaeological inventory survey report, concurred with the recommendations, and found the report to be acceptable.

Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding preservation of archaeological and historic sites should any be found during construction.

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Cultural Resources. The cultural impact study/assessment concludes that there are no cultural resources on Pulelehua site and Pulelehua will not have an adverse effect to cultural practices.

The most significant cultural practices in the vicinity of the Pulelehua area that continue today are fishing and sea-gathering (i.e., *limu*/seaweed, *'opihi*, *wana*/sea urchins, and sea cucumber). While these resources are outside of the Pulelehua community site, care will be taken so that any construction activity will not affect or impact these resources.

Traffic. A detailed traffic study was prepared showing traffic patterns over 10 miles of Honoapi'ilani Highway and includes the potential impacts of 24 other planned developments in West Maui, in addition to Pulelehua.

Each potential development was analyzed separately and then integrated into nationally recognized traffic modeling software. The number of trips generated by each development was calculated and distributed on the 10-mile study area. The results were then compiled to look at total traffic impact.

The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed by 2011 as projected. Certain components of Pulelehua, like the elementary school and affordable housing nearer the employment centers, are in fact, hoped to improve traffic conditions in Lahaina during peak traffic hours.

Population. The Pulelehua community is targeted toward Maui residents. As such, the community is not expected to significantly increase the population of the island; however, people currently living in other parts of Maui may move to Pulelehua, thereby increasing the population of West Maui.

Public Services. As Maui's population grows, there is a need for the County to allocate resources necessary to adequately fund police services and other public services. Since Pulelehua will increase the tax base for the County, Pulelehua will provide additional funds for expanding police services and other public services. Additionally, Maui Land & Pineapple Company, Inc., is willing to discuss with the Police Department the possibility of providing a police substation within the community.

Providing the opportunity for people to live closer to their jobs and school is expected to decrease commuting to and from West Maui, lessen traffic congestion and accidents, reduce stress, and allow more family and recreation time, thereby improving overall quality of life for not only Pulelehua residents, but for Maui residents in general. The social impacts of these benefits, although not quantifiable, are expected to contribute to a more stable population which should have a positive impact on lessening crime and other issues requiring police attention.

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The Nāpili Fire Station is located near the Nāpili Shopping Center and is approximately two miles from the Pulelehua community site. Pulelehua's streets provide multiple routes and increase connectivity to all points thus increasing emergency vehicle access by providing alternative routes to an emergency site.

In their correspondence, the Fire Department stated: "We would like to commend the design committee for the multiple access options that residents and emergency responders will have."

Plans for Pulelehua include a 13-acre site for a public elementary school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapi'ilani Highway as elementary school children, residing north of Kā'anapali, will not have to be transported to the Lahaina area for school.

Additionally, a new private school, Maui Preparatory Academy will be located in Nāpili, and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-Kindergarten through 12.

Economic Impacts. In addition to providing housing for Maui workers, the Pulelehua community will enhance the economic environment and stimulate economic diversification relative to the present agricultural use of the property. Some of the economic benefits of the community include:

- \$301.5 million in direct real property capital investment;
- 8,399 "worker years" of employment on Maui over the initial 7 to 9-year build-out period (a "worker year" is the amount of time one full-time worker can work in one year);
- \$278.8 million in total construction-related wages generated over build-out;
- \$47.4 million in profits to local suppliers and contractors;
- 634 permanent full-time equivalent jobs on-site with annual wages of \$16 million (businesses within Pulelehua);
- 71 permanent full-time equivalent jobs in the regional economy with annual wages of \$1.7 million (maintenance, landscaping, and upgrading of the Pulelehua homes and buildings);
- \$30.9 million per year in discretionary expenditures infused into the island economy from community residents; and
- The total base economic impact on Maui from Pulelehua during the first 10 years of development, construction, and use is projected at \$996.3 million, with a stabilized base impact of \$132.2 million per year thereafter. The total overall economic impact during the first decade will be in excess of \$1.9 billion and some \$264.4 million annually over the long-term.

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Water. Based on Domestic Consumption Guidelines, the average daily water demand for Pulelehua is estimated to be approximately 919,313 gallons per day (including irrigation of parks, open spaces, common areas and the school) based on the current mix of uses (see Section 2.6). This estimate includes the water demand from all potential ohana units; however, it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

Potable water will be provided by drilled wells in the vicinity of the Pulelehua site to provide a new source of water for Pulelehua. It is envisioned that wells will draw water from the Honokōwai Aquifer. The current pumpage from the Honokōwai Aquifer of 3.171 MGD is well below the aquifer's sustainable yield of 8 MGD. It is estimated that potable water demand will equal 719,589 gallons per day.

Non-potable water for irrigation will be provided ~~by a mixture of~~ from reclaimed water ~~and surface water~~ sources. This water will irrigate community parks, neighborhood parks, open spaces, common area for 151 multifamily units and the school. Non-potable water use is estimated at 199,747 gallons per day. The use of reclaimed ~~and surface~~ water will reduce the total demand of water by 22 percent.

Wastewater. An onsite sewer collection system will be constructed within Pulelehua. The system will be designed to accommodate the anticipated flow, and will consist of a gravity sewer system and sewer pump stations that will connect a new to sewer line located along the east (mauka) side of Honoapi'ilani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet, and will connect directly to the Lahaina Wastewater Reclamation Plant.

Solid Waste. Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community. After the community is occupied by residents, to the extent practical, wastes such as aluminum, paper, newspaper, glass, and plastic containers will be recycled. Green waste from the community may be processed on-site. Waste that cannot be recycled or incorporated into on-site green waste processing areas will be disposed of in the County's central landfill in Pu'unēnē.

Drainage. The net result of the drainage improvements will be no increase in runoff from Pulelehua onto downstream properties or into the existing drainage ways, desilting basins, and the ocean.

Onsite runoff will be collected by catch basins and bioswales located at appropriate intervals along the Pulelehua roadways and diverted by drain lines into on-site detention basins. Detention basins will be sized to accommodate the increased runoff from the community and will be located within the wide greenway mauka of Honoapi'ilani Highway and between the first Pulelehua street parallel to the highway. Drainage

improvements will also be constructed mauka of the Kapalua West Maui Airport to reduce offsite runoff flowing onto the Pulelehua site.

All detention basins will be designed to suppress peak flow and serve as desilting basins to minimize the conveyance of waterborne silt and debris downstream.

1.9.3 Relationship to Land Use Policies

State Land Use Law, Chapter 205, Hawaii Revised Statutes. The Pulelehua community site is currently in the State Agricultural district. Maui Land & Pineapple Company Inc., has filed a petition with the State Land Use Commission to reclassify the property to the Urban district.

Coastal Zone Management Act, Chapter 205A, Hawaii Revised Statutes. The Coastal Zone Management Area as defined in Chapter 205A, HRS, includes all the lands of the state. As such, Pulelehua is within the Coastal Zone Management Area; however, it is not located along a shoreline.

Hawaii State Plan, Chapter 226, Hawaii Revised Statutes. The Hawaii State Plan (Chapter 226, HRS) establishes a set of goals, objectives and policies that serve as long-range guidelines for the growth and development of the State. As proposed, Pulelehua is relevant to many of goals, objectives, and policies set forth by the State Plan. Conformance with specific elements of the State Plan is discussed in detail in Section 5.1.4.

State Functional Plans. The Hawaii State Plan directs State agencies to prepare functional plans for their respective program areas. There are 13 state functional plans that serve as the primary implementing vehicle for the goals, objectives, and policies of the Hawaii State Plan. The functional plans applicable to Pulelehua are discussed in Section 5.1.5.

Maui County General Plan. The General Plan of the County of Maui sets forth the desired sequence, patterns, and characteristics of future development. This is accomplished through long-range objectives focusing on the social, economic, and environmental effects of development coupled with specific policies designed to implement the objectives. Conformance with specific elements of the General Plan is discussed in Section 5.2.1.

West Maui Community Plan. The West Maui Community Plan Land Use Map designates the site as Agricultural, Open Space, and Park. Maui Land & Pineapple Company Inc., is seeking a Community Plan Amendment to designate the property as Project District 5. Conformance with specific elements of the West Maui Community Plan is discussed in Section 5.2.2.

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Maui County Zoning. The Pulelehua property is currently within the County Agricultural District (zone). Concurrent with the processing of the community plan amendment, Maui Land & Pineapple Company, Inc., is seeking a Change in Zoning of the property to Project District. Section 5.2.3 includes discussion of zoning requirements.

1.9.4 Required Permits and Approvals

A preliminary list of permits and approvals required for the Pulelehua Community is presented below.

Permit/Approval	Responsible Agency	Status
Chapter 343, HRS Compliance	Office of Environmental Quality Control State Land Use Commission (LUC)	<u>Submitted 6-28-04;</u> <u>the LUC accepted the</u> <u>Final EIS on July 13, 2005</u>
State Land Use District Boundary Amendment	State Land Use Commission	<u>Submitted 6-28-04;</u> <u>action pending</u>
Community Plan Amendment	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Submitted 3-18-05;</u> <u>action pending</u>
Project District Phase I/ Change in Zoning	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Submitted 3-18-05;</u> <u>action pending</u>
Project District Phases II and III	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Expected submittal 4-5-06</u>
<u>Project District Phase III</u>	<u>County of Maui Planning Department</u>	<u>Expected submittal 7-5-06</u>
Chapter 6E, HRS Compliance	State Historic Preservation Division	<u>Submitted 06/25/04;</u> <u>accepted 03/03/05</u>
National Pollutant Discharge Elimination System (NPDES) Permit	State Department of Health	<u>Expected submittal 8-5-06</u>
Subdivision Approval	County of Maui Department of Public Works and Environmental Management	<u>Expected submittal 8-5-06</u>
Grading/Building Permits	County of Maui Department of Public Works and Environmental Management	<u>Expected submittal 8-5-06</u>
<u>Well Construction Permit/ Pump Installation Permit</u>	<u>DLNR Commission on Water Resource Management</u>	<u>Expected submittal 4-5-06</u>

1.9.5 Alternatives

The alternatives that have been considered are:

- 1) The “No-Action” Alternative;
- 2) Alternative Locations;
- 3) Alternatives Related to Different Designs or Details Which Would Present Different Environmental Impacts;

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- 4) Actions of a Significantly Different Nature Which Would Provide Similar Benefits with Different Environmental Impacts; and
- 5) The Alternative of Postponing Action Pending Further Study.

None of these alternatives meet all of Pulelehua Community's planning objectives to: 1) develop a holistic community; 2) create a compact, sustainable community; 3) provide affordable housing with dignity; 4) provide mixed uses for livability; 5) value the traditions of Hawai'i; 6) incorporate the design element of connectedness; and 7) make the community walkable and bike-able.

1.9.6 Probable Adverse Environmental Effects That Cannot Be Avoided

Potential adverse environmental impacts that cannot be avoided include changes to the land use character of the region, the visual appearance of the site, impacts from increased traffic, increases in solid waste generated, increased in electrical power consumed, and short-term impacts to air quality and noise levels due to construction. These impacts are more fully discussed in Section 7.4 and in individual sections throughout this document.

1.9.7 Cumulative and Secondary Impacts

To assess the cumulative and secondary impacts of the Pulelehua community in context with other projects 24 proposed West Maui projects see (Table 2 in Section 4.4) were used as the basis of reasonably anticipated development in the area. Cumulative and secondary impacts resulting from these projects, along with the Pulelehua community, are likely to include increased population in West Maui and greater demands on public infrastructure systems and services. It also could be expected that the community character of the region may change as more people live in the area. Section 7.2 discusses cumulative and secondary impacts

1.9.8 Rationale for Proceeding with the Pulelehua Community Notwithstanding Unavoidable Effects

In light of the above mentioned unavoidable effects, the creation of the Pulelehua community should proceed because the relatively minor negative impacts of the community will be offset by substantial positive impacts, including:

- Responsible stewardship of the land provided by Maui Land & Pineapple Company, Inc.'s vision for the creation of the Pulelehua community;
- Provision of high quality affordable housing for the workers of West Maui, to allow people to live near where they work;
- Provision of a complete community, with a mix of housing types, recreation areas, an elementary school, and neighborhood commercial uses;
- Incorporation of sustainable design features into the Pulelehua community to minimize impacts and conserve non-renewable resources;

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- Promotion of walkability and healthy lifestyles; and
- Wages, taxes, and overall positive economic impacts of the community.

1.9.9 Unresolved Issues

Unresolved issues include:

- Final agreement on source of potable and non potable water;
- Final agreement of waste water treatment;
- Final agreement of internal street sections;
- Final agreement of street connections to Honoapi'ilani Highway;
- Final Affordable Housing Agreement with the County of Maui;
- Final resolution on inclusion of hospital facilities; and
- Potential impact of previous chemicals and fertilizers use on the site.

See Section 7.5 for discussion of these unresolved issues.

PULELEHUA DESCRIPTION



2.0 PULELEHUA DESCRIPTION

This section provides background information and a general description of the Pulelehua Community, and discusses the development timetable and preliminary development costs.

2.1 BACKGROUND INFORMATION

2.1.1 Location

The Pulelehua community site is in the Māhinahina region of West Maui between Kā'anapali and Kapalua. It is mauka of Honoapi'ilani Highway between Honoapi'ilani Highway and the Kapalua West Maui Airport (Figure 2). The site is situated across two ahupua'a: Kahana and Māhinahina.

2.1.2 Ownership

Maui Land & Pineapple Company, Inc., owns the Pulelehua community site. The property is identified as TMK: 4-3-01:31 (portion) (Figure 3). Akahale Street, which bisects the site and connects the Kapalua West Maui Airport to Honoapi'ilani Highway, is owned by the State of Hawai'i.

2.1.3 Surrounding Uses

Uses surrounding the Pulelehua community site include the Kapalua West Maui Airport on the mauka boundary; Kahana Ridge, a 240-unit subdivision and Kahana Hui, a 16-lot agricultural subdivision on the north makai boundary; Honoapi'ilani Highway on the furthest makai boundary; and Department of Hawaiian Home Lands (DHHL) property on the south boundary. The area across Honoapi'ilani Highway is fully developed with a mixture of single-family homes and resort condominiums. Residential uses have been considered on the DHHL property.

2.1.4 Description of the Property

The Pulelehua site is an irregularly shaped property of approximately ~~342~~ 310 acres. The site extends upslope from the mauka side of Honoapi'ilani Highway to the makai side of the Kapalua West Maui Airport. The property varies in depth (mauka/makai) from approximately 700 to 2,900 feet and in width (north/south) from about 4,500 to 6,900 feet. The site has approximately 4,800 lineal feet of highway frontage.

The topography of the property ranges from approximately 75 mean sea level (msl) to approximately 240 feet msl, with an average slope of approximately eight percent. While the topography of the site is moderately sloping, there is one large gulch (Māhinahina Gulch) and one shallow gulch (Pōhaku-Kā'anapali Gulch) that bisect the property,

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dividing the site into three distinct areas. Kahanaiki Gulch forms the northern boundary of the property.

Approximately 150 acres of the site are planted in pineapple. The property also contains fallow fields, and agricultural roadways.

Superior views are available from most areas within the Pulelehua community site: looking makai across Honoapiʻilani Highway and existing shoreline residential areas, there are dramatic panoramic views of the Pailolo Channel, Lānaʻi, and Molokaʻi; looking mauka beyond the airport there are views of pineapple fields, mauka forested areas, and the peaks of the West Maui Mountains.

Access to the Pulelehua community site is available directly from Honoapiʻilani Highway via Akahale Street. Akahale Street extends from Honoapiʻilani Highway (at a signalized intersection) through the center of the site to the airport terminal.

2.1.5 State Land Use District

The Pulelehua community site is currently in the State Agricultural district (Figure 4). Maui Land & Pineapple Company Inc., has filed a petition with the State Land Use Commission to reclassify the property to the Urban district.

2.1.6 West Maui Community Plan

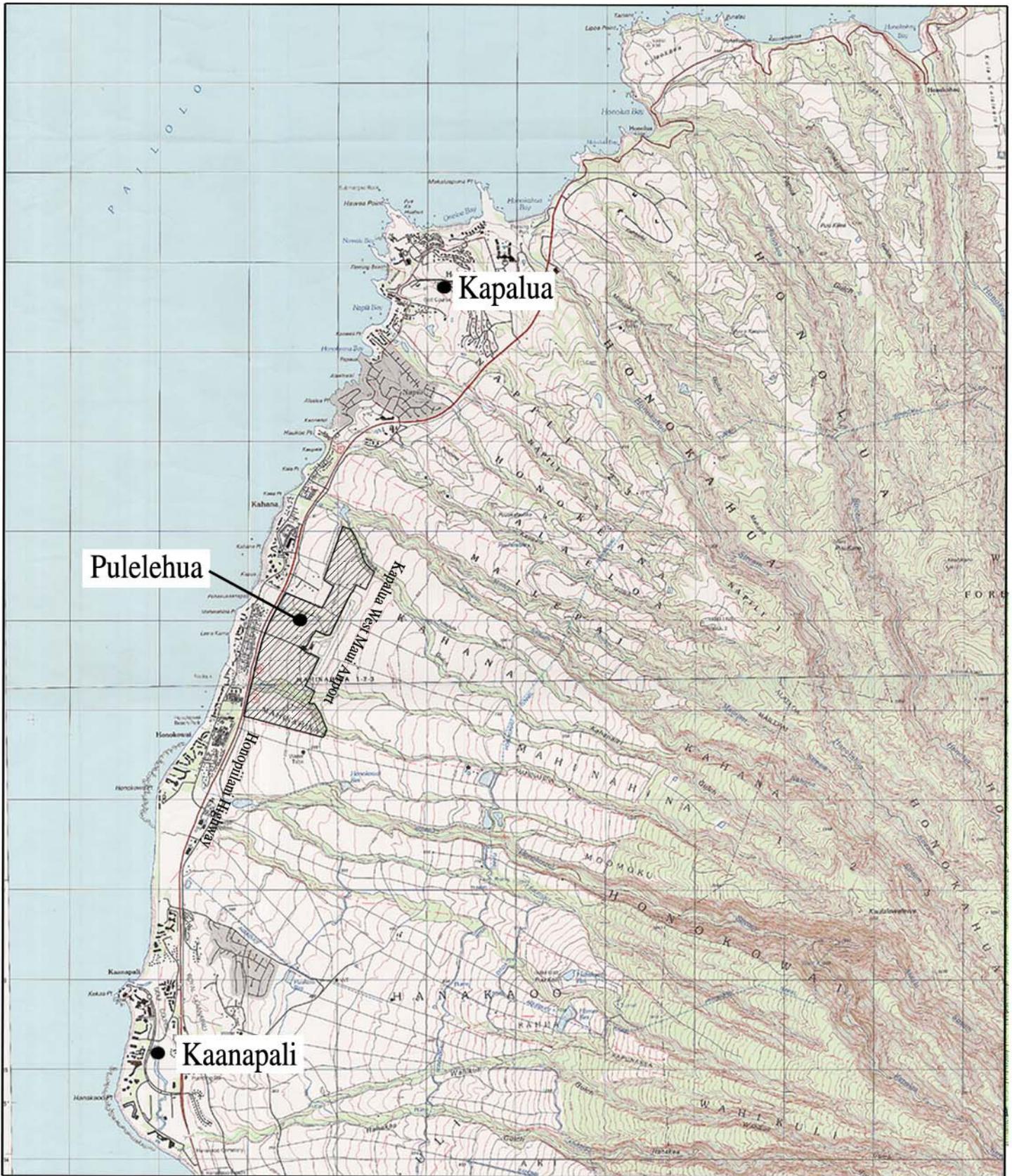
The West Maui Community Plan Land Use Map designates the site as Agricultural, Open Space, and Park (Figure 5). Maui Land & Pineapple Company Inc., is seeking a Community Plan Amendment to designate the property as Project District 5.

2.1.7 County of Maui Zoning

The property is currently within the County Agricultural District (zone). Concurrent with the processing of the community plan amendment, Maui Land & Pineapple Company, Inc., is seeking a Change in Zoning of the property to Project District.

2.2 STATEMENT OF PURPOSE AND NEED

Increasing home prices on Maui have created a situation where most working families cannot afford to purchase a home. The median sales price of a home on Maui was ~~\$612,000~~ \$780,000 in ~~January~~ May 2005, a ~~48~~ 26 percent increase from last year (\$620,000 in May 2004). In Lahaina, the median home price increased even more sharply than the island-wide median: a ~~39~~ 59 percent increase from ~~\$509,500~~ \$615,000 in ~~January~~ May 2004 to ~~\$710,000~~ \$975,000 in ~~January~~ May 2005. These recent increases in median home prices are even more significant considering that in 2000 the island-wide



Pulelehua

Kapalua

Kaanapali

Legend

 Pulelehua

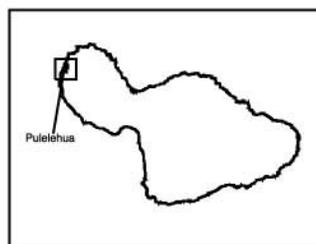


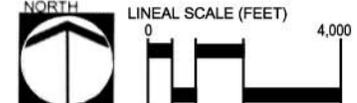
Figure 2
Regional Location
Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. ISLAND OF MAUI

NORTH

LINEAL SCALE (FEET)

0 4,000



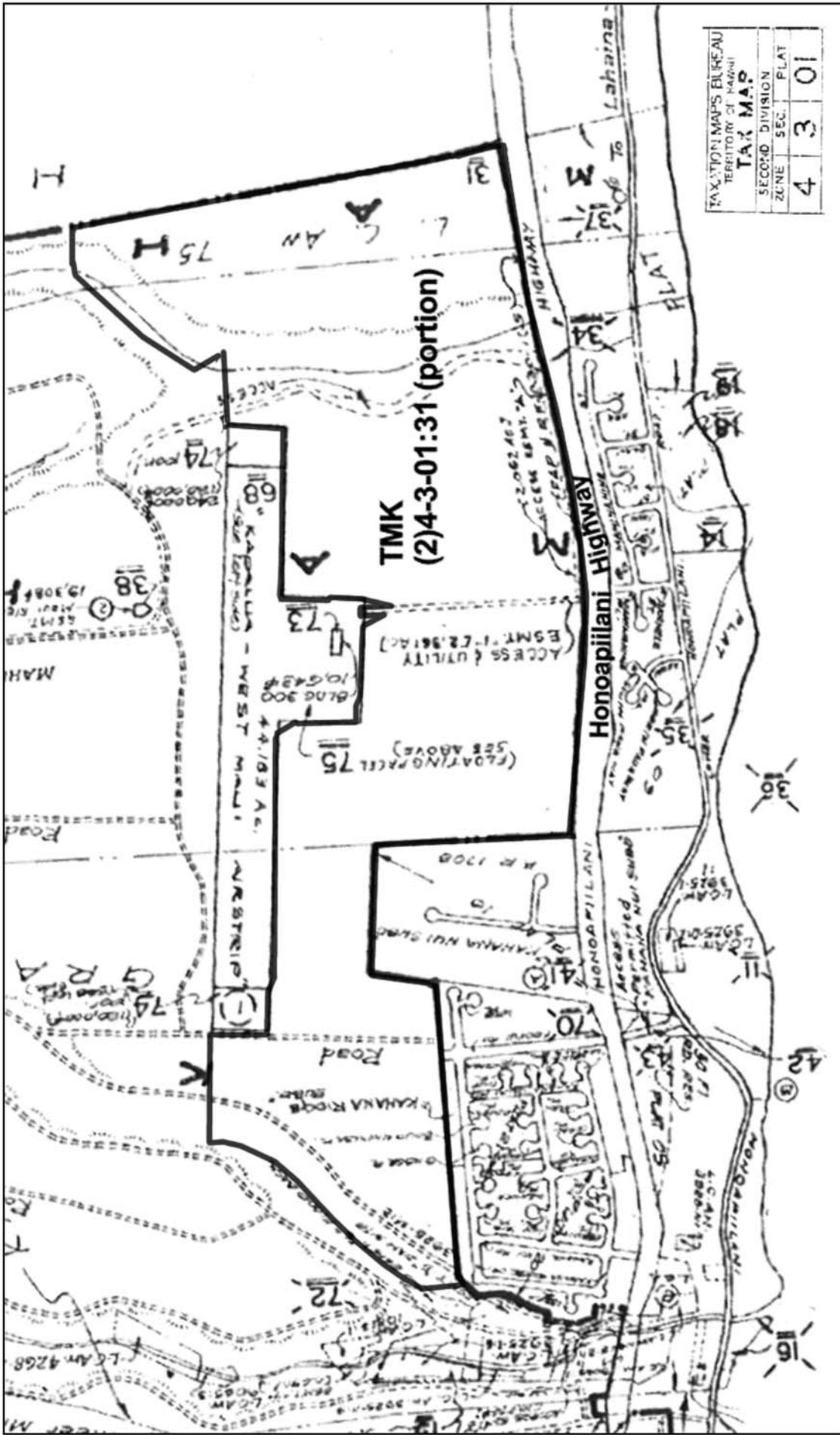



Figure 3
TMK Map

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

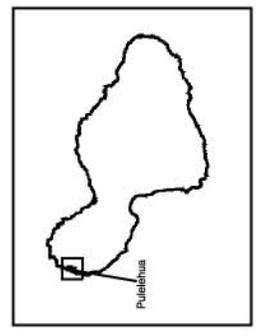
ISLAND OF MAUI



NORTH

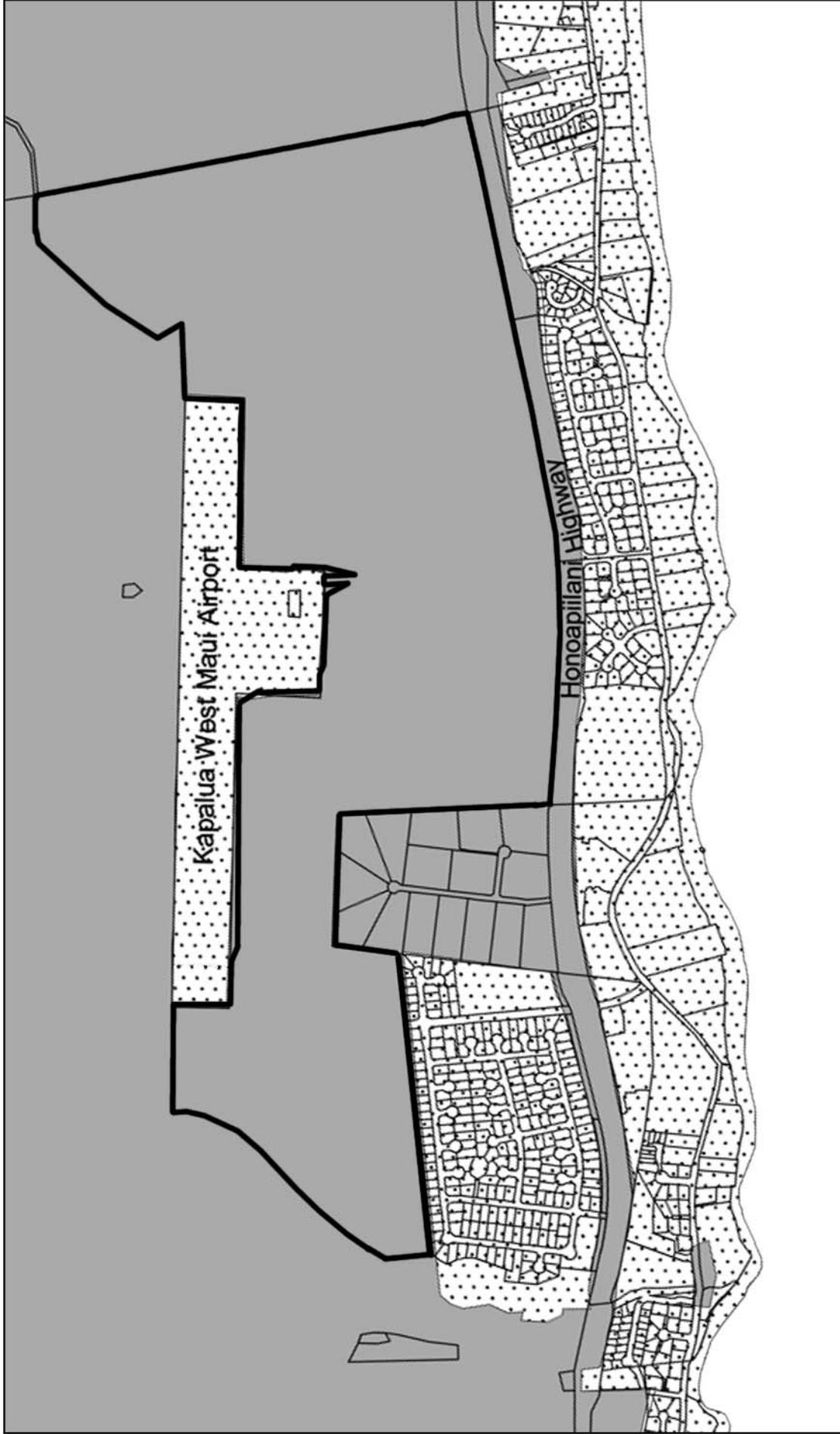
LINEAL SCALE (FEET)

0 1,000



Legend

Pulelehua Boundary

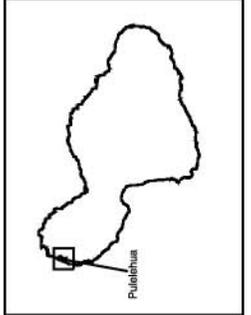


Legend

- Pulelehua Boundary
- Urban District
- Agricultural District

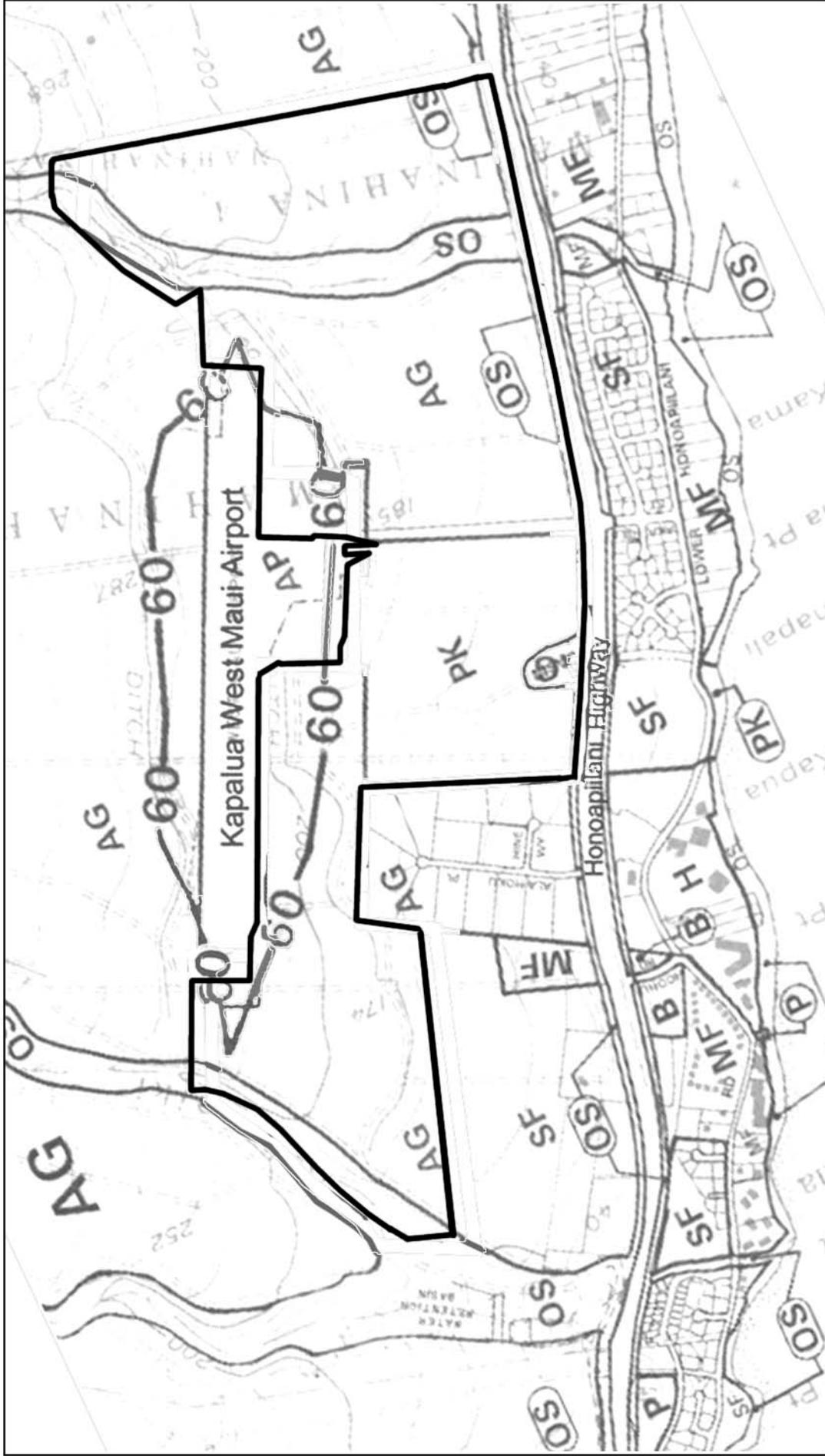
Source: State Land Use Commission

Figure 4
State Land Use Districts
Pulelehua
MAUI LAND & PINEAPPLE COMPANY, INC.



ISLAND OF MAUI
NORTH
LINEAL SCALE (FEET)
0 1,000





Legend

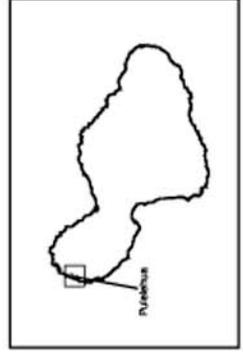
	Pulelehua Boundary		Park
	Agricultural		Public/Quasi-Public
	Airport		Business/Commercial
	Single Family Residential		Hotel
	Multi-Family Residential		Airport Special Control District
	Open Space		

Figure 5
Community Plan

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. ISLAND OF MAUI

LINEAL SCALE (FEET)



Source: Maui County

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median price of a home was \$275,000, and the Lahaina median price was \$260,000 (Realtors Association of Maui, Inc. 2005).

Maui's population is also growing, which naturally creates a demand for housing. Projections commissioned by the Maui Planning Department and calculated by SMS Research (SMS 2002) indicate that the Maui County population will increase from 139,573 people in 2005 to 175,136 people in 2020, a 25.5 percent increase. In West Maui, the population is expected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

With the increase in West Maui's population, forecasts of housing demand estimate a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the 2005 Housing and Urban Development (HUD) figures for the County of Maui.

In the past few years, housing development has not kept up to meet West Maui's population growth. Recent developments have included Kahana Ridge of 240 units, Kahana Villas of 117 units, Nāpili Villas of 184 units, Kāpua Village of 45 units, and various small luxury developments.

With the lack of housing development and increase in the population, Maui continues to have a housing shortage. According to John Stephens, president of the Realtors' Association of Maui, "There is a shortage of housing in all sectors, not just affordable housing" (quoted in Eager 2005). One of the factors for increasing housing prices is the lack of either new or older homes for sale (Eager 2005).

In recent years, various landowners and developers have proposed several major new housing projects in West Maui. These include Kā'anapali 2020, Waine'e Village, Pu'unoa, The Villages of Leiali'i, Kapalua Mauka, and homes on the DHHL Honokōwai property. Other smaller projects are also proposed. These projects are in various stages of the planning and permitting process, but it is unlikely all will proceed or be built as currently proposed. For example the Pu'unoa project has been rejected twice by the Maui County Council, approvals for Kā'anapali 2020 are likely to take many more years, and the Villages of Leiali'i has been tied up in a legal dispute for over 10 years, although an agreement was recently reached to allow DHHL to provide 104 homes on the site.

Pulelehua will help to satisfy the demand for housing by providing 882 homes in West Maui. At least 51 percent of the Pulelehua homes will be affordable to families making between 50 to 140 percent of the median income. Other Pulelehua homes will help to satisfy the demand for ~~other moderate~~ "gap" group and market segments, and are expected to be within the range of comparable homes in West Maui.

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While Pulelehua will help fill a critical need for affordable housing in West Maui, it will also be a complete community with a school, parks, trails, neighborhood commercial establishments, and civic uses, all in close proximity to each other. These elements are critical to Pulelehua as they will provide necessary services to residents and contribute to the creation of a real, vibrant community with many services and amenities within walking distance.

The marketing study prepared for Pulelehua (Hallstrom 2005) concludes that Pulelehua's neighborhood commercial uses are essential to the community and can be supported by Pulelehua's residents. Section 4.8.3 of this EIS discusses the neighborhood commercial uses in more detail. Appendix A contains the complete marketing study.

2.2.1 Historical Perspective

The idea for Pulelehua began in January of 2004 when Mayor Arakawa approached Maui Land & Pineapple Company, Inc., to help solve the affordable housing crisis in West Maui. Recognizing the critical need for affordable housing, Maui, Maui Land & Pineapple Company, Inc., then began considering sites for a new community on its West Maui property. The area makai of the Kapalua West Maui airport was chosen for its proximity between the major resort employment centers of Kapalua and Kā'anapali, and access to infrastructure.

To ensure the community had input in the planning process, Maui Land & Pineapple Company, Inc., selected nationally recognized town planners Dover, Kohl & Partners to partner with West Maui citizens to design a community that would be both affordable and meet the same high standards for quality as established at their Kapalua Resort. The new community would be called Pulelehua, which means butterfly in Hawaiian, and is a reference to Kapalua's famous logo of a butterfly with a pineapple in the center. This logo is in itself a reference to Maui Land & Pineapple Company, Inc.'s heritage as a pineapple plantation.

2.2.2 ~~2.2.1~~ Statement of Objectives

The objectives of Pulelehua are rooted in Maui Land & Pineapple Company Inc.'s desire to create and manage holistic communities that build a sustainable future for Maui.

Holistic communities first respect and foster an authentic sense of place and inspire community. Second, they generate a strong sense of belonging and inclusiveness. Third, holistic communities preserve surrounding agricultural land and create significant open space and trail systems.

Maui Land & Pineapple Company Inc.'s vision to create holistic communities is based on four cornerstones: authenticity, inclusiveness, sustainability, and eco-sensitivity; which will create a firm foundation for Pulelehua. These cornerstones make Pulelehua a unique

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and an important model for meeting the challenge of balancing Maui's present growth and future health.

Authenticity to our island's unique architecture and cultural history will be reflected in Pulelehua's buildings and sense of place. Inclusiveness is part of Pulelehua at the most basic level—community involvement in the planning process and the inclusion of both affordable, moderate, and market rate homes and rental units for the working families of Maui, and specifically for those who work in West Maui. Sustainability will be incorporated into all energy and water consumption within the community, ensuring that Pulelehua does not undermine our island's health. Finally, eco-sensitivity will support the community's preservation of open space and the design of a walkable, bike-able town with an extensive trail system.

Holistic communities provide a vital and sustaining life experience. They increase quality of life by enabling people to live close to work, and thereby decrease time lost during a daily commute, decrease traffic congestion, reduce stress, provide for more family and recreation time, and lessen pollution. Holistic communities also offer residents the opportunity to meet many of their needs—including shopping, education, fitness, and civic participation—within the community. The physical layout encourages residents to walk or bike to stores, school, and recreation, thus reducing dependence on cars.

As a holistic community, the objectives of Pulelehua are to:

- Create a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
- Provide affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
- Create "affordable housing with dignity," by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable "project";
- Provide homes near employment centers, thereby increasing quality of life by decreasing commuting;
- Create genuine neighborhoods by design; places where residents can walk and interact with their neighbors;
- Create traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities;
- Contribute to the social infrastructure by including a new State DOE Elementary School;
- Incorporate eco-efficient design;
- Build a community that preserves surrounding agricultural land and creates significant open space and trail systems; and
- Encourage modes of travel other than cars as means of traversing through and to the community.

2.3 THE VISION

The vision for Pulelehua is that of a holistic community based on the traditional Hawaiian concept of the *ahupua'a*—a section of land stretching from the summit of the mountains, down through the fertile valley lands, and ending at the sea. Within each *ahupua'a* grew most of the products needed by the people who lived and worked there. The *ahupua'a* was managed as a complete ecological, social, and economic system. The people of the *ahupua'a* understood the limits of its resources and their complex interrelationships.

Holistic communities respect Hawai'i's natural beauty and fragile ecosystems—and work to protect our exquisite places in perpetuity. This is demonstrated in the traditional Hawaiian value of *mālama'āina*—caring for, protecting and preserving the land. Maui Land & Pineapple Company, Inc., has pledged to continue to engage in responsible stewardship of the environment, and Pulelehua is an important part of this philosophy.

Land stewardship includes making critical decisions to determine where land can be developed, and where it is essential to preserve open space. While the vast majority of Maui Land & Pineapple Company, Inc.'s land holdings will remain in agriculture or preserved open space, Pulelehua will serve a critical function—to provide affordable housing within close proximity to the working families in West Maui. Providing the opportunity for people to live close to where they work is an important feature of sustainable design—increasing quality of life by decreasing time lost during the daily commute and decreasing traffic congestion.

During the planning workshops for Pulelehua, several planning ideals emerged from the community that fit with the ideas of holistic communities; these became the “First Principles” that guided the work of the design team:

- ***A Compact, Sustainable Community***
Create genuine neighborhoods, not just subdivisions. Genuine neighborhoods contain a mix of uses and housing types, accommodating a wide variety of people and activities. A compact community respects the land on which it is placed, protecting and restoring natural amenities within and around the town.
- ***Affordable Housing with Dignity***
Provide a variety of affordable housing options, integrated into complete neighborhoods. Include a wide variety of street-oriented, privacy-protecting buildings. Integrate density into the neighborhoods with careful urban design.
- ***Mixed Uses for Livability***
Include neighborhood-serving commerce and live/work units, but without any of the typical "strip shopping centers."

- ***True Hawai'i***
Value traditional Hawaiian architecture, the landscape, the climate, important views, outdoor life, and the principal of *mālama'āina* - and design with these issues in mind.
- ***Connectedness***
Incorporate networks of green space, streets and trails into the neighborhood, allowing multiple types of circulation. Encourage people-to-people contact through the architecture and urban design by creating high quality public buildings and spaces, houses with porches, parks, streets and sidewalks for all to enjoy.
- ***Make it Walkable & Bike-able***
The design of the streets and destinations located along them determine how they will be used; make great streets, not just ordinary ones, and people will use them for more than just driving.

2.4 THE COMMUNITY PLANNING PROCESS

The week of March 19 - 26, 2004, West Maui residents joined together with Maui Land & Pineapple Company, Inc., and a team of town planners, designers, and engineers to create a plan for a new community near the Kapalua West Maui Airport. This planning effort was initiated to create affordable housing in West Maui, so that people who work in the area can also afford to live there.

The idea for the Pulelehua community has enjoyed support from the beginning from many in the community, including West Maui employees and residents, Mayor Alan Arakawa, and Maui County Planning Director Mike Foley. Having a high level of community involvement in the planning process was a top priority, to ensure that the plan reflected the needs and wants of people who live and work in the area. Led by the town planning firm of Dover, Kohl & Partners, the design team conducted a week-long series of planning workshops to create a vision for the site. Over 10,000 fliers inviting people to attend the workshops were distributed in local newspaper and by direct mail. The planning workshops also were promoted throughout the month of March 2004 on the radio, inviting anyone who was interested to attend.

The design team began with an analysis of the site, located mauka of Honoapi'ilani Highway, and roughly bounded by Kahanaiki Gulch to the north and Māhinahina Gulch to the south. The team walked and drove over the entire site, noting important views and topographical features. The team then toured the surrounding neighborhoods, becoming familiar with the existing roadways, houses, and shops in the area. The team also researched traditional Hawai'i towns and architecture, studying Lahaina, Lāna'i City, and other towns; specific elements that make these settlements memorable were noted, such as the lanais and porches, the relationships of buildings to the streets, and the quality of public open spaces.

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On Friday, March 19, 2004, a community kick-off presentation was held at the Ritz-Carlton Kapalua. This event informed the public about the upcoming planning events, and how they could be involved in the process. The night began with introductions by Mayor Alan Arakawa, Maui County Planning Director Mike Foley, and Maui Land & Pineapple Company, Inc.'s Bob McNatt, encouraging the crowd of approximately 250 to continue participating in the planning process. Victor Dover, town planner and head of the design team, gave a presentation about traditional neighborhood design, and transportation planner Rick Hall followed with a presentation about walkable, pedestrian-friendly design. Toward the end of the evening, an open microphone session was held, to allow those in attendance the chance to speak out about what was on their mind and ask questions.

On Saturday, March 20, 2004, an interactive hands-on design session allowed approximately 100 participants to share their ideas in the design of the new community. Community members worked together with facilitators from the design team in small groups, drawing ideas on large maps of the site. Discussions involved desired land uses, activities, services, and physical characteristics for the new community. At the end of the design session, one member from each table presented their work to the entire group. A general consensus emerged quickly; some of the most widely shared ideas were:

- Provide high quality affordable housing for the workers of West Maui, to allow people to live near where they work.
- Include a mix of housing types to accommodate residents of different backgrounds, ages, and incomes.
- Reflect Hawaiian building traditions with native landscaping, island architecture, and common open spaces for community gathering and recreation.
- Provide needed amenities for West Maui residents, such as a community/cultural center, an elementary school, and a network of open spaces and trails.
- Create pedestrian-friendly streets to promote walkability to destinations within the neighborhood.

Following the hands-on session, the design team set up an on-site studio for the week at Nāpili Plaza, to synthesize the many ideas heard into one cohesive vision for the site. West Maui citizens were invited to stop by to check the progress of the plan and continue to offer input. The table drawings from the Saturday session were placed around the room for citizens to review what their fellow community members had in mind for the neighborhood. Throughout the week, technical meetings were held with representatives of various government agencies, including the Maui County Departments of Planning, Public Works, the Affordable Housing Technical Review Committee, and the Maui Office of the State of Hawai'i Department of Transportation (DOT).

On Tuesday, March 23, 2004, a Community Open House was held at the design studio, to review the preliminary plans and sketches for Pulelehua. Approximately 100 residents

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reviewed the work that had been produced to date. The design team spoke with the attendees and listened to their ideas and concerns, then incorporated what was learned into the evolving plan.

On Friday, March 26, 2004, a Work-In-Progress presentation was held at the Ritz-Carlton Kapalua. David Cole, CEO of Maui Land & Pineapple Company, Inc., began the event by welcoming the approximately 180 attendees, and gave a brief introduction about the new direction of Maui Land & Pineapple Company, Inc., and how Pulelehua fits within that vision. He then introduced Victor Dover, who presented the preliminary ideas and drawings that had been produced over the previous week. The "First Principles" that guided the design of the site reflected the ideas heard at the hands-on session, including "affordable housing with dignity," "mixed uses for livability," and "true Hawai'i." Plans and visualizations conveyed these principles in a physical form.

After the presentation, people gathered around maps of the plan that had been posted in the room, and spoke with members of the design team. Initial feedback was generally positive. Lee Altenberg, University of Hawai'i professor and attendee that evening, was quoted in the *Maui News* (Eagar 2004) saying, "This is the most concentrated collection of intelligent ideas I've heard since I came to Maui nine years ago."

Since the planning workshops in March 2004, the design team continued refining the details of the plan and public involvement in the planning and approvals process continued through the use of a web page, newsletters and letters to the editor requesting continued public participation in the creation of Pulelehua. Through this on-going process, over ~~2,000~~ 2,700 people interested in Pulelehua have contacted Maui Land & Pineapple Company, Inc. This public involvement demonstrates the need for Pulelehua to move forward and ensures that Maui residents get the high quality, affordable, and attractive neighborhoods that they deserve.

In addition to receiving input from the community, Maui Land & Pineapple Company, Inc., has worked diligently with Federal, State, and County agencies for over a year to make Pulelehua a reality. This has included meetings open to the public, such as meetings with the County of Maui Affordable Housing Technical Review Committee, ~~and~~ the Maui Economic Opportunity Housing Task Force, the Cultural Resources Commission, and the Urban Design Review Board, as well as a workshop meetings with the Maui County Council Housing & Human Concerns Committee and the Maui Planning Commission. Chapter 8 contains a list of Federal, State, and County agencies, and individuals, private companies, and community organizations, contacted in the process of planning Pulelehua.

2.5 NO FUTURE PHASES

At this time, Maui Land & Pineapple Company, Inc., has no intention on planning, engineering, or constructing any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

In an effort to evaluate all options and gauge community response and support, Maui Land & Pineapple included the entire portion of land around the Kapalua West Maui Airport for discussion at the community planning charrette in March 2004. During the course of the charrette many individuals did voice support for a large multi-phased project that would address the overwhelming demand for affordable, moderate, and market rate homes in West Maui.

As research was conducted and the planning evolved, Maui Land & Pineapple Company, Inc., decided to develop Pulelehua as single phase property of ~~312~~ 310 acres (including open space and gulches) comprised of 882 residential units with 51 percent being made up of affordable units. This decision formed the basis of this environmental impact statement, the ensuing studies, and preparation of plans and development standards.

Pulelehua will be entirely engineered, and all improvements will be developed and constructed, at one time. Based on available labor, material delivery issues and market absorption rates, the development, construction, and sale of all units will take ~~place over several years~~ less than a ten year period.

2.6 THE PULELEHUA COMMUNITY

2.6.1 Traditional Neighborhood Design Principles

The design of Pulelehua is based on Traditional Neighborhood Design (TND) concepts, which are being incorporated into new communities across the mainland and in many parts of the world. TND communities are an alternative to conventional suburban sprawl, and have been well received and enthusiastically embraced in many areas as a way to reduce congestion, preserve open space, restore a sense of place, and create vibrant communities.

Three principles of TND communities on which Pulelehua was based are explained below. These concepts were presented at the Pulelehua design charrette in March of 2004 and were well received by many of the participants.

- **The Region and Town**

The region is the overall context for all planning. Towns within a region need a comprehensive strategy to prosper. Each town should have both homes—for people of all incomes—and nearby jobs, so residents aren't forced to travel far to work. Each town also needs a discrete sense of place. Towns and cities within a

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region should have clear boundaries, contributing to a sense of place. The land between towns should be preserved as open space.

Town centers, individual neighborhoods, and community edges each have their own building densities, street sizes, and appropriate mixtures of retail, residential, and other functions. The highest densities and most intense mix of uses are typically found in town centers; lower densities are found at the edge. The compact development in the neighborhood center allows for more open space to be preserved along the edge, increasing quality of life for all residents.

- ***The Neighborhood, the District, and the Corridor***

Diverse, walkable neighborhoods are what distinguish TND communities from other development styles. Each neighborhood has a center and an edge. The center should be a public space, whether a square, a green, or an important intersection. The optimal size of a neighborhood is a quarter-mile from center to edge. Most people will walk a distance of approximately a quarter-mile before turning back or opting to drive or bicycle instead of walking. This dimension is consistent in the way people have created settlements for centuries. For a neighborhood to feel walkable, many daily needs should be supplied within this five-minute walk. That includes not only homes, but stores, workplaces, schools, houses of worship, and recreational areas.

Neighborhoods traditionally have a mix of uses and types of buildings. A variety of building types allows for diverse lifestyle options and incomes to live in the same neighborhood. For example, in a shopfront building, the business owner can live above his or her shop, or rent the upper floor as an office or apartment. Nearby, terrace homes and cottages can be intermingled with larger detached homes. The mix of uses also allows for more efficient use of parking spaces. Parking spaces in the town center can be used by business patrons or workers during the day, and residents of upper floor apartments at night; separate spaces for each use are not usually required.

- ***The Block, the Street, and the Building***

If there is one thing that reduces the livability of most conventional subdivisions, it is the fact that streets do not feel like pleasant, shared spaces. In TND communities, neighborhoods have a network of streets designed so that pedestrians, bicyclists, and motorists can move safely and comfortably through the neighborhood. Multiple options for travel through the street network allow traffic to disperse through the neighborhood, avoiding traffic problems on one particular street.

To make streets feel safe, buildings must be oriented to have doors, windows, and front porches facing the street, creating natural surveillance for pedestrian activity by the building occupants. Blocks that include alleys allow parking to be accessed

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along the rear of each lot, reducing the number of curb cuts along the sidewalk, which enhances the pedestrian experience. On-street parking and street trees, located between the sidewalk and moving vehicular lanes, provide another layer of comfort for pedestrians. The configurations of great streets consistently provide a high-caliber experience for pedestrians as a baseline obligation, and go on from there to accommodate all other required modes of travel.

2.6.2 Pulelehua Description

The site chosen for the Pulelehua community presents many unique opportunities. The gentle slope of the land provides exceptional views from many vantage points; remarkable gulches form natural divisions for neighborhoods and can be preserved as amenities for future residents; natural features such as the topography, wind direction, and the sun angle can be used to inform the designers of ways to organize the orientation of new buildings and streets. Figure 6 contains photographs of the Pulelehua community site.

Within the plan for Pulelehua (Figure 1) there are three distinct neighborhoods proposed, each with its own individual character. The central neighborhood, anchored by Akahele Street, will be a complete neighborhood unit with a mix of uses including Pulelehua-serving retail, public uses including an elementary school and a Wellness Center, open space and recreation spaces, and a variety of residential options. The uses and building types are to be organized with the most intense and closely spaced uses (commercial and higher density) in the central area, with less intense uses (single-family homes and less density) toward the edges.

The central neighborhood is to include a main street area, consisting of shop front buildings with apartments above, and live/work units. At one end of the main street will be a Wellness Center overlooking a long terracing green that leads back to the highway. At the other end of the main street is the proposed site for the elementary school—healthy living and education will provide the anchors for the neighborhood. Near the airport, more commercial, "workplace edge" areas will provide options for residents to live and work in the community.

A range of housing types will complete this area; attached homes would be found near the neighborhood center, allowing privacy and homeownership in a compact, affordable form. Single-family homes in the form of cottages, terrace homes, or apartment buildings are some of the building types that would be found in the neighborhood general area—between the center and edge. Farther away, moderately sized single-family homes can be found. Larger single-family lots would be found along the outer edge, completing a variety of housing types and price options.

All of the buildings in the neighborhood will reflect traditional Hawaiian architecture; inspiration in their design was drawn from the work of architect Charles Dickey and from traditional settlements such as Lahaina, Wailuku, and Lānaʻi City. Houses located along



1. Much of the Pulelehua site consists of fallow pineapple fields. The central Pulelehua neighborhood is proposed for this area. Akahele Street is on the left, Molokai is in the distance, across the Pailolo Channel.



2. Akahele Street runs through the Pulelehua site and connects the Kapalua West Maui Airport to Honoapiilani Highway.



Key Map

Figure 6a

Site Photographs

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. Island of Maui



3. Fallow fields, Mahinahina Gulch, and views of Lanai (left) and Molokai (right).



4. A row of Ironwood trees separates the Pulelehua community site from Honoapiilani Highway.



5. A view into Mahinahina Gulch.



Key Map

Figure 6b

Site Photographs

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. Island of Maui



6. The north portion of the Pulelehua site is still in pineapple cultivation. The Kahana Ridge subdivision borders the property in this area.



7. Cultivated fields transition into to fallow fields. The airport termial is seen on the left, Lanai in the distace, and a house within the neighboring Kahana Hui subdivision is on the left.



Key Map

Figure 6c

Site Photographs

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. Island of Maui

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streets that run mauka-makai will frame vistas to the water and the islands of Moloka'i and Lāna'i. These views can be enjoyed by pedestrians, bicyclists, and motorists on the streets, as well as residents on their front or side lanais.

Other new neighborhoods are to be located to the north (Kahanaiki) and south (Māhinahina), separated from the central neighborhood by preserved gulches; these are to have a different, predominantly residential character. Kahanaiki, the north neighborhood, will include park space that can be shared with the Kahana Ridge subdivision and a network of walkable streets and trails to connect residents to other areas of the Pulelehua community. The park space of the Kahanaiki neighborhood will include a wide buffer area adjacent to the Kahana Ridge subdivision. This buffer area will be maintained by the Pulelehua Home Owners' Association (or other entity as established to maintain Pulelehua's network of open space). Near the airport a an additional green buffer area is ~~to~~ will be created.

Māhinahina, the south neighborhood, will contain houses and possibly a medical facility to become an interconnected part of the complete community. Opportunities exist to link with neighboring DHHL property.

Circulation through the new neighborhoods was an important consideration during the design process. Vehicular circulation is to occur along a network of interconnected streets to disperse traffic throughout the neighborhood. There are to be multiple connections to Honoapi'ilani Highway to allow a series of options to enter and exit the neighborhoods. Not all of these connections would have traffic signals, and those that do would have timed lights, to keep traffic flowing along the highway.

Pedestrian circulation, as well as vehicular circulation, was given a high priority by the designers. Neighborhood streets will be designed for lower vehicle speeds, with appropriately narrow lanes, sidewalks, street trees, and buildings close to the street. A system of alleyways are included to move parking pads, car ports or garages, solid waste removal and utility equipment to the rear of the properties. A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood. These paths and trails will run through a strategically located network of green spaces and exterior greenbelt that will make the neighborhoods livable for residents.

Appendix B contains the Pulelehua Design Book, which contains additional Pulelehua planning, design, and building details, including renderings and conceptual floor plans.

2.6.3 ~~2.6.1~~ Land Use Summary

The holistic concept of Pulelehua provides for a complete community in a compact area. Of the total Pulelehua community site of approximately ~~312~~ 310 acres, about 31 percent (97 acres) of the community will be used for homes and other built uses. Community

recreation areas, neighborhood parks, and open space will encompass approximately ~~34~~ 32 percent (98 acres) of the community. A public elementary school with playgrounds and fields will be provided on approximately four percent (13 acres) of the site. Other areas will include rights of way (21 percent or 66 acres) and the deep gulches (10 percent or 32 acres). Figure 7 shows the spatial allocation of land uses.

2.6.4 ~~2.6.2~~ Building Types

The design, placement, and uses of homes and buildings are a key element of the traditional neighborhood design of Pulelehua. The various types and uses of buildings within Pulelehua include:

- ***Main Street***
The basic unit of a traditional mixed use street. Main Street buildings primarily contain commercial uses on the ground floor and may contain commercial uses, offices, or dwellings on upper floors. Examples of uses include general stores, restaurants, bakeries, professional offices, drugstores, and other neighborhood-serving uses. Approximately 21,475 square feet of Main Street retail space is proposed.
- ***Live/Work***
Buildings intended for offices or workshops, minor repairs, and storage and distribution uses. Approximately 20,300 square feet of Workplace Edge/Loft space is proposed.
- ***Apartment***
A large house subdivided into two or more complete, separate dwelling units.
- ***Terrace House***
A single dwelling unit located at the front of its lot; buildings are typically narrow and may be attached to neighboring units.
- ***Sideyard/Cottage House***
A single dwelling unit located at the front and one side of its lot, with a side lanai facing the side yard.
- ***Front Lanai***
A single dwelling unit with a front lanai or stoop, with yard on all four sides, suited to medium-sized lots.
- ***Estate House***
A single dwelling unit with yards on all four sides, suited to larger lots.



Legend

	Lots	97 Acres (31%)
	School	13 Acres (4%)
	Open Space	77 Acres (25%)
	Community / Recreation Park	21 Acres (7%)
	Neighborhood Park	6 Acres (2%)
	Gulch	32 Acres (10%)
	Right of Way	66 Acres (21%)
Total		312 Acres (100%)

Figure 7
Land Use
Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



LINEAL SCALE (FEET)



Town Plan by:
DOVER, KOHL & PARTNERS
town planning



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- **Ohana (potential)**

An attached or detached dwelling unit that is accessory, incidental or subordinate in size and character to a principal building situated on the same lot or parcel, with a maximum of 625 to 800 square feet of living area, depending on lot type and district zone. Ohana units will be built at the discretion of individual owners.

The provision for potential ohana units will contribute to furthering affordability within Pulelehua. Ohana units will allow families to add living areas for family members or provide additional income if rented. In the true meaning of “ohana,” it is envisioned that Pulelehua’s ohana units will allow a family to provide living space for aging parents or allow children to live separately as they become adults and seek an affordable place of their own. If rented, ohana units can increase affordability by providing an owner with additional income to help pay the mortgage or other needs. In addition, if rented, it is envisioned that the small size of the ohana units will keep rent prices reasonable and affordable, thereby providing another source of affordable housing in West Maui.

Figure 8 shows the distribution of buildings/lot types within Pulelehua. Bed and breakfast uses, transient vacation rentals, and timeshare or other vacation rental or ownership plans will be prohibited within Pulelehua.

Table 1 shows the proposed number of homes in Pulelehua and the estimated square feet of retail and other commercial uses that could be built under the Pulelehua plan.

Table 1: Pulelehua Home Count and Maximum Square Footage

Pulelehua - Home Count (based on Conceptual Lot Layout)				
Home Type	Neighborhood			Total
	Central	Kahanaiki	Māhinahina	
Main Street	20	0	0	20
Live/Work	22	21	0	43
Apartment	77	31	43	151
Terrace House	74	17	44	135
Sideyard/ Cottage House	144	73	49	266
Front Lanai	101	57	86	244
Estate House	0	17	6	23
Total Homes	438	216	228	882
Potential Ohana units	101	74	92	267
Total Homes w/ Ohana	539	290	320	1149
Civic Lots	4	2	1	7
Maximum Square Footage (based on Conceptual Lot Layout)				
Use	Sq. Ft.	Formula to Calculate		
Retail (in main street buildings)	21,475	frontage x 40' depth		
Specialty Retail/Office (in live/work)	54,000	frontage x 90% x 40' depth		
Workplace Edge	20,300	frontage x 80% x 35' depth		

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As a true mixed-use community, the estimated square feet shown in the above table for retail and other commercial uses is based on the maximum square feet that could be provided in specific transect zones and specific lot types provided in the plan. The flexibility of the plan allows for varied uses over time, so that not all retail and other commercial area may be built, or that uses may change over time to meet the needs of the community and specific building owners. With this flexibility a residential building could eventually provide formal office space for a home business or, for example, a first floor could be converted to retail or other commercial use, with the second floor continuing as residential.

2.6.5 ~~2.6.3~~ Parking

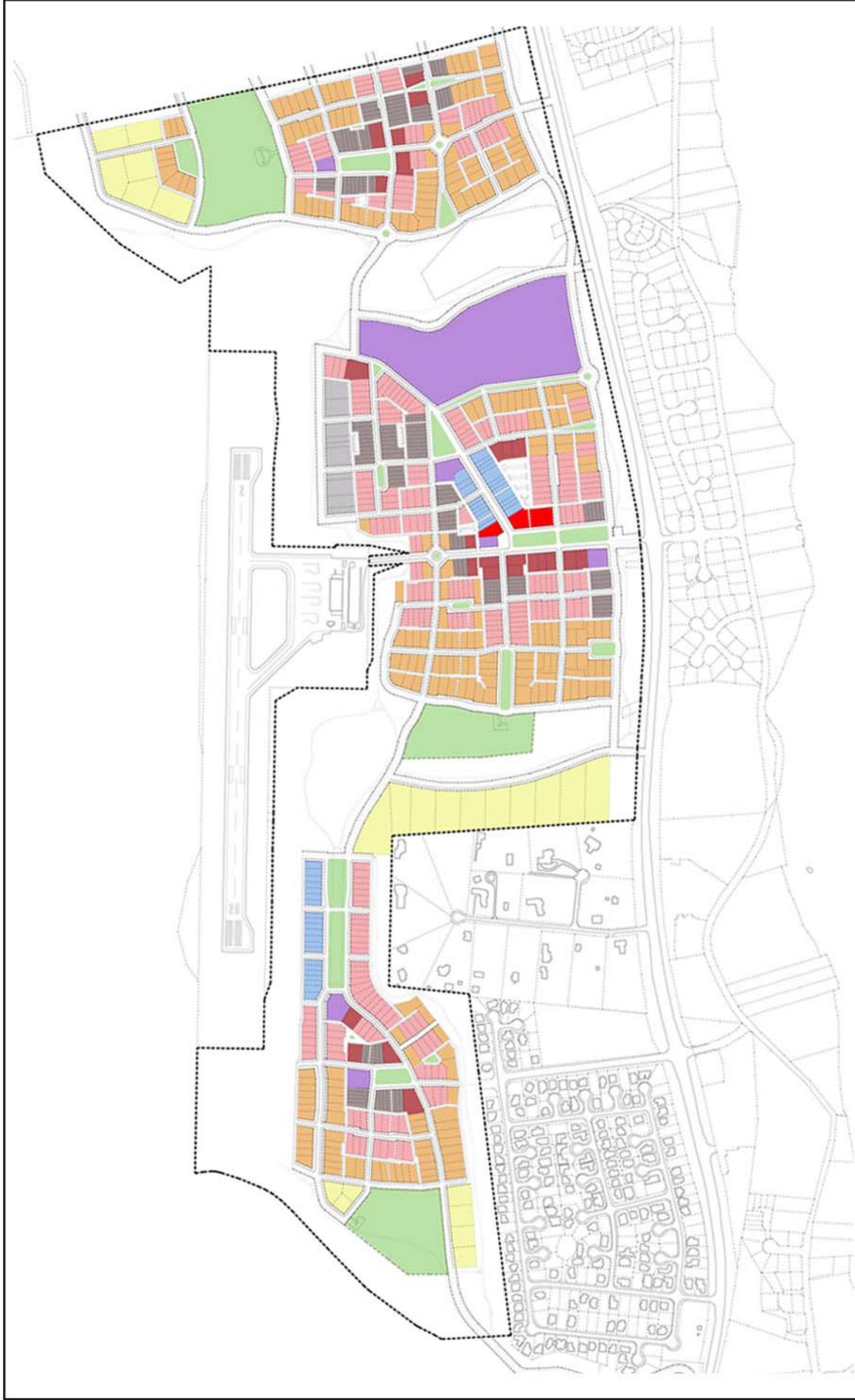
The Pulelehua Development Standards call for parking regulations that encourage a balance between compact pedestrian oriented development and necessary car storage. The proposed mixed-use land pattern within Pulelehua fosters more pedestrian trips and fewer automobile trips than other more automobile dependant commercial districts in Maui County. As such, parking requirements follow the Wailuku Redevelopment Code. The Wailuku Redevelopment Code provides for a 30 percent reduction in standard parking requirements for commercial uses because of the walkability of downtown Wailuku.

In Pulelehua, residential on-site parking shall be located in the rear, accessed by an alley. Parking spaces located on-street and in commonly-owned lots may be used to meet commercial parking requirements. Also, on-street parking and commonly-owned lots will share joint-use of required parking spaces where two or more uses on the same site are able to jointly use the same parking spaces because their demands occur at different times.

A thorough parking analysis was completed via lot types and districts: Core, Central, General, Edge, Estate Edge, Workplace Edge (Figures 1 and 8). Within the community, each lot type (apartment, terrace home, side-yard lanai home, etc) will have two parking stalls designated on-site. Homes that permit ohana units are only allowed in General, Edge, and Workplace Edge districts; and must provide for one on-site parking stall for the ohana unit. The General, Edge, and Workplace Edge areas are larger lots and can easily accommodate an ohana unit with an on-site parking stall. At least three parking spaces per lot will be provided within the Core and Central areas. In the Edge, Estate Edge, Workplace Edge locations, at least five parking spaces per lot will be provided.

2.6.6 ~~2.6.4~~ Affordability

Pulelehua will emphasize “affordable housing with dignity” an integrated affordable housing approach by providing a range of affordable homes integrated with market priced homes into complete neighborhoods housing types throughout the community. Affordable homes will not be segregated into fringe neighborhoods or placed in the least



Legend

- Main Street
- Live-Work
- Apartment
- Terrace House
- Sideyard / Lanai Cottage
- Front Lanai
- Estate Edge
- Workplace Edge / Loft
- Civic

Figure 8
Building / Lot Type Distribution

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



Town Plan by:
DOVER, KOHL & PARTNERS
town planning



NOT TO SCALE

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desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low moderate and gap group income Maui residents affordable to families making between 50 to 140 percent of the median income. There will also be approximately 100 moderate-rate (i.e. "gap") homes available for sale.

Pulelehua will provide housing to families earning between 50 and 140 percent of the median-family income on Maui. As of February ~~2004~~ 2005, this figure is ~~\$60,700~~ \$62,350 based on the HUD guidelines for the County of Maui. Based on this February 2005 figure, a family of four earning between ~~\$30,350~~ \$33,950 and ~~\$84,980~~ \$87,290 would qualify for affordable housing.

Based on the ~~2004~~ 2005 HUD guidelines and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than ~~\$187,400~~ \$193,500 if a family earned 50 to 80 percent of the median-family income. If a family earned 81 percent to 100 percent of the median-family income, the price would be set no higher than ~~\$238,000~~ \$245,600 and prices would top out at ~~\$349,200~~ \$359,800 if a family earned 100 percent to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 51 percent of Pulelehua's affordable housing is shown below:

<u>Percentage of Units</u>	<u>Percentage of HUD Median-family Income</u>
10	50 to 80
21	81 to 100
20	101 to 140

~~To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.~~

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;

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5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

<u>Lottery Pool</u>	<u>Preference</u>
<u>A</u>	<u>MLP Employees and subsidiaries</u>
<u>B</u>	<u>Kapalua Nui Partners</u>
<u>C</u>	<u>West Maui residents who are police officers, public school teachers, and firefighters</u>
<u>D</u>	<u>Maui residents who work in West Maui, but do not live in West Maui</u>
<u>E</u>	<u>West Maui residents</u>

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold as affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Based on the size of Pulelehua and the services currently envisioned, it is estimated, the Home Owner Association (HOA) fees for Pulelehua will be similar to the average fees found in similar associations (plus future escalation). ~~Maui Land & Pineapple Company Inc. will consider a graduated type of fee structure based on affordable and market rate homes or other criteria such as number of bedrooms, lot size or housing type.~~

Research regarding HOA fees on Maui found fees ranging from \$100 to \$400 per month depending on amenities such as pools, tennis courts, or outdoor gas barbeques, as well as the level of service provided for the fees. Isolated developments were found which have higher fees. Pulelehua HOA fees are currently estimated to be \$150 per unit. Maui Land & Pineapple Company Inc. will consider a graduated type of fee structure based on

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affordable and market rate homes or other criteria such as number of bedrooms, lot size, or housing type.

~~In addition to affordable homes, Pulelehua's marketing study (Hallstrom 2005) projects that during the next two decades approximately 25 percent of the housing demand in West Maui will be for homes ranging from \$380,000 to \$550,000 and 19 percent of the demand will be for homes above \$550,000. Pulelehua's moderate and market homes rate will help to satisfy the demand for homes in these ranges.~~

Maui Land & Pineapple Company, Inc., may establish a second trust to plan, develop, and administer a community enrichment center focused on cultural and wellness programs for Pulelehua residents. It is anticipated that this trust will be funded by a transfer fee assessed on all Pulelehua property transactions.

2.6.7 ~~2.6.5~~ Proposed Medical Center

Maui Land & Pineapple Company, Inc., is currently in discussions with the Hawaii Health System Corporation (HHSC) to provide up to 15 acres in Pulelehua's south Māhinahina neighborhood to support a medical facility as well as other medical related businesses like doctor's offices and clinics. It is uncertain at this time if this plan will move forward. A Needs Analysis and other steps will be taken before a final decision can be made.

HHSC's initial vision for the medical center would include a 30 to 50-bed long-term care facility. This facility may be based on the "Greenhouse Project" concept and be made up of four to five buildings. Each building could house eight to ten residents and would be approximately 6,000 square feet in size. The residents would enjoy separate living areas and bathrooms, situated around a common kitchen and dining area. These buildings could be designed to fit into the neighborhood in such as way as to look like large single-family homes.

In addition, an urgent/emergency care medical clinic could be developed. This facility would address critically injured or sick patients to provide stabilization and diagnostic services. The patients would then be released or transported to full service facilities, such as Maui Memorial Medical Center.

The Long Term Care and Urgent/Emergency Care medical facilities, as well as and other medical related businesses could be located relatively close to the Honoapi'ilani Highway to facilitate quick and easy access.

In the event the medical center moves forward certain assumptions and conditions within the Pulelehua community may change. The number of residential units for example will be reduced. Internal neighborhood traffic patterns may change slightly, but the intent will be to build the facilities within the fabric of the traditional town plan.

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It is difficult to quantify the impacts of the medical center because it has not been designed. Based on conceptual information the medical facility will generate less demand for water, sewer, and electricity than the houses that will be replaced in the plan. Other potential impacts may also be reduced accordingly.

2.7 DEVELOPMENT TIMETABLE AND PRELIMINARY COSTS

Development and sales of the Pulelehua community are projected to be completed within five to nine years. Within this total time and before construction, permitting and entitlement processing is expected to take approximately one year. Construction of the major backbone infrastructure is estimated to take an additional year, with the first homes being completed in 2007. Continued construction and full absorption should occur over the preceding five and a half years.

Development Timetable	Years
Entitlement Processing and Permitting	1
Site Engineering, Infrastructure Construction	1
Construction and Sales	5 to 6
Total	7 to 8

Costs to develop the Pulelehua community are preliminary and will be better defined during detailed site engineering. The order of magnitude costs for the development of on-site infrastructure and final subdivision layout is expected to be approximately \$77 million.

Residential construction costs are estimated to be approximately \$238 million. Commercial construction costs are estimated to be approximately \$27 million.

In total, costs for the Pulelehua community are estimated to be approximately \$342 million.

2.8 SUSTAINABLE BUILDING DESIGN

William McDonough + Partners (WM+P) prepared an assessment of “cradle to cradle” design strategies to incorporate into Pulelehua’s development plan.

William McDonough + Partners explored environmental clues to incorporate sustainable design in Pulelehua. The hydrology study revealed specific recommendations that, if feasible, will be designed into Pulelehua, such as bioswales and pervious pavement in the alleys to keep runoff from flowing off-site. Wind studies informed the orientation of the homes to allow for natural ventilation.

The Office of Environmental Quality Control (OEQC) has issued “Guidelines for Sustainable Building Design in Hawaii: A Planner’s Checklist” (OEQC, May 1999) and has

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requested that consideration be made in applying sustainable building techniques to projects. The OEQC Guidelines state, “[a] sustainable building is built to minimize energy use, expense, waste and impact on the environment. It seeks to improve the region’s sustainability by meeting the needs of Hawai’i’s residents and visitors today without compromising the needs of future generations.”

Combining information from both William McDonough + Partners and OEQC’s “Guidelines for Sustainable Building Design in Hawaii: A Planner’s checklist”, sustainable design features considered for Pulelehua includes:

- A site selected that is surrounded by existing development, which is easier to serve with existing municipal infrastructure.
- Identification of eco-efficient goals and ensuring goals are met.
- A design that community includes a mix of residential, commercial, public uses, parks, open space, a neighborhood elementary school, biking and walking paths combining to form a community that encourages residents to build relationships with each other, rely less on cars for transportation, walk and bicycle more often, enjoy outdoor surroundings, and actively engage in civic life.
- The existing resources and natural features of the Pulelehua community site will be preserved. Existing gulches will be preserved.
- Buildings will be sited to take advantage of natural features and maximize their beneficial effects where practical. The orientation of the street grid allows buildings to be oriented with primary roof facade within 30 degrees of due south, to allow for installation or retrofit with solar panels, as well as providing for passive solar design.
- Buildings will be oriented to minimize energy use and provide for natural cooling of interior spaces by channeling trade winds. Ceiling fans and radiant barriers may be provided to avoid using air conditioning.
- Bioswales, block dry and wetlands, cisterns, and pervious pavement in the alleys will be incorporated into the site design, if feasible, to manage storm water.
- Buildings will be located close to the street to provide a comfortable environment for pedestrians and bicyclists; curb cuts are limited as parking and auto access will be located in the rear of the lot, served by alleys.
- The streets within the Pulelehua community will be designed to maximize pedestrian use. Street design includes:
 - Narrow lanes designed for slow travel speeds,
 - Slight cranks and bends of roads within the neighborhood to allow for natural traffic calming (long, straight segments of neighborhood streets are avoided),
 - Continuous sidewalks and street trees to provide a comfortable pedestrian environment,
 - Traffic circles at major intersections to slow traffic and provide a traffic-calmed alternative to the intersection, and

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- On-street parking will provide a barrier between pedestrians on the sidewalk and cars in moving travel lanes.
- The footprint of the Pulelehua community will be minimized by development clustered in compact neighborhoods with smaller lots to allow more common open space to be preserved in the community, making more efficient use of the land.
- Building types within the Pulelehua community will allow flexibility to accommodate changing needs of the occupants.
- Natural cooling such as street trees that shade buildings and paved areas will be included within the Pulelehua community.
- Energy consumption will be minimized through the use of solar design features such as solar water heaters.
- Where feasible, landscaping will include:
 - Use of locally made soil amendments and compost for plant nourishment, improved water absorption and holding capacity.
 - Use of drought tolerant and/or slow growing hardy grasses, native and indigenous plants, shrubs, ground covers, trees, appropriate for local conditions, to minimize the need for irrigation.
 - Use of mulches to minimize evaporation, reduce weed growth, and retard erosion.
 - Use of Low Impact Sustainable Agriculture (LISA) techniques to minimize ground nutrients from Agriculture.
 - Use of edible landscaping, such as vegetables, fruit trees, and herbs, to provide nutrition for the community.
 - Use of non-potable water or reclaimed water for common areas, fire system, and recreational fields.
- Road sections through non-urbanized areas (not fronted by development) will use open swales for drainage.
- Recycling and waste diversion strategies will be employed during construction and during occupancy.
- Homes will include water conserving, low flow fixtures as required by Uniform Plumbing Code.
- Specifications for building materials will encourage use of products with high recycled content, low or non-toxic materials, which are locally produced.

Pulelehua is committed to a material selection program that emphasizes efficient and environmentally sensitive use of building materials.

DESCRIPTION OF THE NATURAL ENVIRONMENT,
POTENTIAL IMPACTS & MITIGATIVE MEASURES



3.0 DESCRIPTION OF THE NATURAL ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATIVE MEASURES

This section describes the existing conditions of the physical or natural environment, potential impacts of the Pulelehua Community, and mitigative measures to minimize any impacts.

3.1 CLIMATE

Existing Conditions

The climate of the Māhinahina region area is very much affected by its coastal situation and by nearby mountains. Winds are variable but are often trade winds from the north or northeast. Temperatures in the region are generally very consistent and moderate with an average daily temperature range of about 66 to 85 degrees Fahrenheit (°F). The extreme minimum temperature recorded at nearby Kā'anapali is 47°F, while the extreme maximum temperature is 98°F. Average annual rainfall in the area amounts to about 20 to 30 inches. Rainfall mostly occurs in the months between November and April.

Potential Impacts

The Pulelehua community is not expected to have an impact on climatic conditions of the area.

Mitigative Measures

Since the Pulelehua community is not expected to have an impact on climatic conditions of the area, no mitigative measures are planned.

3.2 TOPOGRAPHY AND GEOLOGY

Existing Conditions

The topography of the Pulelehua community ranges from approximately 75 feet mean sea level (msl) to approximately 240 feet msl. Kahanaiki Gulch serves as the northern boundary of the site. Shallow Pōhaku-Kā'anapali gulch bisects the site at the approximate midpoint. Māhinahina Gulch traverses the site approximately 1,000 feet from the southern boundary.

Geologically, the island of Maui is characterized as East and West Maui, with East Maui dominated by Haleakalā Volcano. The Pulelehua community is on West Maui, an area where the Mauna Kahalawai Volcano is estimated to be more than two million years old.

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Its last eruptions are estimated to have occurred about 20,000 years ago. According to Juvik and Juvik (1998):

An extinct volcano whose evolution includes shield, postshield and rejuvenated stages forms West Maui. Numerous cones, domes, dikes, flows, and pyroclastic deposits of mugearite, hawaiiite, and trachyte represent the postshield stage, while the only evidence of its rejuvenated stage is a few vents and flows located mainly near Lahaina. Erosion has exposed nearly 4,900 vertical feet (1,490 meters) of volcanic layers on West Maui. (p. 43)

Macdonald, Abbot, and Peterson (1983) categorize five major geologic units of West Maui as follows:

1. Pliocene and Pleistocene volcanic rocks, including the Wailuku and Honolua volcanic series;
2. Pleistocene and recent volcanic rocks, including the Lahaina volcanic series;
3. Pleistocene sediments which include calcareous dunes and consolidated earthy deposits;
4. Recent sediments which include unconsolidated deposits; and
5. Historic volcanic rocks.

Typically, the West Maui basalt is thin-bedded 'a'ā and pāhoehoe created by quiescent flank eruptions along rift zones. The soils of West Maui, which reach depths of about 20 feet, indicate that the volcanic activity probably stopped in the Pliocene or earliest Pleistocene era (Macdonald, Abbot, and Peterson 1983).

In describing the stage of geological erosion of West Maui, Macdonald, Abbot, and Peterson (1983) state:

Stream erosion of West Maui volcano has reached a late youthful to submature stage. Because of the thick armor of Honolua flows, the rainy northeastern slope has reached a less advanced stage of dissection than might otherwise be expected and broad surfaces that have not been lowered much below the original surface lie between the deep canyons. In contrast, the drier southwestern slope has been much more deeply dissected, leaving sharp crested ridges between the valleys. (pp. 386-378)

Potential Impacts

To the extent possible, improvements will conform to the contours of the land limiting the need for extensive grading of the site. No structures will be built in the gulches. Impacts on the topography and geology of the site could be caused by alterations, such as grading, to accommodate the Pulelehua community.

Mitigative Measures

The proposed improvements are relatively insignificant compared to the overall geologic character of the site and region; therefore, significant impacts are not expected. Appropriate engineering, design, and construction measures will be undertaken to minimize potential erosion due to grading of soils during construction. Further information on soils and grading is provided in the Section 3.3 below.

3.3 SOILS

Existing Conditions

Three soil suitability studies have been prepared for lands in Hawai'i. These are the U.S. Department of Agriculture (USDA) *Soil Conservation Service Soil Survey* (SCS), the University of Hawai'i Land Study Bureau *Detailed Land Classification*, and the State of Hawai'i Department of Agriculture's *Agricultural Lands of Importance to the State of Hawaii* (ALISH). The principal focus of these studies has been to describe the physical attributes of Hawai'i's lands and the relative productivity of different land types for agricultural production purposes.

Soil Conservation Survey. The USDA Soil Conservation Service's *Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai* (USDA 1972), classifies the soils on the site as Lahaina Silty Clays (LaB and LaC), Rough Broken and Stony Land (rRS), and 'Ewa Silty Clay Loam (EaA) (Figure 9). Under the Soil Conservation Service's Land Capability Grouping, soil types are rated according to eight levels, ranging from the highest classification level, I, to the lowest level, VIII. Lower case letters following the classification level indicate specific subclasses. Brief descriptions of soils of the Pulelehua community site, along with their Land Capability Grouping rating, follow:

Lahaina Silty Clay (LaB), 3 to 7 percent slopes. On these soils permeability is moderate, runoff is slow, and the erosion hazard is slight. Cobblestones are common on the surface in a few places. Near the coastal plains, in some places, the soils contain fragments of coral, stones, gravel, or sand. The soils are used for sugarcane and pineapple. Small acreages are used for truck crops, pasture, and homesites.

Approximately 156.7 acres (50 percent) of the site contain LaB soils. LaB soils are rated IIe if irrigated, IIIc if non-irrigated. Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices. Subclass IIe soils are subject to moderate erosion if they are cultivated and not protected. Subclass III soils have severe limitations that reduce the choice of plants, require special conservation practices, or both. Subclass IIIc soils have severe limitations because of climate.

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Lahaina Silty Clay (LaC), 7 to 15 percent slopes. On these soils runoff is medium and the erosion hazard is moderate. The soils are used for sugarcane and pineapple. Small acreages are used for truck crops, pasture, and wildlife habitat.

Approximately 86.9 acres (27.7 percent) of the site contain LaC soils. LaC soils are rated IIIe. Class III soils have severe limitations that reduce the choice of plants, require special conservation practices, or both. Subclass IIIe soils are subject to severe erosion if they are cultivated and not protected.

Rough Broken and Stony Land (rRS). On these soils runoff is rapid, and geologic erosion is active. This soil type is used for pasture, wildlife habitat, and watershed. It consists of very steep, stony gulches.

Approximately 67.1 acres (21.4 percent) of the site contain rRS soils. rRS soils are rated VIIs. Class VII soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat. Subclass VIIs soils have very severe soil limitations because of unfavorable texture, or because they are extremely rocky or stony. Also included are land types that are steep, rocky, or stony.

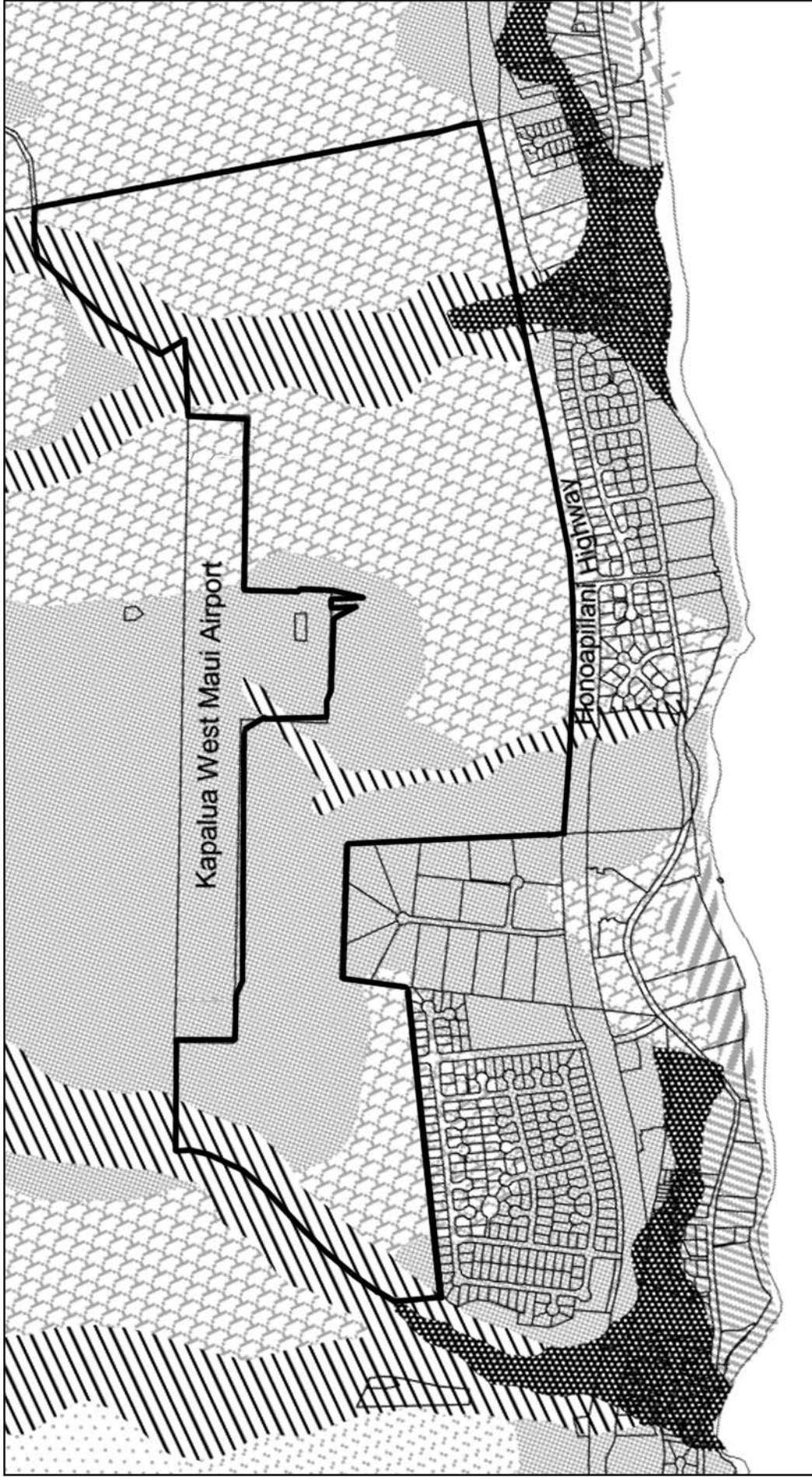
‘Ewa Silty Clay Loam (EaA), 0 to 3 percent slopes. On these soils runoff is very slow and the erosion hazard is no more than slight. The soil is used for sugarcane and homesites.

Approximately 2.1 acres (0.7 percent) of the site contain EaA soils. EaA soils are rated I if irrigated, IVc if non-irrigated. Class I soils have few limitations that restrict their use. Class IV soils have very severe limitations that reduce the choice of plants, require very careful management, or both. Subclass IVc soils have very severe limitations because of climate.

Detailed Land Classification. The University of Hawai‘i Land Study Bureau document *Detailed Land Classification, Island of Maui* classifies soils based on a five-class productivity rating using the letters A, B, C, D, and E, with A representing the highest class of productivity and E the lowest. Under this system the soils of the Pulelehua site are rated as A, B, and E, as shown in Figure 10.

Approximately 246.8 acres (78 percent) of the soils in the Pulelehua community site are rated “A”, 12.7 acres (4 percent) are rated “B”, and 53.3 acres (17 percent) are rated “E.” However, without irrigation all of the “A” and “B” soils would be classified as “D,” the second lowest productivity rating.

Agricultural Lands of Importance to the State of Hawaii. The State of Hawai‘i Department of Agriculture’s *Agricultural Lands of Importance to the State of Hawaii*



Legend

-  Pulelehua Boundary
-  Lahaina Silty Clay, 7-15% Slopes
-  Lahaina Silty Clay, 3-7% Slopes
-  Rough Broken and Stony Land
-  Ewa Silty Clay Loam, 0-3% Slopes

Source: U.S. Department of Agriculture Natural Resources Conservation Service

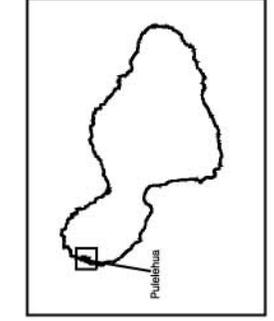


Figure 9
Soil Conservation Service Survey

Pulelehua

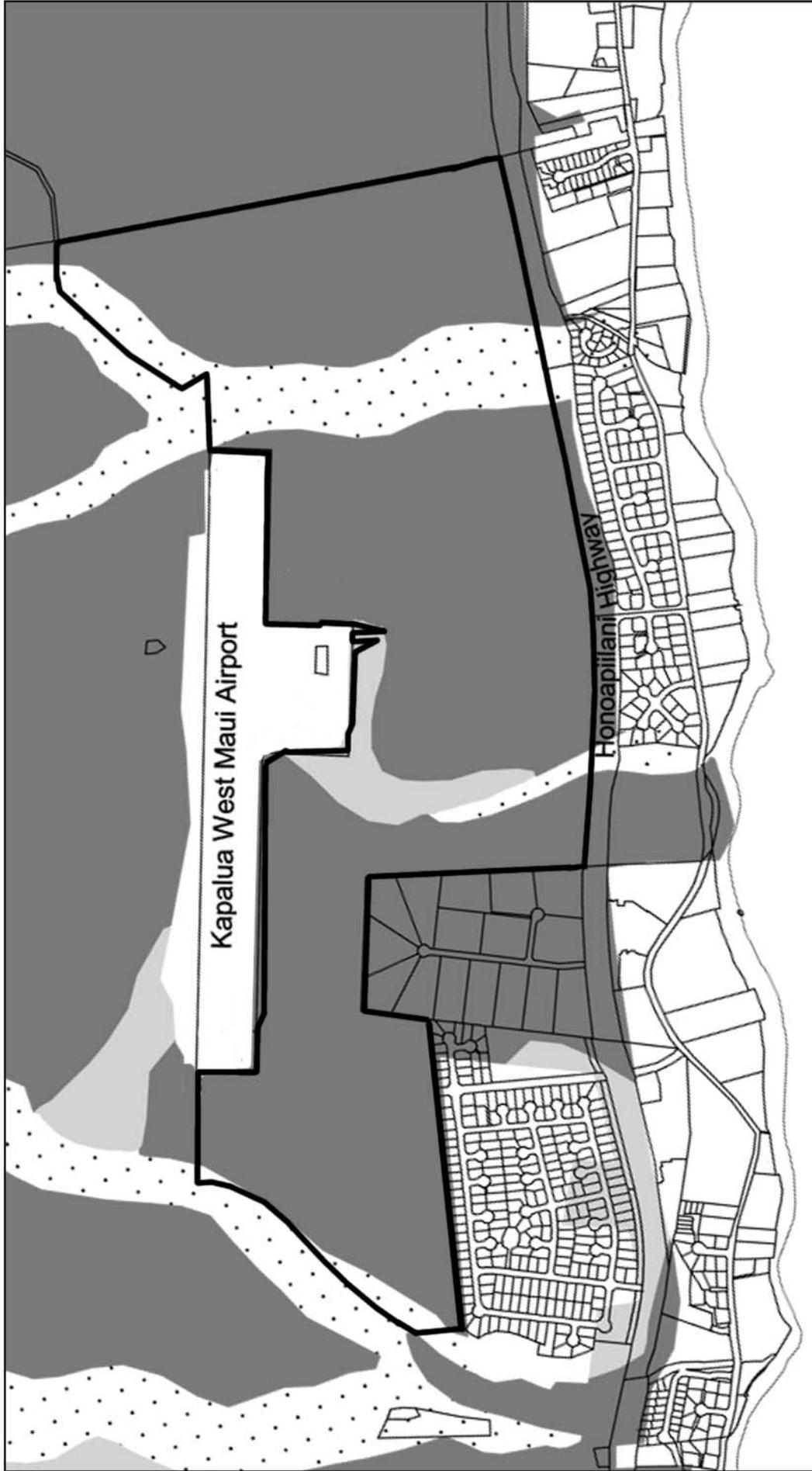
MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



LINEAL SCALE (FEET)





Legend

-  Pulelehua Boundary
-  A: Excellent
-  B: Good
-  C: Fair
-  D: Poor
-  E: Very Poor
-  N: Not Classified

Source: Land Study Bureau

Figure 10
Detailed Land Classification

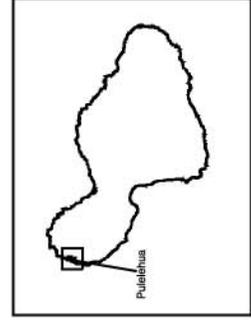
Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



LINEAL SCALE (FEET)



PULELEHUA
FINAL ENVIRONMENTAL IMPACT STATEMENT

(ALISH) system of defining agricultural suitability classify the soils of the Pulelehua community site as Prime Agricultural Land and Unclassified Land (Figure 11).

Approximately 252.8 acres (81 percent) of the Pulelehua community site are rated Prime Agricultural Land and 60 acres (19 percent) (primarily gulch areas) are rated Unclassified Land.

According to the ALISH system, when treated and managed according to modern farming methods, including water management, Prime Agricultural Land has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops economically. Prime Agricultural Land is land best suited for the production of food, feed, forage, and fiber crops. Unclassified lands have been determined to have no value for soil-based agriculture.

Potential Impacts

The Pulelehua community will be built on the broad, gently sloping lands between Honoapi'ilani Highway and the Kapalua West Maui Airport. Part of the development process will include grading portions of this area.

Impacts to the soils of the site include the potential for soil erosion and the generation of dust during construction. Clearing and grubbing activities will temporarily disturb the soil retention values of the existing vegetation and expose soils to erosion forces. Some wind erosion of soils could occur without a proper watering and re-vegetation program. Heavy rainfall could also cause erosion of soils within disturbed areas of land.

Mitigative Measures

The Pulelehua community will include considerable open space thus limiting the need to grade all areas. To the extent possible, improvements will conform to the contours of the land further limiting the need for extensive grading of the site. In addition, graded areas will be limited to specific areas for short periods of time.

Grading will be limited to less than 15 acres at one time. Upon the completion of grading for each area, all exposed areas will be grassed or landscaped. All grassing on a grading phase will be completed before commencement of grading in the next phase in compliance with the Maui County grading ordinance. Measures to control erosion during the site development period 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;

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- 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.

All construction activities will comply with all applicable Federal, State, and County regulations and rules for erosion control. Before issuance of a grading permit by the County of Maui, an erosion control plan and best management practices required for the NPDES permit will be prepared describing the implementation of appropriate erosion control measures.

All construction activities will also comply with the provisions of Chapter 11-60.1, HAR, Section 11-60.1-33 on Fugitive Dust. Measures to control dust from road areas and during various phases of construction include:

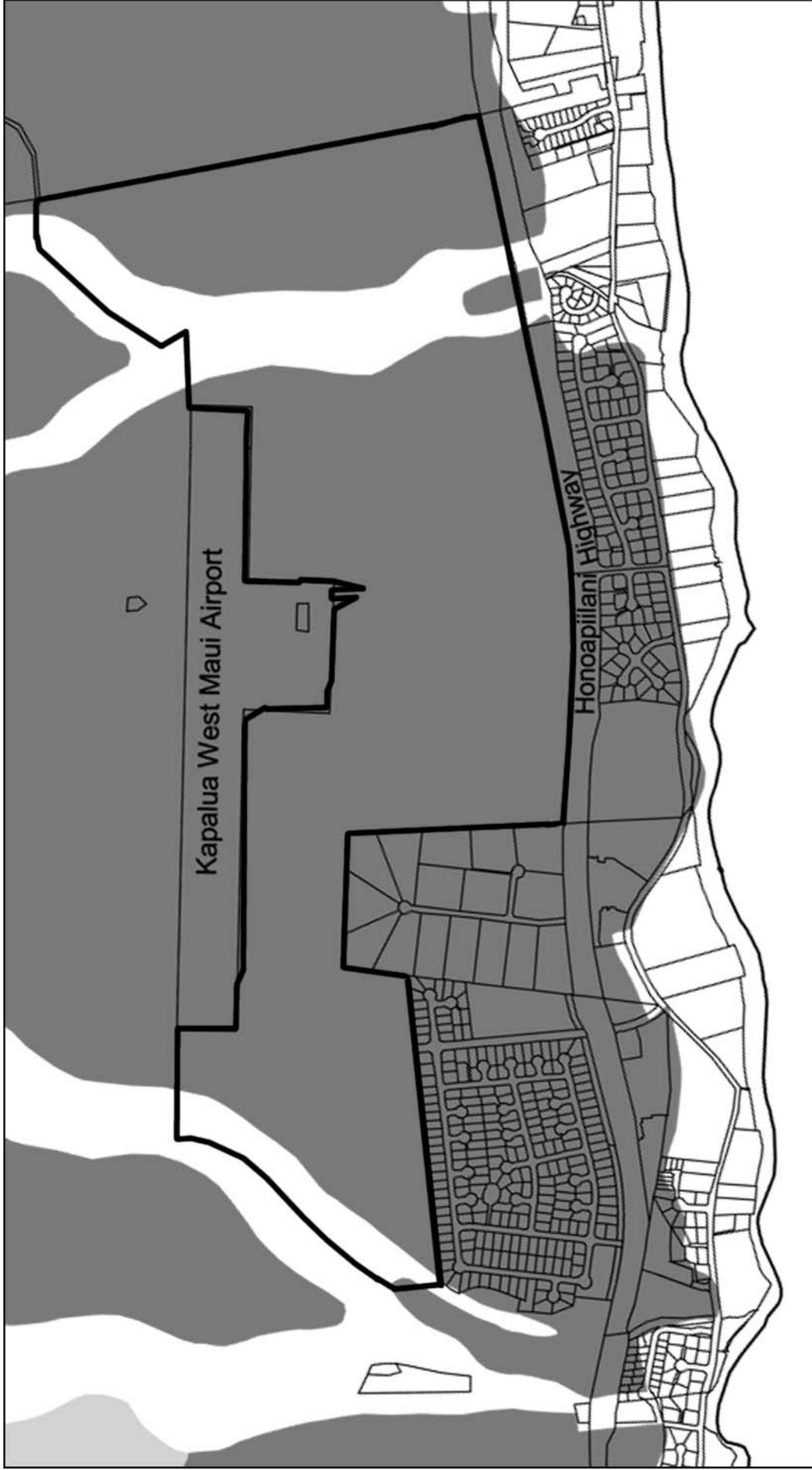
- Planning phases of construction to: minimize the amount of dust-generating materials and activities, centralize on-site vehicular traffic routes, and locate potential dust-generating equipment in areas of the least impact;
- Providing an adequate water source at the site prior to start-up construction activities;
- 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; and
- Controlling dust from debris being hauled away from the project site.

After construction, establishment of permanent landscaping will provide long-term erosion control.

3.4 AGRICULTURAL IMPACT

Existing Conditions

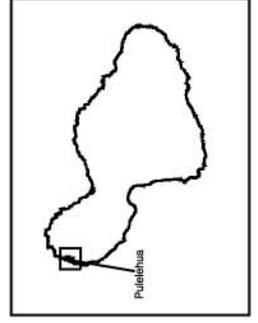
Maui Pineapple Company, (a subsidiary of Maui Land & Pineapple Company, Inc.) currently cultivates pineapple on approximately 150 acres (approximately half) of the Pulelehua community site. Other areas are long-fallow fields, roadways, and gulches.



Legend

-  Pulelehua Boundary
-  Prime Agricultural Land
-  Unique Agricultural Land
-  Other Agricultural Land
-  Unclassified Land

Figure 11
Agricultural Lands of Importance
to the State of Hawaii (ALISH)



Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



LINEAL SCALE (FEET)

1,000



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Potential Impacts

Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use. This amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd. The creation of Pulelehua will not lead to a decrease in Maui Land & Pineapple Company, Inc.'s agricultural viability. Further, with the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

Once the Pulelehua community is built, ongoing nearby pineapple operations are not expected to significantly impact residents, as cultivated fields will either be across gulches, or mauka of the Kapalua West Maui Airport.

The 5,800 acres currently in cultivation by Maui Pineapple Company does not include approximately 219 acres of fields that are not being replanted in anticipation of other new communities currently proposed by Maui Land & Pineapple Company, Inc. Approximately 169 acres at the site of the proposed Kapalua Mauka community in West Maui and 50 acres at the site of the proposed Kauhale Lani community in Pukalani were not replanted after harvest. These fields were not well suited for pineapple cultivation and are inefficient to farm because of topography and other conditions. Maui Pineapple Company, is keeping its best land in cultivation and exploring options to cultivate pineapple on other lands.

Mitigative Measures

A critical design element of Pulelehua is the creation of a compact, holistic community, clustering housing and other uses in a specified area adjacent to existing urban uses (between the airport and residential areas makai of the highway) and thus preserving surrounding agricultural land and open space. Compact communities allow for needed housing and other services but respect and acknowledge the value of agricultural land and open spaces by limiting development to appropriate areas. Compared to traditional, sprawling, large-lot subdivisions, Pulelehua will concentrate urban uses in a defined area, allowing more of the surrounding land to remain in agriculture or open space.

Pulelehua will strengthen the connection between agriculture and community by including community gardens, so that residents will have the opportunity to grow their own healthy fruits and vegetables and reduce dependence on imported produce. This is a critical element of Maui Land & Pineapple Company, Inc.'s goal to create a holistic and sustainable community.

Maui Land & Pineapple Company maintains a long-term commitment to agriculture. Strengthening its agricultural operations is one of the Company's foremost goals. While focusing on the market demand for fresh whole pineapple, Maui Pineapple still produces

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pineapple for canning. However, the shift toward fresh pineapple production ~~has allowed~~ is necessary to enable Maui Pineapple Company, Ltd., to compete against foreign producers.

During the past year, Maui Pineapple Company has vastly reworked the way it grows pineapple. New techniques include more careful field preparation, more efficient fertilization, and a new method of growing pineapple crowns from seed. With these changes, time to harvest should fall from 14 months to nine or 10 months, with fruit of at least the same weight and even better quality. Expected yield is more than 50 tons per acre, while the industry average is 46 tons per acre.

In addition, previously announced plans for ending cultivation at the Honolua plantation have been canceled. Instead, planting plans have been reevaluated and fields that were abandoned have been harvested. Transportation of pineapple from Honolua to Central Maui has been shifted to larger trucks, increasing efficiency and reducing the number of trucks on Honoapi'ilani Highway.

Due to the demand for fresh whole pineapple, in Hāli'imaile, a second processing line for fresh pineapple is being constructed, and often two sorting shifts are run to process fruit. The fresh market requires higher quality and more uniform fruit. With better quality pineapple, sales are expected to become more consistent throughout the year. Subsequently, seasonal planting and harvesting is expected to evolve into consistent year-round production. This smoothes the need for seasonal labor and will offer workers more regular, and perhaps even more, total hours.

In addition to its pineapple operations, Maui Land & Pineapple Company is exploring a wide array of diversified agricultural opportunities and conducting field trials on new crops.

To further diversified agriculture, Maui Land & Pineapple Company, Inc., is expanding its agricultural base, via a new entity called Maui Agricultural Partners. Maui Agricultural Partners will support a diverse community of farming partnerships to enable the sharing of knowledge, infrastructure, and costs. The goal of Maui Agricultural Partners is to become a "grower of growers" through entrepreneurial programs allowing Maui farmers to develop the talent base necessary to grow Maui's diversified agriculture industry. As part of this commitment, Maui Land & Pineapple Company, Inc., will establish relationships with local high schools, Maui Community College, and the University of Hawai'i to foster joint agricultural, environmental, and Hawaiian programs. The charter of Maui Agricultural Partners is to partner with agricultural experts to bring land, water, utilities, capital, and talent to promote diversified crops. As a partner, Maui Land & Pineapple Company, Inc., is committed to a long-term stake in sustaining farming operations as evidenced by its investment of land and technical and financial resources.

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One early effort of this partnering is Maui Land & Pineapple Company, Inc.'s agreement with Pacific Biodiesel Inc., to jointly explore cost effective methods for growing, processing, and marketing biofuels, including refining vegetable oil into fuel. It is envisioned that this effort will contribute to identifying crops with the potential to become primary or secondary clean fuel sources for Hawai'i.

Through Maui Agricultural Partners, Maui Land & Pineapple Company, Inc., also hopes to create a market for Maui-grown produce to be sold in local farmer's markets, to restaurants and resorts, and to supermarkets. The goal is to create a marketplace for local produce by meeting buyer's demands for quality, reliability, and volume. A pilot program for this effort is Kapalua Farms, an entity of Maui Land & Pineapple Company, Inc., that will support greater Kapalua with fresh fruits, vegetables, and eventually meats.

In addition, Maui Land & Pineapple Company, Inc., is actively promoting a new academic partnership between the University of Hawai'i and EARTH University of Costa Rica to focus on agricultural research and education to further foster agricultural entrepreneurs and agricultural sustainability. This partnership was forged in November 2003 with an agreement to exchange students and faculty between the two universities. Maui Land & Pineapple Company, Inc., will support EARTH University students in Hawai'i, particularly on Maui, through use of their agricultural facilities in Hāli'imaile and Honolulu.

Regarding potential nuisance complaints from Pulelehua residents about ongoing nearby pineapple operations, Maui Land & Pineapple Company, Inc., will notify all prospective buyers and lessees that the Hawaii Right to Farm Act (Chapter 165, HRS) limits the circumstances under which pre-existing farm activities may be deemed a nuisance.

3.5 IDENTIFICATION OF CHEMICALS AND FERTILIZERS

Portions of the Pulelehua community site are currently in pineapple cultivation by Maui Pineapple Company or are fallow fields. As part of its agricultural operations, Maui Pineapple Company uses fertilizers, pesticides, fungicides, herbicides, and plant growth regulators. Maui Pineapple Company's application and use of all fertilizers, pesticides, fungicides, herbicides, and plant growth regulators is in compliance with all product labeling and applicable government regulations.

Fertilizers. Maui Pineapple Company uses the following fertilizers, which provide nutrients essential for plant growth, as part of its pineapple operations on the cultivated fields of the Pulelehua site: UAN-32 (Urea-Ammonium nitrate), urea, potassium sulfate, potassium chloride, Treble Super Phosphate, rock phosphate, lime, magnesium sulfate, iron sulfate, and zinc sulfate.

Pesticides, Insecticides, and Nematocides. Maui Pineapple Company uses the following pesticides, to control nematodes, ants, or, other insects, as part of its pineapple operations on the cultivated fields of the Pulelehua site: Telone II Soil Fumigant (1, 3

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dichloropropene), Nema-cur 3 (Fenamiphos), Vydate (Oxamyl), Thiodan (Endosulfan), Amdro Pro Fire Ant Bait (Hydramethylnon), and Diazinon 50W (Diazinon).

Fungicides, Herbicides, and Plant Growth Regulators. Maui Pineapple Company uses the following fungicides, herbicides, and plant growth regulators, to regulate plant growth, induce flowering, control weeds, or control disease, as part of its pineapple operations on the cultivated fields of the Pulelehua site: Ethrel 4 or Etephon 2 (Etephon), Ethylene gas (Ethylene), Karmex DF or Direx L (Diuron), Evik (Ametryne), Hyvar X (Bromacil), Aliette (Fosetyl-Al), Phosguard (Phosphorous acid), Tilt (Propiconazole), Herbimax, Assure II Herbicide (Qualifop-ethyl), Velpar (Hexazinone), and Round-up (Glyphosate).

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Potential Impacts

The creation of the Pulelehua community is expected to significantly reduce the amount of fertilizers, pesticides, fungicides, herbicides, and plant growth regulators used on the site relative to agricultural uses.

Results of a nearshore water quality study conducted for this EIS (see Section 3.6 and Appendix C) conclude that Pulelehua has the potential to improve near shore water quality relative to agricultural use of the lands. The study results indicate that the near shore area makai of Pulelehua is presently receiving nutrients from groundwater. The major source of these nutrients is likely from the long-term percolation of fertilizers used on the agricultural fields of West Maui. With the change from agricultural uses to urban uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean. It has been shown that the greatest contribution of nutrients to groundwater from human activities on West Maui is from agriculture. On the other hand, golf courses, resort, and residential development provide a relatively small contribution (Soicher and Peterson 1997). Since Pulelehua will replace agriculture uses with residential uses, the overall subsidies of nutrients delivered to the ocean are expected to decrease.

Mitigative Measures

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate

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assessment and soils analyses as may be necessary to determine the possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and/or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

Maui Land & Pineapple Company, Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolulu aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

Over fertilization of Pulelehua landscaping will be avoided to ensure the community does not contribute to additional nutrients entering the ocean. Common nitrogen/phosphorus/potash mixed fertilizers are anticipated to be applied to lawn areas, groundcover, shrubs, and trees. With proper irrigation management practices, leaching and runoff of fertilizers should be negligible.

Within Pulelehua the use of herbicides will generally be limited to the initial landscaping period on the site. Anticipated application of pesticides will be used as a treatment and not as a preventative measure. As a treatment, application will be limited. In addition, plant selection will be based on hardiness, drought tolerance, pest resistance, as well as aesthetic concerns.

3.6 MARINE ENVIRONMENT AND NEARSHORE WATER QUALITY

While Pulelehua is mauka of Honoapi'ilani Highway and not on the coastline, Maui Land & Pineapple Company, Inc., commissioned a baseline marine environment assessment and potential impact analysis of the nearshore areas makai of the Pulelehua community site. The study area extended from Ka'ōpala Bay, through Pōhaku Bay ("S Turns"), to the area of the Māhinahina drainage culvert.

The purpose of the assessment was to: 1) determine the existing condition of the marine environment in the vicinity of the Pulelehua community site; 2) evaluate the effects of current land uses on water quality before the start of any construction at Pulelehua; and 3) collect data that could provide insight into the potential effects of Pulelehua on the nearshore marine ecosystem. Key elements of the report are summarized below. The complete report is included in Appendix C.

Existing Conditions

The nearshore area in the vicinity of Pulelehua consists of a broad shallow, gently sloping fossil reef platform bisected by sand channels. At depths greater than about 8 meters, the predominant bottom cover is sand. Coral communities are very sparse throughout most of the nearshore zones because harsh conditions that result from the combination of breaking surf, sediment re-suspension, and discharge of terrigenous (mud & silt) material. Similarly, reef fish communities are sparse, largely due to the lack of vertical relief of the reef platform. Algae communities, however, are able to successfully settle on the sand-covered reef pavement, and are abundant and diverse. Large expanses of the offshore area is composed of fields of the calcareous algae *Halimeda* growing on sand-covered bottom. In terms of marine life, the most common federally protected species in the area are the green sea turtle and Hawaiian monk seals.

Analyses of water chemistry indicate that the nearshore area is presently receiving input of nutrients from groundwater. The major source of these nutrients is likely from the long-term percolation of fertilizers used on the agricultural fields of West Maui. Sampling showed levels of silicon, nitrate, and phosphate currently higher compared to ocean water due to inflow of groundwater. Nitrate and phosphate inflows are most likely from agricultural fertilizer.

It was observed that following abnormally heavy, or “back-to-back” rain storms, desilting basins designed to intercept surface flow before it reaches the ocean become overloaded. With the capacity of the basins exceeded, fine-grained terrigenous material discharges to the ocean. As a result, after heavy rains a zone of muddy water that could extend up to several hundred meters offshore often characterizes the nearshore area.

In sum, the marine environment makai of the Pulelehua community site presently could be termed “sub-optimal.” However, the only measurements of water quality constituents that were found to exceed DOH water quality standards was NO₃ (nitrate) in a zone within about 100 to 250 meters from shore.

Potential Impacts

The marine environment assessment concludes that the Pulelehua community has the potential to improve conditions in the marine environment.

It is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses. This is because, unlike agricultural lands which are periodically plowed or fallow, and thus exposed to rainfall and erosion, residential uses provide more stable soil retention qualities in the form of fixed landscaping, roads, and buildings. Thus with residential uses, the existing level of runoff flows from the site will contain much less sedimentation than the current conditions with agricultural uses.

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In addition, with the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean. It has been shown that the greatest contribution of nutrients to groundwater from human activities on West Maui is from agriculture. Comparatively, golf courses, resort, and residential development provide a relatively small contribution (Soicher and Peterson 1997). Since Pulelehua will replace agriculture uses with residential uses, the overall subsidies of nutrients delivered to the ocean are expected to decrease.

In the past decade, the West Maui coastal areas have experienced the proliferation of several species of nuisance algae. One common perception (though never proven) is that the cause of the algal proliferation was nutrient subsidies to the nearshore ocean from anthropogenic land uses (e.g., sewage injection wells, agriculture). However, a study that compared the biomass of one of the main alga responsible for the nuisance situation (*Hypnea musciformis*) with the required nutrients to sustain growth showed that natural groundwater discharge was sufficient to support the algal biomass (Dollar and Andrews, 1997). Thus, nutrient subsidies from anthropogenic sources are not a requirement to trigger algal proliferation. Subsequently, Pulelehua should have no effect on algal abundance.

The marine environment assessment also concludes that Pulelehua will not negatively affect green sea turtles, Hawaiian monk seals, or other protected species, nor will Pulelehua change the structure of the shoreline.

Mitigative Measures

All additional runoff due to Pulelehua will be retained on site, through the use of retention/detention basins, with no increased flow into the existing drainage ways, desilting basins, and the ocean. Section 4.9.2 contains additional information on drainage, potential impacts, and mitigative measures. Measures to control erosion, as detailed in Section 3.3, will be implemented during site development. After construction, new landscaping within the community will also help to retain stormwater runoff on-site and provide better soil retention, furthering reducing the potential for any sediment flowing from the site. Over fertilization of Pulelehua landscaping will be avoided to ensure the community does not contribute to nutrients entering the ocean.

3.7 NATURAL HAZARDS

Existing Conditions

Natural hazards impacting the Hawaiian Islands include volcanic eruptions, earthquakes, landslides, hurricanes, tsunamis, and flooding.

Volcanic hazards in the area of Pulelehua are considered minimal. No lava flows have impacted the West Maui region for at least 20,000 years (MacDonald et al. 1983).

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In Hawai'i, most earthquakes are linked to volcanic activity, unlike other areas where a shift in tectonic plates is the cause of an earthquake. Each year, thousands of earthquakes occur in Hawai'i; the vast majority of them so small they are detectable only with highly sensitive instruments.

Landslide is a general term used to describe the down-slope movement of unstable soil, rock and organic materials under the influence of gravity. Unstable soil is a by-product of erosion. Erosion occurs naturally from water, wind, gravity, or other geological agents.

Devastating hurricanes have impacted Hawai'i twice in the past 23 years: Hurricane 'Iwa in 1982 and Hurricane 'Iniki in 1992. While it is difficult to predict these natural occurrences, it is reasonable to assume that future events could be likely given the recent record.

Tsunamis are large, rapidly moving ocean waves triggered by a major disturbance of the ocean floor, which is usually caused by an earthquake but sometimes can be produced by a submarine landslide or a volcanic eruption. About 50 tsunamis have been reported in the Hawaiian Islands since the early 1800's. Seven caused major damage, and two of these were locally generated. The Pulelehua community is outside of the Civil Defense Tsunami Evacuation Zone. In the Māhinahina region the Tsunami Evacuation Zone is makai of Honoapi'ilani Highway.

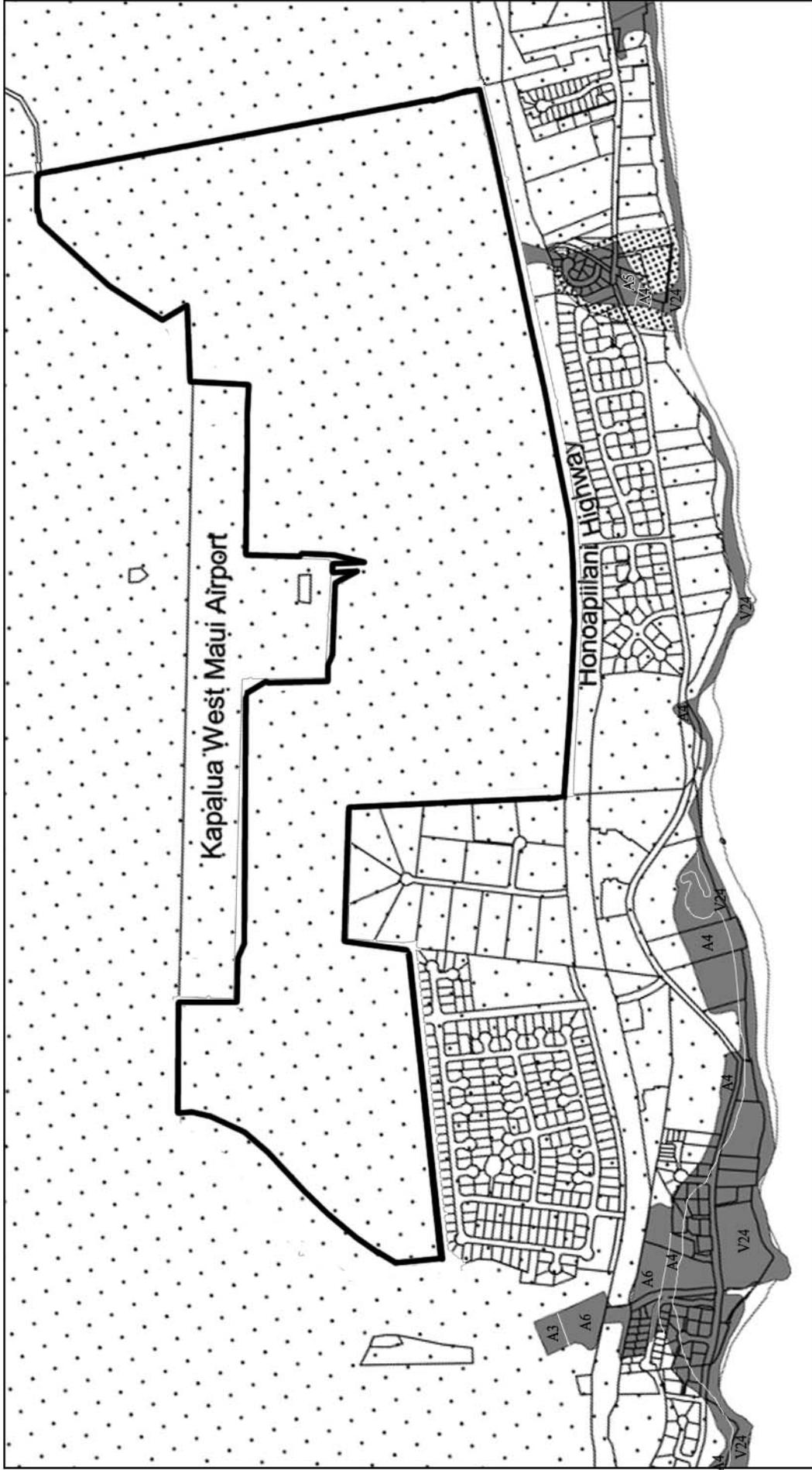
Flood hazards are primarily identified by the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA), National Flood Insurance Program. According to the FIRM, the Pulelehua site is located in Zone C. FEMA defines Zone C as areas determined to be outside of the 500-year floodplain (Figure 12).

Potential Impacts

Pulelehua will not exacerbate any hazard conditions. Volcanic impacts to the community are considered unlikely. Seismic hazards in the Pulelehua site are no greater than other locations on Maui; however buildings, as well as roadways, sewer, and water lines could be damaged by an earthquake of sufficient magnitude.

The topography of the Pulelehua site averages an eight percent slope, with little potential of landslides. There are no known landslides events in this area.

Pulelehua, as the rest of Maui or the State, is no more or less vulnerable to the destructive winds and torrential rains associated with hurricanes. Since Pulelehua is outside Tsunami Evacuation Zone, impacts from tsunamis are considered minimal.



Legend

-  Pulelehua Boundary
-  ZONES A1-30 and V1-30
Special Flood Hazard Areas Inundated by 100-Year Flood and Areas of 100-Year Coastal Flood with Velocity (Wave Action); Base Flood Elevations and Flood Hazard Factors Determined
-  ZONE C:
Areas Determined To Be Outside 500-Year Floodplain
-  ZONE B:
Areas of 500-Year Flood

Source: Flood Insurance Rate Map (1997)
Panel Number 150003 0151C

Figure 12
Flood Insurance Rate Map

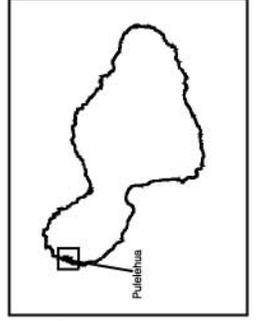
Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

NORTH

LINEAL SCALE (FEET)

0 1,000



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Because the Pulelehua site is located in an area of minimal flooding, impacts from flooding are not expected. Section 4.9.2 contains more information on drainage of the site and discusses proposed impacts and improvements related to drainage infrastructure.

Mitigative Measures

While volcanic impacts to Pulelehua are considered unlikely, mitigation of lava flow hazards is limited to provision of adequate evacuation routes and a civil defense warning system designed to provide area residents with as much advance notice of a threatening lava flow as possible.

Mitigation of hazards associated with earthquakes include adherence to Maui County building codes and standards to minimize potential damage to structures. All buildings and structures will be designed and constructed in compliance with applicable building codes and standards. Likewise, the destructive winds and torrential rainfall of hurricanes will be mitigated by compliance with the Maui County Building Code.

Although landslides or unstable soils are unlikely to occur at Pulelehua, geotechnical studies of the soils will be completed prior to construction. Geotechnical studies investigate the soil and rock below the ground to determine its properties as a basis of design for foundations and to help mitigate hazards of unstable soil.

Because Pulelehua and is at a higher elevation than the coastal regions, the community could serve as a tsunami evacuation center for people along the coast.

3.8 BOTANICAL RESOURCES

Existing Conditions

No threatened, endangered, or species of concern were found during a botanical survey of the Pulelehua community site (Char 2004). The majority of the site is either under active pineapple cultivation or fallow agricultural fields. Weedy species associated with agricultural lands are found primarily along the margins of the pineapple fields. Fallowed fields support scattered patches of weeds. Further descriptions of the various botanical resources are summarized below. The complete botanical survey is included as Appendix D.

Pineapple Fields. A portion of the Pulelehua community site is under active pineapple cultivation. The closed rows of grayish-green colored pineapple plants exclude most other plant species. A few weedy plants occur along the margins of the fields where they abut dirt roads. The most commonly observed weeds are sourgrass (*Digitaria insularis*), Guinea grass (*Panicum maximum*), Natal redtop grass (*Melinis repens*), little bell (*Ipomoea triloba*), swollen fingergrass (*Chloris barbata*), and nutgrass (*Cyperus rotundus*).

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Plowed fields located between Māhinahina Gulch and the Kapalua West Maui Airport support bare soil with only a few scattered weedy patches.

Fallowed fields located between Akahale Street and the Kahanaiki Gulch support wild bittermelon vines (*Momordica charantia*), Guinea grass (*Panicum maximum*), sourgrass (*Digitaria insularis*), spiny amaranth (*Amaranthus spinosus*), slender amaranth (*A. viridis*), *Crassocephalum crepidioides*, nutgrass (*Cyperus rotundus*), virgate mimosa (*Desmanthus prenambucanus*), little bell (*Ipomoea triloba*), Natal redtop grass (*Melinis repens*), dog tail (*Buddleia asiatica*) and soubush (*Pluchea carolinensis*). Also found in the fallowed fields were two native species, pōpolo (*Solanum americanum*) and 'uhaloa (*Waltheria indica*).

Gulch Vegetation. Vegetation in the gulches consists primarily of koa haole and Guinea grass (*Panicum maximum*) with scattered trees or small stands of trees. These include trees of Chinaberry (*Melia azedarach*), Java plum (*Syzygium cumini*), kiawe (*Prosopis pallida*), 'opiuma (*Pithecellobium dulce*), silkoak (*Grevillea robusta*), and kukui (*Aleurites moluccana*). In addition, Christmas berry (*Schinus terebinthifolius*) and kolomona (*Senna surattensis*) shrubs are occasionally encountered.

Vegetation on the gulch slopes include koa haole shrubs, Guinea grass (*Panicum maximum*), green panicgrass (*Panicum maximum* var. *trichoglume*), Natal redtop grass, 'uhaloa (*Waltheria indica*), 'a'ali'i (*Dodonaea viscosa*), 'ākia (*Wikstroemia oahuensis*), pua kala (*Argemone glauca*), koali 'awa (*Ipomoea indica*), and 'ūlei (*Osteomeles anthyllidifolia*).

Fence posts and barbed wire can be found in places along the top of the gulches, indicating that Māhinahina Gulch is or was recently used for grazing cattle. This gulch contains Guinea grass (*Panicum maximum*), tree tobacco (*Nicotiana glauca*), lion's ear (*Leonotis nepetifolia*), castor bean (*Ricinus communis*), Natal redtop grass (*Melinis repens*), spiny amaranth (*Amaranthus spinosus*), golden crown-beard (*Verbesina encelioides*), and buffelgrass (*Cenchrus ciliaris*).

Seven native species were observed on the site: 'uhaloa (*Waltheria indica*), pōpolo (*Solanum americanum*), 'a'ali'i (*Dodonaea viscosa*), 'ūlei (*Osteomeles anthyllidifolia*), koali 'awa (*Ipomoea indica*), 'ākia (*Wikstroemia oahuensis*), and pua kala (*Argemone glauca*). The last two species, 'ākia and pua kala, are endemic, that is, they are native only to the Hawaiian Islands. The others are all indigenous, that is, they are native to the Hawaiian Islands and elsewhere. All seven native species are widespread throughout the Hawaiian Islands where they occur in similar lowland, dry to mesic environments.

Potential Impacts

Since no threatened or endangered species or species of concern are known to occur on the Pulelehua site and pineapple fields or fallow fields cover most of the area, the botanical survey concludes that the proposed use of the site for the Pulelehua community is not expected to have a significant negative impact on botanical resources. The survey

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further concludes that “there are no botanical reasons to impose any restrictions, conditions, or impediments to the proposed development of the site.” The establishment of the community will include grubbing of the pineapple fields.

Mitigative Measures

While the Pulelehua community will transform the agricultural fields of the site into a more urban environment, over one third of the community will be open space, landscaped parks, or gulch areas. Design standards for the community will include a unified streetscape planting theme and program to ensure the appropriate use of landscaping. New landscaping will include native, indigenous, and Polynesian introduced plants creating a more diverse range of plants. To the extent possible, existing trees on site will be retained. The establishment of the community will include grubbing of the pineapple fields. However, grubbed areas will be limited to specific areas for short periods of time.

3.9 WILDLIFE RESOURCES

Existing Conditions

No threatened or endangered species of birds or mammals were observed on the Pulelehua community site during an avifaunal and feral mammal field survey conducted on April 30 and May 1, 2004 (Bruner 2004). In addition, no native birds or mammals were observed. Results of the survey are summarized below. The complete survey is included as Appendix E.

The only migratory bird observed on the site was the Pacific Golden-Plover (*Pluvialis fulva*). Migratory shorebirds such as the plover typically depart Hawai'i for their arctic breeding grounds at the end of April. If the survey had been conducted earlier in April it is likely a few more plover and possibly Ruddy Turnstones (*Arenaria interpres*) might have been found foraging in the fields and on the grass areas around the airport. No seabirds or waterbirds were observed on the site, which was as expected as the site does not contain suitable habitat for these birds.

A total of eleven alien bird species were tallied on the survey and are listed below.

Common Name	Scientific Name
Cattle Egret	<i>Bubulcus ibis</i>
Gray Francolin	<i>Fancolinus pondicerianus</i>
Ring-necked Pheasant	<i>Phasianus colchicus</i>
Spotted Dove	<i>Streptopelia chinensis</i>
Zebra Dove	<i>Geopelia striata</i>
Barn Owl	<i>Tyto alba</i>
Japanese White-eye	<i>Zosterops japonicus</i>

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Common Name	Scientific Name
Common Myna	<i>Acridotheres tristis</i>
Red-crested Cardinal	<i>Paroaria coronata</i>
Northern Cardinal	<i>Cardinalis cardinalis</i>
Nutmeg Mannikin	<i>Lonchura punctulata</i>

Three Small Indian Mongoose (*Herpestes auropunctatus*) and one Roof Rat (*Rattus rattus*) were observed on the site during the survey. Mice (*Mus musculus*) and feral cats (*Felis catus*) likely occur on the site, but were not detected during the survey. The endangered Hawaiian Hoary Bat (*Lasiurus cinereus semotus*) was not found on the site. The absence of the bat was not unexpected due to its relatively low numbers on Maui.

Potential Impacts

The Pulelehua community is not expected to impact threatened, endangered, or native species of wildlife, since none were observed on the site. All of the birds and mammals found on the site are alien species. In addition, most of the mammals on site, or believed to be on site, are often regarded as pests (i.e., mongooses, rats, and mice).

Maui Land & Pineapple Company, Inc., will eradicate any rodents prior to site clearing activities as required by HAR Chapter 11-26, "Vector Control" and will notify the Department of Health by submitting Form VC12 to the Maui Vector Control Program.

Mitigative Measures

While the Pulelehua community will transform the agricultural fields of the site into a more urban environment, over one third of the community will be open space, landscaped parks, or gulch areas, providing extensive open space for birds. The establishment of the community will include grubbing of the pineapple fields, possibly impacting habitat on a temporary basis. However, grubbed areas will be limited to specific areas for short periods of time. New landscaping will include native, indigenous, and Polynesian introduced plants, perhaps making the area more attractive to the introduced species of birds that are present. To the extent possible, existing trees on site will be retained.

DESCRIPTION OF THE HUMAN ENVIRONMENT,
POTENTIAL IMPACTS & MITIGATIVE MEASURES



4.0 ASSESSMENT OF THE EXISTING HUMAN ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATIVE MEASURES

This section describes the existing conditions of the human environment, potential impacts of the Pulelehua community, and mitigative measures to minimize any impacts.

4.1 ARCHAEOLOGICAL AND HISTORIC RESOURCES

Existing Conditions

Archaeological Services Hawaii conducted an archaeological inventory survey (Archaeological Services Hawaii 2004) of the Pulelehua community site in May through June 2004 to document archaeological sites and recommend mitigation measures. The results of the survey did not reveal any significant surface cultural manifestations with the exception a plantation-era irrigation flume and isolated surface artifacts. Although not required by the State Historic Preservation Division (SHPD), the archaeologists conducted subsurface testing by backhoe in the cultivated portion of the Pulelehua community site to determine the presence or absence of subsurface cultural remains or deposits. The archaeological inventory survey is summarized below. Appendix F contains the complete survey report.

Historical Background and Settlement Pattern. Initial settlement on Maui is postulated to have occurred between A.D. 300-600 along the windward regions, including Wailuku on the windward isthmus between East and West Maui, and Hāna on the windward coast of East Maui. These areas provided abundant rainfall and fertile soil to support intensive agriculture. Population expansion into the drier, leeward areas likely took place by A.D. 1000-1200 when population growth and polity expansion forced agricultural expansion into marginally productive areas.

Historical residential structures or compounds, while present in adjacent coastal areas, were probably never located within the Pulelehua community site. Traditional land use in the West Maui region generally conformed to that of similar regions in Hawai'i. Traditional and historical settlement patterns were dictated by the availability of naturally occurring fresh water sources. The population was centered on the coast near Honokōwai Stream and Kahananui Stream where intensive irrigation agriculture was practiced, along with the exploitation of marine resources. Dry land cultivation, primarily sweet potatoes, is indicated in areas adjacent to the coastal margin. The coastline of Māhinahina and Kahana, due to the lack of fresh water, was probably only sparsely populated, with residents engaged in fishing and possibly commuting to the streams north and south for the purpose of irrigation agriculture. Trenching in the Pulelehua site revealed substantial

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basal soils which could easily have supported the cultivation of dry land crops such as sweet potatoes and gourds.

Ranching and Commercial Agricultural. From the mid-1800s onward, the history and land use of Māhinahina and Kahana revolved around two major land holding entities, Honolua Ranch and the Pioneer Mill Co. By around 1860, Henry Baldwin, majority owner of Māhinahina and Kahana, had consolidated holdings that came to be known as Honolua Ranch (Honolua Ranch later changed its name to Baldwin Packers, then Maui Pineapple Company, and finally, in 1969, to Maui Land & Pineapple Company, Inc., commonly referred to as Maui Land & Pine, or ML&P). The success of Pioneer Mill depended on satisfactory water agreements with Honolua Ranch, which controlled the major water-producing watershed. The two companies agreed that Honolua Ranch would build and own the Honokōhau Ditch, while Pioneer Mill would finance it and use the water.

Following the construction of aqueducts in the early 1900s for the purpose of delivering water to sugarcane lands of the Pioneer Mill Co., a phase of commercial agriculture began in the area around 1912 and has continued to a degree, to the present.

The Pioneer Mill Co., and more specifically the Pioneer Mill Co. railroad, played a significant role in the historical and demographic development of the region from the 1860s until relatively recent times (ca 1950s). The Pioneer Mill Co., engaged solely in the business of raising and processing sugarcane, was established in 1863 by Lahaina entrepreneurs James Campbell and Henry Turton in partnership with Benjamin Pitman, a Hilo merchant. In 1885, H. Hackfield & Company, predecessor of the present owner Amfac/JMB-Hawaii, Inc., bought control of the company. The Pioneer Mill Co., built a narrow gauge railroad to transport cane from its West Maui fields to its mill in Lahaina. In 1883, construction of the railroad was completed, running from its terminus at Honokōwai along the coast to the mill at Lahaina. That the railroad terminated at Honokōwai, together with Alexander, Bishop, and Dodge's 1885 map (registered map #1268A), which designates the land from Honokōwai south for sugarcane and the lands of Māhinahina north for cattle grazing, strongly suggests that the boundary between Honolua Ranch land and that of the Pioneer Mill Co., was at or near the Māhinahina and Honokōwai *ahupua'a* boundary.

In 1912, David Fleming founded the plantation that was later to be renamed Baldwin Packers by planting pineapple on a small section of the Honolua Ranch in West Maui. Eventually, neatly planted fields covered 2,500 acres from Māhinahina on the south to Kahakuloa on the north. The fruit, processed at a cannery at Honokahua, departed for the outside world via Kā'anapali Landing. In 1922, the Territory of Hawai'i erected Mala Wharf, motivating Baldwin Packers to build a cannery close by, in Lahaina. Pioneer Mill cane cars conveniently transported pineapples to this processing plant.

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Throughout most of the 20th Century, populations in the area of the proposed site were centered by three plantation camps: Honokōwai, Māhinahina, and Kahana. Honokōwai Camp probably dates to the 1880s. Kahana Camp probably dates to the extension of the Pioneer Mill Co. railroad around 1919. The closest camp, Māhinahina Camp, was east of the Pulelehua site, situated just below the Honokōhau Ditch and well outside of the Pulelehua site. Māhinahina Camp probably dates to the construction of the ditch around 1904 and residents of this camp probably provided maintenance for the ditch and adjacent pineapple fields.

Previous Archaeology. No previous archaeological studies have been undertaken within the Pulelehua community site; however, numerous studies have been completed in the vicinity. Information obtained from previous archaeological and historical studies in the vicinity indicates that prehistoric and historic remains may be located along the coastal areas of Māhinahina 1, 2, 3, Māhinahina 4, and Kahana ahupua'a, and in Māhinahina 1, 2, 3, Māhinahina 4, and Kahanaiki gulches. However, due to previous disturbances from pineapple cultivation, no prehistoric surface remains are expected on the plateau area of Pulelehua. Based on the results of previous archaeological work in the vicinity, sites expected in the gulches include features associated with prehistoric and historic agricultural and habitation. Types of prehistoric sites could include terraces, walls, platforms, and cultural deposits. Historic remains expected in the gulches include features associated with ranching and agricultural activities including walls and terraces.

Results of Fieldwork. Results of the surface survey of the Pulelehua community site revealed no significant surface cultural manifestations with the exception of a plantation-era irrigation flume in Māhinahina 1, 2, 3 Gulch and isolated surface artifacts. Although not required by the SHPD, the archaeologists conducted subsurface testing by backhoe in the cultivated portion of the Pulelehua community site to determine the presence or absence of subsurface cultural remains or deposits and to examine the general nature of the stratigraphy.

The irrigation flume is located in Māhinahina 1, 2, 3 Gulch near the southeastern boundary of the Pulelehua site where Māhinahina Gulch forks to Māhinahina 1, 2, 3 Gulch to the north and Māhinahina 4 Gulch to the south. The flume, constructed in 1898 by Pioneer Mill to transport water to the sugarcane fields, extended across and along the slope of the gulch. It was constructed of semicircular galvanized iron and wooden braces and trestles. By 1917, the flume had deteriorated and was replaced with tunnels.

Isolated artifacts, including a basalt hammerstone (Artifact #1) and two glass medicine bottles (Site 5641 and Artifact #3), were recovered from the surface of the Pulelehua site. Artifact #1 was found on the surface of a pineapple field access road in the southeastern the site. It measured 47 mm in diameter and 26.8 mm in thickness, and weighed 87.39 g. This discoidal-shaped hammerstone exhibited battering around the perimeter edges and polished surfaces. This artifact may have had a dual function as an *'ulu maika*.

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A historic surface artifact scatter was identified along the edge of a cut slope below the pineapple fields in the north central portion of the Pulelehua site. Sparse amounts of glass fragments from beer bottles and unidentified fragments were identified in the scatter. Two intact medicine bottles (Site 5641 and Artifact # 3) were collected from this scatter.

Site 5641 is a complete clear glass medicine bottle with a cork closure. It measured 113.3 mm high, 43.7 mm wide at the base, 20.1 mm in diameter at the opening, and 27.8 mm thick at the base, and weighed 83.38 g. It was embossed with "44" and "U.S.A.", and a maker's mark of a triangle with the letters "WT" on the base. This bottle was manufactured in 1944 by the Armstrong Cork Company, Glass Division.

Artifact #3 is a complete, clear glass, fully automatic, medicine bottle with a thread screw closure. It measured 100 mm high, 32 mm wide at the base, 15.5 mm in diameter at the opening, and 24.5 mm thick at the base, and weighed 59.55 g. It was embossed with 30 c.c. on the base. This type of bottle was manufactured after 1930.

Due to extensive previous disturbances from pineapple cultivation, backhoe trenching was conducted to determine presence/absence and extent of subsurface cultural remains. A total of 20 backhoe trenches (T1 through T20) were excavated in selected areas throughout the parcel. Several of these trenches (T5 and T20) were excavated in the vicinity of surface artifacts to determine the source of these finds.

Trenches 1-5 were placed south of Māhinahina 1, 2, 3 Gulch along roadways in between pineapple fields. T5 was located in the vicinity of Artifact #1. T6-10 were placed in a fallow pineapple field between Māhinahina 1, 2, 3 Gulch and Akahēle Street, and T11-14 were placed in a fallow pineapple field between Akahēle Street and existing pineapple fields. T15-20 were placed south of Kahanaiki Gulch along roadways in between pineapple fields. T20 was located near the historic surface artifact scatter. No cultural remains or deposits were encountered in any of the trenches.

Potential Impacts

The Pulelehua community is not expected to have an impact on archaeological resources. The results of the archaeological inventory survey of the Pulelehua community site (Archaeological Services Hawaii, LLC 2004) did not reveal any significant surface cultural manifestations with the exception a plantation-era irrigation flume and three isolated surface artifacts, two from the 20th century. Historical research indicates that historical residential structures or compounds, while present in adjacent coastal areas, were probably never located within the Pulelehua community site.

Based on the negative results of subsurface testing, together with evidence for previous disturbances in the region area from pineapple cultivation, Archaeological Services Hawaii, does not recommend further inventory-level archaeological work for the Pulelehua community site.

Mitigative Measures

The plantation-era irrigation flume (Site 5553), in Māhinahina Gulch is situated outside the proposed community site and will not be impacted by the Pulelehua community. Thus, Archaeological Services Hawaii, LLC, does not recommend further work for the flume. However, due to the presence of isolated surface artifacts, and Māhinahina Camp in the vicinity, archaeological monitoring is recommended during initial construction activities to document any subsurface cultural remains or deposits underlying the till zone. Prior to commencing any construction activities, an archaeological monitoring plan will be prepared for approval by SHPD.

Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological and historic sites should any sites be found during construction. Should historic remains such as artifacts, burials, concentrations of shell or charcoal be encountered during construction activities, work shall cease immediately in the immediate vicinity of the find and the find shall be protected from further damage. The contractor shall immediately contact the SHPD which will assess the significance of the find and recommend appropriate mitigation measures, if necessary.

The SHPD reviewed the archaeological inventory survey report, concurred with the recommendations, and found the report to be acceptable.

4.2 CULTURAL RESOURCES

Existing Conditions

Maria E. Ka'imipono Orr conducted a cultural impact study/assessment of the Pulelehua community site to gather information about traditional cultural practices and pre-historic and historic cultural resources that may be affected by the Pulelehua community (Orr 2004). The cultural impact study/assessment is summarized below. Appendix G contains the full study.

Ancient Land, Water and Marine Resources and Use. The traditional literature has a sparse amount of information about Māhinahina; the goings and comings of various *ali'i nui*, their families and their adventures and the *maka'āinana*, the people who cared for the land. Archaeological studies have revealed that fishing villages or settlements were along the coastal lands of the Kā'anapali District; the earliest dates (ca. AD 610) were in Honokahua. This area of Honokahua and Honolua has perennial streams that supported kalo lo'i (wet land taro terraces), as did neighbor ahupua'a Honokōwai. Other streams in the district had seasonal flows of water. According to native and foreign Land Commission Awards (LCA) testimonies, these valley/gulch and kula lands appeared to have supported the cultivation of mai'a or banana (*Musa xparadisiaca* spp), olonā (*Touchardia latifolia*),

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sweet potato, dry land taro, hala (*Pandanus* spp), kukui (*Aleurites moluccana*), milo (*Thespesia populnea*) and kou (*Cordia subcordata*).

There were only two recorded fishponds in the Kā'anapali District, one was at Honokōwai, bordering Māhinahina and the other was at the mouth Kahana Nui Stream. However, both Māhinahina and Kahana had *kahawai* (stream, creek, valley, gulch, whether wet or dry) where fresh water drained into the ocean supporting the life cycles of several species of fish and *limu* (seaweed); referred to as Māhinahina Gulch, Kahana Nui Gulch and Kahana Iki Gulch).

The district also had several known *heiau* (structure of worship), alluding to organized and complex social and religious systems, above the ordinary scope of the personal and occupational *ko'a* (shrines). However, by the time researchers were able to study the area in the late 1800s and early 1900s many more were suspected to have been destroyed by historic use of the lands. According to previous archaeological surveys, almost all traces of the ancient period in Māhinahina-Kahana have been destroyed with the exception of a few stone remnants in the Kahana Gulches and a cultural deposit in the Māhinahina Gulch. Carbon dating analysis of charcoal specimen from Site #255 in Māhinahina Gulch indicates an occupation date of AD 1150, with a pre-contact occupational time span of AD 1150 to 1778.

Historic Land, Water & Marine Resources and Use. The native and foreign testimonies and registers of the Mahele land claims process provide a view of lands already in transition. Seventy years had passed since first contact by Captain Cook, and 28 years had passed since the missionaries arrived. The devastating sandalwood era was winding down, but not before heavily modifying the landscape by denuding the upper forests and kula lands. According the testimonies, much of the kula lands were converted to pasture; this was followed by mono-crop agricultural practices—the cultivation of sugar cane and pineapple, which also radically modified the natural landscape with infrastructural roads, railways, bridges, ditches, tunnels, plowing and rock crushing. This was the land history of Māhinahina as well. The Māhinahina house lots mentioned in the testimonies were either destroyed before or during the sugar plantation era. One modified house from the sugar plantation's Māhinahina Camp is currently utilized by Honolua Plantation employees, along with two transported houses from Fleming's Beach (Honolua area). However, these are mauka and well outside of the Pulelehua lands.

The Pulelehua lands were at one time leased by Pioneer Mill Company and cultivated with sugar cane. In the late 1980s, the lands were part of a land exchange and subsequently cultivated with pineapple. The lands now border the Kapalua West Maui Airport (*mauka*) and the Cane Haul Road (parallel to the Honoapi'ilani Highway) and straddle Akahahele Street that leads to the airport. The northern boundary is the Kahana drainage (Kahana Iki Gulch). Both sections, on either side of Akahahele Street are currently fallow pineapple fields. A section of Pulelehua is located south of the Māhinahina Gulch drainage and is currently cultivated in pineapple.

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The Māhinahina-Kahana drainages (valleys, gulches, gullies, streambeds) were seasonal and fell victim to the alien vegetation transported as seeds by cattle, goats and pigs, etc. Today they are inundated with predominantly alien grasses, shrubs and trees; a few *kukui* trees were observed in the gulches within the Pulelehua area. However, the upper gulches and lands still have cultural resources in the way of flora, fungus, and feral pigs. The Kahana drainage has a few remnants of the early historic period (stone animal pens); and the Māhinahina drainage has a remnant wooden flume from the sugar plantation period. The Honolua Ditch continues to traverse Māhinahina (underground and *mauka*). Desiltation basins were constructed in both the Māhinahina Gulch and Kahana Iki Gulch, and in the section north of Akahēle Street (Pōhaku-Kā'anapali Basin).

Coastal waters in the Māhinahina-Kahana region (makai of the Pulelehua site) have a long history of prolific marine resources (fish, turtles, lobster, crabs and seaweed). The waters of Māhinahina-Kahana are still fished by families representing several generations in the area, as well as newcomers. However, the cultural interviewees felt that the ocean is dying (diminished resources—fish, lobster, crabs, seaweed—and coral are dying).

Survey Findings (Cultural Practices). It is evident that at one time the lands of Māhinahina-Kahana, which include the Pulelehua lands, were part of an ancient Hawaiian life system. Previous archaeological surveys in the vicinity revealed evidence of possible burials, hearths, temporary habitation shelters (Kahana Gulch) and cultural deposits (Māhinahina Gulch), indicating a multi-use of the lands. A cultural practice of these lands at one time was growing sweet potato, a staple for the ancient people of this area, as well as cultivating bananas, olonā, hala and possibly dry-land taro. There are no traces of these plants now within the Pulelehua community site. Hawaiians also made use of the flora that grew in the gulches, valleys and mountains, such as *kukui*, 'ōhi'a, fungus, and *lama*, for medicines, food, crafts, and lumber. These resources are still sought after today. However, other than a few *kukui* trees in the gulches, none of these plants exist today on Pulelehua community site.

The most significant cultural practices in the vicinity of the Pulelehua community area, but outside of the Pulelehua site, that continue today are fishing and sea-gathering (i.e., *limu*/seaweed, 'opihi, *wana*/sea urchins, and sea cucumber).

Potential Impacts

Pulelehua is not expected to impact cultural resources. The cultural impact study/assessment concludes (in part):

The lands within the project area were heavily impacted by the historic activities of the 19th and 20th centuries. Any cultural sites and/or resources would have been destroyed or buried by ranching, sugar, and pineapple plantation activities; therefore there will be no adverse impact to any

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cultural resources on Pulelehua lands...Since there are no resources on Pulelehua lands, there will be no adverse effects to cultural practices.

A concern of people interviewed for the cultural impact study/assessment was the potential impact from the Pulelehua community to marine resources and cultural fishing practices due to: 1) runoff and silt; and 2) seepage of pesticides and fertilizers from yards into the groundwater and eventually the ocean.

Another concern of people interviewed relates to cultural resources that may be in the gulches and access to the gulches and mauka lands. People interviewed felt that the Pulelehua community could impede access to these areas.

Mitigative Measures

Pulelehua is not expected to impact marine resources and cultural fishing practices and may actually improve existing nearshore water quality conditions. All additional runoff due to the community will be retained on site with no increased flow into the existing drainage ways, desilting basins, and the ocean. Section 4.9.2 contains additional information on drainage, potential impacts, and mitigative measures.

Results of a nearshore water quality study conducted for this EIS (see Section 3.6 and Appendix C) conclude that Pulelehua has the potential to improve near shore water quality relative to agricultural use of the lands. The study concludes that it is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses. This is because, unlike agricultural lands which are periodically plowed or fallow, and thus exposed to rainfall and erosion, residential uses provide more stable soil retention qualities in the form of fixed landscaping, roads, and buildings. Thus with residential uses, the existing level of runoff flows from the site will contain much less sedimentation than the current conditions with agricultural uses.

The nearshore water quality study also concludes that with the change to residential uses subsidies of nutrients delivered to the ocean are expected to decrease. Study results indicate that the nearshore area makai of Pulelehua is presently receiving nutrients from groundwater. The major source of these nutrients is likely from the long-term percolation of fertilizers used on the agricultural fields of West Maui. With the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean. It has been shown that the greatest contribution of nutrients to groundwater from human activities on West Maui is from agriculture. On the other hand, golf courses, resort, and residential development provide a relatively small contribution (Soicher and Peterson 1997). Since Pulelehua will replace agriculture uses with residential uses, the overall subsidies of nutrients delivered to the ocean are expected to decrease.

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Other than *kukui* trees in the gulches, there are no known cultural resources on the Pulelehua site. No uses are proposed in Kahanaiki (north) or Māhinahina (south) Gulch other than limited infrastructure that may be necessary. Pōhaku-Kā'anapali Gulch, the shallow gulch that bisects the site, is proposed to be left in open space with areas designated for playfields and a community garden. Access to gulches and mauka lands is discussed below, in the next section.

The archaeological survey did not find any significant surface cultural manifestations with the exception a plantation-era irrigation flume and isolated surface artifacts. In addition, subsurface archaeological testing of 20 backhoe trench excavations did not reveal any subsurface cultural remains. Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological and historic sites should any sites be found during construction.

4.3 ACCESS AND TRAILS

Pulelehua site is not along the shoreline, nor does it provide primary access to the mountains. The site has been in pineapple cultivation for several decades. Because of this, access to, and use of, the area by the public has been limited. There are no known traditional trails through the property; however, there are existing cane roads that provide access to specific agricultural fields. Currently, due to agricultural operations, the area is fenced and gated; however, access is allowed with a permit.

Maui Land & Pineapple Company, Inc., grants requests for access to its West Maui lands. Request for access are typically for gathering or harvesting, fishing, research, recreation, or other activities. Visitors granted access are given a key to a specific gate and must return the key within an allotted time.

Potential Impacts and Mitigative Measures

Relative to the agricultural use of the majority of the site, the establishment of the Pulelehua community will make the area more accessible and will not impede access to mauka lands.

Pulelehua will not be a gated community and its trails and parks will be open for all Maui residents to enjoy. There will be approximately ~~423~~ 133 acres of parks in Pulelehua, including trails, ball fields, neighborhood parks, community gardens, and open space gulches.

Creation of the Pulelehua community will not change Maui Land & Pineapple Company, Inc.'s current practice of allowing access its West Maui Lands with permission.

4.4 TRANSPORTATION

Hall Planning and Engineering, Inc., prepared a transportation report to analyze the impacts the Pulelehua community on the regional transportation system. Existing transportation conditions in the area were analyzed, followed by the most comprehensive analysis of West Maui's proposed future development to date. Twenty-four proposed projects (excluding Pulelehua) were analyzed separately and then combined to estimate cumulative "background" traffic growth using computer-based traffic modeling software. Then Pulelehua's projected trips were determined and added to "background" traffic to evaluate the cumulative impact on the traffic network in the future. This analysis covered 10 miles of State highways and included over a dozen major intersections. Key elements of the report are summarized below. The complete report is included in Appendix H.

Existing Conditions

Honoapi'ilani Highway forms the makai boundary of the Pulelehua site. As the primary roadway in area, Honoapi'ilani Highway provides regional access within West Maui, and connects to other regional highways serving other parts of Maui. North of the intersection of Lower Honoapi'ilani Road, Honoapi'ilani Highway is a two-way, two-lane, undivided roadway with a 45 mile per hour (mph) posted speed limit, with most vehicles actually traveling at higher speeds. From the intersection of Lower Honoapi'ilani Road south to Dickenson Street in Lahaina, Honoapi'ilani Highway is a two-way, four-lane undivided roadway. South of Dickenson Street, Honoapi'ilani Highway continues as a two-way, two-lane, undivided roadway.

Akahele Street bisects the Pulelehua community site and connects Honoapi'ilani Highway with the Kapalua West Maui Airport. The Honoapi'ilani Highway/Akahele Street intersection is signalized and has auxiliary right turn lanes and signalized left turn lanes on all approaches. In the mauka direction, Akahele Street provides access to Kapalua West Maui Airport. In the makai direction, Akahele provides access to the Māhinahina area.

In addition to Akahele Street, principal intersections in the Pulelehua vicinity include:

- Nāpilihau Street/Honoapi'ilani Highway—north of Akahele Street. Nāpilihau Street is a two-way, two-lane, road with a 20 mph posted speed and a signalized intersection. In the makai direction, Nāpilihau Street provides access to the Nāpili Shopping Center and the Nāpili area. In the mauka direction, Nāpilihau Street provides access to the Maui Pineapple Company base yard.
- Ho'ohui Road/Honoapi'ilani Highway—north of Akahele Street. Ho'ohui Road is a two-way, two-lane road with a 20 mph posted speed and a signalized intersection. In the mauka direction, Ho'ohui Road provides access to the Kahana Ridge subdivision. In the makai direction, Ho'ohui Road provides access to the Kahana Gateway Shopping Center and the Kahana area.

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- Lower Honoapi'ilani Road/Honoapi'ilani Highway—south of Akahahele Street. It is a signalized intersection with signalized left turn lanes in all directions and auxiliary right turn lanes heading southbound from Lower Honoapi'ilani Road. In the mauka direction, Lower Honoapi'ilani Road provides access to County of Maui Wastewater Treatment Facility. In the makai direction, Lower Honoapi'ilani Road provides access to the Honokōwai area.

Based on traffic counts and standard traffic engineering analysis, the transportation report found that Honoapi'ilani Highway operates well at the principal intersections listed above in the critical AM and PM peak hours, meaning traffic at the intersections does not experience long delays.

In addition to the principal intersections listed above, the transportation report provided analysis on the current travel quality of Honoapi'ilani Highway from Office Road in Kapalua to 'Aholo Road in Lahaina. This segment of Honoapi'ilani Highway includes the Lahainaluna intersection. The analysis found that Honoapi'ilani Highway operates at acceptable levels with brief slowdowns during peak hours of the day, but there is congestion at the intersection of Honoapi'ilani Highway and Lahainaluna Road. This is exclusive of traffic accidents that occasionally congest West Maui roads.

Currently, the Honoapi'ilani Highway corridor is pedestrian-unfriendly, due to a lack of sidewalks and relatively high traffic speeds. The area makai of the Akahahele/ Honoapi'ilani intersection on Lower Honoapi'ilani Road does display some walkable features, including sidewalks and crosswalks, but high speeds hamper pedestrian comfort.

Potential Impacts

An objective of Pulelehua is to create homes for Maui's working families near employment centers. Many employees at the Kā'anapali and Kapalua resorts and other businesses in West Maui currently commute from Central Maui or other regions. Providing the opportunity for workers to afford a home near their jobs is expected to decrease commuting to and from West Maui, lessen traffic congestion, reduce stress, allow more family and recreation time, lessen pollution, and improve overall quality of life for not only Pulelehua residents, but for Maui residents in general.

Providing homes near employment also allows workers more transportation options to get to work, such as walking and bicycling, and makes public transportation more feasible by clustering populations and destinations within in a defined area along a practical route. The compact design of Pulelehua will further contribute to the feasibility of public transportation by providing a concentrated population within a walkable community, thus enabling many people to walk a short distance to get to a transit stop.

The traditional neighborhood design of Pulelehua will also serve to minimize trips onto Honoapi'ilani Highway as many essential services needed by Pulelehua residents will be

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within walking and biking distance, such as stores, restaurants, parks, and a school. Thus, unlike in a conventional subdivision, Pulelehua residents will not need to drive to areas outside of Pulelehua for all their daily needs. Walking and bicycling will be a way of life for Pulelehua residents.

However, it is recognized that many of these potential positive impacts are not quantifiable or predictable. To gain an understanding of future regional traffic impacts after the build out of Pulelehua in 2011, the traffic report analyzed current traffic conditions using standard traffic engineering methods and projected future growth in traffic conditions both without and with Pulelehua.

Regional Impacts Summary. To predict cumulative future regional traffic impacts, the Pulelehua transportation report identified 25 developments, including Pulelehua, that are projected to be built or under construction in the West Maui region by 2011. Table 2 lists these proposed projects along with the number of units expected to be built by the time Pulelehua is completed in 2011. Where available, traffic projections from Traffic Impact Analysis Reports (TIARs) for these other projects were included in the analysis.

Taking Pulelehua out of the mix, the traffic impacts of the developments in Table 2 were analyzed using generally accepted planning and engineering methods. For the Honoapi'ilani Highway corridor (from Office Road in Kapalua to 'Aholo Road in Lahaina), trip generation analysis determined that future projects would generate a total of 1,765 new external trips during the AM peak hour and 1,736 new external trips during the PM peak hour.

It is important to note that not all of these trips will be distributed (travel) along the entire length of the Honoapi'ilani Highway corridor. For example, some cars may enter Honoapi'ilani Highway at Ho'ohui Road and travel north toward Kapalua. Other cars entering Honoapi'ilani Highway from Ho'ohui Road will travel south. Some of these south-bound cars will turn off Honoapi'ilani Highway at Kā'anapali Parkway or other points. Still others will continue on to Lahaina and turn off Honoapi'ilani Highway at Lahainaluna Road or other points, or continue on to the "other side." Thus, not all of the projected peak hour trips will be on all segments of the Honoapi'ilani corridor.

To analyze the trip distribution along the Honoapi'ilani corridor, the traffic engineers looked at specific segments of Honoapi'ilani in relation to proposed new developments to determine where cars would be entering and exiting the highway. With the proposed developments listed in Table 2 (excluding Pulelehua), the analysis shows increases in traffic on average of about 200 peak hour trips on any given segment of Honoapi'ilani Highway. The projected non-Pulelehua trips impact Honoapi'ilani Highway as "background" traffic growth that is assumed to occur, with or without the creation of Pulelehua. The traffic analysis indicates that Honoapi'ilani Highway will continue to function adequately with these developments through the 2011 build-out year.

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Table 2: West Maui Projects Included in the Cumulative Pulelehua Traffic Analysis

Project #	Project Name	Location	Proposed Buildout	Estimated Development by 2011
1	Honolua Ridge	North of Kapalua	Phases I & II; 49 SF lots	25 units
2	Kapalua Mauka	Kapalua; mauka of Honoapi'ilani Hwy.	690 units; 390 SF; 300 MF most units resort residential	75 SF 90 MF
3	Pailolo	North Kahana/Nāpili	25 SF units	25 SF units
4	Maui Preparatory Academy	Mauka of Honoapi'ilani Hwy; Māhinahina area	540 students; pre-K to Grade 12	540 students; pre-K to Grade 12
5	Villas at Kahana Ridge	Kahana Ridge	117 MF units	117 MF units
6	Pulelehua	Māhinahina mauka of Honoapi'ilani Hwy	882 mixed residential units; 318 potential ohana units, commercial, public. (1,218 units residential units were assumed for the transportation analysis, based on initial scenarios)	882 mixed residential units; 318 potential ohana units, commercial, public. (1,218 units residential units were assumed for the transportation analysis, based on initial scenarios)
7	Maui Breakers	Māhinahina	90 MF units	90 MF units
8	DHHL Honokōwai	Honokōwai/next to Pulelehua	411 SF units	0 units
9	Marriott expansion	Kā'anapali	303 addl. timeshare units; 336 fewer hotel rooms	457 timeshare units; 55 hotel rooms
10	Hyatt expansion	Kā'anapali	173 lockout units and 153 timeshare	153 timeshare and 43 lockout units
11	Kihune	Nāpili	20 MF units	20 MF units
12	Intrawest	North Beach Lot 4	700 MF units	700 MF units
13	Kā'anapali 2020	Kā'anapali; mauka of Honoapi'ilani Hwy.	1,257 SF; 1,163 MF; 390 mixed-use MF; commercial; public; golf	200 SF; 200 MF
14	Starwood	North Beach Lot 2	258 MF units + 258 lockout units	258 MF units + 65 lockout units
15	Palisades at Kā'anapali	Kā'anapali mauka of Honoapi'ilani Hwy,	132 SF units	132 SF units
16	Land Tech	Kā'anapali	18 SF units	18 SF units
17	Villages at Leiali'i	West Maui	4,846 units; 2006 SF 2840 MF	104 SF

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Project #	Project Name	Location	Proposed Buildout	Estimated Development by 2011
18	West Maui Resource Center -- Phase II	Above Lahaina Regional Park	16 units transitional housing; 10 units long-term housing	26 units
19	Lōkāhi Pacific	Lahaina	12 SF units	12 SF units
20	Waine'e Village	Lahaina mauka of Honoapi'ilani Hwy	575 units; 400 SF; 175 MF	100 SF; 60 MF
21	Plantation Inn	Lahaina	14 MF units	14 MF units
22	Pu'unoa Village	Lahaina, mauka of Honoapi'ilani Hwy	268 SF units	0 units
23	Mākila	Launiupoko	40 SF units + 40 Ohana units	40 SF units + 40 Ohana units
24	Olowalu	Olowalu	20 SF units + 20 Ohana units	20 SF units + 20 Ohana units
25	Ukumehame	Ukumehame	46 SF units + 46 Ohana units	46 SF units + 46 Ohana units

Pulelehua Transportation Analysis. When built as planned, by 2011, Pulelehua will generate 745 new AM peak hour external trips, and 987 new PM peak hour external trips.

Again, it is important to note that not all of these trips will be distributed along entire length of the Honoapi'ilani Highway corridor; some cars from Pulelehua will be traveling north toward Kapalua, others will be traveling south, but not all of these cars will travel all the way through Lahaina and on to the "other side." For example, during the AM peak, it is projected that only about 98 cars from Pulelehua will travel through the Lahainaluna intersection and only 49 of these will then travel beyond Shaw Street.

The distribution of Pulelehua trips along the Honoapi'ilani corridor indicates that Pulelehua is expected to add an average of approximately 150 peak hour trips on any given segment of Honoapi'ilani Highway. Combined, Pulelehua and all other projected developments will add an average of about 350 peak hour trips on any given segment of Honoapi'ilani Highway. More specifically, the segments closer to Pulelehua will receive a higher number of trips, on the order of 400 trips, while areas further to the north or south will receive fewer trips, on the order of 50 trips.

These are conservative estimates, i.e., actual trip generation may be much lower. Due to the walkability of Pulelehua's traditional town plan, many of these trips will be captured on-site, rather than become external trips. Since the ITE (Institute of Transportation Engineers) trip-generation rates are based on data collected in suburbs where automobiles are essential for every trip, these rates underestimate the number of trips that will remain on-site in a walkable community such as Pulelehua, which in turn overestimates the

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number of trips that will travel the public roadway network, primarily Honoapi'ilani Highway. Below are several additional site-specific conditions which further contribute to the conservative estimate of trip generation:

- The unit count used for Pulelehua assumes all ohana units that can be built by future residents will be built by 2011. However, these ohana units will be constructed at the discretion of the lot purchaser, and it is unlikely that all units will actually be built.
- Currently, some West Maui employees reside outside of West Maui, and it is expected that a percentage of these employees will move to Pulelehua, reducing the vehicle trips coming into West Maui on Honoapi'ilani Highway. This work trip shift is not included in the analysis.
- Trips generated by Pulelehua parents taking their children to school may be overstated due to the public DOE elementary school within Pulelehua. It is expected the school will have significant positive impact on travel on Honoapi'ilani Highway as elementary school children residing approximately north of Kā'anapali, including Pulelehua children, will not have to travel to the Lahaina area for school.
- The Lahaina Bypass and Honoapi'ilani Highway four-laning projects were not included in the analysis since no construction schedule for these projects has been set. However, if constructed, these projects will have a mitigating effect on any Pulelehua transportation impacts.

Additional Analysis

In response to several comments on the Draft EIS, the following additional analysis regarding Pulelehua traffic impacts is provided:

Traffic Impact South of Lahaina. The transportation report analyzed a 10-mile portion of Honoapi'ilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina, there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launiupoko. While the transportation report does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapi'ilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak hour, approximately 49 cars from Pulelehua (southbound) will travel on Honoapi'ilani Highway through the Shaw Street intersection and beyond. Thus if it is assumed that none of these cars turn off the highway between Shaw Street and Mā'alaea, 49 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui.

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In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapi'ilani Highway will cross the Shaw Street intersection during the AM peak hour. Thus if it is assumed that these cars did not enter Honoapi'ilani Highway from some points between Shaw Street and Mā'alaea, 52 cars will travel on Honoapi'ilani Highway from Mā'alaea or other parts of Maui.

Using the same assumptions, in the PM peak hour, 42 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Mā'alaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali

	<u>AM Peak Hour</u>	<u>PM Peak Hour</u>
<u>From Pulelehua (southbound)</u>	<u>49</u>	<u>42</u>
<u>To Pulelehua (northbound)</u>	<u>52</u>	<u>113</u>

Level of Service Concept. The Level of Service (LOS) traffic engineering concept is explained on page 2 of the transportation report included in the Draft EIS. As explained, there is a common misconception that LOS designations are like school grades, in which D is worse than C, C is worse than B, and A is best of all. In urban areas a LOS of D is typically considered acceptable for peak conditions. This is because roads are very expensive to build, and once built, they must be heavily used to help justify the cost of construction. A road that operates at LOS A at all times is a road that has been over-built for local traffic conditions. Even during peak traffic hours, a road at LOS A carries only a fraction of its vehicle capacity, which is a highly inefficient use of scarce transportation funding. Comparatively, a road that operates at LOS C or D carries many trips for its size and represents a more efficient use of transportation funding. At LOS C or D, the road will be congested during peak travel times, but will also carry a measurable amount of traffic during off-peak times. Such roads represent a better fit between the desire to travel freely on the road and the expense of building new roads. For this reason, many communities adopt LOS D as their standard LOS for roads and streets.

Comparison of the 2011 "with Pulelehua" scenario with the 2011 "without Pulelehua" scenario shows that the majority of intersections will operate at the same LOS with or without Pulelehua. In other words, considering all the other projected projects taken into account in the transportation report, Pulelehua will not substantially change the LOS at most intersections. Table 19 on page 52 in the transportation report is an example of this, showing the same LOS at intersections with or without Pulelehua.

Traffic Counts. Traffic counts taken for Pulelehua were compared with counts taken and traditional peak periods for other traffic impact studies in the area and with State Department of Transportation (DOT) data. The volumes were comparable. While it is possible that tourism was affected by the invasion of Iraq, this usual factor was not

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considered in the traffic counts. However, based on a comparison with other counts taken and traditional peak periods traffic impact studies and DOT data, the Pulelehua traffic volumes were comparable.

Trip Generation Rates. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Based on the professionally acceptable trip generation procedure, 986 vehicle trips are generated during the PM peak hour and 745 vehicle trips during the AM peak hour are reasonable trip generation estimates.

Given the walkable design of Pulelehua, the ITE rates probably overestimate the external automobile trip generation, so using these rates represents a very conservative trip generation estimate.

Commercial and School Traffic. Traffic projections of the transportation report include projections of traffic generated from Pulelehua's school and neighborhood commercial uses. ITE trip generation rates were used to project future conditions. These are standard rates used by traffic engineers throughout the country.

Trip Distribution. Trip distribution percentages were formulated from professional experience and judgment of the Pulelehua traffic engineers. To enhance this knowledge, multiple traffic impact reports for the area were studied to discern detailed distribution patterns.

Effect on Drive Times. It is estimated that a trip through Lahaina during the PM peak hour will take approximately 14 seconds longer if Pulelehua is built. It is estimated that a trip from Lahaina to Kapalua during the PM peak hour will take approximately 24 seconds longer if Pulelehua is built.

Intersections Most Impacted. Because the transportation report considers trip generation as originating and terminating from Pulelehua, the intersections closest to Pulelehua are the most impacted. As traffic is distributed further from Pulelehua, impacts lessen significantly, as not all Pulelehua vehicles travel the entire length of Honoapi'ilani Highway.

Traffic Signals. Traffic volumes projected in the transportation report at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes reach specific established levels. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company, Inc., will provide.

Less Pulelehua Intersections. Providing fewer Pulelehua connections to Honoapi'ilani Highway would result in long cueing times at the limited intersections, thus requiring more side street green time at Akahale Street and interrupting smooth traffic flow on Honoapi'ilani Highway. Multiple access points distribute site-oriented traffic more

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evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapiʻilani Highway.

Public Safety. The posted speed limit on Honoapiʻilani Highway in the vicinity of Pulelehua is 45 miles per hour, but most vehicles exceed this limit. This is partially due to the design of Honoapiʻilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peaks hours, it is very likely that people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

The Pulelehua street intersections with Honoapiʻilani Highway will be engineered and designed according to all applicable Federal, State and County standards. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company, Inc., will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

Construction Vehicle Traffic. During construction, construction vehicle traffic impacts are assumed to be less than full built out of Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the AM or PM peak hours. Although daily construction traffic is somewhat active, neither the daily or peak hour construction traffic exceeds the total build-out traffic forecast after Pulelehua completion.

Roundabout. A roundabout is not proposed on Honoapiʻilani Highway as part of Pulelehua. Previous plans had included a roundabout; however this has been eliminated from the current plan.

Lahaina Bypass. Because the time for the construction of the Lahaina Bypass is uncertain, the transportation report does not assume the Lahaina Bypass or the “mini” bypass will be built. This results in conservative estimates of traffic impacts.

Big Box Shopping. Pulelehua’s neighborhood businesses are not meant to compete with big box stores in Kahului. While Pulelehua residents are likely to shop at a variety of retailers, providing neighborhood-serving businesses within Pulelehua will allow some immediate needs to be met within Pulelehua, thus decreasing a portion of trips onto Honoapiʻilani Highway. Unlike a conventional subdivision, Pulelehua residents will have the option of not driving to obtain some basic services.

Impact of Topography on Biking and Walking. Elevation was carefully considered in the design of Pulelehua. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for

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walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Pulelehua streets are designed to run along the contour lines as much as possible, and streets that run up and down (mauka and makai of) the contour lines are relatively short. Within Pulelehua, trip lengths will be short and walking will not be adversely affected. While a few bicyclists/pedestrians might choose to zigzag up hill to their destination and would benefit from the street grid, most will choose the shortest route, cutting across a slope to reduce the effective grade of the path in a rural or recreational setting. However, when streets are designed to climb a slope, pedestrians generally follow the sidewalk and climb as required. Keeping the blocks short will minimize topographical constraints.

Mitigative Measures

The traffic analysis indicates that peak hour traffic will continue to operate at acceptable levels of service, as long as the following improvements are made:

- Maui Land & Pineapple Company will add four additional, non-signalized, well-spaced intersections along Honoapi'ilani Highway to adequately distribute Pulelehua in and outbound trips. Left turn storage lanes and right turn deceleration lanes will be included. These intersections are in the Pulelehua plan and vital to proper operation of both the traditional town street system and Honoapi'ilani Highway.
- If PM peak traffic reaches projected levels, the intersection of Lower Honoapi'ilani Road and Honoapi'ilani Highway will require an added left turn lane on the south approach due to the projected traffic queues for that movement. To receive the two lanes of turning traffic, an additional westbound lane would be needed on the west leg.

The Pulelehua community will change area traffic flow. However, estimates of future traffic indicate the community will not create adverse traffic conditions. To the contrary, the walkable community design pattern established for Pulelehua will encourage walking, biking and transit as added modes of travel that will support the motor vehicle travel mode. This increase in travel choices will increase overall mobility in West Maui.

4.5 NOISE

D.L. Adams Associates, Ltd., prepared an environmental noise assessment report for the Pulelehua community to examine potential noise impacts (non airport) and suggest possible mitigation measures. A separate airport noise contour report was also prepared. Section 4.10 of this EIS contains information regarding airport impacts, including airport

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noise. Key elements of the D.L. Adams Associates, Ltd., report are summarized below. The complete report is included in Appendix I.

Existing Conditions

The dominant noise sources in the vicinity of the Pulelehua community site are traffic from Honoapi'ilani Highway and aircraft from the Kapalua West Maui Airport. Other noise sources include wind and birds. Existing agricultural operations can also contribute to noise in the area depending on field operations, such as harvesting and plowing.

Potential Impacts

Potential impacts on the ambient quality of the site and surrounding area due to the creation of the Pulelehua community, not including airport noise, are primarily limited to short-term construction activity and, in the long-term, human activity within the community and increases in traffic.

Construction Noise. Creation of the Pulelehua community will involve excavation, grading, and construction of new buildings and infrastructure. Earthmoving equipment, such as bulldozers and diesel trucks, will likely be the dominant noise sources during construction. Typical road construction equipment, such as asphalt or concrete paving machines will also be required. Nearby residences may be impacted by construction noise depending on proximity to the site. Construction activity will occur during daytime hours. Noise from construction activity will be short-term and will comply with DOH noise regulations.

Traffic Noise. Traffic-generated noise due to Pulelehua is not expected to be significant. While vehicular traffic volumes in the area will increase, the increase in noise due to traffic from Pulelehua is expected to be less than 2 decibels (dB). This change in noise level is not perceptible to most people. The predictions and projections include the traffic volumes of the Pulelehua community and 24 other projects proposed in West Maui (see Table 2).

Human Activity. After the establishment of the Pulelehua community, the ambient quality of the site will be changed from the current agricultural uses to typical residential and commercial sound patterns. These include, people talking, children playing, cars entering and exiting the community, and other sounds from human habitation.

Mitigative Measures

All Pulelehua activities will comply with HAR, Chapter 11-46, Community Noise Control.

Construction Noise. Proper mitigating measures will be employed to minimize construction-related noise impacts and comply with all Federal and State noise control

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regulations. Increased noise activity due to construction will be limited to daytime hours and persist only during the construction period. Noise from construction activities will be short-term and will comply with DOH noise regulations (HAR, Chapter 11-46, Community Noise Control). When construction noise exceeds, or is expected to exceed the DOH's allowable limits, a permit must be obtained from the DOH. Specific permit restrictions for construction activities are:

- No permit shall allow any construction activities that emit noise in excess of the maximum permissible sound levels before 7:00 a.m. and after 6:00 p.m. of the same day, Monday through Friday.
- No permit shall allow any construction activities that emit noise in excess of the maximum permissible sound levels before 9:00 a.m. and after 6:00 p.m. on Saturday.
- No permit shall allow any construction activities that would emit noise in excess of the maximum permissible sound levels on Sundays and holidays.

The use of pile drivers, hoe rams, jack hammers 25 lbs. or larger, high-pressure sprayers, and chain saws may be restricted to 9:00 a.m. to 5:30 p.m., Monday through Friday.

Traffic Noise. The increase in traffic-related noise due to Pulelehua (less than 2 dB) is not considered significant and will not be perceptible to most people. Therefore mitigation measures related to increases in traffic noise are not proposed. However, to buffer Pulelehua homes from Honoapi'ilani Highway noise, the design of Pulelehua provides for a wide landscaped greenway along Honoapi'ilani Highway. In addition, the existing earth berm along the mauka side of Honoapi'ilani Highway will be an effective sound barrier to mitigate traffic noise. Minor modifications to the berm may be undertaken, if necessary, to ensure that all homes within the Pulelehua are consistent with Federal Highway Administration and HUD traffic noise guidelines.

Human Activity. Noise levels generated by residential and commercial uses within Pulelehua will conform to the DOH rules and regulations, which state maximum permissible noise limits at individual property lines. Pulelehua design standards and building requirements will control noise emanating from stationary mechanical equipment, such as chillers, compressors, air conditioning units, etc. Noisy equipment will be located away from homes, as much as is practical.

4.6 AIR QUALITY

B.D. Neal & Associates prepared an air quality study to: 1) examine the potential short- and long-term air quality impacts that could occur as a result of construction and use of the Pulelehua community; and 2) suggest mitigative measures to reduce any potential air quality impacts where possible and appropriate. The study also considered the potential impact on Pulelehua from aircraft emissions occurring at the adjacent Kapalua West Maui Airport. The air quality study is summarized below; however, information regarding

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aircraft emissions is summarized in Section 4.10 of this EIS, which discusses airport impacts. Appendix J contains the full study.

Existing Conditions

Air quality in the Māhinahina region is believed to be relatively good. Existing impacts include distant volcanic emissions (VOG) and possibly occasional localized impacts from traffic congestion. Emissions of fugitive dust can occur during periods where agricultural operations and field activity expose soils.

Regional and local climate along with the amount and type of human activity generally dictate the air quality of a given location. The climate of the Māhinahina region is affected by its near coastal location and by nearby mountains. Winds are variable but are predominantly trade winds from the north or northeast. Temperatures in the Māhinahina region are generally very consistent and moderate with an average daily temperature range of about 66°F to 85°F.

Both Federal and State standards have been established to maintain ambient air quality. At the present time, seven parameters are regulated including: particulate matter, sulfur dioxide, hydrogen sulfide, nitrogen dioxide, carbon monoxide, ozone and lead. Hawai'i air quality standards are comparable to the national standards except those for nitrogen dioxide and carbon monoxide which are more stringent than the Federal standards.

Potential Impacts

Creation of the Pulelehua community may result in short and long-term impacts on air quality either directly or indirectly as a consequence of construction and use. However, it is anticipated that no Federal or State air quality standards will be violated as a result of the Pulelehua community.

Short-Term Impacts. Short-term impacts from fugitive dust will likely occur during the Pulelehua construction phase. To a lesser extent, exhaust emissions from stationary and mobile construction equipment, from disruption of traffic, and from worker's vehicles may also affect air quality during the construction period.

Long-Term Impacts. After construction, motor vehicles coming to and from Pulelehua will result in a long-term increase in emissions, however it is expected that concentrations will remain well within State and Federal standards.

To assess the impact of emissions from vehicles, an air quality modeling study was undertaken to estimate current ambient concentrations of carbon monoxide at several intersections in the Pulelehua vicinity and to predict future levels both with and without the community.

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Model results indicated that present one-hour and eight-hour carbon monoxide concentrations are well within both Federal and State ambient air quality standards. In the year 2011 without Pulelehua, carbon monoxide concentrations are predicted to remain largely unchanged despite the expected increase in ambient traffic volumes. This is because older vehicles that emit more air pollution will be replaced with newer vehicles during the intervening years. With Pulelehua in the year 2011, maximum carbon monoxide concentrations are estimated to increase by about 10 to 15 percent in the vicinity compared to the without Pulelehua case, but concentrations are predicted to remain well within Federal and State standards. Implementing mitigation measures for traffic-related air quality impacts is probably unnecessary and unwarranted.

Electrical Demand and Solid Waste Disposal. The air quality study concludes that significant long-term impacts on air quality are unlikely due to indirect emissions associated with the community's electrical power and solid waste disposal requirements. Nevertheless, Pulelehua will include energy conservation design features (such as solar water heating) and conservation and recycling programs to further reduce any associated impacts and conserve the island's resources.

Mitigative Measures

Mitigation measures will be implemented to minimize potential air quality impacts, as listed below.

Short-Term Construction Activities. All construction activities will comply with the provisions of HAR, Chapter 11-60.1, "Air Pollution Control," Section 11-60.1-33, Fugitive Dust. In compliance with these provisions a dust control plan will be implemented.

Fugitive dust emissions will be controlled to a large extent by watering of active work areas, using wind screens, keeping adjacent paved roads clean, and by covering of open-bodied trucks. Other dust control measures include limiting the area disturbed at any given time and/or mulching or stabilizing inactive areas that have been worked will also be implemented. Paving and landscaping early in the construction schedule will also reduce dust emissions. Monitoring dust at the property boundary during the construction period will be considered as a means to evaluate the effectiveness of the project dust control program.

Exhaust emissions from construction equipment can be mitigated by moving equipment and workers to and from the site during off-peak traffic hours.

Long-Term Operations. Because traffic-related emissions are expected to remain well within Federal and State and standards, the air quality study concludes that implementing mitigation measures for traffic-related air quality impacts is probably unnecessary and unwarranted.

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While significant long-term impacts on air quality due to indirect emissions associated with Pulelehua electrical power and solid waste disposal requirements are unlikely, Pulelehua will include energy conservation design features (such as solar water heating) and conservation and recycling programs to further reduce any associated impacts and conserve the island's resources.

4.7 VISUAL RESOURCES

Existing Conditions

Looking mauka from Honoapi'ilani Highway up Akahahele Street, the dominant view of the Pulelehua community site is of gently sloping, fallow pineapple fields up to Kapalua West Maui Airport. Fallow fields support bare soil with scattered weeds. Utility poles line Akahahele Street. Beyond the airport are pineapple fields, most in active cultivation. Forested areas rise to the mountain peaks beyond the pineapple fields. Besides the opening created by the intersection Honoapi'ilani Highway and Akahahele Street, an earthen berm and ironwood trees along Honoapi'ilani highway block most mauka views, however some mauka views are available at the point where Honoapi'ilani Highway crosses Māhinahina Gulch. From the highway in front of the Kahana Ridge subdivision, the high retaining walls and houses block all mauka views.

Within the Pulelehua community site looking makai, there are dramatic panoramic views of the Pailolo Channel, Lāna'i, and Moloka'i from most areas.

Figure 6 contains photographs of the site.

Potential Impacts and Mitigative Measures

With the creation of the Pulelehua community, existing views mauka views from Honoapi'ilani Highway up to the Kapalua West Maui Airport will change from fallow agricultural fields to urban uses. Māhinahina Gulch will not be developed and so primary views to mauka peaks should not change significantly where Honoapi'ilani Highway crosses Māhinahina Gulch. Also, the play fields of the school site on the north side of Māhinahina Gulch will provide substantial open space along the highway and gulch.

A key design element of Pulelehua is the creation of a wide landscaped greenway along the length of Honoapi'ilani Highway. This greenway will include the existing earthen berm and ironwood trees and will extend approximately 100 to 200 feet from Honoapi'ilani Highway to the first Pulelehua street parallel to the highway. This aesthetically pleasing open space will include biking and walking trails and is in accord with provisions of the West Maui Community Plan calling for landscaping along the highway. Landscaping of the greenway will be in compliance with the Maui County Planting Plan, and where feasible, will include native and indigenous plants.

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An important objective of Pulelehua is to preserve surrounding agricultural land and open space vistas by the creation of a compact community in an appropriate setting. The in-fill location of Pulelehua—between the existing urban uses makai of Honoapiʻilani Highway and the urban land of the Kapalua West Maui Airport and between the urban uses of Kahana Ridge and the airport—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.

In designing Pulelehua, there were many conscious decisions regarding the physical design and visual appearance of the community. For example, the community is organized with the most intense and closely spaced uses (retail and compact residential areas) in the central area, with less intense uses (single-family homes and larger lots) toward the edges. The commercial core of Pulelehua is purposely in the middle of the community to provide a town center and avoid retail “strip mall” uses along Honoapiʻilani Highway. In addition, Pulelehua will foster an authentic sense of place as buildings will reflect traditional Hawaiian architecture, inspired from the work of architect Charles Dickey and from traditional settlements such as Lanai City.

All Pulelehua common area exterior lighting will be shielded from adjacent residential properties to the extent possible. Street lighting and common area lighting will be designed to minimize night sky light pollution to the extent possible. This will be accomplished through a combination properly selected light fixture shades, bulb types and wattages, reflectors, and lens used within each fixture.

The gentle slopes of the Pulelehua site provide opportunities for many outstanding views from within the community. Another significant aspect of the community design is the many mauka/makai streets that frame vistas to the ocean and the islands of Molokai and Lanai. Residents will either have ocean views from their homes and lanais, or be able to enjoy views from many areas of the community. This outstanding feature is one of the many elements to provide “affordable housing with dignity” by design of the community.

4.8 SOCIAL-ECONOMIC IMPACTS

The Hallstrom Group Inc., prepared a market study, economic impact analysis for the Pulelehua community. Key findings of the analysis along with other social-economic information are summarized below. Appendix A contains the complete full study.

4.8.1 Population

Existing Conditions

The 2000 United States Census reported that resident population of Maui County was 128,094 people in 2000. This is more than double the 1980 total of 62,823 persons.

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Population projections commissioned by the Maui Planning Department and calculated by SMS Research indicate that the Maui County population will reach 139,573 people in 2005¹ (SMS 2002).

For the West Maui region (Lahaina, Kā'anapali, Nāpili-Honokōwai, and Kapalua) the United States Census reported a population of 17,748 people in 2000. The SMS Research projections indicate that the West Maui population will reach 19,779 people in 2005 (SMS 2002).

In addition to the resident population, for the year 2005 it is projected that approximately 46,865 non-residents populate Maui County on any given day. Approximately 25,069 (53.5 percent of total) of these visitors are in the West Maui region (SMS 2002).

Combining resident and visitor populations, the de facto population of Maui is estimated to be 186,438 people in 2005. The de facto population of West Maui is estimated to be 44,848 people in 2005.

Currently the Pulelehua community site does not contain any residents.

Potential Impacts

Projections indicate that the Maui County population will increase to 175,136 people in 2020, a 25.5 percent increase from the 2005 population. In West Maui, the population is expected to increase to 25,431 people in 2020, a 28.5 percent increase from the 2005 population. The daily visitor population for Maui County is projected to increase to 55,800 visitors in 2020. Approximately 31,757 (56.9 percent) of these visitors will be in the West Maui region. Therefore, the de facto population of Maui County in 2020 is estimated to be 230,936 people. The de facto population of West Maui in 2020 is estimated to be 57,188 people.

The Pulelehua community is targeted toward Maui residents. As such, the community is not expected to cause a significant increase in the population of the island, but rather it will provide homes for Maui's growing population.

However, people currently living in other parts of Maui may move to Pulelehua to be closer to their jobs in West Maui, thereby increasing the population of West Maui. This is seen as a positive impact as it will decrease commuting to and from West Maui, lessen traffic congestion, reduce stress, reduce the amount of gasoline consumed, lessen pollution, allow more family and recreation time, and improve overall quality of life for not only Pulelehua residents, but for Maui residents in general.

¹ SMS projections presented here are their "baseline" projections, defined as "Current best guess by DBEDT of Maui County variables based on the long-term forecast model and incorporating year 2000 Census date where possible."

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It is also thought that some former Maui residents who may have moved away because they could not afford a Maui home or for other reasons, may be attracted to return to Maui because of the affordability of homes in Pulelehua.

When fully built out in 2011, Pulelehua will provide homes for approximately 2,492 full-time residents, based on 96 percent of the homes being occupied by full-time residents and an average household size of 2.9 people per home (Hallstrom 2005).

Mitigative Measures

Maui Land & Pineapple Company, Inc., will restrict affordable home sales in Pulelehua to Hawai'i residents to the ~~fullest extent possible under legal precedents and constitutional mandates~~ legally permissible. Pulelehua is not intended for vacation, second-home buyers, so vacation rentals, bed and breakfasts, and timeshare/fractional ownership will not be allowed. Speculation will be strongly discouraged through the provision of stringent buy-back, shared appreciation, and other anti-speculation provisions on affordable priced homes.

Potential impacts and mitigative measures related to Pulelehua-generated impacts, such as traffic and the need for additional infrastructure and public services are discussed in other sections of this EIS. However, it should be noted that the population of Maui is projected to grow independent of Pulelehua. The needs of a growing population relating to traffic, infrastructure, public services, and other issues will need to be addressed regardless of whether Pulelehua is built.

4.8.2 Housing

Existing Conditions

Historically, vast potentially habitable areas of Maui and significant water resources have been devoted to agriculture. Until the past decade, the long term viability of the sugar industry was unquestioned and the business remained a major employer and tax payer. As a result, cane land was reclassified for urban uses only after lengthy public agency reviews and negotiation with labor unions.

The long-term impact of this policy, in the face of unmet resident housing needs and off-island capital driven visitor-oriented land use demands, has been high appreciation in real estate prices on Maui since the early 1970s, primarily due to the high demand versus low supply of available residential land.

West Maui is among the most desirable resort and residential areas in Hawai'i. The area has many full-time residents but is also a large vacation destination, with many visitors, resorts, and second homes. In the past, the West Maui residential sector has been dominated by condominium projects along the shoreline, with single-family subdivisions

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further from the shore, in destination resorts, or in mauka areas, such as Lahainaluna. Oceanfront condominium projects generally have been devoted to vacation or second-home uses, with limited numbers of full-time residents, while the more mauka areas (such as Lahainaluna) have been more commonly occupied by full-time residents. The large majority of buyers in resort single-family subdivisions have been non-residents. However, the movement of non-resident buyers into non-resort subdivisions is an increasing trend, as evidenced at Kahana Ridge, Lahaina, and Launiupoko.

The demand by non-resident buyers for general residential units in West Maui is significant; among the highest for any region in the state. This conflict between visitors and full-time residents over a limited available land base has created a dysfunctional real estate market with tourist-dollars overwhelming the local population in the competition for housing. In addition, non-resident buyers typically place their second homes in vacation rental pools to be used for short-term transient vacation rentals to other non-residents or leave the home vacant when they are not on Maui. These units then are not available for rental to long-term residents, further decreasing amount of available housing. It is expected that the local residential population in West Maui would be higher were it not for the competition in residential units between full-time residents and visitors (Hallstrom 2005).

In ~~January~~ May 2005, the median sales price of a home on Maui was ~~\$612,000~~ \$780,000, an ~~48~~ 26 percent increase from 2004. However, in the Lahaina area the median home price increased ~~39~~ 59 percent from ~~\$509,500~~ \$615,000 in ~~January~~ May 2004 to ~~\$710,000~~ \$975,000 in ~~January~~ May 2005. These recent increases in median home prices are even more significant considering that in 2000 the island-wide median price of a home was \$275,000 and the Lahaina median price was \$260,000 (Realtors Association of Maui, Inc. 2005).

It is estimated that the West Maui housing sector is currently undersupplied by approximately 470 to 1,168 units (Hallstrom 2005). While some recent projects such as Kahana Villas (117 units), Nāpili Villas (184 units), Kāpua Village (45 units) have provided some homes in lower price ranges, virtually all new residential product recently offered in West Maui has been either resort-oriented (within Kā'anapali or Kapalua), estate sized agricultural lots (Launiupoko) or homesites beyond the affordability of most local households (Kahana Ridge, 240 units). Even so, all offered product has been rapidly absorbed, with most projects having applications or waiting lists.

With the increase in West Maui's population, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the HUD figures for the County of Maui.

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Compounding the demand for housing, employment forecasts project 6,843 new jobs in the West Maui region by 2020—a 30 percent increase from 22,866 jobs in 2005 to 29,709 jobs in 2020 (SMS 2002).

In recent years, various landowners and developers have proposed several major new housing projects in West Maui. These include Kā’anapali 2020, Waine’e Village, Pu’unoa, The Villages of Leiali’i, Kapalua Mauka, and homes on the DHHL Honokōwai property. Other smaller projects are also proposed. These projects are in various stages of the planning and permitting process, but it is unlikely all will proceed or be built as currently proposed. For example, the Pu’unoa project has been rejected twice by the Maui County Council, approvals for Kā’anapali 2020 are likely to take many more years, and the Villages of Leiali’i has been tied up in a legal dispute for over 10 years, although an agreement was recently reached to allow DHHL to provide 104 homes on the site.

Potential Impacts

Pulelehua will help to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui. At least 51 percent of the Pulelehua homes will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the HUD figures for the County of Maui. Other Pulelehua homes will help to satisfy the demand for other market segments and are expected to be within the range of comparable homes in West Maui.

The Pulelehua marketing study (Hallstrom 2005) projects that during the next two decades approximately 31 percent of the housing demand in West Maui will be for homes affordable to families making 80 percent or less of the median income and approximately 25 percent of the housing demand in West Maui will be for homes affordable to families making 81 to 140 percent or less of the median income.

To meet this demand, the current breakdown for Pulelehua’s affordable housing is shown below:

Percentage of Units	Percentage of HUD Median-family Income
10	50 to 80
21	81 to 100
20	101 to 140

Based on the current HUD median income for the County of Maui of ~~\$60,700~~ \$62,350 per year, a family of four earning between ~~\$30,350~~ \$33,950 and ~~\$84,980~~ \$87,290 would qualify for affordable housing. Based on the ~~2004~~ 2005 guidelines, and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than ~~\$187,400~~ \$192,500 if a family earned 50 to 80 percent of the median-family income. If a family earned 81 to 100 percent of the median-family

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income, the price would be set no higher than ~~\$238,000~~ \$245,600 and prices would top out at ~~\$349,200~~ \$359,800 if a family earned 100 to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Maui Land & Pineapple Company, Inc., will restrict all affordable home sales in Pulelehua to Hawai'i residents to the fullest extent possible under legal precedents and constitutional mandates. ~~To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy back and limited appreciation provisions.~~ All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold as affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

~~In addition, at least 125 homes will be maintained as affordable rentals in perpetuity. Further, bed and breakfast uses, transient vacation rentals, and timeshare or other vacation rental or ownership plans will be prohibited.~~

The Pulelehua marketing study (Hallstrom 2005) also projects that during the next two decades approximately 25 percent of the housing demand in West Maui will be for homes ranging from \$380,000 to \$550,000 and 19 percent of the demand will be for homes above \$550,000. Pulelehua's moderate and market homes rate will help to satisfy the demand for homes in these ranges.

Mitigative Measures

By design, Pulelehua is planned as a holistic, inclusionary, mixed income community. Holistic communities embrace a diversity of people and activities and Pulelehua will be a place where Maui's resort employees, police, teachers, fire fighters, doctors, lawyers, and others can live side-by-side. As a mixed income community, Pulelehua will contain a variety of housing options, in terms of type, size and price, integrated into complete neighborhoods. Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income segregated, affordable "project."

Pulelehua will be a community with an authentic sense of place that provides a vital and sustaining life experience. Mixed housing types, lot sizes, and income levels will add pattern and texture to the community. The Pulelehua design will promote walking within the community and interaction among residents, thus fostering a sense of neighborliness, civic pride, and shared responsibility. Community amenities such as playfields, neighborhood parks, and the trail system, will be available to all residents whether they live in an affordable or market rate home.

Pulelehua's, inclusionary design also allows for young families to purchase their first home along side more established families or senior citizens thereby allowing for social diversity of age ranges and life experiences within the community. In the long-term, Pulelehua's mixed housing types, lot, sizes, and flexible design standards will allow for residents' changes over time. For example, a young couple will be able to start out in a home they can currently afford, move to a larger home when they have children and their incomes rise, and later move to an apartment or condo close to stores and services when they retire. This range of options will allow residents to remain within the community they helped to establish and where they have raised their kids and made lifelong friends. It also allows for multiple generations of an extended family to all live in the same community, within walking distance of each other.

4.8.3 Neighborhood Commercial Uses

Existing Conditions

Currently, there are no commercial uses within the Pulelehua community site. The nearest commercial area is the Kahana Gateway Shopping Center at the intersection of Honoapi'ilani Highway/Ho'ohui Road. The Nāpili Shopping Center, in Nāpili, is approximately two miles to the North at the intersection of Honoapi'ilani Highway/Nāpilihau Street. Both of these are small retail and office centers featuring convenience stores, a few restaurants, limited shops, and office space. The nearest supermarket is Star Market, approximately one and half miles, to the south in Honokōwai,

with access via Lower Honoapi'ilani Road. Regional shopping and other commercial areas are in Lahaina.

Potential Impacts and Mitigative Measures

While Pulelehua will help fill a critical need for affordable housing in West Maui, it will also be a complete community with neighborhood shops, restaurants, offices, and other businesses serving residents. These businesses and other elements, such as parks, trails, civic uses, and the school, are critical to Pulelehua as they will provide essential services to residents and contribute to the creation of a real, vibrant community with many services and amenities within walking distance.

This traditional neighborhood design, with stores and services as an integral part of the community, will help to minimize trips onto Honoapi'ilani Highway as many establishments providing for residents' day-to-day needs will be within walking and biking distance. Thus, unlike in a conventional subdivision, Pulelehua residents will not need to drive to areas outside of Pulelehua for all their daily needs. Walking and bicycling will be a way of life for Pulelehua residents.

Pulelehua's neighborhood commercial uses are divided into three distinct classes:

- ***“Main Street” Retail***
The basic unit of a traditional mixed use street. Main Street buildings primarily contain commercial uses on the ground floor and may contain commercial uses, offices, or dwellings on upper floors. Examples of uses include general stores, restaurants, bakeries, professional offices, drugstores, and other neighborhood-serving uses. Approximately 21,475 square feet of Main Street retail space is proposed.
- ***Specialty Retail/Office***
A single dwelling unit with a ground floor that may be used for a business with a residence above. In the Pulelehua plan these types of buildings are called “Live/Work.” Examples of uses include specialty shops and services (such as a florist), professional offices, barber shops, and beauty salons. Approximately 54,000 square feet of Specialty Retail/Office space is proposed.
- ***Workplace Edge/Loft***
Buildings intended for offices or workshops, minor repairs, and storage and distribution uses. Approximately 20,300 square feet of Workplace Edge/Loft space is proposed.

The distribution of these uses can be seen in Figure 8.

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As a true mixed use community, the projected square feet for “Main Street” Retail and Specialty Retail/Office uses are based on the maximum square feet that could be provided. The flexibility of the Pulelehua plan allows for varied uses over time, so that not all of this area may be built, or uses may change over time to meet the needs of the community and specific building owners. With this flexibility a residential building could eventually provide formal office space for a home business or, for example, a first floor could be converted to retail or other commercial use, with the second floor continuing as residential.

The design of Pulelehua purposely places the primary neighborhood commercial core in the middle of the community to provide a town center and avoid retail “strip mall” uses along Honoapi‘ilani Highway. Workplace Edge/Loft uses are strategically placed near the airport to provide a buffer between homes and provide a synergy of uses. Given these interior locations, Pulelehua’s neighborhood commercial areas are specifically targeted toward Pulelehua residents.

The marketing study prepared for Pulelehua (Hallstrom 2005) concludes that Pulelehua’s neighborhood commercial uses are appropriate and can be supported by Pulelehua’s residents. The study further concludes:

Given traffic issues in West Maui, the time constraints of a modern family, the limitations of nearby support commercial opportunities, the income demographics of project residents, airport proximity, and the desire to develop a competitive community offering a comprehensive lifestyle, we consider the commercial/mixed use component of the Pulelehua master plan to be essential.

4.8.4 Community Character

Existing Conditions

West Maui, generally, and Kā’anapali and Kapalua specifically, are among the most desirable resort/residential areas in Hawai‘i, with an exceptional and diverse visitor industry offering a strong employment base, a historic town offering a range of modern services, a superior climate, lush natural beauty, and a variety of recreational resources.

Lahaina and the Kā’anapali Resort provide the urban core of the region, while condominiums and single-family homes line the coastal strip between Kā’anapali and Kapalua. In practice, a large amount of makai condominiums serve as vacation rentals while the more mauka areas (such as Lahainaluna and Wahikuli) are more commonly occupied by full-time residents.

In addition to areas of Lahainaluna, Wahikuli, and Kā’anapali, in recent years, two subdivisions, Kahana Ridge and Kahana Hui, have been built mauka of Honoapi‘ilani

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Highway near the Kapalua West Maui Airport and adjacent to the Pulelehua community site. South of Lahaina, the Launiupoko subdivision has also been built mauka of Honoapi'ilani Highway.

Potential Impacts and Mitigative Measures

An important objective of Pulelehua is to preserve surrounding agricultural land and open space vistas by the creation of a compact community in an appropriate setting. The in-fill location of Pulelehua—between the existing urban uses makai of Honoapi'ilani Highway and the urban land of the Kapalua West Maui Airport and between the urban uses of Kahana Ridge and the airport—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.

With the creation of the Pulelehua community, existing views mauka views from Honoapi'ilani Highway up to the Kapalua West Maui Airport will change from fallow agricultural fields to urban uses. Māhinahina Gulch will not be developed and so primary views to mauka peaks should not change significantly where Honoapi'ilani Highway crosses Māhinahina Gulch.

A key design element of Pulelehua is the creation of a wide landscaped greenway along the length of Honoapi'ilani Highway. This greenway is in accord with provisions of the West Maui Community Plan calling for landscaping along the highway and will include biking and walking trails. The greenway will also include the existing earthen berm and ironwood trees along Honoapi'ilani Highway and additional landscaping will be in compliance with the Maui County Planting Plan.

In designing Pulelehua, there were many conscious decisions regarding the physical design and visual appearance of the community. For example, the community is organized with the most intense and closely spaced uses (retail and compact residential areas) in the central area, with less intense uses (single-family homes and larger lots) toward the edges. The commercial core of Pulelehua is purposely in the middle of the community to provide a town center and avoid retail “strip mall” uses along Honoapi'ilani Highway. In addition, Pulelehua will foster an authentic sense of place as buildings will reflect traditional Hawaiian architecture; inspired from the work of architect Charles Dickey and from traditional settlements such as Lāna'i City.

4.8.5 Economic Impacts

Existing Conditions

The ten-mile urban strand stretching close by the coastline from Puamana to Kapalua has been the economic engine that changed Maui from an isolated agrarian community to a world-class vacation destination boasting the finest in tourism infrastructure. While

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extensive quality development in the Kihei-Mākena corridor in the 1980s placed that region in a competitive position with greater Lahaina, the South Maui area lacks the history and charm of West Maui.

Despite having limited land designated for urban uses, with agricultural and conservation zoned areas still dominating the region, the West Maui region provides 28 percent of all Maui jobs, generates upward of \$3.2 billion in economic activity annually, and represents more than 30 percent of the island tax base and more than 20 percent of countywide assessed real property value (Hallstrom 2005).

Potential Impacts and Mitigative Measures

Pulelehua will provide rentals and homes for Maui's primary workers, those earning between 50 to 140 percent of the median income. These workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions and provide essential services crucial to keeping Maui's economy stable and growing. Without adequate, affordable housing, both businesses and government will increasingly experience difficulty attracting and retaining employees to fill employment positions. With 6,843 new jobs forecasted in the West Maui region by 2020 (SMS 2002), there will be a need for housing within the income ranges of the positions created.

In addition to providing housing for Maui workers, the Pulelehua community will enhance the economic environment and stimulate economic diversification relative to the present agricultural use of the property. Some of the economic benefits of the community include:

- \$301.5 million in direct real property capital investment;
- 8,399 "worker years" of employment on Maui over the initial 7 to 9-year build out period (a "worker year" is the amount of time one full-time worker can work in one year);
- \$278.8 million in total construction-related wages generated over build out;
- \$47.4 million in profits to local suppliers and contractors;
- 634 permanent full-time equivalent jobs on-site with annual wages of \$16 million (businesses within Pulelehua);
- 71 permanent full-time equivalent jobs in the regional economy with annual wages of \$1.7 million (maintenance, landscaping, and upgrading of the Pulelehua homes and buildings);
- \$30.9 million per year in discretionary expenditures infused into the island economy from community residents; and
- The total base economic impact on Maui from Pulelehua during the first 10-years of development, construction, and use is projected at \$996.3 million, with a stabilized base impact of \$132.2 million per year thereafter. The total overall economic impact during the first decade will be in excess of \$1.9 billion and some \$264.4 million annually over the long-term.

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An economic cost/benefit analysis for the Pulelehua community (Appendix O) provides the following conclusions:

- The County of Maui will receive some \$8 million in real property tax revenues during the first decade of development and use of Pulelehua, and stabilized receipts of \$1.5 million annually thereafter. The revenues would be substantially higher (upwards of 30 percent) were the community entirely market-priced; however, the inclusion of a significant affordable-price housing component will limit the assessment base.
- The State of Hawai'i will receive circa \$64.4 million in income gross excise tax revenues during the first ten years of the community's existence, stabilizing at \$12.7 million per year thereafter. Again, these revenues would be much higher were the community designed as a typical subdivision, exploiting highway frontages for intense commercial uses, maximizing housing densities and minimizing open space allowances.
- If analyzed on an "actual cost" basis, the additional government operations associated with the Pulelehua will total some \$992,000 to the County and \$3.5 million to the State annually at build-out.
- From a "per capita" public costs perspective, the additional government operations associated with Pulelehua after completion will total circa \$5.8 million per year for the County of Maui and \$14.7 million for the State.
- Overall during its first decade of development and existence, the estimated net returns to the State and County governments will be positive from an "actual cost" perspective. On a "per capita cost" basis, the State will have receipts greater than expenses during the first ten years, and the County will have higher expenses than income.
- At stabilized use levels, both the County and State should experience some net "actual" cash flow benefits; the State more so. However, both will have operating losses from a "per capita" viewpoint, which is typical for a local resident-oriented development having significant affordable-priced components.
- Additional direct benefits include the proposed donation of a 13-acre serviced school site, 10 acres of improved parks, and provisions for seven civic/community lots. Community amenities, including parks, pathways and open/nature spaces will be available for the general public.
- The commitment by Maui Land & Pineapple Company, Inc., to price 51 percent of the proposed homes to affordable and gap group housing needs, as opposed to market-priced homes, is inferring some \$35.4 million in equity-based benefits directly into the West Maui community via Pulelehua. Additionally, Maui Land & Pineapple Company Inc., will be making a long-term capital commitment to regional housing needs of \$40.6 million through the construction of 125 rental apartments.
- Supplemental regional public benefits from a real estate perspective include protection of highway frontage from large-scale commercial or residential uses; a lower overall housing unit density (2.8 per acre) than typical for a residential

development with significant affordable components; and, actualization of a quality, modern, holistic lifestyle community which will become a standard for future regional urbanization.

4.9 INFRASTRUCTURE AND UTILITIES

Otomo Engineering prepared preliminary engineering and drainage reports for Pulelehua. Key elements of the reports are summarized in the following sections. The complete reports are included in Appendix K L (engineering) and Appendix L M (drainage).

Pulelehua's traffic engineer, Hall Planning and Engineering, Inc., was a key contributor in the design of Pulelehua and especially Pulelehua's internal roadway system, which emphasizes Traditional Neighborhood Design principles such as connectivity and walkability. Design concepts relating to Pulelehua's internal roadways are explained below. The Pulelehua transportation report (Appendix H) contains specific roadway design information and section drawings.

4.9.1 Roadway Facilities

Existing Conditions

Akahele Street is currently the only public roadway within the Pulelehua site. Akahele Street is a State-owned road that bisects the site to connect Honoapi'ilani Highway with the Kapalua West Maui Airport. The Honoapi'ilani Highway/Akahele Street intersection is signalized and has auxiliary right turn lanes and signalized left turn lanes on all approaches. A paved walking path extends from Honoapi'ilani Highway to the airport along the south side of Akahele Street. In addition to Akahele Street, there are numerous private agricultural roads within the site providing access to agricultural fields.

Honoapi'ilani Highway forms the makai boundary of the Pulelehua site. As the primary roadway in area, Honoapi'ilani Highway provides regional access within West Maui, and connects to other regional highways serving other parts of Maui. Bordering the Pulelehua site, Honoapi'ilani Highway is a two-way, two-lane, undivided roadway with a 45 mile per hour (mph) posted speed limit, with most vehicles actually traveling at higher speeds. The section of Honoapi'ilani Highway bordering the Pulelehua site is pedestrian-unfriendly, due to a lack of sidewalks and relatively high traffic speeds; however, there are crosswalks at all crossings of the Honoapi'ilani Highway/Akahele Street intersection.

Pulelehua Roadway Design, Potential Impacts, and Mitigative Measures

Pulelehua is designed as a walkable community following traditional town planning concepts. Circulation through the community was an important consideration during the design process. Vehicular circulation is to occur along a network of interconnected roads to disperse traffic throughout the neighborhood, but design of Pulelehua's internal roadways assumes that pedestrian movement is the key function of the town's streets.

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Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds within the community. This is often called traffic calming by design, thus preventing the need to install traffic humps and other devices later. Short block faces and parallel parking on most streets allow more efficient use of paved surfaces. Short blocks, buildings closer to the sidewalk, narrower street sections, internal roundabouts, and on street parking, all contribute to the traditional traffic calming effect.

A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood. These paths and trails run through a strategically located network of green spaces and an exterior greenbelt along Honoapi'ilani Highway that will increase the attractiveness and livability of the community.

To the extent that pedestrian mobility is not impaired, Pulelehua's walkable streets will also serve motor vehicle mobility, and they form the automobile road system within Pulelehua. A system of alleyways are included to move parking pads, car ports or garages, solid waste removal and utility equipment to the rear of the properties.

Pulelehua's modified street grid system provides multiple routes (for cars, as well as pedestrians and cyclists) to reach a specific destination. Providing multiple routes increases connectivity to all points, decreases congestion by distributing traffic flows, increases emergency vehicle access by providing redundancy, and facilitates pedestrian movement by claming traffic and allowing for a mix of land uses within a walkable distance. In correspondence to Maui Land & Pineapple Company, Inc., the County Fire Department stated: "We would like to commend the design committee for the multiple access options that residents & emergency responders will have."

An important element of Pulelehua's street system is the four additional connections to Honoapi'ilani Highway. The existing connection of Akahale Street with Honoapi'ilani Highway will provide a fifth access to Pulelehua. The location of these access points has been carefully considered and selected to provide evenly spaced intersections on Honoapi'ilani Highway which will facilitate Honoapi'ilani Highway traffic flow. As opposed to only providing a single access point to Pulelehua, the additional connections will ease traffic flow on Honoapi'ilani Highway and within Pulelehua by distributing turning movements to and from Pulelehua at several points, thus eliminating long queuing within turn lanes and allowing for short signal timings where signals are necessary.

To achieve walkability and traditional neighborhood design, internal streets within Pulelehua require slightly narrower dimensions than contemporary County practice. Specifically, street widths and parking lanes within Pulelehua will be narrower than the dimensions called for in the roadway design standards in Chapter 18.16 of the Maui County Code.

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Maui Land & Pineapple Company, Inc., or its subsidiaries, will build all Pulelehua internal roadways and they are working with the County Planning Department and Department of Public Works to allow the Pulelehua streets to be dedicated to the County upon completion.

~~The Fire Department has approved Pulelehua's street designs and stated they were very pleased with the design details and see no major hurdles with what has been proposed.~~

The Fire Department has attended several meetings over the past year regarding Pulelehua and has participated in discussions pertaining to roadway design and emergency access road widths and routes. Maui Land & Pineapple Company Inc., and the Fire Department continue to work together to ensure Pulelehua roadways meet Fire Department requirements.

4.9.2 Drainage

Existing Conditions

There are three drainage ways which traverse through or bound the Pulelehua community site. To the north, Kahanaiki Gulch traverses the northern boundary. It joins Kahana Stream before it crosses Honoapi'ilani Highway. The shallow Pōhaku-Kā'anapali gulch traverses approximately midway through the site. The Kapalua West Maui Airport intercepts drainage from the upper limits of this gulch so that it is primarily dry within the Pulelehua site. Māhinahina Gulch traverses the site approximately 1,000 feet from the southern boundary.

The existing drainage pattern is generally in the east to west (mauka-makai) direction toward Honoapi'ilani Highway. There are three large existing drainage basins within or adjacent to the Pulelehua site which collect runoff and remove silt and debris, before the runoff discharges into the ocean. These basins are: 1) the Kahana Basin, located immediately to the north of the site; 2) Pōhaku-Kā'anapali Basin, located approximately in the middle of the site; and 3) Māhinahina Basin, located at the southwest corner of the site. Two smaller detention basins are located to the north and south of the intersection of Akahahele Street and Honoapi'ilani Highway.

There are two 144-inch culverts where Honoapi'ilani Highway crosses Māhinahina Gulch that were designed to accommodate a 100-year flow of 4,275 cubic feet per second (cfs). A 120-inch culvert diverts runoff from Pōhaku-Kā'anapali Gulch under Honoapi'ilani Highway with a 100-year design flow of 674 cfs. A bridge (Kahana Kai Bridge) along Honoapi'ilani Highway diverts the 100-year discharge flow of 7,540 cfs from the Kahanaiki Stream and Kahana Stream. Runoff from all three drainage ways eventually discharges into the ocean.

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It is estimated that the present 50-year, one-hour runoff from the Pulelehua site is 333.2 cfs. Of this total flow, approximately 51.1 cfs sheet flows toward the mauka boundary of the Kahana Ridge Subdivision. The drainage system installed as part of the Kahana Ridge Subdivision intercepts the runoff and conveys approximately 80 percent into Kahanaiki Gulch and the remaining 20 percent is conveyed into the subdivision's drainage system. Approximately 19.2 cfs sheet flows through the Kahana Hui Subdivision, approximately 68.1 cfs sheet flows into Pōhaku-Kā'anapali Gulch and 77.7 cfs sheet flows into Māhinahina Gulch. It is estimated that 117.1 cfs sheet flows from the Pulelehua site onto Honoapi'ilani Highway.

Potential Impacts

Creation of the Pulelehua community is not expected to have a significant adverse effect on downstream properties or coastal marine waters. The post development runoff from the Pulelehua site is estimated to be 878.0 cfs, an increase of 544.8 cfs over existing conditions. However, all additional runoff due to the community will be retained on site with no increased flow to downstream properties (including Honoapi'ilani Highway, and the Kahana Hui and Kahana Ridge subdivisions) or into the existing drainage ways, desilting basins, and the ocean.

The water quality of the existing runoff volumes from the site is expected to improve from the creation of the Pulelehua community relative to agricultural use of the lands. Results of a nearshore water quality study conducted for this EIS (see Section 3.6 and Appendix C) conclude that it is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses. This is because, unlike agricultural lands which are periodically plowed or fallow, and thus exposed to rainfall and erosion, residential uses provide more stable soil retention qualities in the form of fixed landscaping, roads, and buildings. Thus with residential uses, the existing level of runoff flows from the site will contain much less sedimentation than the current conditions with agricultural uses.

The nearshore water quality study also concludes that with the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean. It has been shown that the greatest contribution of nutrients to groundwater from human activities on West Maui is from agriculture. Comparatively, golf courses, resort, and residential development provide a relatively small contribution (Soicher and Peterson 1997). Since Pulelehua will replace agriculture uses with residential uses, the overall subsidies of nutrients delivered to the ocean are expected to decrease.

Mitigative Measures

Onsite runoff will be collected by catch basins and bioswales located at appropriate intervals along the Pulelehua roadways and diverted by drain lines into on-site detention

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basins. Detention basins will be sized to accommodate the increased runoff from the community and will be located within the wide greenway mauka of Honoapi'ilani Highway and between the first Pulelehua street parallel to the highway. The greenway will vary in width from between 100 to 200 feet and will serve as a landscape buffer and recreation area as well as a detention basin to capture runoff from the Pulelehua community. Additional detention basins may be constructed in park and open space areas. Porous pavement in alleyways and parking lots will be explored for feasibility to decrease storm water runoff. Best management practices (BMPs) will be adopted to minimize infiltration and runoff from construction and vehicle operations.

The detention basins will be designed to provide a recharge rate high enough so that under normal conditions the basins drain quickly, usually within one to two days. Even after heavy rains, the basins should drain before mosquito eggs can hatch and mature into adult mosquitoes. The normal life cycle of a mosquito is eggs to larva to pupa to adult mosquitoes which can fly. It takes one to two days for eggs to hatch into larva and another 5 to 10 days for the larva to change into pupa. The pupa matures into adult mosquitoes over the next two to four days. In total, it takes from between 8 to 16 days on average for eggs to mature to adult mosquitoes that can fly.

Drainage improvements will also be constructed mauka of the Kapalua West Maui Airport to reduce runoff flowing onto the Pulelehua site. All detention basins will be designed to suppress peak flow and serve as desilting basins to minimize the conveyance of waterborne silt and debris downstream.

All drainage improvements will be developed in accordance with applicable DOH and County of Maui drainage requirements and standards. In addition, Maui Land & Pineapple Company, Inc., will comply with all laws and regulations regarding runoff and non-point source pollution, ensuring that storm water run-off and siltation will not adversely affect the downstream marine environment and nearshore and offshore water quality.

The net result of the drainage improvements will be no increase in runoff from Pulelehua onto downstream properties or into the existing drainage ways, desilting basins, and the ocean.

4.9.3 Water System

Existing Conditions

There are two existing water sources which serve the Māhinahina area. The first is surface water from the Honokōhau Ditch which collects water from Honokōhau Stream and Honolua Stream. The surface water from the Honokōhau Ditch is then diverted to the Māhinahina Water Treatment Plant which was designed to process 2.5 million gallons per

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day (MGD). Presently, the treatment plant is processing an average of approximately 2.4 MGD.

The second water source is groundwater from the Honokahua wells and Nāpili wells. The capacities of the wells are 700 gallons per minute (gpm) from Honokahua Well A, 1,250 gpm from Honokahua Well B, 700 gpm from Nāpili Well A, 700 gpm from Nāpili Well B, and 1,000 gpm from Nāpili Well C. According to the County of Maui Department of Water Supply (DWS), Honokahua Well A, Nāpili Well A, and Nāpili Well C currently are not in use. Available information indicates that at least one of these wells is non-operational due to mechanical problems. All wells are owned and operated by the DWS.

The wells draw water from the Honolua Aquifer. According to the Commission on Water Resource Management, the Honolua Aquifer has a sustainable yield of eight MGD. In addition to the wells listed above, two other wells draw water from the Honolua Aquifer. All totaled, the wells pumped an average of 2.731 MGD from the aquifer between January 2002 to October 2004. This total is substantially less than the aquifer's eight MGD sustainable yield.

The Honokōwai Aquifer adjoins the Honolua Aquifer to the south. According to the Commission on Water Resource Management, the sustainable yield of the Honokōwai Aquifer is also eight MGD. Nine wells draw water from the Honokōwai Aquifer. All totaled, these wells pumped an average of 3.177 MGD from the aquifer between May 2003 to October 2004. This total is substantially less than the aquifer's eight MGD sustainable yield.

The Commission on Water Resource Management has not designated the Honolua Aquifer or the Honokōwai Aquifer as groundwater management areas.

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

There are two potable water storage areas for the region: 1) the 2.0 million gallon Honokōwai Reservoir; and 2) the 1.0 million gallon Kahana Ridge reservoir. The Honokōwai reservoir is located at an elevation of 250 feet, approximately 1,000 feet south of the southern boundary of the Pulelehua site. The Kahana Ridge Reservoir is also located at an elevation of 250 feet approximately 3,000 feet to the north of the Pulelehua site. Both reservoirs are owned and operated by the DWS.

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The Honokōwai Reservoir is filled from the Māhinahina Water Treatment Plant. The Kahana Ridge Reservoir is filled from the Honokahua and Nāpili wells. A 16-inch waterline along Honoapi'ilani Highway transports water from the Kahana Ridge Reservoir to the Kahana Ridge subdivision. There are no other waterlines along Honoapi'ilani Highway in the vicinity of the Pulelehua site.

Maui Pineapple Company, Ltd., currently uses a mix of reclaimed (R-1) water from the Lahaina Wastewater Treatment Plant and surface water from the Honokōhau Ditch for irrigation of nearby pineapple fields. There is a 2.0 million gallon reservoir for this water at the 300-foot elevation on the south side of the Kapalua West Maui Airport. Maui Pineapple Company, Ltd., currently has agreements in place with the County of Maui to receive R-1 water from the Lahaina Wastewater Reclamation Plant as part of its agricultural operations. As with other R-1 users, Maui Pineapple Company, Ltd., pays a fee to the County of Maui based on use. The fee helps offset the cost, including pumping, of providing R-1 water.

Potential Impacts

In accordance with the DWS's Domestic Consumption Guidelines, the average daily water demand for Pulelehua is estimated to be approximately 919,313 gallons per day (including irrigation of parks, open spaces, common areas and the school) based on the current mix of uses (see Section 2.6). This estimate includes the water demand from all potential ohana units; however, it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

Fire flow demand for single-family residential development is 1,000 gallons per minute for 2-hour duration, and 2,000 gallons per minute for 2-hour duration for A-2 apartment, schools, and neighborhood businesses and light industrial. Fire hydrants will be installed with a maximum spacing of 350 feet within the single-family residential area and at 250 feet spacing within all other areas.

~~Water wells will be drilled in the vicinity of the Pulelehua site to provide a new source of water for Pulelehua. It is envisioned that wells will draw water from the Honokōwai Aquifer. While Maui Land & Pineapple Company, Inc., continues to evaluate water supply alternatives, the most likely source for Pulelehua's potable water will be from new wells. These wells will likely be located mauka of the Pulelehua site in the Honokowai or Honolua aquifer.~~ As the current pumpage from the Honokōwai Aquifer of 3.171 MGD is well below the aquifer's sustainable yield of eight MGD, the wells are not expected to impact the sustainable yield of the Honokōwai Aquifer. If the new wells draw water from the Honolua Aquifer, the sustainable yield of the Honolua Aquifer is not expected to be impacted as the current pumpage from the Honolua Aquifer of 2.73 MGD is also well below the Honolua Aquifer's sustainable yield of eight MGD.

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Maui Land & Pineapple Company, Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

Mitigative Measures

Maui Land & Pineapple Company, Inc., will work with the DWS for the development and construction of the new wells, which will be built in accordance with DWS standards and all requirements of the Commission on Water Resource Management. In addition, all new sources of potable water will be developed in compliance with Section 11-20-29, HAR and at the appropriate time Maui Land & Pineapple Company, Inc., will submit a water engineering report for the approval of the Director of the State Department of Health.

A 1.0 million gallon water storage tank will be required at an elevation of approximately 375 feet to accommodate the domestic water for Pulelehua. The tank will also be constructed to DWS standards and dedicated to the DWS.

~~The landscaped areas of the Pulelehua community will be irrigated with mixed R-1 and surface water from the reclaimed water reservoir above the Kapalua West Maui Airport. The community parks, neighborhood parks, open spaces, common area for 151 multifamily units and the school will be irrigated using R-1 water. R-1 water will also be used for fire flow requirements. The total R-1 water use demand is estimated at 199,747 gallons per day. The County has confirmed that there is sufficient R-1 capacity from the Lahaina Wastewater Treatment Plant to supply this demand. Maui Land & Pineapple Company, Inc., intends to continue or increase its current agreements with the County to supply R-1 water to Pulelehua. The mixed water will also be used for fire flow requirements. R-1 water from the Lahaina Wastewater Treatment Plant will be pumped to the reclaimed water reservoir above the Kapalua West Maui Airport for distribution to Pulelehua. The recycled/mixed water system within Pulelehua will be built and operated in conformance with all applicable laws and regulations, including HAR, Section 11-62-27, Recycled Water Systems and HAR Title 11, Chapter 11-21, Cross-Connection and Backflow Control.~~

The use of ~~the mixed~~ R-1 water for irrigation will reduce the average daily water demand by almost 22 percent. Therefore, the Pulelehua community will require approximately 719,589 gallons of potable water per day.

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To further conserve water within Pulelehua:

- Single pass cooling will not be allowed pursuant to Maui County Code Section 14.21.20.
- Low-flow fixtures and devices will be used pursuant to Maui County Code Section 16.20A.680.
- Individual homeowners and businesses will be encouraged to maintain fixtures to prevent leaks.
- Climate-adapted native and other appropriate plants will be used in landscaping as practical.
- Best management practices designed to minimize infiltration and runoff from daily operations will be implemented.
- Irrigated turf will be limited where possible.

4.9.4 Wastewater System

Existing Conditions

All existing County wastewater facilities in the vicinity of the Pulelehua site are located makai of Honoapi'ilani Highway, along Lower Honoapi'ilani Road. These facilities include gravity sewer lines, sewer force mains, and sewer pump stations. In addition to the County sewer system, there is a private wastewater collection for Kahana Ridge in the north area of the subdivision. The Kahana Ridge wastewater system connects to the County's sewer system at Ho'ohui Road. All sewerage from the area is transported to the Lahaina Wastewater Reclamation Plant in Honokōwai, approximately 3,500 feet south from the southern boundary of the Pulelehua site.

According to the Wastewater Reclamation Division, County of Maui, the Lahaina Wastewater Reclamation Plant has a design capacity of 9 million gallons per day (MGD). Currently, it is processing approximately an average daily flow of 4 MGD of sewerage. Of the remaining capacity, approximately 1.38 MGD are allocated to AMFAC, 1.80 MGD are allocated to the Housing Finance Development Corporation and 303,350 gallons per day are allocated to Kapalua Land Co., Ltd (a subsidiary of Maui Land & Pineapple Company, Inc.), including purchasable capacity. Kapalua Land Company's allocation is specifically for Kapalua Resort. The County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities. However, ~~it is estimated that the study will take 12 months to~~ is not yet complete.

Potential Impacts

It is projected that Pulelehua will generate approximately 345,688 gallons per day of wastewater based on the current mix of uses (See Section 2.6). This estimate includes wastewater estimates from all potential ohana units; however, it expected that not all

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ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

The existing wastewater facilities along Lower Honoapi'ilani Road were not designed to accommodate sewage flows from development mauka of Honoapi'ilani Highway and therefore, Pulelehua's wastewater system will not connect these facilities. Hence, the capacity of the existing sewer piping system along Lower Honoapi'ilani Road will not be affected by Pulelehua and there would be no requirements to upgrade that section of the existing sewer piping system.

Mitigative Measures

Maui Land & Pineapple Company, Inc., or its subsidiaries will build the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect to a new sewer line located along the east (mauka) side of Honoapi'ilani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet, and will connect directly to the Lahaina Wastewater Reclamation Plant.

The onsite collection system will incorporate a sewer pump station at the northerly limit of the Pulelehua site. The pump station will not serve all of Pulelehua. It will only handle wastewater from a few dozen homes that cannot gravity flow to the new sewer transmission line. The central and southern neighborhoods, as well as a portion of the northern neighborhood, will be able to gravity feed into the new line, to a gravity flow system which will connect to the County's sewer pump station Nāpili No. 1, which will and transport wastewater into the Lahaina Wastewater Reclamation Plant. Pump The County's pump station No. 1 is located on the northerly side of the Lahaina Wastewater Reclamation Plant and pumps wastewater directly into the headworks at the plant.

The pump station at the northerly end of the Pulelehua site will include instrumentation, alarm systems (e.g. equipment failure, high waste water levels), and redundant equipment such as pumps. These features will provide system monitoring and ensure reliability. During the design and engineering phase, various options will be evaluated to keep any potential overflow of waste water from entering Kahana Gulch. Sound attenuation features will be included in the pump station design, as needed, to ensure that all state and county noise requirements are met. Locating the equipment underground will be evaluated during the design and engineering phase of Pulelehua. Sewer pump stations should not emit noxious odors if running properly. Notwithstanding this fact, based on prevailing wind patterns in the area, there is no location within Pulelehua which is predominately upwind of any homes at Kahana Ridge.

The proposed sewage system will be designed to County of Maui standards. In addition, all wastewater plans will conform to applicable provisions of HAR, Chapter 11-62, "Wastewater Systems".

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Maui Land & Pineapple Company, Inc., is working with the Wastewater Reclamation Division to determine the capacity of the existing facilities to confirm that Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua. A detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design. The County of Maui Department of Public works requires wastewater contribution calculations before building permits are issued.

Maui Land & Pineapple Company, Inc., will pay its fair share for any improvement fees assessed for Pulelehua. In the event the Lahaina Wastewater Reclamation Plant cannot accommodate Pulelehua, Maui Land & Pineapple Company, Inc., will evaluate the installation of a packaged sewer treatment plant to address Pulelehua's wastewater treatment demands.

4.9.5 Electrical Service

Existing Conditions

Electrical power on Maui is supplied by Maui Electric Company (MECO). The installed generating capacity currently owned and operated by MECO is 212.90 megawatts (MW). This capacity is divided between the Mā'alaea Generating Station with a reserve capacity of 175.30 MW, and the Kahului Generating Station with a reserve capacity of 37.60 MW. Additional power from Hawaiian Commercial and Sugar (HC&S) supplements the total installed generating capacity of MECO. Power from HC&S is generated at the Pu'unēnē Mill located in Pu'unēnē. HC&S has a purchase power contract with MECO to provide 12 MW of firm power.

There are existing overhead electrical lines along the mauka side of Honoapi'ilani Highway, along Lower Honoapi'ilani Highway, and along Akahele Street, which bisects the Pulelehua site. MECO currently serves the Kahana Ridge Subdivision, which is located on the northwesterly side of the proposed Pulelehua community. MECO also has an electrical substation above the Kapalua West Maui Airport.

Potential Impacts

When built out, monthly residential electrical demand for the Pulelehua community is estimated to be 838,800 kilowatt-hours. This estimate is based on the use of solar water heaters on all homes and room air conditioners, although it is expected that not all homeowners will install air conditioning. Further, the estimate includes the electrical demand from all potential ohana units; however, it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

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According to the MECO, electrical service for Pulelehua will probably be served by the electrical substation above the Kapalua West Maui Airport, either by installing new lines to the Pulelehua site or extending service from the existing lines along Akahahele Street.

All utility lines serving the community will be underground to reduce visual impacts.

Mitigative Measures

By design, the Pulelehua street grid allows for most buildings to be oriented with primary roof façade within 30 degrees of due south to facilitate use of solar panels, as well as providing for passive solar design. Homes will include solar water heaters which will minimize energy loads. In addition, buildings will be oriented to take advantage of natural cooling of interior spaces by channeling trade winds, which will minimize energy use. Ceiling fans and radiant barriers, when feasible, will be provided to avoid using air conditioning whenever appropriate. A radiant barrier is a layer of metallic foil placed on the back of roof decking or attached to the beams just below the roof to reduce heat flow from the roof into the attic, thereby keeping the house cooler.

Design standards will specify low-impact lighting and will encourage energy-efficient building design and site development practices.

Where applicable, the following additional energy saving methods and technologies will be considered during the design phase of Pulelehua:

- Use of site shading to reduce cooling load;
- Maximum use of day lighting;
- Use of high efficiency compact fluorescent lighting;
- Exceeding Model Energy Code requirements;
- Roof and wall insulation, radiant barriers, and energy efficient windows;
- Use of solar parking lot lighting;
- Use of light color or “green” roofs;
- Use of roof and gutters to divert rainwater for landscaping;
- Use of landscaping for dust control and to minimize heat gain to area; and
- Use of photovoltaics, fuel cells, and other renewable energy sources.

4.9.6 Phone and Cable Television Systems

Existing Conditions

There are existing overhead telephone and cable TV lines along the mauka side of Honoapiʻilani Highway and along Lower Honoapiʻilani Highway. ~~Verizon Hawaii~~ Hawaiian Telcom currently provides telephone service to the Kahana Ridge Subdivision,

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located on the northwesterly side of the proposed Pulelehua community. Oceanic Time Warner Cable currently provides cable TV service to the Kahana Ridge Subdivision.

Potential Impacts

The ~~Verizon Hawaii~~ Hawaiian Telcom telephone system serving the Kahana Ridge Subdivision could be extended to serve the northerly portion of the proposed Pulelehua community. ~~Verizon Hawaii's~~ Hawaiian Telcom's telephone facilities along Lower Honoapi'ilani Road could be extended to serve the central and southerly portions of the Pulelehua community.

Mitigative Measures

Maui Land & Pineapple Company, Inc. will coordinate any facility expansion requirements with ~~Verizon Hawaii~~ Hawaiian Telcom and Oceanic Time Warner Cable. The telephone and cable TV distribution systems will be installed underground from the existing facilities along Honoapi'ilani Highway.

4.9.7 Solid Waste

Existing Conditions

Currently, significant levels of solid waste are not being generated on the Pulelehua site; over half of the area is fallow fields or gulches and pineapple cultivation on the remaining area does not generate significant waste that is not already properly handled by Maui Pineapple Company.

The County of Maui Department of Public Works and Environmental Management provides residential refuse collection in the Māhinahina area. Refuse is collected and taken to the County's Central Maui Sanitary Landfill, located four miles southeast of the Kahului Airport on Pūlehu Road. The Olowalu transfer station is located about four miles southeast of Lahaina and accepts self-haul waste from West Maui residents for transfer to the Central Maui Landfill.

Plastic, glass, metal, cardboard, and newspaper can be recycled when left at various drop-boxes throughout the County. Green waste recycling is provided by several private organizations.

Potential Impacts

In the *Public Facilities Assessment Update County of Maui (2002)*, R.M. Towill Corporation projected that the Central Maui Landfill will have adequate capacity to accommodate residential and commercial waste through the year 2020, with a surplus of approximately one million cubic yards of landfill space. This projection was arrived at by

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multiplying the Maui County's de facto population projections by an estimated number of pounds per person per day of waste generated and assumes that solid waste generated by commercial and industrial growth will be captured by a corresponding trend in projected population growth.

The County of Maui's Solid Waste Division estimates that households on Maui generate approximately nine pounds of solid waste per day. Using this estimate, after build-out and sales of all Pulelehua homes, total waste from all households in the Pulelehua community would be approximately 10,827 pounds per day. This estimate includes the waste from all potential ohana units; however, it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

The County Solid Waste Division does not have an established method or formula to estimate the amount of solid waste generated from commercial and light industrial uses. In addition, there are no established methods or formulas established by the State of Hawai'i or at the national level. This is likely due to the fact that, unlike residential uses, the type and amount of solid waste generated by commercial and light industrial uses can vary widely and therefore, is difficult to accurately project.

Commercial wastes from Pulelehua businesses will be recycled as much as possible. Recycling of wastes from commercial uses can be easily implemented because commercial wastes (such as cardboard) can be readily separated from other wastes. In addition, the small scale-nature of commercial uses in Pulelehua is expected to generate a minimal amount of waste compared to large-scale commercial establishments.

Wastes generated by site preparation will primarily consist of vegetation, rocks, and debris from clearing and grubbing. Construction waste will consist of waste lumber, concrete, and other building materials.

Mitigative Measures

Maui Land & Pineapple Company, Inc.'s intent is to handle all green waste from site preparation within its agricultural composting facilities located at the Honolua Plantation; however, if necessary some waste may have to be taken to green waste recycling centers in Central Maui. Currently, there are three green waste recycling centers on Maui: Maui Eko Systems, Inc., Maui Earth Compost & Soil Mixes, and Campaign Recycle Maui. All of these are located in Central Maui. Phasing of site clearing will minimize the amount of green waste generated at any one time.

As much as practical, construction plans will specify the use of products with recycled content (such as steel, concrete aggregate fill, drywall, carpet, and glass tile) and the use of locally produced products (such as plastic lumber, hydromulch, soil amendments, and glass tile).

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During construction a job-site waste management and recycling program will be implemented to maintain clean construction sites, maximize material recycling, and minimize disposal truck traffic impacts. This recycling program will incorporate the “Three Rs” of effective construction waste management:

- Reduce: by preventing waste before it happens through efficient design
- Reuse: by using materials removed during demolition (such as rocks and concrete) on site
- Recycling: by separating recyclable materials from non-recyclable materials and supplying these recyclable materials to a recycler for use as new products

Construction materials that cannot be recycled will be disposed of in the County’s construction and demolition landfill near Mā’alaea.

Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community. After the community is occupied by residents, to the extent practical, wastes such as aluminum, paper, newspaper, glass, and plastic containers will be recycled. Green waste from the community may be processed on-site. Waste that cannot be recycled or incorporated into on-site green waste processing will be disposed of in the County’s central landfill in Pu’unēnē.

4.10 KAPALUA WEST MAUI AIRPORT

Existing Conditions

The Kapalua West Maui Airport borders the Pulelehua community site to the east (mauka). The airport is a commercial service airport owned and operated by the State of Hawai’i, serving only commercial propeller air carriers and commuter/air taxi aircraft. There are no general aviation uses or air cargo facilities. Facilities consist of a single runway, the terminal, a parking lot, and support amenities. The airport site is approximately 50 acres, not including easements on surrounding land in favor of the State of Hawai’i. Access is provided by Akahahele Street, which is also owned by the State of Hawai’i. Current security measures are minimal as there is no Federal Transportation Security Administration (TSA) security check point at the entrance to the airport (even under heightened threat conditions), passengers are not required to pass through metal detectors, and carry-on baggage is not x-rayed or otherwise inspected.

The Kapalua West Maui Airport was built in 1987, in response to the closure of the Kā’anapali Airstrip at North Beach. Originally, Maui Land & Pineapple Company, Inc., leased the airport land to Hawaiian Airlines, which subsequently obtained all required land use approvals and built and operated the facility privately. In 1995, the State of Hawai’i obtained the airport property and facilities through condemnation. The DOT does not have an adopted Master Plan for the Kapalua West Maui Airport.

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Operating Restrictions. Operations at the airport are subject to several restrictive conditions imposed by: 1) the original development agreement between Maui Land & Pineapple Company, Inc., and Hawaiian Airlines, 2) the State Land Use Commission Decision and Order (Docket Number A84-577) reclassifying the airport site from the Agricultural district to the Urban district; and 3) the County of Maui Change in Zoning Ordinance (Ordinance Number 1535-1986) changing the zoning of the property from Agricultural to Conditional Zoning (Airport District). These conditions still restrict operations and include:

- The runway, runway apron, and other facilities cannot be expanded, and no portion of the runway safety area can be paved or used for displaced landing or takeoff thresholds;
- Airport operations are limited to daylight hours (one half hour after sunrise and one half hour before sunset);
- Jet aircraft are not allowed, regardless of seating capacity or Short Takeoff and Landing (STOL) capabilities;
- Helicopter operations are not allowed;
- All propeller-driven aircraft of 12,500 pounds or less shall not generate noise levels greater than 80dB;
- For all other aircraft, noise levels shall not exceed:
 - for takeoff: 80.5 EPNdB;
 - for sideline: 84 EPNdB; and
 - for approach: 91.6 EPNdB;
- Aircraft are limited to a maximum seating capacity of 50 passengers;
- Flights are limited to a maximum of:
 - 35 for aircraft with a passenger seating capacity of 25 passengers or less (such as the Cessna 402 and the Dash 6); and
 - 35 for aircraft with a seating capacity between 26 and 50 passengers (such as the Dash 7 and Dash 8); and
- All reasonable actions must be taken to operate the airport to minimize noise generated by aircraft operations.

The above operating restrictions cannot be amended without the written approval, by resolution, of the Maui County Council.

Airport Design. Based on the Kapalua West Maui Airport operating restrictions, the Federal Aviation Administration (FAA) has determined that the “Critical Aircraft” for the Kapalua West Maui Airport is the De Havilland Canada Dash 8 (Dash 8), meaning that the design standards for the airport must meet the design requirements necessary for the operation of the Dash 8. With a capacity of approximately 50 passengers, the Dash 8 is the largest aircraft allowed at the airport.

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FAA Advisory Circular 150/5300-13 specifies design requirements for various classes of airports based on the types of planes using the facility. With the critical aircraft being the Dash 8, the FAA airport design classification for the Kapalua West Maui Airport is “Design Group III”. The design criteria for this classification include:

- **Runway Obstacle Free Area (ROFA)**
The ROFA is a rectangle-shaped area, 800-feet wide (centered on the runway centerline), and extending 600 feet from each runway end. Parallel to the length of the runway, the airport property line is 200 feet from either side of the runway centerline, meaning an additional 200 feet beyond both the makai and mauka airport property boundaries are required for the ROFA.
- **Runway Protection Zone (RPZ)**
The RPZ is a trapezoid-shaped area that starts 200 feet from the end of the runway paving. At the end closest to the runway, the RPZ is 500-feet wide (centered on the runway centerline). The RPZ extends from this point for 1,000 feet. At the end of the 1,000-foot length, the RPZ is 700-feet wide. The RPZ represents an air space exclusion that starts at the runway elevation and rises at a 20:1 slope. A substantial portion of the RPZ extends beyond the airport property boundary.
- **Runway Safety Area (RSA)**
The RSA is an area 300-feet wide (centered on the runway centerline), extending 600 feet from each runway end. This area is entirely within the airport property.

Figure 13 shows the FAA required safety zones.

In correspondence from the DOT to Maui Land & Pineapple Company, Inc., the DOT indicated that there is a need for DOT to acquire additional land or easements surrounding the airport to meet the FAA design requirements.

Current Operations, Noise, and Air Quality. Based on total annual operations at the Kapalua West Maui Airport in 2004, there was an average of 12.5 arrivals and 12.5 departures, or 25 “operations” (12.5 flights) per day. This is well below the maximum number of flights that could be allowed at the airport under the operating restrictions. Under the restrictions there could be a total of 70 flights or 140 operations per day.

There has never been an accident at the airport. An accident is defined as a failure of aircraft resulting in an injury.

The State DOT has not conducted an airport noise study for the Kapalua West Maui Airport. To determine the existing and projected noise conditions at the airport and the surrounding area, Maui Land & Pineapple Company, Inc., commissioned Mestre Greve Associates and Edward K. Noda and Associates to determine existing and projected noise contours around the Kapalua West Maui Airport.

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Mestre Greve Associates is a nationally recognized acoustical engineering firm that specializes in noise studies with a special emphasis on transportation systems. Mestre Greve Associates has done airport noise studies for airports around the world, including noise studies for the Kahului International Airport on Maui and Honolulu International Airport on Oahu. Other airport noise studies prepared by Mestre Greve Associates include studies for: John Wayne Airport, Long Beach Airport, Oakland International Airport, Seattle Tacoma International Airport, Louis Armstrong International Airport, San Antonio International Airport, and Aspen Airport. Edward K. Noda and Associates has provided environmental services in Hawai'i for over 20 years and has specialized expertise in airport planning.

The airport noise contours and subsequent report (Appendix ~~M~~ N) for the Kapalua West Maui Airport were prepared in conformance with all FAA and State DOT requirements, including Federal Air Regulation Part 150, Noise Compatibility Program. This included using FAA's Integrated Noise Model Version 6.1 computer modeling software to determine the noise contours.

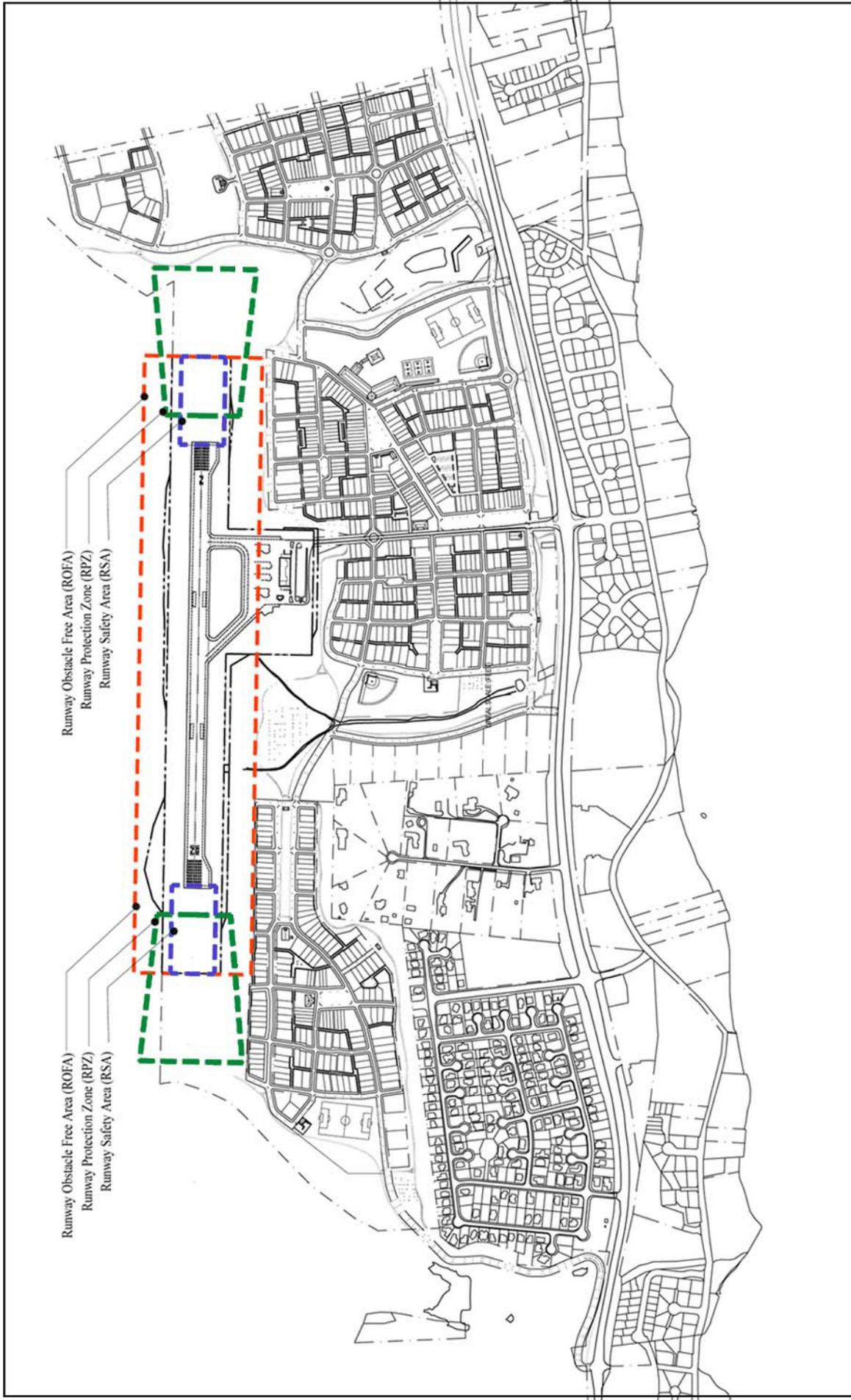
The study shows that under existing conditions, the critical 55 Day Night Noise Level² (DNL) noise contour extends slightly beyond the airport parking lot in front of the terminal, but is still within State DOT property. From the property boundary at the midpoint between the terminal building and the north end of the runway, the 55 DNL noise contour extends 180 feet into the Pulelehua site. From the property boundary at the midpoint between the terminal building and the south end of the runway, the 55 DNL noise contour extends 220 feet into the Pulelehua site (Figure 14).

The 55 DNL noise contour is determined to be the critical contour because under both the FAA and the State DOT Airports Division airport noise compatibility guidelines, homes and other uses, such as schools and businesses, located below the 55 DNL contour are considered compatible and "unconditionally acceptable."

Under the FAA noise compatibility guidelines, dwelling units (houses and apartments) are acceptable in areas below the 65 DNL noise contour. Commercial uses, such as offices and businesses, and public uses, such as schools and churches, are also acceptable in areas below the 65 DNL contour.

The State DOT Airports Division noise compatibility guidelines are more restrictive, as naturally ventilated homes are not recommended within or above the 60 to 65 DNL contours. If homes are within the 60 to 65 DNL contours, noise level reduction measures, such as insulation and air conditioning, are recommended to achieve interior levels of 45 DNL or less. Commercial uses and most public uses (with the exception of schools and

² Day Night Noise Level, abbreviated as DNL and sometimes L_{dn} , is a description of noise based on the exposure of noise over a 24 hour period.



Runway Obstacle Free Area (ROFA)
Runway Protection Zone (RPZ)
Runway Safety Area (RSA)

Runway Obstacle Free Area (ROFA)
Runway Protection Zone (RPZ)
Runway Safety Area (RSA)

Legend

- Airport Property Boundary
- - - Runway Obstacle Free Area (ROFA)
- Runway Protection Zone (RPZ)
- Runway Safety Area (RSA)

Figure 13
FAA Required Airport Safety Areas

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.
ISLAND OF MAUI
NORTH



LINEAL SCALE (FEET)



1,000



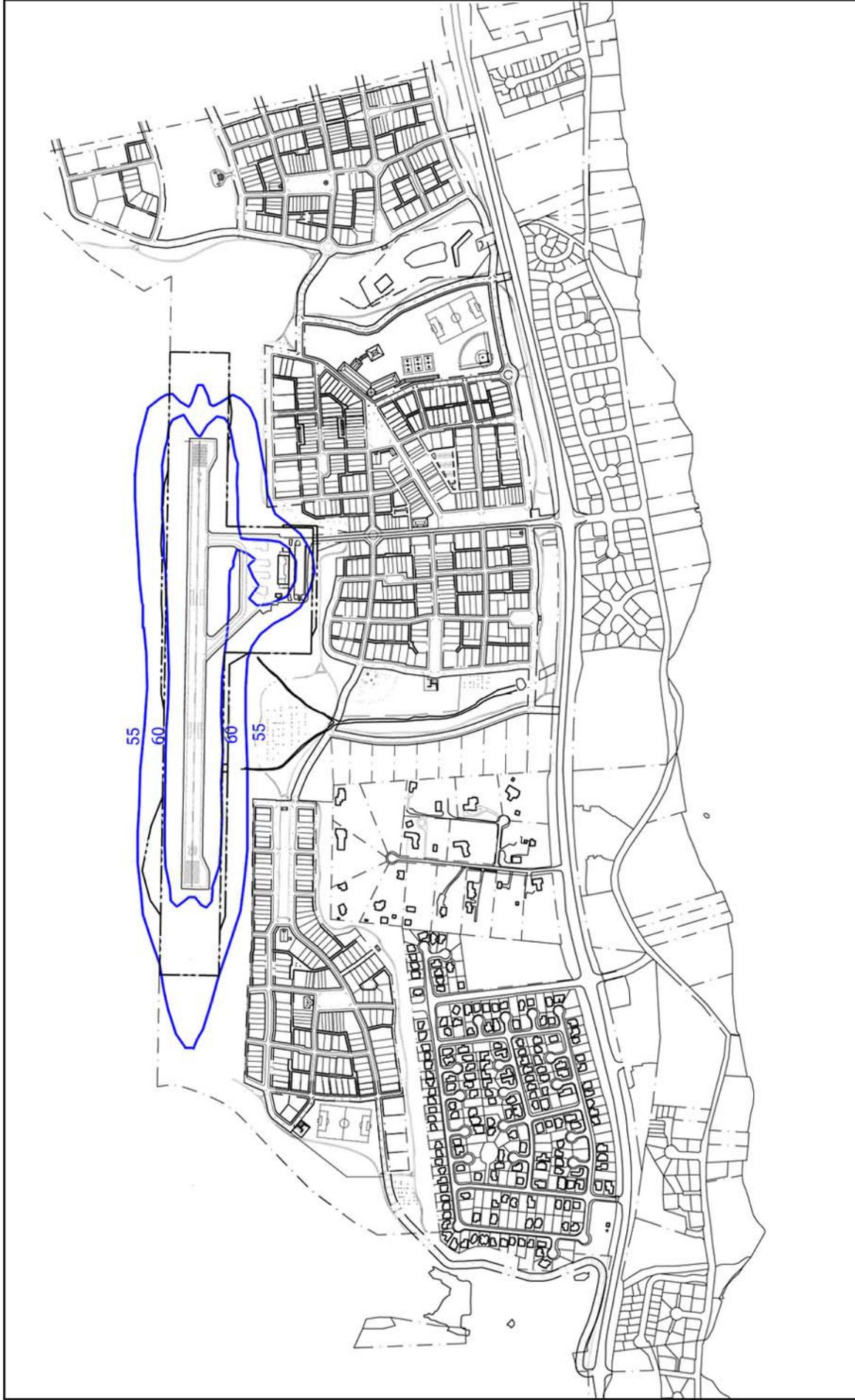


Figure 14
Existing Airport Noise Conditions

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC. ISLAND OF MAUI

NORTH

LINEAL SCALE (FEET)

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churches) are acceptable in areas below the 65 DNL contour. Schools and churches are acceptable in areas below the 60 DNL contour.

To evaluate existing and projected air quality conditions due to airport operations, Maui Land & Pineapple Company, Inc., requested certified consulting meteorologist B.D. Neal & Associates to include an analysis of airport air quality as part of their air quality study prepared for this EIS (Appendix J). The analysis considered the types of aircraft using the airport and the existing and maximum allowable number of operations.

Current aircraft emissions are much less than established air pollution rates. Most aircraft emissions occurring at the airport result from aircraft taxiing. These emissions tend to disperse by the time they reach beyond the airport boundary and are carried away from the area by prevailing winds.

Potential Impacts

Creation of the Pulelehua community is not expected to impact the Kapalua West Maui Airport or any airport operations. Further, the Kapalua West Maui Airport is not expected to significantly impact the Pulelehua community.

Airport Noise, Operations, and Air Quality. Results of the airport noise contour study show that the Pulelehua community will not be significantly impacted by aircraft noise now or in the future. Under existing airport noise conditions, all uses within Pulelehua, with the exception of a short segment of a trail and a few industrial lots, will be below the critical 55 DNL noise contour. Homes, schools, churches, businesses, and public uses below the 55 DNL noise contour are all considered “unconditionally acceptable” under both FAA and State DOT Airports Division airport noise compatibility guidelines. Further, under existing noise conditions, there are no uses above the 60 DNL noise contour, as the majority of this contour is within the boundaries of the airport property (Figure 14).

Results of the airport noise contour study also show that even with maximum “worst case scenario” conditions, airport noise will not significantly impact the community. If theoretical worst case conditions were ever realized, the vast majority of the Pulelehua community, including the school, would still be below the 55 DNL noise contour, and there would be no uses above the 65 DNL contour. Virtually all homes would be below the 60 DNL contour, which is in accord with the FAA and State DOT Airports Division airport noise compatibility guidelines. Only a very slight area of Pulelehua would be above the 60 DNL contour, but still below the 65 DNL. This area is near the airport and will contain industrial uses, which are acceptable in this noise contour level, and a few “live/work” lots, which allow for businesses uses to be combined with residences. In accordance with State DOT Airports Division noise compatibility guidelines, homes on the “live/work” lots within the 65 to 60 DNL contours will be built with noise reduction measures, such as insulation and air conditioning, to achieve interior noise levels of 45 DNL or less (Figure 15).

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It is extremely unlikely that the projected “worst case scenario” noise conditions would ever occur. To project worst case conditions, noise contours were based on the maximum amount of flights that could occur under the airport operating restrictions. Currently, there are 4,569 flights or 9,138 operations (4,569 arrivals and 4,569 departures) annually at the airport. Theoretically, with the maximum allowable number of 70 flights or 140 operations per day, there could be 51,000 operations per year if the maximum number of flights occurred every day of the year. This would equate to approximately one take off and landing every five minutes, everyday.

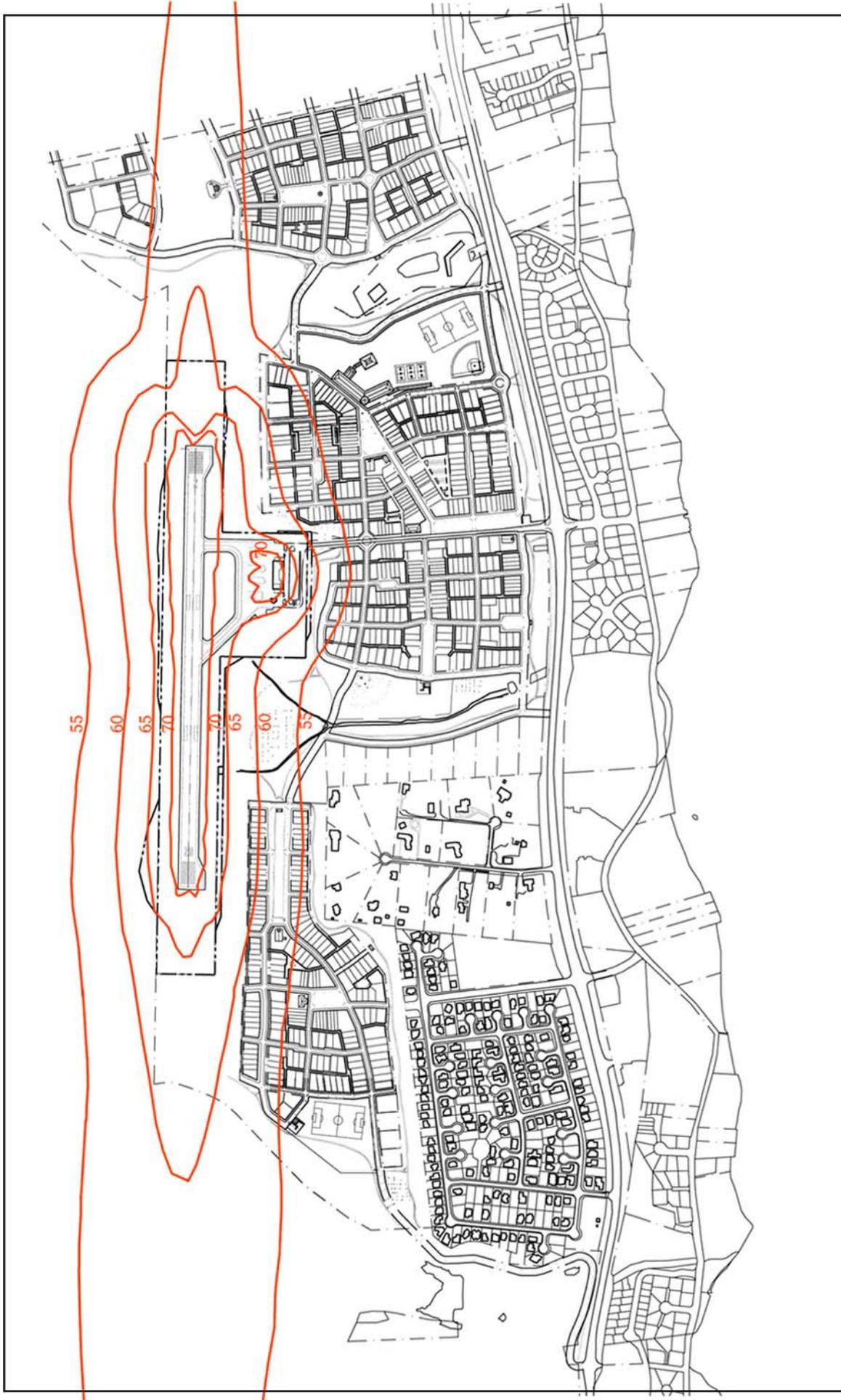
Expanding the number of operations by more than five times over existing conditions is very unlikely given the current demand for flights and physical limitations of the airport. Demand forecasts published by the DOT in 2004 project 10,000 annual operations at the airport by 2025, a very small increase over current operating levels. Additionally, with only one runway, a small terminal, and with limited baggage handling capabilities and parking facilities, it is highly unlikely the existing airport could physically handle the amount of aircraft and passengers on the allowable maximum number of flights.

Expansion of the airport is also extremely unlikely. The restrictions imposed on the airport severely limit the potential for any expansion in regard to lengthening the runway, larger aircraft, jet landings and take offs, and helicopter use. As mentioned above, these restrictions cannot be amended without the written approval, by resolution of the Maui County Council. Even without restrictions on expansion, the gulches to the north and the south of the airport are natural barriers to lengthening the runway. Additionally, the State of Hawai'i does not own any of the surrounding land and would need to acquire additional land to expand facilities.

Regarding airport-related air quality impacts to Pulelehua, the air quality study concludes that even with a substantial increase in aircraft operations in the future, the potential impact on Pulelehua from aircraft emissions will be insignificant due to relatively small emission rates.

Air quality impacts within Pulelehua are extremely unlikely due to the prevailing wind patterns and the location of the airport runways with the likely trajectory of air pollution emission. Much of the emissions that do occur from airport operations are emitted during aircraft taxiing at interior locations of the airport, and these emissions are substantially dispersed by the time they reach the airport boundary.

Airport Design. The Pulelehua community will not impact the potential for the State DOT to bring the Kapalua West Maui Airport into conformance with FAA airport design requirements as specified in FAA Advisory Circular 150/5300-13. After receiving comments from the State DOT and consulting with the FAA, Maui Land & Pineapple Company, Inc., substantially revised the original Pulelehua plan to ensure no uses



Legend

- Airport Property Boundary
- Maximum Airport DNL Noise Contours

Figure 15
Maximum Projected Airport Noise Conditions

Pulelehua

MAUI LAND & PINEAPPLE COMPANY, INC.

ISLAND OF MAUI



LINEAL SCALE (FEET)



1,000



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associated with Pulelehua will be within any area required for the proper design of the airport. Specifically these changes include:

- ***Runway Obstacle Free Area (ROFA)***
Eliminating or relocating all uses within the area required for the ROFA. There are currently no uses proposed within the ROFA even though this area extends 200 feet into Maui Land & Pineapple Company, Inc.'s property.

- ***Runway Protection Zone (RPZ)***
Relocating the community garden once proposed near the north end of the runway so that it is not on the ground area below the RPZ. This eliminates the potential for birds that could have been attracted to the garden from flying into the RPZ air space exclusion area. There are currently no uses proposed on the ground below the RPZ, even though a substantial portion of the RPZ extends into Maui Land & Pineapple Company, Inc.'s property.

Figure 13 shows the FAA required safety zones.

In addition, FAA and State DOT were concerned about recreation fields that were once proposed south of Māhinahina Gulch. The Pulelehua plan has been revised to relocate the fields. While the fields were not in the south RPZ, they were in the airport flight track. Compatible uses such as parking, roads and a memorial park are now proposed for the area.

In their comments on the EISPN, the State DOT stated that when practical, ownership or control of the RPZ and ROFA should be held by the airport operator. Since portions of the RPZ and ROFA are on land owned by Maui Land & Pineapple Company, Inc., Maui Land & Pineapple Company, Inc., is agreeable to enter into negotiations with DOT so that DOT may obtain the required areas.

Airport Access and Security. The traditional neighborhood design of Pulelehua, based on a modified grid pattern of interconnected streets, will increase access to the airport, as a grid pattern provides multiple alternative routes to a destination compared to a straight line. To ensure airport security, the revised Pulelehua plan provides for a security checkpoint on Akahahele Street 300 feet from the airport terminal building. The location of the security check point at 300 feet from the terminal building was determined through consultation with the TSA. There will be no interconnected cross streets between the security check point and the airport, thus ensuring that access to the airport can be controlled at a single entry point. This also allows for queuing to occur along Akahahele Street.

Mitigative Measures

Maui Land & Pineapple Company, Inc., has made substantial revisions to the Pulelehua plan to mitigate issues related to the Kapalua West Maui Airport. These changes, discussed above, have resulted in an increased buffer area (i.e., the ROFA) between the airport and any buildings in Pulelehua, and ensure no uses associated with Pulelehua will be within any area required for the proper design and operation of the airport.

All uses within Pulelehua, including homes, the school, and businesses, are located in accord with FAA and State DOT airport noise compatibility guidelines. At the current level of airport operations, the entire community of Pulelehua falls below the 55 DNL noise contour, which is the area that is considered “unconditionally acceptable” under FAA and State DOT Airport Division airport noise compatibility guidelines.

Even if the theoretical “worst case scenario” airport noise projections were reached, there still would be no uses above the 65 DNL contour and the vast majority of the Pulelehua community, including most homes and the school, would be below the critical 55 DNL noise contour. Also, under “worst case” conditions virtually all homes would be below the 60 DNL contour, which is in accord with the FAA and State DOT airport noise compatibility guidelines. Only a very slight area of Pulelehua would be above the 60 DNL contour but still below the 65 DNL. This area is near the airport and will contain industrial uses, which are acceptable in this noise contour level, and a few “live/work” lots, which allow for businesses uses to be combined with residences. In accordance with State DOT Airports Division noise compatibility guidelines, homes on the “live/work” lots within the 65 to 60 DNL contours will be built with noise reduction measures, such as insulation and air conditioning, to achieve interior noise levels of 45 DNL or less.

Measures to further ensure compatibility with the airport include:

- Notification to buyers of the proximity of the airport and the presence of aircraft noise.
- Homes will be built with double wall construction to help insulate noise levels, although not required.

Since the potential air quality impacts on Pulelehua from aircraft emissions will be insignificant, no air quality-related mitigative measures are warranted or proposed.

In creating the Pulelehua Community, Maui Land & Pineapple Company, Inc., will coordinate with the State DOT regarding design or construction issues that may impact the State DOT’s existing infrastructure lines, equipment, or facilities. In addition, all required FAA forms and documents regarding uses near airports will be submitted to both the FAA and the State DOT Airports Division for review and approval before any work begins.

4.11 PUBLIC SERVICES AND FACILITIES

Overview

As discussed in Section 4.8.1, projections indicate that the Maui County population will increase to 175,136 people in 2020, a 25.5 percent increase from the 2005 population. In West Maui the population is expected to increase to 25,431 people in 2020, a 28.5 percent increase from the 2005 population. These projections do not include the daily visitor population of Maui County which is projected to increase to 55,800 visitors in 2020, a nearly 20 percent increase.

The Pulelehua community is targeted toward Maui residents. As such, the community is not expected to cause a significant increase in the population of the island, but rather it will provide homes for Maui's growing population. While Pulelehua will provide homes for Maui's growing population, it is important to note that the build-out of Pulelehua will occur over approximately several years and thus the need for additional public services to serve Pulelehua residents is expected to occur incrementally and in proportion with Maui's population growth. The needs of a growing population relating to public services and other issues will need to be addressed regardless of whether Pulelehua is built.

Pulelehua will contribute to increased State and County revenues in the form of increased property taxes relative to the existing Agricultural zoning of the site, increased income tax revenue from construction jobs and long-term employment opportunities, increased financial stability of residents (from home ownership and employment) and thus greater excise tax receipts from resident's expenditures. These increased revenues are expected to ~~keep pace with or~~ off set the costs of public services relative to Pulelehua; however, it will be up to the State and the County to adequately allocate resources to serve Maui's growing population.

4.11.1 Police Protection

Existing Conditions

Police protective services on Maui are provided by the Maui Police Department. The Pulelehua community falls within the Maui Police Department's District IV – Lahaina. This district is serviced by: 1) a police station located at the Lahaina Civic and Recreation Center (1850 Honoapi'ilani Highway), approximately three miles from the Pulelehua community site; and 2) a police substation located in the Nāpili Shopping Center, approximately two miles from the Pulelehua community site.

In their comment letter on the EISP, the Maui Police Department stated that the Lahaina Patrol District consists of five beats that cover the area from the Pali Tunnel to Nākālele Point. The District has an authorized strength of 53 uniformed officers and six investigative officers. However, with only 36 of 53 authorized positions filled, the District

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is at 68 percent staffing. Two officers are assigned to cover the resort and Honokōwai areas, and although there are two funded Community Police Officer positions allocated to the District, they remain vacant.

Potential Impacts and Mitigative Measures

As Maui's population grows there is a need for the County to allocate resources necessary to adequately fund police services. Since Pulelehua is intended for Maui residents, the overall island population is not expected to increase; however, people currently living in other parts of Maui may move to Pulelehua to be closer to their jobs in West Maui. Maui Land & Pineapple Company, Inc., is willing to discuss with the Police Department the possibility of providing a police substation within the community.

Providing the opportunity for people to live closer to their jobs and school is expected to decrease commuting to and from West Maui, lessen traffic congestion and accidents, reduce stress, and allow more family and recreation time, thereby improving overall quality of life for not only Pulelehua residents, but for Maui residents in general. The social impacts of these benefits, although not quantifiable, are expected to contribute to a more stable population which should have a positive impact on lessening crime and other issues requiring police attention.

4.11.2 Fire Protection

Existing Conditions

Two fire stations cover the Lahaina region: the Lahaina Fire Station and the Nāpili Fire Station. The Lahaina Fire Station is responsible for the Lahaina, Olowalu, and Kā'anapali areas. The Nāpili Fire Station is responsible for the Honokōwai, Nāpili, and Kapalua, areas. The Nāpili Fire Station is located near the Nāpili Shopping Center at 4950 Hanawai Street and is approximately two miles from the Pulelehua community site.

Potential Impacts and Mitigative Measures

The Fire Department has been involved with the planning and design of Pulelehua from the earliest stages. In correspondence to Kapalua Land Company, Ltd. (a subsidiary of Maui Land & Pineapple Company, Inc.), dated July 26, 2004, the Fire Department approved Pulelehua's street designs and stated they were very pleased with the design details and see no major hurdles with what has been proposed.

Pulelehua's modified street grid system provides multiple routes (for cars, as well as pedestrians and cyclists) to reach a specific destination. Providing multiple routes increases connectivity to all points and increases emergency vehicle access by providing alternative routes to reach an emergency at a specific point. In their correspondence, the

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Fire Department stated: "We would like to commend the design committee for the multiple access options that residents & emergency responders will have."

4.11.3 Schools

Existing Conditions

Educational facilities in West Maui include four public schools and two private schools. The public schools are: King Kamehameha III Elementary (grades K-5), Princess Nahienaena Elementary (grades K-5), Lahaina Intermediate (grades 6-8), and Lahainaluna High (grades 9-12). The private schools are: Sacred Hearts School (grades K-8) and West Maui Carden Academy.

As of October 2004, the current enrolment at West Maui's public schools was as follows: In their comment letter on the Pulelehua Draft EIS, dated May 17, 2005 (see Section 12.0) the Department of Education (DOE) provided the following information on the enrollments (for school year 2004-2005) and capacities (for school year 2003-2004) of West Maui public schools:

	Current Enrollment (2004-2005)	Capacity (2003-2004)	Over Capacity (2004-2005)
Kamehameha III Elementary:	698 <u>702</u>	704	<u>-2</u>
Princess Nahienaena Elementary:	661 <u>664</u>	681	<u>-17</u>
Lahaina Intermediate:	637	577 <u>597</u>	<u>40</u>
Lahainaluna High School:	1,038	850 <u>794</u>	<u>244</u>

Kamehameha III Elementary School is the designated public elementary school for students from the area extending from Honokōhau Valley to Kā'anapali (which includes the Pulelehua area). All Kamehameha III Elementary School students must be transported to and from school, either by school buses, or by other means such as their parents or car pools. The DOE operates six school buses to transport 254 students to Kamehameha III Elementary School from the Honokōhau Valley to Kā'anapali area. Many of these students reside in the area near Pulelehua.

Potential Impacts and Mitigative Measures

Plans for Pulelehua include a 13-acre site for a public elementary school. Maui Land & Pineapple Company, Inc., will contribute the 13-acre school site as a portion of their standard fair-share school impact fee. Maui Land & Pineapple Company, Inc., plans to develop Pulelehua in one phase and will keep the DOE informed regarding the progress of Pulelehua.

It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapi'ilani Highway as elementary school children residing north of Kā'anapali will

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not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honoapi'ilani Highway.

Planning Director Mike Foley has noted that the Pulelehua school will be a good traffic mitigation measure since West Maui Schools have the highest number of parents driving kids to school within the State. In their comment letter on the EISPN, the Police Department stated that "having a school in the vicinity is a must," in reference to the fact that there is currently no school in the Pulelehua area and all students must be driven to Lahaina area schools, including schools serviced by Lahainaluna Road.

The DOE has indicated that the Pulelehua school site is appropriate and acceptable for an elementary school.

~~The Market Study and Economic Impact Analysis prepared for the Pulelehua community (Hallstrom 2005) estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on DOE figures, with about 75 percent (308 children) attending grades Kindergarten to 8th, and 25 percent (103) attending high school.~~

In their comment letter on the Draft EIS, the Department of Education estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students. The number of students is dependent on the total number of residential units and the breakdown between single-family and multi-family homes.

The Department of Education also provided the following information regarding the projected enrollments and capacities for the 2009-2010 school year:

	<u>Projected Enrollment</u> <u>(2009-2010)</u>	<u>Over Capacity</u> <u>(2009-2010)</u>	<u>Pulelehua</u> <u>Students</u>
Kamehameha III Elementary:	<u>683</u>	<u>-21</u>	
Princess Nahienaena Elementary:	<u>615</u>	<u>-66</u>	
<u>Elementary Subtotal:</u>	<u>1,298</u>		<u>239</u>
Lahaina Intermediate:	<u>664</u>	<u>67</u>	<u>115</u>
Lahainaluna High School:	<u>996</u>	<u>172</u>	<u>136</u>

The Department of Education concludes that an elementary school within Pulelehua could accommodate all elementary students residing in Pulelehua and that Pulelehua will impact Lahaina Intermediate and Lahainaluna High by doubling the number of students currently over facility capacity. To mitigate this impact the Department of Education requests the State and Maui County to impose a standard school fair-share condition to offset the impact of Pulelehua on the Lahainaluna schools.

A new private school, Maui Preparatory Academy, will be located in Nāpili and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. In 2007, four classes of pre-Kindergarten will be added. The anticipated enrollment of pre-Kindergarten children is 18 students per classroom. In 2008, an additional primary grade level will be added. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-Kindergarten through 12.

4.11.4 Recreational Facilities

Existing Conditions

Lahaina has a well-developed park system, with over 10.3 acres of sub-regional and special-use park land per 1,000 residents. The sub-regional park system in the Lahaina area consists of 23 neighborhood parks. The West Maui community currently has access to two tennis courts, two sports fields, a gym, and a community center (Lahaina Civic Center), in addition to the many supplemental facilities offered by resorts in the area. The following major public parks are available in the region:

- Hanaka'ō'ō Beach Park;
- Wahikuli Beach Park;
- Wahikuli State Wayside Park;
- Māla Beach Park;
- Kelaweā Park;
- Paunau Park;
- Malu'ulu O Lele Park; and
- Nāpili Park.

Potential Impacts and Mitigative Measures

Pulelehua will contain approximately ~~90~~ 100 acres of useable parks and recreation areas (Figure 7). This includes neighborhood parks, ball fields, community gardens, and an extensive trail system. Gulch areas provide an additional 33 acres of open space. This is far more than the approximately 10 acres of parks required under County subdivision requirements (Section 18.16.320, Maui County Code).

Pulelehua's parks will be open to all Maui residents. While the West Maui Plan designates approximately 50 acres of the Pulelehua site as a regional park, Pulelehua's ~~90~~ 100 acres of useable parks and trails nearly doubles that amount of park space. In addition, Maui Land & Pineapple Company, Inc., will build all Pulelehua parks. If the County were to develop the regional park as designated on the Community Plan, the County would have to acquire the land, and build and maintain all facilities. It is unknown when the County would develop the regional park.

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Pulelehua's neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

The County Department of Parks and Recreation has indicated its willingness to accept and maintain Pulelehua's neighborhood parks and ball fields, while Pulelehua's homeowner association will maintain the trail system and the smaller neighborhood parks.

4.11.5 Health Care Services

Existing Conditions

Maui Memorial Medical Center, located in Wailuku, is currently Maui's only acute care facility. The Center has 196 beds and provides emergency, acute, and general medical care. Maui Memorial Medical Center is approximately an hour's drive from West Maui by emergency ambulance. Routine and non-emergency medical services for West Maui residents are provided by medical and dental offices located in communities of West Maui.

Potential Impacts and Mitigative Measures

Pulelehua residents, at some time, may require health care and emergency medical services.

The proposed Pulelehua Project District ordinance provides for medical uses as a permitted use in Pulelehua's Māhinahina Neighborhood (the area south of Māhinahina Gulch). Maui Land & Pineapple Company, Inc., is currently participating in discussions with Maui Memorial Medical Center officials to donate land for a medical facility in the neighborhood. The facility would initially include a 30 to 50-bed long-term care facility. In addition, an Urgent/Emergency Care Medical Clinic could be developed. This facility would address critically injured or sick patients to provide stabilization and diagnostic services. See Section 2.6.7 for additional information on the proposed medical center.

There are several other proposals for increased medical services on Maui:

- The Maui Memorial Medical Center in Wailuku is currently undergoing a \$42 million renovation, which will add 45 additional beds by 2007.
- Plans are currently underway for the West Maui 24-Hour Acute Care Emergency Medical Facility, to be located on a 15-acre site near the Lahaina Civic Center.

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- Malulani Health Systems proposes to build a 40-acre, \$180 million, 100-bed hospital in Kihei, which is estimated to open in 2009.

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CONFORMANCE WITH LAND USE
PLANS, POLICIES & LAWS



5.0 CONFORMANCE WITH LAND USE PLANS, POLICIES, AND LAWS

This section discusses the relationship of the proposed Pulelehua community to State and County land use plans, policies, and controls for the West Maui region.

5.1 STATE OF HAWAII

5.1.1 Environmental Impact Statement Law, Chapter 343, Hawaii Revised Statutes

Compliance with Chapter 343, HRS is required as described earlier in Section 1.9.3.

5.1.2 State Land Use Law, Chapter 205, Hawaii Revised Statutes

The State Land Use Law (Chapter 205, HRS), establishes the State LUC and gives this body the authority to designate all lands in the State into one of the four districts: Urban, Rural, Agricultural, or Conservation.

The Pulelehua site is within the State Agricultural District (Figure 4). A State Land Use District Boundary Amendment will be sought to change the site from the Agricultural District to the Urban district.

Decision making criteria to be used in the LUC's review of petitions for reclassification of district boundaries is found in Section 205-17, HRS, and Section 15-15-77, HAR. In addition, standards for determining the Urban district are contained in Section 15-15-18. The following is an analysis of how the Pulelehua community conforms to these criteria and standards.

Land Use Commission Decision Making Criteria

§205-17 Land use commission decision making criteria. *In its review of any petition for reclassification of district boundaries pursuant to this chapter, the commission shall specifically consider the following:*

- (1) The extent to which the proposed reclassification conforms to the applicable goals, objectives, and policies of the Hawaii state plan and relates to the applicable priority guidelines of the Hawaii state plan and the adopted functional plans;*
- Pulelehua conforms to the goals, objectives, and policies of the Hawaii State Plan and functional plans, as discussed in sections below.

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(2) *The extent to which the proposed reclassification conforms to the applicable district standards; and*

- Conformance of Pulelehua to the Urban district standards is discussed in following sections.

(3) *The impact of the proposed reclassification on the following areas of state concern:*

(A) Preservation or maintenance of important natural systems of habitats;

- The Pulelehua site is not a known habitat for threatened or endangered plant species (see Section 3.8).
- The Pulelehua site is not a known habitat for threatened or endangered species of birds or mammals (see Section 3.9).

(B) Maintenance of valued cultural, historical, or natural resources;

- No significant archaeological resources have been identified on the Pulelehua site; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction (see Section 4.1).
- Pulelehua is not expected to impact cultural resources as no cultural resources have been identified on the property (see Section 4.2).

(C) Maintenance of other natural resources relevant to Hawaii's economy, including, but not limited to, agricultural resources;

- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4); furthermore, Pulelehua will preserve surrounding agricultural lands by limiting development to a compact, defined area.

(D) Commitment of state funds and resources;

- Use of State or County lands or funds could include the proposed public school and medical center uses on the site and on- and off-site infrastructure improvements relating to roadway, traffic, water, sewer, utility and drainage facilities affecting State and/or County roadways or other lands; however, the specific nature of all potential improvements is not known at this time

(E) Provision of employment opportunities and economic development; and

- Pulelehua will provide homes for sale and rent to Maui's primary workers, those earning between 50 to 140 percent of the median income. These workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions and provide essential services crucial to keeping Maui's economy stable

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and growing. Without adequate, affordable housing, both businesses and government will increasingly experience difficulty attracting and retaining employees to fill employment positions. By 2020 in the West Maui region, additional needed homes are forecasted to be approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005), and 6,843 new jobs will be created. There will be a need for housing within the income ranges of the positions created.

(F) Provision for housing opportunities for all income groups, particularly the low, low-moderate, and gap groups; and

- Pulelehua will provide homes and rentals for Maui's primary workers, those earning between 50 to 140 percent of the median income as well as helping to satisfy the demand for moderate and market homes.

(4) The representations and commitments made by the petitioner in securing a boundary change.

§15-15-77 Decision-making criteria for boundary amendments. *(a) The commission shall not approve an amendment of a land use district boundary unless the commission finds upon the clear preponderance of the evidence that the proposed boundary amendment is reasonable, not violative of section 205-2, HRS, and consistent with the policies and criteria established pursuant to sections 205-16, 205-17, and 205A-2, HRS.*

(b) In its review of any petition for reclassification of district boundaries pursuant to this chapter, the commission shall specifically consider the following:

- (1) The extent to which the proposed reclassification conforms to the applicable goals, objectives, and policies of the Hawaii state plan and relates to the applicable priority guidelines of the Hawaii state plan and the adopted functional plans;*
- (2) The extent to which the proposed reclassification conforms to the applicable district standards;*
- (3) The impact of the proposed reclassification on the following areas of state concern;*
 - (A) Preservation or maintenance of important natural systems or habitats;*
 - (B) Maintenance of valued cultural, historical, or natural resources;*
 - (C) Maintenance or other natural resources relevant to Hawaii's economy including, but not limited to agricultural resources;*
 - (D) Commitment of state funds and resources;*
 - (E) Provision for employment opportunities and economic development; and*
 - (F) Provision for housing opportunities for all income groups, particularly the low, low-moderate, and gap groups;*
- (4) In establishing the boundaries of the districts in each county, the commission shall give consideration to the general plan of the county in which the land is located;*

- Pulelehua is generally consistent with the West Maui Community Plan land use policies (see Section 5.2.2). A community plan amendment will be sought so that Pulelehua is consistent with the West Maui Community Plan Land Use Map.

(5) The representations and commitments made by the petitioner in securing a boundary change, including a finding that the petitioner has the necessary

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economic ability to carry out the representations and commitments relating to the proposed use or development; and

(6) Lands in intensive agricultural use for two years prior to date of filing of a petition or lands with a high capacity for intensive agricultural use shall not be taken out of the agricultural district unless the commission finds either that the action:

(A) Will not substantially impair actual or potential agricultural production in the vicinity of the subject property or in the county or State; or

- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4).
- Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use; this amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd. Maui Land & Pineapple Company, Inc., owns ample land, which is better suited to agriculture.
- In addition to its pineapple operations, Maui Land & Pineapple Company, Inc., is exploring a wide array of diversified agricultural opportunities and conducting field trials on new crops.
- With the closure of Pioneer Mill in Lahaina and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

(B) Is reasonably necessary for urban growth.

- Population projections indicate that the Maui County population will increase from 139,573 people in 2005 to 175,136 people in 2020, a 25.5 percent increase (SMS 2002). In West Maui, the population is expected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase. With the increase in West Maui's population, forecasts of housing demand estimate a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income.
- (c) Amendments of a land use district boundary in conservation districts involving land areas fifteen acres or less shall be determined by the commission pursuant to this subsection and section 205-3.1, HRS.*
- (d) Amendments of land use district boundary in other than conservation districts involving land areas fifteen acres or less shall be determined by the appropriate county land use decision-making authority for the district.*
- (e) Amendments of a land use district boundary involving land areas greater than fifteen acres shall be determined by the commission, pursuant to this subsection and section 205-3.1, HRS.*

Standards for Determining Urban District Boundaries

§15-15-18 Standards for determining “U” urban district boundaries. Except as otherwise provided in this chapter, in determining the boundaries for the “U” urban district, the following standards shall be used:

- (1) It shall include lands characterized by “city-like” concentrations of people, structures, streets, urban level of services and other related land uses;
 - Pulelehua will be a complete community with homes, a school, parks, trails, neighborhood commercial establishments, and civic uses all in close proximity to each other.
- (2) It shall take into consideration the following specific factors:
 - (A) Proximity to centers of trading and employment except where the development would generate new centers of trading and employment;
 - Pulelehua is located between West Maui’s primary employment areas of Kā’anapali and Kapalua. In addition, the site is bordered by existing urban uses makai of Honoapi’ilani Highway, Kapalua West Maui Airport, and Kahana Ridge subdivision. Thirty-two percent of the Pulelehua boundaries are contiguous to lands within the Urban district. If the boundary of Honoapi’ilani Highway (which is in the Agricultural district, but borders the Urban district on the makai side) is included, 52 percent of the site is contiguous to the Urban district.
 - (B) Availability of basic services such as schools, parks, wastewater systems, solid waste disposal, drainage, water, transportation systems, public utilities, and police and fire protection; and
 - Basic services are available or can be made available to the Pulelehua site. The Lahaina Wastewater Treatment Plant is approximately 3,500 feet from the south border. The potable water aquifers serving the area are currently being pumped at less than 50 percent of sustainable capacity. In addition, the Commission on Water Resource Management has not designated the aquifers (Honolua and Honokōwai) as groundwater management areas. Pulelehua will include an elementary school site. Access is available via Honoapi’ilani Highway. An electrical substation is located nearby, above the Kapalua West Maui Airport. The Nāpili Fire Station and a police substation are approximately two miles away in Nāpili.
 - (C) Sufficient reserve areas for foreseeable urban growth;
 - Pulelehua will provide 882 homes to help meet the needs of West Maui’s growing population. While this amount of homes is less than the projected demand, the community will provide for urban growth.

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- (3) *It shall include lands with satisfactory topography, drainage, and reasonably free from the danger of any flood, tsunami, unstable soil condition, and other adverse environmental effects;*
- The topography of the property ranges from approximately 75 msl to approximately 240 feet msl, with an average slope of approximately eight percent. It is not in a flood or tsunami zone and does not have unstable soil conditions or other adverse environmental effects.
- (4) *Land contiguous with existing urban areas shall be given more consideration than non-contiguous land, and particularly when indicated for future urban use on state or county general plans;*
- Thirty-two percent of the Pulelehua boundaries are contiguous to lands within the Urban district. If the boundary of Honoapi'ilani Highway (which is in the Agricultural district, but borders the Urban district on the makai side) is included, 52 percent of the site is contiguous to the Urban district.
 - A community plan amendment will be sought so that Pulelehua is consistent with the West Maui Community Plan Land Use Map.
- (5) *It shall include lands in appropriate locations for new urban concentrations and shall give consideration to areas of urban growth as shown on the state and county general plans;*
- The in-fill location of Pulelehua—between the existing urban uses—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.
- (6) *It may include lands which do not conform to the standards in paragraphs (1) to (5):
When surrounded by or adjacent to existing urban development; and
Only when those lands represent a minor portion of this district;*
- (7) *It shall not include lands, the urbanization of which will contribute toward scattered spot urban development, necessitating unreasonable investment in public infrastructure or support services; and*
- Pulelehua will not contribute to scattered spot urban development, necessitating unreasonable investment in public infrastructure or support services.
- (8) *It may include lands with a general slope of twenty per cent or more if the commission finds that those lands are desirable and suitable for urban purposes and that the design and construction controls, as adopted by any federal, state, or county agency, are adequate to protect the public health, welfare and safety, and the public's interests in the aesthetic quality of the landscape.*

5.1.3 Coastal Zone Management Act, Chapter 205A, Hawaii Revised Statutes

The Coastal Zone Management Area as defined in Chapter 205A, HRS, includes all the lands of the state. As such, the Pulelehua site is within the Coastal Zone Management Area; however, it is not located along a shoreline.

The relevant objectives and policies of the Hawaii Coastal Zone Management (CZM) Program, along with a discussion of how Pulelehua conforms to these objectives and policies, is discussed below.

Recreational Resources

Objective

(A) *Provide coastal recreational opportunities to the public.*

- While not on the coast, Pulelehua will include neighborhood parks, ball fields, community gardens, and an extensive trail system, which will be open to the public.

Policies

(B) *Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:*

- (iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;*
 - (vi) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters*
- While Pulelehua is not on the coast, a marine environment assessment prepared for Pulelehua concludes that the community has the potential to improve conditions in the marine environment as it is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses; and with the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean (see Section 3.6).

Historic Resources

Objective

Protect, preserve, and where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies

A) *Identify and analyze significant archaeological resources;*

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- No significant archaeological resources have been identified on the Pulelehua site; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction.

Scenic and Open Space Resources

Objective

Protect, preserve, and where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies

B) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline.

D) Encourage those developments which are not coastal dependent to locate in inland areas.

- Pulelehua is not coastal dependent and is located mauka of Honoapi'ilani Highway.
- Pulelehua's compact design will preserve and enhance open space areas and natural environment resources by concentrating needed housing in a defined area.

Coastal Ecosystems

Objective

Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources.

C) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and

D) Promote water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems and prohibit land and water uses which violate state water quality standards.

E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

- A marine environment assessment prepared for Pulelehua concludes that the community has the potential to improve conditions in the marine environment as is likely that sedimentation discharge to the ocean will be significantly less with

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Pulelehua compared to agricultural uses, and with the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean (see Section 3.6).

Economic Uses

Objective

Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies

A) *Concentrate coastal dependent development in appropriate areas.*

- With increase in West Maui's population, forecasts of housing demands, and the creation of additional jobs in West Maui, Pulelehua will provide homes to workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions, and provide essential services crucial to keeping Maui's economy stable and growing.
- Pulelehua is not along the coast, and is an in-fill community between the existing urban uses.

Coastal Hazards

Objective

Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.

Policies

A) *Develop and communicate adequate information about storm wave, tsunami, flood, erosion, subsidence, and point and nonpoint source pollution hazards.*

B) *Control development in areas subject to storm wave, tsunami, flood, erosion, hurricane, wind, subsidence, and point and nonpoint source pollution hazards.*

C) *Ensure that developments comply with requirements of the Federal Flood Insurance Program.*

D) *Prevent coastal flooding from inland projects.*

- Pulelehua is not in a tsunami zone or flood zone.
- All additional runoff due to the community will be retained on site with no increased flow to downstream properties (including Honoapi'ilani Highway, and the Kahana Hui and Kahana Ridge subdivisions) or into the existing drainage ways, desilting basins, and the ocean.
- Pulelehua will be in compliance with all laws and regulations regarding runoff and non-point source pollution, ensuring that storm water runoff and siltation will not adversely affect the downstream marine environment and nearshore and offshore water quality.

Managing Development

Objective

Improve the development review process, communication and public participation in the management of coastal resources and hazards.

Policies

- A) *Use, implement, and enforce existing laws to the maximum extent possible in managing present and future coastal zone development.*
- B) *Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements.*
- C) *Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life-cycle and in terms understandable to the public to facilitate public participation in the planning and review process.*

- All improvements will be developed in accordance all Federal, State, and County requirements standards.

Public Participation

Objective

Stimulate public awareness, education, and participation in coastal management.

Policies

- A) *Promote public involvement in coastal zone management processes.*

- Community planning workshops for Pulelehua were held in March 2004. Since then, Maui Land & Pineapple Company, Inc., has worked diligently with Federal, State, and County agencies for over a year to make Pulelehua a reality. This has included meetings open to the public, such as meetings with the County of Maui Affordable Housing Technical Review Committee and the Maui Economic Opportunity Housing Task Force, as well as a workshop meeting with the Maui County Council Housing & Human Concerns Committee.

Beach Protection

Objective

Protect beaches for public use and recreation.

Policies

- A) *Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion.*

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- Pulelehua is not on the shoreline and is not expected to interfere with natural shoreline processes.

Marine Resources

Objective

Implement the State's ocean resources management plan.

Policies

(A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources.

- A marine environment assessment prepared for Pulelehua concludes that the community has the potential to improve conditions in the marine environment as it is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses, and with the change from agricultural uses to residential uses, there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean (see Section 3.6).

5.1.4 Hawaii State Plan, Chapter 226, Hawaii Revised Statutes

The Hawaii State Plan (Chapter 226, HRS) establishes a set of goals, objectives, and policies that serve as long-range guidelines for the growth and development of the State. The Plan is divided into three parts: Part I (Overall Theme, Goals, Objectives and Policies); Part II (Planning, Coordination and Implementation); and Part III (Priority Guidelines). Part II elements of the State Plan pertain primarily to the administrative structure and implementation process of the Plan. As such, comments regarding the applicability of Part II to Pulelehua are not appropriate. The sections of the Hawaii State Plan directly applicable to Pulelehua, along with a discussion of how Pulelehua conforms to the State Plan are included below.

Part I: Overall Theme, Goals, Objectives and Policies

The Hawaii State Plan lists three "Overall Themes" relating to: (1) individual and family self-sufficiency; (2) social and economic mobility; and (3) community or social well-being. These themes are viewed as "basic functions of society" and goals toward which government must strive (§226-3). To guarantee the elements of choice and mobility embodied in the three themes, the Plan states three goals:

- 1) *A strong, viable economy, characterized by stability, diversity and growth that enables fulfillment of the needs and expectations of Hawaii's present and future generations.*
- 2) *A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.*

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- 3) *Physical, social and economic well-being, for individuals and families in Hawaii, that nourishes a sense of community responsibility, of caring and of participation in community life (§226-4).*
- Pulelehua will contribute to these goals by:
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors;
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui; and
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting.

Specific objectives, policies, and priority directions of the State Plan most relevant to the Pulelehua community are listed and discussed below.

Objectives and Policies for Population (§226-5)

Objective

It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic and social objectives contained in this chapter.

Policies

- 1) *Manage population growth statewide in a manner that provides increased opportunities for Hawaii's people to pursue their physical, social and economic aspirations while recognizing the unique needs of each County.*
 - 2) *Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.*
 - 3) *Promote increased opportunities for Hawaii's people to pursue their socio-economic aspirations throughout the islands.*
 - 4) *Encourage research activities and public awareness programs to foster an understanding of Hawaii's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii's population.*
 - 7) *Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.*
- Pulelehua will promote increased opportunities for Hawaii's people to pursue their physical, social, and economic aspirations by:
 - Helping to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;

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- Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
- Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
- Providing homes near employment centers, thereby increasing quality of life by decreasing commuting; and
- Creating “affordable housing with dignity,” by providing a variety of affordable housing options integrated into a complete community rather than an affordable housing “project”.

Objectives and Policies for the Economy—in General (§226-6)

Objectives

- 1) *Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people.*

Policies

- 6) *Strive to achieve a level of construction activity responsive to, and consistent with, State growth objectives.*
- 9) *Foster greater cooperation and coordination between the public and private sectors in developing Hawaii's employment and economic growth opportunities.*
- 11) *Maintain acceptable working conditions and standards for Hawaii's workers.*
- 14) *Promote and protect intangible resources in Hawaii such as scenic beauty and the aloha spirit, which are vital to a healthy economy.*

- Pulelehua contribute to these objectives and polices by:
 - Providing homes for sale and rent to Maui's primary workers, those earning between 50 to 140 percent of the median income. These workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions and provide essential services crucial to keeping Maui's economy stable and growing; and
 - Creating approximately:
 - 8,399 “worker years” of employment on Maui over the initial 7- to 9-year build-out period (a “worker year” is the amount of time one full-time worker can work in one year);
 - 634 permanent full-time equivalent jobs on-site with annual wages of \$16 million (businesses within Pulelehua);
 - permanent full-time equivalent jobs in the regional economy with annual wages of \$1.7 million (maintenance, landscaping, and upgrading of the Pulelehua homes and buildings); and
 - \$30.9 million per year in discretionary expenditures infused into the island economy from community residents.

Objectives and Policies for the Economy—Agriculture (§226-7)

Objectives

- 1) *Viability of Hawaii's sugar and pineapple industries.*
- 3) *An agriculture industry that continues to constitute a dynamic and essential component of Hawaii's strategic, economic, and social well-being.*

Policies

- 2) *Encourage agriculture by making best use of natural resources.*
 - 10) *Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.*
- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4).
 - Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use; this amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd.
 - In addition to its pineapple operations, Maui Land & Pineapple Company, Inc., is exploring a wide array of diversified agricultural opportunities and conducting field trials on new crops.
 - Pulelehua will preserve surrounding agricultural lands by limiting development to a compact, defined area.
 - With the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

Objectives and Policies for the Physical Environment—Land Based, Shoreline and Marine Resources (§226-11)

Objectives

Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of the following objectives:

- 2) *Effective protection of Hawaii's unique and fragile environmental resources.*

Policies

- 1) *Exercise an overall conservation ethic in the use of Hawaii's resources.*
- 2) *Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.*
- 3) *Take into account the physical attributes of areas when planning and designing activities and facilities.*
- 4) *Manage natural resources and environs to encourage their beneficial and multiple use without generating costly or irreparable environmental damage.*
- 5) *Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.*

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- The Pulelehua site is not a known habitat for threatened or endangered plant species (see Section 3.8).
- The Pulelehua site is not a known habitat for threatened or endangered species of birds or mammals (see Section 3.9).
- Pulelehua has the potential to improve conditions in the marine environment as is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses, and with the change from agricultural uses to residential uses there is likely to be a decrease in the flux of nutrients (e.g. fertilizers) to the ocean (see Section 3.6).

Objectives and Policies for Facility Systems—Water (§226-16)

Objective

Provision of water to adequately accommodate domestic, agricultural, commercial, recreational, and other needs within resource capacities.

- Pulelehua’s potable water needs will be addressed by drilling wells in aquifers that are currently being pumped at less than 50 percent of their sustainable capacity.
- Pulelehua’s landscaped areas will be irrigated with a mix of R-1 and surface water.

Objectives and Policies for Facility Systems—Transportation (§226-17)

Objective

1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.

- Pulelehua’s homes near employment will allow workers more transportation options to get to work, such as walking and bicycling, and will make public transportation more feasible by clustering populations and destinations within in a defined area along a practical route.
- Providing homes near employment centers will also decrease commuting, thereby increasing quality of life.
- The traditional neighborhood design of Pulelehua will serve to minimize trips onto Honoapi’ilani Highway as many essential services needed by Pulelehua residents will be within walking and biking distance, such as stores, restaurants, parks, and a school.

Objectives and Policies for Socio-Cultural Advancement—Housing (§226-19)

Objective

1) Greater opportunities for Hawaii’s people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing

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is made available to very low-, low-, and moderate-income segments of Hawaii's population.

- 2) *The orderly development of residential areas sensitive to community needs and other land uses.*

Policies

- 1) *Effectively accommodate the housing needs of Hawaii's people.*
- 2) *Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.*
- 3) *Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.*
- 5) *Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.*

Foster a variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods that reflect the cultures and values of the community.

- Pulelehua implements objectives and policies for socio-cultural advancement by:
 - Helping to satisfying the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;
 - Creating "affordable housing with dignity," by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable "project";
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities.

Objectives and Policies for Socio-Cultural Advancement—Education (§226-21)

Objective

Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.

Policies

- 2) *Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.*

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- Pulelehua includes a school site to ensure adequate and accessible educational services and facilities to meet the needs of Pulelehua residents and the area north of Kā'anapali.
- Pulelehua's school is expected to have a significant positive impact on travel on Honoapi'ilani Highway, as elementary school children residing north of Kā'anapali will not have to be transported to the Lahaina area for school.
- The public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honoapi'ilani Highway.

Objectives and Policies for Socio-Cultural Advancement—Leisure (§226-23)

Objective

- a) *Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational, needs for present and future generations.*
- Pulelehua will include neighborhood parks, ball fields, community gardens, and an extensive trail system of linked paths and trails to allow pedestrians and bicyclists to have another option for movement through the neighborhood.
- Pulelehua's parks will be open to all Maui residents.

Part III. Priority Guidelines

The purpose of this part of the Plan is to establish overall priority guidelines to address areas of Statewide concern. The Plan notes that the State shall strive to improve the quality of life for Hawaii's present and future population through the pursuit of desirable courses of action in five major areas of Statewide concern which merit priority attention: 1) economic development, 2) population growth and land resource management, 3) affordable housing, 4) crime and criminal justice; and 5) quality education (§ 226-102). The priority guidelines applicable to the Pulelehua community are discussed below:

Economic Priority Guidelines (§ 226-103)

- c) *Priority guidelines to promote the continued viability of the sugar and pineapple industries:*
 - 1) *Provide adequate lands to support the economic viability of the sugar and pineapple industries.*
- Pulelehua's compact design preserves surrounding agricultural lands by concentrating needed housing in a defined area.
- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4)

Population Growth and Land Resources Priority Guidelines (§226-104)

- a) *Priority guidelines to effect desired Statewide growth and distribution:*
 - 1) *Encourage planning and resource management to insure population growth rates throughout the State that are consistent with available and planned resource capacities and reflect the needs and desires of Hawaii's people.*
 - 2) *Manage a growth rate for Hawaii's economy that will parallel future employment needs for Hawaii's people.*
- Population projections indicate that the Maui County population will increase from 139,573 people in 2005 to 175,136 people in 2020, a 25.5 percent increase (SMS 2002). In West Maui, the population is expected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase. With the increase in West Maui's population, forecasts of housing demand estimate a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income.
- Pulelehua will help to satisfy the housing demand of a growing population and expanding job base, thus contributing to the stable social and economic well being of residents.

Affordable Housing Priority Guidelines (§226-106)

- 4) *Create incentives for development which would increase home ownership and rental opportunities for Hawaii's low- and moderate-income households, gap-group households, and residents with special needs.*
- 6) *Encourage public and private sector cooperation in the development of rental housing alternatives.*
- 7) *Give higher priority to the provision of quality housing that is affordable for Hawaii's residents and less priority to development of housing intended primarily for individuals outside of Hawaii.*
- Pulelehua implements these affordable housing guidelines by:
 - Helping to satisfying the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities;
 - Creating "affordable housing with dignity," by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable "project";
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and

- Providing homes near employment centers, thereby increasing quality of life by decreasing commuting.

5.1.5 State Functional Plans

The Hawaii State Plan directs State agencies to prepare functional plans for their respective program areas. There are 13 state functional plans that serve as the primary implementing vehicle for the goals, objectives, and policies of the Hawaii State Plan. The functional plans applicable to the Pulelehua Community, along with each plan's applicable objectives, policies, and actions are discussed below.

Agriculture

The Agriculture functional plan seeks to increase the overall level of agricultural development in Hawaii, in accordance with the two fundamental Hawaii State Plan objectives for agriculture: 1) continued viability of Hawaii's sugar and pineapple industries, and 2) continued growth and development of diversified agriculture throughout the State.

- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4).
- Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use; this amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd. Maui Pineapple Company, Ltd., owns ample land, which is currently fallow and better suited to agriculture.
- In addition to its pineapple operations, Maui Land & Pineapple Company, Inc., is exploring a wide array of diversified agricultural opportunities and conducting field trials on new crops.
- Pulelehua's compact design preserves surrounding agricultural lands by concentrating needed housing in a defined area.
- With the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

Employment

The Employment Functional Plan focuses on the preparation of Hawaii's workforce for the global, information-based twenty-first century economy. It takes a multi-agency approach in providing job training and education services, implementing job placement services, improving the quality of the work environment, and coordinating employment information, analysis, and planning.

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- Pulelehua will provide homes for sale and rent to Maui's primary workers, those earning between 50 to 140 percent of the median income. These workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions and provide essential services crucial to keeping Maui's economy stable and growing. Without adequate, affordable housing, both businesses and government will increasingly experience difficulty in attracting and retaining employees to fill employment positions. By 2020 in the West Maui region, additional needed homes are forecasted to be approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) and 6,843 new jobs are needed. There will be a need for housing within the income ranges of the positions created.

Energy

The Energy Advisory Committee highlights three major concerns for Hawaii in its Functional Plan: 1) the state's over dependency on oil and fossil fuels; 2) the need for an integrated approach to energy development and management; and 3) energy emergency preparedness.

- The design of Pulelehua incorporates many energy efficiency strategies, including:
 - Buildings oriented with primary roof façade within 30 degrees of due south, to facilitate use of solar panels, as well as providing for passive solar design;
 - Solar water heaters;
 - Buildings oriented to take advantage of natural cooling of interior spaces by channeling trade winds which will minimize energy use;
 - Design standards that specify low-impact lighting; and
 - Encouragement of energy efficient building design and site development practices.

Health

The State Health Functional Plan identifies four major priority issues. These are: 1) preventive health care; 2) access to health care; 3) environmental protection; and 4) public administration issues.

- Maui Land & Pineapple Company, Inc., is currently participating in discussions with Maui Memorial Medical Center officials to donate land within Pulelehua for a medical facility that could include some urgent care and emergency capabilities. The facility could expand to provide 30 to 35 beds for long-term medical care.

Historic Preservation

The long-term philosophy of the Historic Preservation Functional Plan highlights the importance of maintaining a record of Hawai'i's unique history. History enriches our social, intellectual, aesthetic and economic lives with insights from the past. With the

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rapid change and development of our island state, our historical resources are at risk. The Historic Preservation Functional Plan attempts to preserve these resources by focusing on three main issue areas: 1) preservation of historic properties; 2) collection and preservation of historic records, artifacts and oral histories; and 3) provision of public information and education on the ethnic and cultural heritages and history of Hawai'i.

- No significant archaeological resources have been identified on the Pulelehua site; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction (see Section 4.1).
- Pulelehua is not expected to impact cultural resources as no cultural resources have been identified on the property (see Section 4.2).
- Pulelehua's architecture honors Maui's historic past by reflecting the design of traditional settlements such as Lahaina, Wailuku, and Lāna'i City.

Housing

The State Housing Functional Plan, prepared by the State Housing Finance and Development Corporation (now Housing and Community Development Corporation of Hawaii), addresses six major areas of concern: 1) increasing home ownership; 2) expanding rental housing opportunities; 3) expanding rental housing opportunities for the elderly and other special need groups; 4) preserving housing stock; 5) designating and acquiring land that is suitable for residential development; and 6) establishing and maintaining a housing information system. The majority of the objectives, policies, and implementing actions of the State Housing Functional Plan apply to the government sector.

- In their letter commenting on the Pulelehua EISPN, the Housing and Community Development Corporation stated: "We ... find the proposed Pulelehua master planned community is consistent with the homeownership and rental housing objectives of the State Housing Functional Plan." (See Section 11.0).

Recreation

The Recreation Functional Plan outlines the public and private sectors' roles in serving the recreation and open space needs of the public. It organizes objectives, policies, and actions into six major issue areas: 1) Ocean and shoreline recreation; 2) Mauka, urban, and other recreational opportunities; 3) Public access to shoreline and upland recreation areas; 4) Resource conservation and management; 5) Management of recreation programs, facilities, and areas; and 6) Wetlands protection and management.

- Pulelehua will include neighborhood parks, ball fields, community gardens, and an extensive trail system of linked paths and trails to allow pedestrians and bicyclists to have another option for movement through the neighborhood.

- Pulelehua’s parks will be open to all Maui residents.

Transportation

The overall objective of the Transportation Functional Plan is to provide for the efficient, safe, and convenient movement of people and goods. The Transportation Functional Plan is implemented as a short- to mid-term action agenda by the DOT. It identifies four key issue areas as the most critical concerns relating to transportation in Hawaii. They are: 1) Congestion; 2) Economic Development; 3) Funding; and 4) Education.

- Pulelehua will change area traffic flow; however, estimates of future traffic indicate the community will not create adverse traffic conditions.
- Pulelehua’s traditional neighborhood design, with homes, neighborhood businesses, and recreation areas all within walking distance, facilitates convenient pedestrian and bicycle access and minimizes use of the automobile.
- Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds.
- A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood.

5.2 COUNTY OF MAUI

5.2.1 General Plan

Pulelehua implements many of the objectives and policies of the *General Plan of the County of Maui 1990 Update*. As required by the County of Maui Charter, the *General Plan of the County of Maui* sets forth the desired sequence, patterns, and characteristics of future development. This is accomplished through long-range objectives focusing on the social, economic, and environmental effects of development coupled with specific policies designed to implement the objectives.

Specific General Plan objectives and policies applicable to Pulelehua are discussed below.

Population

Objective

1. *To plan the growth of resident and visitor population through a directed and managed growth plan so as to avoid social, economic, and environmental disruptions.*

Policies

- a. *Manage population growth so that the County’s economic growth will be stable and the development of public and private infrastructures will not expand beyond growth limits specified in the appropriate community plans or negatively impact our natural resources.*

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- b. Balance population growth by achieving concurrency between resident employee work force, the job inventory created by new industries, affordable resident/employee housing, constraints on the environment and its natural resources, public and private infrastructure, and essential social services such as schools, hospitals, etc.*
- Population projections indicate that the Maui County population will increase from 139,573 people in 2005 to 175,136 people in 2020, a 25.5 percent increase (SMS 2002). In West Maui, the population is expected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase. With the increase in West Maui's population, forecasts of housing demand estimate a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income.
 - Pulelehua responds to the need for housing of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income.
 - Maui Land & Pineapple Company, Inc., seeks the cooperation of Federal, State, and County agencies to ensure the provision of infrastructure necessary for Pulelehua.
 - Pulelehua's affordable homes near employment centers are expected to decrease commuting to and from West Maui, lessen traffic congestion, reduce stress, allow more family and recreation time, lessen pollution, and improve overall quality of life for not only Pulelehua residents, but for Maui residents in general.

Land Use

Objective

1. *To preserve for present and future generations existing geographic, cultural and traditional community lifestyles by limiting and managing growth through environmentally sensitive and effective use of land in accordance with the individual character of the various communities and regions of the County.*
2. *To use the land within the County for the social and economic benefit of all the County's residents*

Policies

- b. Provide and maintain a range of land use districts sufficient to meet the social, physical, environmental and economic needs of the community.*
- d. Formulate a directed land use growth strategy which will encourage the redevelopment and infill of existing communities allowing for mixed land uses, where appropriate.*

Policies

- b. Encourage land use patterns that foster a pedestrian oriented environment to include such amenities as bike paths, linear parks, landscaped buffer areas, and mini-parks.*
- c. Encourage land use methods that will provide a continuous balanced inventory of housing types in all price ranges.*

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- e. *Encourage programs to stabilize affordable land and housing prices.*

Objective

3. *To preserve lands that are well suited for agricultural pursuits.*

Policies

- a. *Protect prime agricultural lands from competing nonagricultural land uses.*
- d. *Discourage conversion, through zoning or other means, of productive or potentially productive agricultural lands to nonagricultural land uses, including but not limited to golf courses and residential subdivisions.*
- The in-fill location of Pulelehua—between the existing urban uses—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.
 - Pulelehua will meet the criteria to allow for a change in zoning from Agricultural to Project District (Section 19.30A.020, MCC) without resulting in the loss of productive agricultural land (see Section 5.2.3).
 - Pulelehua’s traditional neighborhood design, with homes, neighborhood businesses, and recreation areas all within walking distance, facilitates convenient pedestrian and bicycle access and minimizes use of the automobile.
 - Pulelehua’s compact design preserves surrounding agricultural lands by concentrating needed housing in a defined area.
 - Pulelehua will not impact Maui Land & Pineapple Company, Inc.’s long-term goals for continuing agricultural operations on Maui (see Section 3.4).

Environment

Objective

1. *To preserve and protect the County’s unique and fragile environmental resources.*

Policies

- a. *Preserve for present and future generations the opportunity to experience the natural beauty of the islands.*
- Pulelehua will preserve mountain and coastal scenic vistas and the open space areas of the region by limiting development to a compact, defined area.

Policies

- b. *Evaluate all land-based development relative to its impact on the County’s land and ocean ecological resources.*
- Pulelehua is expected to improve nearshore waters relative to agricultural use of the property.

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- Pulelehua will include natural landscaping, will not impact streams or drainageways, is not in a floodway, and will not increase runoff over existing conditions.

Cultural Resources

Objective

1. *To preserve for present and future generations the opportunity to know and experience the arts, culture and history of Maui County.*

Policies

- b. *Encourage the recordation and preservation of all cultural and historic resources, to include culturally significant natural resources.*
- No significant archaeological resources have been identified on the Pulelehua site; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction (see Section 4.1).
 - Pulelehua is not expected to impact cultural resources as no cultural resources have been identified on the property (see Section 4.2)
 - Pulelehua's architecture honors Maui's historic past by reflecting the design of traditional settlements such as Lahaina, Wailuku, and Lāna'i City.

Economic Activity

Objective

1. *To provide an economic climate which will encourage controlled expansion and diversification of the County's economic base.*

Policies

- a. *Maintain a diversified economic environment compatible with acceptable and consistent employment.*

Objective

3. *Utilize an equitable growth management program which will guide the economic well-being of the community.*

Policies

- a. *Encourage a sustainable rate of economic development which is linked to the carrying capacity of the infrastructure systems and the fiscal ability of the County to maintain those systems.*
- Pulelehua will provide homes for sale and rent to Maui's primary workers, those earning between 50 to 140 percent of the median income. These workers, including resort employees, teachers, police, firefighters, and others, fill necessary positions and provide essential services crucial to keeping Maui's economy stable and growing. Without adequate, affordable housing, both businesses and government will increasingly experience difficulty attracting and retaining

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employees to fill employment positions. By 2020 in the West Maui region, additional needed homes are forecasted to be approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005), and 6,843 new jobs will be created. There will be a need for housing within the income ranges of the positions created.

- In addition, Pulelehua implements these objectives and policies by:
 - Providing desired commercial services within a walkable community; and
 - Contributing to increased quality of life by providing homes close to employment centers, thereby reducing commuting.

Agriculture

Objective

2. *To maximize the use and yield of productive agricultural land throughout the County.*

Policies

- a. *Ensure the availability of land that is well suited for agricultural production.*

- Pulelehua's compact design preserves surrounding agricultural lands by concentrating needed housing in a defined area.
- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4).
- Creation of Pulelehua will require that the approximately 150 acres of land currently in pineapple cultivation be withdrawn from agricultural use; this amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd. Maui Pineapple Company, Ltd., owns ample land, which is better suited to agriculture.
- In addition to its pineapple operations, Maui Land & Pineapple Company, Inc., is exploring a wide array of diversified agricultural opportunities and conducting field trials on new crops.
- With the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

Housing

Objective

1. *To provide a choice of attractive, sanitary and affordable homes for all our residents.*

Policies

- a. *Provide or require adequate physical infrastructure to meet the demands of present and planned future affordable housing needs.*
- b. *Encourage the construction of housing in a variety of price ranges and geographic locations.*
- c. *Encourage the use of innovative performance standards and building methods to reduce housing costs to the consumer.*

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- d. *Streamline or “fast-track” the government review process for affordable single-family and multi-family housing projects.*
- f. *Encourage large land owners in the context of new projects to provide land and/or housing for their employees.*
- i. *Ensure that each community plan region contains its fair share of affordable housing.*

Objective

- 2. *Provide affordable housing to be fulfilled by a broad cross-section of housing types.*

Policies

- a. *Identify Federal, State, County, and private lands for affordable housing development, and make a dedicated effort to reserve these lands.*
- Pulelehua implements these objectives and policies by:
 - Helping to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;
 - Creating “affordable housing with dignity,” by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable “project”;
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities.

Urban Design

Objective

- 1. *To see that all developments are well designed and are in harmony with their surroundings.*

Policies

- a. *Require that appropriate principles of urban design be observed in the planning of all new developments.*

Objective

- 2. *To encourage developments which reflect the character and the culture of Maui County’s people.*

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Policies

- a. *Establish urban design guidelines and standards which will reflect the unique traditional architectural values of each community plan area.*
 - b. *Encourage community design which establishes a cohesive identity.*
 - c. *Encourage the establishment of continuous green areas, bike-paths, active and passive recreation areas, and mini-parks in new subdivision development.*
- Pulelehua implements these objectives and policies by:
 - Helping to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;
 - Creating “affordable housing with dignity,” by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable “project”;
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities.

Transportation

Objective

1. *To support an advanced and environmentally sensitive transportation system which will enable people and goods to move safely, efficiently and economically.*

Policies

- b. *Support environmentally sensitive developments or modernization of major transportation facilities such as new harbors and airports when they are needed by our residents.*

Objective

2. *To develop a program for anticipating and enlarging the local street and highway systems in a timely response to planned growth.*

Policies

- b. *Ensure that transportation facilities are anticipated and programmed for construction in order to support planned growth.*
- d. *Support Maui County’s street tree plan and encourage landscape planting, irrigation and maintenance programs along all public highways and rights-of-way.*

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Objective

3. *To develop a Maui County transportation system linked to land use planning that is less dependent on the automobile as its primary mode of moving people.*

Policies

- c. *Direct economic development toward existing communities in order to minimize employee commuting and foster a healthy job/housing balance.*
 - f. *Support and expand programs to reduce automobile dependent employee commuting for hotel, commercial and industrial projects.*
- Pulelehua's affordable homes near employment centers are expected to decrease commuting to and from West Maui, lessen traffic congestion, reduce stress, allow more family and recreation time, lessen pollution, and improve overall quality of life for not only Pulelehua residents, but for Maui residents in general.
 - Pulelehua's traditional neighborhood design, with homes, neighborhood businesses, and recreation areas all within walking distance, facilitates convenient pedestrian and bicycle access and minimizes use of the automobile.
 - Pulelehua will change area traffic flow; however, estimates of future traffic indicate the community will not create adverse traffic conditions.
 - Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds.
 - A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood.

Water

Objective

1. *To provide an adequate supply of potable and irrigation water to meet the needs of Maui County's residents.*

Policies

- d. *Monitor growth activities throughout Maui County in order that development of new water sources is concurrent with approval of new developments.*

Objective

2. *To make more efficient use of our ground, surface and recycled water sources.*

Policies

- a. *Reclaim and encourage the productive use of wastewater discharges in areas where such use will not threaten the integrity of ground water resources.*
 - h. *Support the establishment of potable groundwater use priorities which prohibit the use of potable water for the irrigation of golf courses, golf driving ranges, parks and landscaped open space.*
- Pulelehua's potable water needs will be addressed by drilling wells in aquifers that are currently being pumped at less than 50 percent of their sustainable capacity.

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- Maui Land & Pineapple Company, Inc., will coordinate with the Commission on Water Resource Management and the DWS for the provision of water for Pulelehua.
- Pulelehua's landscaped areas will be irrigated with a mix of R-1 and surface water.

Liquid and Solid Waste

Objective

1. *To provide efficient, safe and environmentally sound systems for the disposal and reuse of liquid and solid wastes.*

Policies

- e. *Encourage and promote public awareness to reduce, reuse, recycle and compost waste materials.*
- Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community.
 - Maui Land & Pineapple Company, Inc., is working with the Wastewater Reclamation Division to determine the capacity of the existing facilities to confirm that Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua.

Energy

Objective

1. *To make Maui County more self-sufficient in its need for non-renewable energy and more efficient in its use of energy.*

Policies

- d. *Create incentive programs to encourage the use of solar heaters and other energy saving building design concepts and devices.*
 - f. *Encourage the incorporation of energy-saving building design concepts and devices in all new private and public developments by providing energy efficient urban design guidelines and amendments to the Maui County Uniform Building Code.*
- The design of Pulelehua incorporates many energy efficiency strategies, including:
 - Buildings oriented with primary roof façade within 30 degrees of due south, to facilitate use of solar panels, as well as providing for passive solar design;
 - Solar water heaters;
 - Buildings oriented to take advantage of natural cooling of interior spaces by channeling trade winds, which will minimize energy use;
 - Design standards that specify low-impact lighting; and
 - Encouragement of energy efficient building design and site development practices.

Recreation and Open Space

Objective

1. *To provide high-quality recreational facilities to meet the present and future needs of our residents of all ages and physical ability.*

Policies

- a. *Maintain and upgrade existing recreational facilities to meet the community needs.*
 - b. *Maintain recreational facilities for both active and passive pursuits.*
 - c. *Maintain the natural beauty of recreational areas.*
 - d. *Develop facilities that will meet the different recreational needs of the various communities.*
- Pulelehua's compact design will preserve and enhance the region's open space areas and natural environment resources by concentrating needed housing in a defined area.
 - Pulelehua will include neighborhood parks, ball fields, community gardens, and an extensive trail system of linked paths and trails to allow pedestrians and bicyclists to have another option for movement through the neighborhood.
 - Pulelehua's parks will be open to all Maui residents.

Health and Family

Objective

1. *To meet the health needs of all residents and visitors.*

Policies

- a. *Encourage the expansion and improvement of our hospitals and our public and private medical facilities.*
 - b. *Encourage the State to provide prompt and adequate 24-hour emergency services available to each community throughout the County.*
- Maui Land & Pineapple Company, Inc., is currently in discussions with the Hawaii Health System Corporation (HHSC) to provide up to 15 acres in Pulelehua's south Māhinahina neighborhood to support a medical facility as well as other medical related businesses like doctor's offices and clinics (see Section 2.6.7)

Education

Objective

1. *To provide Maui residents with continually improving quality educational opportunities which can help them better understand themselves and their surroundings and help them realize their ambitions.*

Policies

- b. *Require that quality educational facilities and services be available to all residents.*

- Plans for Pulelehua include a 13-acre site for a public elementary school (see Figure 1).

Public Safety

Objective

1. *To create an atmosphere which will convey a sense of security for all residents and visitors and aid in the protection of life and property.*

Policies

- k. *Restore and encourage the sense of neighborhood and community caring throughout Maui County.*
- Pulelehua will contribute to this objective and this policy by:
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities.

5.2.2 West Maui Community Plan

The West Maui Community Plan is one of nine community plans for Maui County. It reflects current and anticipated conditions in the West Maui region and advances planning goals, objectives, policies, and implementation considerations as a decision-making guide in the region through the year 2010. The West Maui Community Plan provides specific recommendations addressing the goals, objectives, and policies contained in the General Plan, while still recognizing the values and unique attributes of the West Maui region. The goals, objectives, policies, and implementing actions of the *West Maui Community Plan* applicable to the Pulelehua community are discussed below.

Land Use

Goal

An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of residents and visitors in a manner that provides for the stable social and economic well-being of residents and the preservation and enhancement of the region's open space areas and natural environment resources.

- Pulelehua implements this goal in several important ways:
 - Pulelehua is well-planned and provides for a mixture of compatible land uses within walking distance of each other;

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- Pulelehua is an in-fill location bordered by existing urban uses of Kahana Ridge subdivision, the Kapalua West Maui Airport, and areas makai of Honoapi'ilani Highway;
- Pulelehua will help to satisfy the housing demand of a growing population and expanding job base, thus contributing to the stable social and economic well being of residents; and
- Pulelehua's compact design will preserve and enhance the region's open space areas and natural environment resources by concentrating needed housing in a defined area.

Objectives and Policies for the West Maui Region in General

1. *Protect and enhance the quality of the marine environment.*
 2. *Preserve and enhance the mountain and coastal scenic vistas and the open space areas of the region.*
 3. *Ensure that appropriate lands are available to support the region's present and future agricultural activities.*
 4. *Establish an appropriate supply of urban land within the region to meet the needs of the community over the next 20 years. The Community Plan and its map shall define the urban growth limits for the region and all zoning requests and/or proposed land uses and developments shall be consistent with the West Maui Community Plan and its land use map.*
 5. *Preserve the current State Conservation District and the current State Agriculture District boundaries in the planning region, in accordance with this Community Plan and its land use map. Lands north of Kapalua and south of Puamana to the region's district boundaries should ensure the preservation of traditional lifestyles, historic sites, agriculture, recreational activities and open space.*
 7. *Provide for specific criteria for the subdivision of lands designated for agricultural use in order to control the potential loss of productive agricultural lands and the open space resource.*
 8. *Provide and maintain parks and beach access for the present and future needs of residents and visitors. For the areas outside Lahaina town, establish or expand parks and public shoreline areas to include but not limited to the following:*
 - c. *The proposed Mahinahina regional park on approximately 50 acres of land below the Kapalua/West Maui Airport.*
 9. *Maintain the current size, scale and level of services at the airstrip in Mahinahina through appropriate zoning conditions.*
- The in-fill location of Pulelehua—between the existing urban uses makai of Honoapi'ilani Highway and the urban land of the Kapalua West Maui Airport and between the urban uses of Kahana Ridge and the airport—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.
 - Pulelehua will:
 - Improve the nearby marine environment (see Section 3.6);
 - Preserve mountain and coastal scenic vistas and the open space areas of the region by limiting development to a compact, defined area;

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- Provide an appropriate supply of urban land to meet the needs of a growing population; a community plan amendment will be sought so that Pulelehua is consistent with the West Maui Community Plan;
- Meet the criteria to allow for a change in zoning from Agricultural to Project District (Section 19.30A.020, MCC) without resulting in the loss of productive agricultural land (see Section 5.2.3);
- Provide over 100 acres of community parks, neighborhood parks and landscaped open space open to all Maui residents—more that twice the area called for in the community plan, and provided within a few years; and
- Increase the safety areas surrounding the Kapalua West Maui Airport without impacting the size, scale, or level services of the airport under the current operating restrictions (see Section 4.10).
- Regarding the proposed Māhinahina regional park on approximately 50 acres within the Pulelehua site, as planned, Pulelehua will provide nearly twice as much park space in the form of neighborhood parks, ball fields, community gardens, and an extensive trail system. Pulelehua’s parks will be open to all Maui residents. In addition, Maui Land & Pineapple Company, Inc., will build all Pulelehua parks. If the County were to develop the regional park as designated on the Community Plan, the County would have to acquire the land and build and maintain all facilities. It is unknown when the County would develop the regional park.

Pulelehua’s neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. In total, there will be 27 acres of parks and 77 acres of open space in Pulelehua all of which will be open to the public. Because of the close proximity of Pulelehua’s parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

Environment

Goal

A clean and attractive physical, natural and marine environment in which man-made developments on or alterations to the natural and marine environment are based on sound environmental and ecological practices, and important scenic and open space resources are preserved and protected for public use and enjoyment.

- Pulelehua will be designed and built based on sound environmental and ecological practices and will incorporate many sustainable features (see Section 2.8).
- Pulelehua’s compact design will preserve and enhance open space areas and natural environment resources by concentrating needed housing in a defined area.

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Objectives and Policies

Preserve agricultural lands and open space with particular emphasis on natural coastal areas along major highways.

- Pulelehua will provide a wide landscaped buffer area along Honoapi'ilani Highway (see Section 4.7).
- Pulelehua's compact design preserves surrounding agricultural lands by concentrating needed housing in a defined area.

Protect the quality of nearshore and offshore waters. Monitor outfall systems, streams and drainage ways and maintain water quality standards. Continue to investigate, and implement appropriate measures to mitigate, excessive growth and proliferation of algae in nearshore and offshore waters.

- Pulelehua is expected to improve nearshore waters relative to agricultural use of the property and not contribute to excessive growth and proliferation of algae in nearshore and offshore waters (see Section 3.6)

Emphasize land management techniques such as natural landscaping, regular maintenance of streams and drainage ways and siltation basins, avoidance and development of flood-prone areas, and other measures that maintain stream water quality. Wherever feasible, such management techniques should be used instead of structural solutions, such as building artificial stream channels or diversion of existing natural streams.

- Pulelehua will include natural landscaping, will not impact streams or drainageways, is not in a floodway, and will not increase runoff over exiting conditions.

Encourage soil erosion prevention measures and the installation of siltation basins to minimize downstream sedimentation and degradation of nearshore and offshore water quality.

- A nearshore water quality study for Pulelehua concludes that it is likely that sedimentation discharge to the ocean will be significantly less with Pulelehua compared to agricultural uses (see Section 3.6)

Integrate stream channels, gulches and other areas deemed unsuitable for development into the region's open space system for the purposes of safety, open space relief, greenways for public use and visual separation. Existing development of these stream channels, gulches and other areas shall be maintained and shall not be expanded. Drainage channels and siltation basins should not be considered for building sites, but used, rather, for public open space.

Mahinahina Stream

For other natural drainageways that discharge to the ocean during part of the year, their natural filter functions shall be preserved. The preservation of these natural filter functions may be accomplished by the use of structural controls or solutions in accord with accepted engineering standards or rules as may be adopted by the Department of Public Works and Waste Management, and includes the use of best management

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practices such as desilting basins, moderation of flow velocity, subsurface infiltration systems, and baffles.

Promote public/private initiatives in the maintenance, and, where appropriate, landscaping of drainage ways.

- Māhinahina Stream/Gulch will be left in open space, providing visual separation between two of Pulelehua's neighborhoods and maintaining existing drainage functions.

Promote recycling programs to reduce solid waste disposal in landfills.

- Pulelehua will include provisions for recycling, such as collection systems and space for bins for recyclables.

Encourage park, golf course, landscape and agricultural uses of treated effluent. Plan for wastewater reuse in the design of new parks, golf courses, and open spaces.

- Pulelehua's landscaped common areas will be irrigated with ~~mixed R-1 and surface~~ water.

Promote the planting of trees and other landscape planting to enhance streetscapes and the built environment.

- Pulelehua's traditional neighborhood design provides for extensive street trees and landscaping.

Economic Activity

Goal

A diversified economy that provides a range of stable employment opportunities for residents, allows for desired commercial services for the community, and supports the existing visitor and agricultural industries, all in a manner that will enhance both the community's quality of life and the environment.

- Pulelehua implements this primary goal in several ways:
 - Pulelehua will provide homes for sale and rent to workers essential to Maui economy, such as resort employees, teachers, police, firefighters, and others;
 - Pulelehua will provide desired commercial services within a walkable community; and
 - Pulelehua will contribute to increased quality of life by providing homes close to employment centers, thereby reducing commuting.

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Objectives and Policies

1. *Promote a diversified economic base which offers long term employment to West Maui residents, and maintains overall stability in economic activity in the areas of:*
 - d. *Resident-related service/commercial services.*
 2. *Provide for the preservation and enhancement of agriculture.*
 - a. *Maintain the land acreage required to sustain present and future agricultural operations and open space.*
 - b. *Prevent urbanization of agricultural lands to the greatest extent possible.*
 - d. *Discourage use of agricultural lands for non-agricultural purposes.*
- Pulelehua will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui (see Section 3.4)
 - Pulelehua will preserve surrounding agricultural lands by limiting development to a compact, defined area.
 - With the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.
3. *Expand light industrial and service commercial activities in appropriate locations to accommodate the region's needs.*
 - b. *Encourage neighborhood commercial activities and professional services to serve existing and future residents.*
- Pulelehua will be a complete community with neighborhood shops, restaurants, offices, and other businesses serving residents.

Cultural Resources

Goal

To preserve, protect and restore those cultural resources and sites that best represent and exemplify the Lahaina region's pre-contact, Hawaiian Monarchy, missionary and plantation history.

- Pulelehua is not expected to impact cultural resources as no cultural resources have been identified on the property (see Section 4.2)
- Pulelehua's architecture honors Maui's historic past by reflecting the design of traditional settlements such as Lahaina, Wailuku, and Lāna'i City

Objectives and Policies

1. *Preserve and protect significant archaeological, historical and cultural resources that are unique in the State of Hawaii and Island of Maui.*
- No significant archaeological resources have been identified on the Pulelehua site; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction.

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3. *Encourage and protect traditional shoreline and mountain access, cultural practices and rural/agricultural lifestyles. Ensure adequate access to our public shoreline areas for public recreation, including lateral continuity.*
 - Relative to the agricultural use of the majority of the site, the establishment of the Pulelehua community will make the area more accessible and will not impede access to mauka lands.
6. *Ensure that new projects or developments address potential impacts on archaeological, historical, and cultural resources and identify all cultural resources located within the project area as part of initial project studies. Further require that all proposed activity adequately mitigate potential adverse impacts on cultural resources.*
 - An archaeological survey and a cultural impact assessment of the Pulelehua site did not identify significant archaeological or cultural resources; however, Maui Land & Pineapple Company, Inc., and its contractors will comply with all laws and rules regarding the preservation of archaeological, cultural, and historic sites should any sites be found during construction.

Housing

Goal

A sufficient supply and choice of attractive, sanitary and affordable housing accommodations for a broad cross section of residents.

- Pulelehua implements this primary goal by:
 - Helping to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income;
 - Creating “affordable housing with dignity,” by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable “project”;
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting;
 - Creating genuine neighborhoods by design; places where residents can walk and interact with their neighbors; and
 - Creating traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities.

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Objectives and Policies

1. *Accommodate the 20-year housing needs of the planning region.*
 - Pulelehua will provide 882 homes which will help to satisfy the projected demand for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes projected to be needed in West Maui by 2020.
2. *Provide a variety of affordable housing opportunities, including improved lots and self-help projects and special needs housing for the elderly, single parent families, homeless and disabled.*
 - Pulelehua's inclusionary housing will embrace a diversity of people and activities.
3. *Coordinate the planning, design and construction of public infrastructure improvements with major residential projects that have an affordable housing component.*
4. *Plan, design and construct off-site public infrastructure improvements (i.e., water, roads, sewer, drainage, police and fire protection, and solid waste) in anticipation of residential developments defined in the Community Plan and consistent with the directed and managed growth plan required by the County General Plan.*
 - Maui Land & Pineapple Company, Inc., is coordinating with Federal, State, and County agencies, and private companies and individuals, to ensure the provision of infrastructure necessary for Pulelehua.
5. *Encourage public sector projects, government assistance programs, anti-speculation provisions, joint public-private efforts, and other housing assistance programs to reduce costs and increase housing availability. Such programs should be aimed at expanding housing choices with wide price variety.*
 - Pulelehua will provide homes affordable to families making between 50 to 140 percent of the median-family income on Maui as well as moderate and market rate homes.
 - Speculation in the resale of Pulelehua affordable homes will be discouraged with strong buy-back and limited appreciation provisions.
6. *Promote efficient housing designs in order to reduce residential home energy consumption.*
 - Pulelehua's eco-efficient design incorporates many energy-efficient features, such as solar water heaters.
7. *Maintain acceptable standards for affordable housing projects, including but not limited to, the installation of sidewalks and provision of adequate off-street parking.*
 - Pulelehua's "affordable housing with dignity," provides that affordable homes will not be of lesser quality or appearance than other homes and community amenities

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such as playfields, neighborhood parks, and the trail system, will be available to all residents whether they live in an affordable or market rate home.

Urban Design

Goal

An attractive and functionally integrated urban environment that enhances neighborhood character, promotes quality design at the resort destinations of Kaanapali and Kapalua, defines a unified landscape planting and beautification theme along major public roads and highways, watercourses, and at major public facilities, and recognizes the historic importance and traditions of the region.

- Pulelehua implements this primary goal by:
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience;
 - Creating a genuine neighborhood where residents can walk and interact with their neighbors;
 - Incorporating architecture that honors Maui's historic past by reflecting the design of traditional settlements such as Lahaina, Wailuku, and Lāna'i City;
 - Providing a wide landscaped greenway along Honoapi'ilani Highway;
 - Providing affordable and moderately priced housing for the working families of Maui, and specifically for those who work in West Maui;
 - Creating "affordable housing with dignity," by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable "project";
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting;
 - Providing a mix of uses and housing types that embrace a diversity of people and activities; and
 - Preserving surrounding agricultural land and creates significant open space and trail systems.

Objectives and Policies for the West Maui Region in General

1. *Enhance the appearance of major public roads and highways in the region.*

- Pulelehua will include a wide landscaped greenway along the length of Honoapi'ilani Highway ranging from approximately 100 to 200 feet to the first Pulelehua street parallel to the highway.

3. *Improve pedestrian and bicycle access within the region.*

- Pulelehua is designed as a walkable community following traditional town planning concepts.
- Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds.

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- A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood.
- 5. *Integrate stream channels and gulches into the region's open space system for the purposes of safety, open space relief, greenways for public use and visual separation. Drainage channels and siltation basins should not be used for building sites, but, rather, for public open space. Drainage channel rights-of-way and easements may also be used for pedestrian walkways and bikeway facilities.*
- Pulelehua's paths and trails will run through gulches, a strategically located network of green spaces, and an exterior greenbelt along Honoapi'ilani Highway.
- 6. *Promote a unified street tree planting scheme along major highways and streets. Hedge planting should be spaced and limited in height, in order to provide vistas to the shoreline and mountains.*
- Pulelehua's interior streets and the greenway along Honoapi'ilani Highway will be planted according to a unified street tree planting scheme.
- 9. *Save and incorporate healthy mature trees in the landscape planting plans of subdivisions, roads or any other construction or development.*
- 10. *Incorporate drought-tolerant plant species in future landscape planting.*
- Pulelehua's landscaping will include drought tolerant and/or slow growing hardy grasses, native and indigenous plants, shrubs, ground covers, and trees, appropriate for local conditions, to minimize the need for irrigation.
- 13. *Encourage neighborhoods and community organizations to upgrade and maintain streets and parks in accordance with the Maui County Planting Plan.*
- 14. *Require all future subdivisions, construction projects and developments to comply with the Maui County Planting Plan.*
- Pulelehua's landscaping will comply with the Maui County Planting Plan.

Infrastructure

Goal

Timely and environmentally sound planning, development, and maintenance of infrastructure systems which serve to protect and preserve the safety and health of the region's residents, commuters, and visitors through the provision of clean water, effective waste disposal and efficient transportation systems which meets the needs of the community.

- Maui Land & Pineapple Company, Inc., is coordinating with Federal, State, and County agencies and private company's and individuals and to ensure the provision of infrastructure necessary for Pulelehua.

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- Pulelehua’s potable water needs will be addressed by drilling wells in aquifers that are currently being pumped at less than 50 percent of their sustainable capacity.
- Pulelehua’s landscaped areas will be irrigated with a mix of R-1 and surface water.
- Pulelehua’s affordable homes near employment centers are expected to decrease commuting to and from West Maui, lessen traffic congestion, reduce stress, allow more family and recreation time, lessen pollution, and improve overall quality of life for not only Pulelehua residents, but for Maui residents in general.
- Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community.

Transportation

Objectives and Policies

3. *Support improvements for the safe and convenient movement of people and goods, pedestrians and bicyclists in the Lahaina region particularly along Honoapiilani Highway, Front Street and Lower Honoapiilani Road and seek to establish a regional network of bikeways and pedestrian paths.*
 - Pulelehua will change area traffic flow; however, estimates of future traffic indicate the community will not create adverse traffic conditions.
 - Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds.
5. *Promote residential communities that provide convenient pedestrian and bicycle access between residences and neighborhood commercial areas, parks and public facilities, in order to minimize use of the automobile.*
 - Pulelehua’s traditional neighborhood design, with homes, neighborhood businesses, and recreation areas all within walking distance, facilitates convenient pedestrian and bicycle access and minimizes use of the automobile.
 - A second circulation system of linked paths and trails will allow pedestrians and bicyclists to have another option for movement through the neighborhood.
11. *Maintain a community airstrip in the Mahinahina area and limit the current size, scale and level of services at the airstrip through conditional zoning.*
 - Pulelehua will not impact the Kapalua West Maui Airport and will provide for airport safety areas without impacting the size, scale, or level services of the airport under the current operating restrictions (see Section 4.10)
12. *Create a direct control overlay district in and around the Kapalua/West Maui Airport generally defined by the 60 LDN isoline of the FAA approved noise contour map for the airport. The intent of the district shall be to establish specific guidelines for noise attenuation standards within the district.*

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- This EIS contains the first airport noise contour study of the Kapalua West Maui Airport (see Section 4.10 and Appendix ~~M~~ N).
- Uses within Pulelehua are located in accordance with all Federal and State airport noise guidelines.

Implementing Actions

10. *Provide a landscaped buffer area along Honoapiilani Highway to enhance both pedestrian and vehicular circulation, as well as to soften the effects of the built environment.*
- Pulelehua will include a wide landscaped greenway along the length of Honoapi'ilani Highway ranging from approximately 100 to 200 feet to the first Pulelehua street parallel to the highway.

Water and Utilities

Objectives and Policies

1. *Protect ground water resources in the region.*
- Pulelehua's potable needs will be addressed by drilling wells in aquifers that are currently being pumped at less than 50 percent of their sustainable capacity.
4. *Coordinate the construction of all water and public utility improvements to minimize construction impacts.*
- Pulelehua is projected to be built in one phase to minimize construction impacts.
5. *Study the feasibility of integrating all regional water systems into a public water system to be managed and operated by the County.*
 6. *Improve and expand the West Maui water development program projected by the County to meet future residential expansion needs and establish water treatment facilities where necessary.*
 7. *Coordinate expansion of and improvements to water system to coincide with the development of residential expansion areas.*
- Maui Land & Pineapple Company, Inc., will coordinate with the Commission on Water Resource Management and the County Department of Water Supply for the provision of water for Pulelehua.
9. *Promote conservation of potable water through the use of treated wastewater effluent for irrigation.*
- Pulelehua's landscaped areas will be irrigated with ~~a mix of R-1 and surface~~ water.
10. *Encourage the installation of underground electrical, telephone and cable television lines.*
- Pulelehua will contain underground utilities.

Liquid and Solid Waste

Objectives and Policies

1. *Reuse the treated effluent from the County's wastewater treatment system for irrigation and other suitable purposes in a manner that is environmentally sound.*
- Pulelehua's landscaped areas will be irrigated with a mix of R-1 and surface water.
2. *Reduce the disposal of solid waste in landfills through expanded recycling programs and the provision of convenient drop-off facilities.*
- Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community.

Implementing Actions

2. *Design and construct improvements to expand the capacity of the Lahaina Wastewater Treatment Plant consistent with the West Maui Community Plan.*
- Maui Land & Pineapple Company, Inc., is working with the Wastewater Reclamation Division to determine the capacity of the existing facilities to confirm that Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua.

Drainage

Objectives and Policies

1. *Construct and maintain, as needed, desilting basins along major drainage channels.*
2. *Construct necessary drainage improvements in flood-prone areas, incorporating landscaped swales and unlined channels to provide open space continuity. Urge the use of landscaped/green belt drainage channels as opposed to concrete-lined channels or culverts.*
3. *Insure that new developments will not result in adverse flooding conditions for downstream properties by requiring onsite retention facilities for stormwater run-off generated by the development.*
4. *Support the implementation of flood control projects and siltation basins mauka of Honoapiilani Highway to address present problem areas.*
- All additional runoff due to the community will be retained on site with no increased flow to downstream properties (including Honoapi'ilani Highway, and the Kahana Hui and Kahana Ridge subdivisions) or into the existing drainage ways, desilting basins, and the ocean.
- Māhinahina Stream/Gulch will be left in open space, providing visual separation between two of Pulelehua's neighborhoods and maintaining existing drainage functions.

Energy

Objectives and Policies

1. *Promote energy efficiency as the energy resource of first choice and seek to increase energy efficiency in all sectors in the community.*
 3. *Promote the environmentally sensitive use of renewable energy resources, such as biomass, wind, and solar.*
 5. *Support energy efficient technologies in conjunction with new urban development and encourage energy efficient building design and site development practices.*
- The design of Pulelehua will incorporate many energy efficiency strategies, including:
 - Buildings oriented with primary roof façade within 30 degrees of due south, to facilitate use of solar panels, as well as providing for passive solar design;
 - Solar water heaters;
 - Buildings oriented to take advantage of natural cooling of interior spaces by channeling trade winds which will minimize energy use;
 - Design standards that specify low-impact lighting; and
 - Encouragement of energy efficient building design and site development practices.

Social Infrastructure

Goal

Develop and maintain an efficient and responsive system of public services which promotes a safe, healthy, and enjoyable lifestyle, and offers opportunities for self improvement and community well being.

- Pulelehua will contribute to the social infrastructure by:
 - Creating a community that fosters an authentic sense of place, respects the land, and provides a vital and sustaining life experience; and
 - Providing homes near employment centers, thereby increasing quality of life by decreasing commuting.

Recreation and Open Space

Objective and Policies

1. *Provide adequate community-oriented park facilities including facilities for field and court games, children's play, and picnicking within, or adjacent to, existing and future residential areas at the following existing or planned park sites:*
 - b. *Major residential projects.*
- Pulelehua will include neighborhood parks, ball fields, community gardens, and an extensive trail system of linked paths and trails to allow pedestrians and bicyclists to have another option for movement through the neighborhood.
 - Pulelehua's parks will be open to all Maui residents.

Health and Public Safety

Objectives and Policies

1. *Support the appropriate level of police services in consideration of the region's resident and visitor population.*
 - Maui Land & Pineapple Company, Inc., is open to providing a police substation within the community.
2. *Establish an emergency medical care facility in West Maui.*
 - Maui Land & Pineapple, Inc., is currently in discussions with the Hawaii Health System Corporation (HHSC) to provide up to 15 acres in Pulelehua's south Māhinahina neighborhood to support a medical facility as well as other medical related businesses like doctor's offices and clinics (see Section 2.6.7).

Education

Objectives and Policies

1. *Ensure adequate school facilities and educational opportunities within the region.*
6. *Provide for additional elementary schools at Napilihau and in conjunction with major residential developments.*
 - Plans for Pulelehua include a 13-acre site for a public elementary school (see Figure 1).

Implementing Actions

2. *Coordinate with the State Department of Education plans for future residential development, so that facilities are planned and constructed in a timely manner.*
 - The DOE has indicated that the Pulelehua school site is appropriate and acceptable for an elementary school.

Government

Goal

Government that demonstrates the highest standards of fairness, responsiveness to the needs of the community, fiscal integrity, effectiveness in planning and implementing programs and projects to accommodate a stable social and economic well-being for residents, a fair and equitable approach to taxation, and efficient and results-oriented management.

- Forecasts of housing demand estimate a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income.

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- Pulelehua responds to the need for housing of a growing population and expanding job base by providing 882 homes in West Maui, at least 51 percent of which will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income.

Objectives and Policies

1. *Coordinate and direct future public and private development, including capital improvement projects, consistent with the Community Plan and the island-wide directed and managed growth plan required by the General Plan.*
 2. *Monitor the implementation of and compliance with the Community Plan.*
- A community plan amendment will be sought so that Pulelehua is consistent with the *West Maui Community Plan*.
 - 3. *Remove unnecessary delays in the permit process through means such as consolidated public hearings and concurrent processing of applications.*
 - 4. *Expedite the review and approval process for projects, which will result in public benefit by “fast-tracking.”*
- Pulelehua represents an opportunity for government to implement the above polices.
 - 7. *Insure that adequate infrastructure is or will be available to accommodate planned development.*
 - Maui Land & Pineapple Company, Inc., seeks the cooperation of Federal, State, and County agencies to ensure the provision of infrastructure necessary for Pulelehua.

Implementing Actions

3. *Review and amend building and subdivision codes and zoning standards such as minimum lot sizes, and compact parking ratios as a way to reduce the cost of development.*
- Pulelehua’s Project District ordinance will provide specific design standards necessary to implement a traditional neighborhood designed community.
 - 7. *Adopt ordinances to establish appropriate standards to insure that agricultural lands will be used for agricultural purposes or remain available for future agricultural uses.*
 - Pulelehua will meet the criteria to allow for a change in zoning from Agricultural to Project District (Section 19.30A.020, MCC) without resulting in the loss of productive agricultural land (see Section 5.2.3).

Planning Standards

The following planning standards are specific guidelines or measures for development and design. These standards are essential in clarifying the intent of the land use and town design objectives and policies and the "Land Use Map".

1. Land Use Standards

- a. All zoning and land use approvals shall be consistent with the West Maui Community Plan and its land use policies.*
- Pulelehua is generally consistent with the *West Maui Community Plan* land use policies (see Land Use Policies above).
- b. Limit multifamily and single-family residential, business commercial, and industrial uses to areas designated for such purposes on the Community Plan Land Use Map.*
- A community plan amendment will be sought so that Pulelehua is consistent with the *West Maui Community Plan* Land Use Map.
- d. Maintain acceptable standards for affordable housing projects, including but not limited to, the installation of sidewalks and provision of adequate off-street parking.*
- Pulelehua's Project District ordinance will provide specific design standards necessary to implement a traditional neighborhood designed community.

2. Project District Standards

The implementation procedure for several areas within the planning region is to utilize the project district development approach. This provides for a flexible and creative planning approach rather than specific land use designations. This planning approach establishes continuity in land uses and designs while providing for orderly growth of the community, as well as comprehensive and concurrent provision of infrastructural facilities and systems.

Because of the variety of conditions and constraints related to the different project districts, each project district will be implemented through a separate ordinance. Each project district ordinance will specify the permitted uses, densities, design guidelines and other information necessary to attain each project district's objective and the objectives of the West Maui Community Plan.

- Pulelehua's Project District ordinance will provide specific design standards necessary to implement a traditional neighborhood designed community.

5.2.3 Maui County Code

Community Plan Amendment. The West Maui Community Plan Land Use Map designates the Pulelehua site as Agricultural, Open Space, and Park (Figure 5). Maui Land

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& Pineapple Company, Inc., is seeking a Community Plan Amendment to designate the property as Project District 5.

Section 2.80A.060 of the Maui County Code specifies procedures for revisions or amendments to community plans. This environmental impact statement is prepared in partial fulfillment of these requirements. All other requirements will also be satisfied.

County of Maui Zoning. The Pulelehua site is currently within the County Agricultural District (zone). Concurrent with the processing of the community plan amendment, Maui Land & Pineapple Company, Inc., is seeking a Change in Zoning of the property to Project District.

Chapter 19.30A, of the Maui County Code establishes criteria regarding the rezoning of agriculturally zoned land. Specifically, Section 19.30A.020, MCC states:

Agricultural lands that meet at least two of the following criteria should be given the highest priority for retention in the agricultural district:

- A. *Agricultural Lands of Importance to the State of Hawai'i (ALISH);*
- B. *Lands not classified by the ALISH system whose agricultural land suitability, based on soil, topographic, and climatic conditions, supports the production of agricultural commodities, including, but not limited to coffee, taro, watercress, ginger, orchard and flower crops and non-irrigated pineapple. In addition, these lands shall include lands used for intensive animal husbandry, and lands in agricultural cultivation in five of the ten years immediately preceding the date of approval of this chapter; and*
- C. *Lands which have seventy-five percent or more of their boundaries contiguous to lands within the agricultural district.*

Under the ALISH soil rating system, a majority of the Pulelehua property is classified as "prime agricultural land." However, this classification applies when the land is treated and managed according to modern farming methods, including water management. If irrigated, the land is considered productive agricultural land; however, without irrigation, the land may have severe limitations with low productivity ratings.

Maui Pineapple Company currently irrigates the pineapple fields remaining on the Pulelehua property. In addition, much of the Pulelehua site has been left fallow because Maui Pineapple Company has other fields that produce higher yields or are more feasible to farm. Further, with the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

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Sixty-eight percent of the Pulelehua boundaries are contiguous to lands within the agricultural zone, 32 percent are contiguous to residential or airport zoned land.

The Pulelehua property is an in-fill location bordering existing urban uses of Kahana Ridge subdivision, the Kapalua West Maui Airport, and areas makai of Honoapi'ilani Highway. The use of the Pulelehua property for a holistic, inclusionary, affordable community serving the needs of Maui's growing population is appropriate and in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.

5.2.4 Special Management Area

The Pulelehua site is not within the Special Management Area (SMA) as defined by the County of Maui.

5.3 APPROVALS AND PERMITS

A listing of anticipated permits and approvals required for the Pulelehua community is presented below.

Permit/Approval	Responsible Agency	Status
Chapter 343, HRS Compliance	Office of Environmental Quality Control State Land Use Commission (LUC)	<u>Submitted 6-28-04;</u> <u>the LUC accepted the</u> <u>Final EIS on July 13, 2005</u>
State Land Use District Boundary Amendment	State Land Use Commission	<u>Submitted 6-28-04;</u> <u>action pending</u>
Community Plan Amendment	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Submitted 3-18-05;</u> <u>action pending</u>
Project District Phase I/ Change in Zoning	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Submitted 3-18-05;</u> <u>action pending</u>
Project District Phases II and III	County of Maui Planning Department Maui Planning Commission Maui County Council	<u>Expected submittal 4-5-06</u>
<u>Project District Phase III</u>	<u>County of Maui Planning Department</u>	<u>Expected submittal 7-5-06</u>
Chapter 6E, HRS Compliance	State Historic Preservation Division	<u>Submitted 06/25/04;</u> <u>accepted 03/03/05</u>
National Pollutant Discharge Elimination System (NPDES) Permit	State Department of Health	<u>Expected submittal 8-5-06</u>
Subdivision Approval	County of Maui Department of Public Works and Environmental Management	<u>Expected submittal 8-5-06</u>
Grading/Building Permits	County of Maui Department of Public Works and Environmental Management	<u>Expected submittal 8-5-06</u>
<u>Well Construction Permit/ Pump Installation Permit</u>	<u>DLNR Commission on Water Resource Management</u>	<u>Expected submittal 4-5-06</u>

ALTERNATIVES



6.0 ALTERNATIVES

Under HAR, Title 11, Chapter 200, Environmental Impact Statement Rules, Section 11-200-10(6), the alternatives to the proposed action considered are limited to those that would allow the objectives of the project to be met, while minimizing potential adverse environmental impacts. The feasible alternatives must also address the project's economic characteristics while responding to the surrounding land uses that will be impacted by the project. In conformance with applicable regulations, the following alternatives, including alternative sites and uses of the property, have been identified and investigated.

The objectives of the Pulelehua are rooted in Maui Land & Pineapple Company, Inc.'s desire to create and manage holistic communities that build a sustainable future for the Maui (see Section 2.2.1). Pulelehua is intended to be a new traditional neighborhood for the working families of West Maui. Pulelehua will provide affordable housing mixed within other moderate and market rate housing to enhance the social fabric of the community. Pulelehua is planned to be more than a typical residential subdivision; it will be a community where residents can live, work, shop, and learn within walking distance of their homes.

6.1 THE "NO-ACTION" ALTERNATIVE

The no-action alternative would not involve any immediate changes to the Pulelehua site and the property would remain vacant of any additional improved uses.

Under the no-action alternative, most likely the existing fallow fields would remain and the fields in pineapple cultivation would eventually become fallow for a variety of reasons:

- In the long-term, pineapple cultivation abutting the Kahana Ridge subdivision and the large lot subdivision of Kahana Hui may become increasingly problematic due to incompatibility of uses.
- The Department of Hawaiian Home Lands (DHHL) has long-term plans to develop its adjacent property to the south for its beneficiaries in homesteads or other uses. When this occurs, Maui Pineapple Company would cease pineapple cultivation in this area because the fields would be surrounded by developed land on one side and the Māhinahina gulch on the other, thus making those fields uneconomical to farm.
- As discussed in Section 4.10, FAA and DOT design requirements for the Kapalua West Maui Airport require additional areas around the airport within Maui Land & Pineapple Company, Inc.'s pineapple fields. DOT has indicated interest in acquiring these lands. As such, areas around the airport that are in active cultivation may become part of the airport property.

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The no-action alternative would not respond to the need or the objective to provide affordable housing in West Maui and would not be consistent with State and County policies of providing affordable housing. As stated in Section 4.8.2, it is estimated that the West Maui housing sector is currently undersupplied by approximately 470 to 1,168 units (Hallstrom 2005). With the increase in West Maui's population, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the HUD figures for the County of Maui.

However, the objective of Pulelehua is not only to provide affordable housing, but also create a holistic community. Holistic communities foster an authentic sense of place, respect the land, and provide vital and sustaining life experiences. The "no-action" alternative would not achieve this objective.

Under the no-action alternative, the site would remain as agricultural land, underutilized in terms of meeting the demand for long term residential housing in West Maui. Maintaining the site in its present condition would forego home ownership opportunities for Maui residents. The social and economic benefits of developing the proposed Pulelehua community outweigh the loss of agricultural land (which will not impact Maui Land & Pineapple Company, Inc.'s agricultural goal and production), and therefore, the no-action alternative has been rejected.

In addition, the no-action alternative would not meet the Pulelehua objectives to:

- Create "affordable housing with dignity," by providing a variety of affordable housing options integrated into complete neighborhoods, and not segregated into an affordable "project";
- Provide homes near employment centers, thereby increasing quality of life by decreasing commuting;
- Develop genuine neighborhoods by design; places where residents can walk and interact with their neighbors;
- Create traditional neighborhoods with a mix of uses and housing types that embrace a diversity of people and activities;
- Contribute to the social infrastructure by including a new DOE Elementary School;
- Build a community that preserves surrounding agricultural land that creates significant open space and trail systems; and
- Encourage modes of travel other than cars as means of traversing through and to the community.

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Finally, the no-action alternative would deny the State, County, and general public of the potential public benefits associated with the Pulelehua community. Some of these benefits include:

- 301.5 million in direct real property capital investment;
- 8,399 “worker years” of employment on Maui over the initial 7- to 9-year build out period (a “worker year” is the amount of time one full-time worker can work in one year);
- \$278.8 million in total construction-related wages generated over build out;
- 634 permanent full-time equivalent jobs on-site with annual wages of \$16 million (businesses within Pulelehua); and
- 71 permanent full-time equivalent jobs in the regional economy with annual wages of \$1.7 million (maintenance, landscaping, and upgrading of the Pulelehua homes and buildings).

6.2 ALTERNATIVE LOCATIONS

There is a strong demand for affordable and moderate market-rate housing in West Maui for full-time residents as there are many employment opportunities between Lahaina and Kapalua. Many of those employed in West Maui commute from other areas of Maui, adding traffic along Honoapi‘ilani Highway and contributing to stresses, and loss of leisure and family time.

While Maui Land & Pineapple Company, Inc., owns approximately 23,000 acres of land in West Maui, much is not developable for residential use for a variety of reasons, including: 1) steep topography; 2) distance from Honoapi‘ilani Highway or other accessibility issues; and 3) access to utilities and infrastructure (potable water, sewer, electricity, telephone, and communication systems). Additionally, over 8,600 acres of this land is in conservation areas.

The Pulelehua site was selected for many reasons, including:

- Access to nearby existing utility systems such as the water sources, the Māhinahina Water Treatment Plant, the Lahaina Wastewater Treatment Plant, and a Maui Electric Substation;
- A location central to major employment areas of Kā‘anapali and Kapalua, but outside the AM and PM congested traffic area of Lahaina tow;
- Ready access to Honoapi‘ilani Highway bordering the site; and
- An in-fill location between urban uses: Kahana Ridge and the Kapalua West Maui Airport and areas makai of Honoapi‘ilani Highway.

Alternate sites on Maui Land & Pineapple Company, Inc., land would not provide similar attributes and could thus become more problematic in meeting Pulelehua’s objective of providing affordable housing close to employment areas and other objectives stated in

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Section 2.2.1. Other sites further from existing infrastructure may also be more expensive to develop, thus making the provision of affordable housing less feasible.

6.3 ALTERNATIVES RELATED TO DIFFERENT DESIGNS OR DETAILS WHICH WOULD PRESENT DIFFERENT ENVIRONMENTAL IMPACTS

There are three possible land uses which would present different environmental impacts: industrial, agricultural, and park.

Industrial Use. Typically, airports generate a demand for industrial uses such as maintenance of airplanes, smaller airlines, helicopter tour companies, parcel delivery services, rental car companies, etc. Such industrial space is not immediately available adjacent to the airport. However, depending on the extent of industrial development toward Honoapi'ilani Highway and toward some of the existing residential and agricultural subdivisions adjoining the Pulelehua site, such a land use may be viewed as undesirable because of the potential for negative visual impacts (industrial buildings with fencing) and noise impacts (industrial/mechanical noises – from the morning to the early evening). This use would not address the need or the objective to create a holistic community that builds a sustainable future for Maui and other objectives stated in Section 2.2.1.

Agricultural Use. The Pulelehua site is zoned Agricultural which allows the site to be developed as an agricultural subdivision. As such, under the Agricultural Ordinance (Maui County Code, Chapter 19.30A), the entire parcel (TMK 4-3-01:31) could be subdivided in to 70 lots ranging in size from 2 acres, 15 acres, 25 acres, and 40 acres. The ~~342~~ 310-acre Pulelehua portion of the parcel could be subdivided to create approximately 23 lots (Figure 16). Such a use would be highly economically feasible given the demand for larger lots and the lower costs for infrastructure improvements (smaller diameter waterlines and septic tanks, for instance) and fewer and cheaper roads. The impacts on regional traffic, schools, and other facilities would be significantly less than Pulelehua.

However, small-scale agricultural subdivision (similar to the adjoining Kahana Hui agricultural subdivision) of the parcel would not address the need or the objective to create a holistic community, provide affordable housing, and other objectives stated in Section 2.2.1.

Park Use. The West Maui Community Plan Land Use Map shows a 50-acre area of the Pulelehua site as being designated for a regional park. However, Pulelehua's 90 acres of useable parks and trails nearly doubles that amount of park space. Pulelehua's parks will be open to all Maui residents and will include neighborhood parks, ball fields, community gardens, and an extensive trail system.

In addition, Maui Land & Pineapple Company, Inc., will build all Pulelehua parks. If the

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County were to develop the regional park as designated on the Community Plan, the County would have to acquire the land and build and maintain all facilities. It is unknown when the County would develop the regional park.

Additionally, Pulelehua's parks within the community will enable people to get to the parks by walking or biking instead driving to a regional park. This allows for less traffic on Honoapi'ilani Highway. Again, this use would not address the need for affordable housing or the objective to create a holistic community that builds a sustainable future for the Maui and other objectives stated in Section 2.2.1.

Reduced Access Points to Honoapi'ilani Highway. The Pulelehua plan proposes four new access points to Honoapi'ilani Highway in addition to the existing access provided by Akahele Street. The Pulelehua intersections have been carefully considered and spaced more than 800 feet apart per access management guidelines to minimize the impact on travel flow of Honoapi'ilani Highway.

The alternative of providing fewer Pulelehua connections to Honoapi'ilani Highway was thoroughly studied during the planning Charrette and by Pulelehua traffic engineers and was rejected because fewer access points would result in long queuing times at the limited intersections, thus requiring more side street green time at Akahele Street, thereby interrupting smooth traffic flow on Honoapi'ilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapi'ilani Highway.

Finally, a more subtle environmental implication exists. With an optimal number of access points, more balanced traffic entering and leaving the site is very likely to encourage walking by town residents and guests. The more pedestrian trips within and to Pulelehua, the less the total vehicle miles of travel for this portion of West Maui.

Proposed Medical Center. Maui Memorial Medical Center in Wailuku, which is approximately an hour's drive from West Maui, is the only acute care for all of Maui. Given the close proximity to the Kapalua West Maui Airport, Pulelehua would be a logical area for an urgent care clinic or hospital. Emergency helicopters are already allowed to land at the Kapalua West Maui Airport and in September 2004 an agreement was signed to allow the air ambulance to land at the airport.

The proposed Pulelehua Project District ordinance provides for medical uses as a permitted use in Pulelehua's Māhinahina Neighborhood (the area south of Māhinahina Gulch). Maui Land & Pineapple Company, Inc., is currently participating in discussions with Maui Memorial Medical Center officials to donate land for a medical facility in the neighborhood.

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Should an urgent care clinic or other medical facility be developed, certain assumptions and conditions within the Pulelehua community would change. The number of home, for example, would be reduced. Figure 17 shows two medical facility alternatives, a seven-acre site and a 15-acre site. A seven-acre medical facility would reduce the total number of homes in the Māhinahina neighborhood by 50. A 15-acre facility would eliminate 90 homes.

With a medical facility neighborhood traffic patterns within the Māhinahina neighborhood may change slightly, but the intent would be to build the facilities within the fabric of Pulelehua's traditional town plan. Based on conceptual information, the medical facility would generate less demand for water, sewer, and electricity than the houses that would be replaced in the plan. Other potential impacts may also be reduced accordingly. It is anticipated that a medical facility could also provide significant positive economic impacts in the form of related medical businesses and professional job creation.

The close proximity to the airport would provide for air transport between the Pulelehua medical facility and the Maui Memorial Medical Center or medical facilities on Oahu, potentially saving lives. Potential impacts relating to air transport could include increased use of the airport, however since September 2004, the air ambulance has only landed at the airport once.

6.4 ACTIONS OF A SIGNIFICANTLY DIFFERENT NATURE WHICH WOULD PROVIDE SIMILAR BENEFITS WITH DIFFERENT ENVIRONMENTAL IMPACTS

Conventional Subdivision or an all Affordable Subdivision. One alternative that would address the demand for affordable housing would be to develop a conventional small-lot subdivision. Typical subdivisions that include only residential uses require residents to spend more time getting from one activity to the next and discourage neighborhood interaction.

Several aspects of the design of Pulelehua contribute to a high quality of life. The community will include a mix of residential, commercial and public uses, parks, and open space, a neighborhood school, biking and walking paths, a town center, pedestrian friendly streets and public civic spaces. These components combine to form a community that encourages residents to build relationships with each other, rely less on cars for transportation, walk and bicycle more often, enjoy outdoor surroundings, and actively engage in civic life.

Communities that incorporate a mix of residential, commercial, and public spaces offer a broad range of activities within a relatively small area. This allows residents to spend less time getting from one activity to the next and more time doing what they want to do, be it grocery shopping, playing in the park or barbecuing with friends. Pulelehua will be an example of a "live, work, play, learn" community.



Legend

15-acre site

7-acre site

DISCLAIMER:
This graphic has been prepared for general planning purposes only.

Figure 17
Medical Center Alternative

Pulelehua

MAUI LANDS & PINEAPPLE COMPANY, INC.
NORTH

ISLAND OF MAUI



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A community such as Pulelehua differs from conventional neighborhoods in aesthetic and practical ways. Homes are oriented toward the street, which is narrow and bordered by wide sidewalks; porches and lanai invite neighbors to talk story; affordable and market rate homes are mixed together and do not differ substantially in quality or appearance; and streets connect to other neighborhoods and the town center rather than ending in cul-de-sacs, inviting interaction with the community.

Traditional neighborhood design results in more compact, confined communities that preserve rather than consume surrounding open space. This is particularly significant for Pulelehua and West Maui, where open space will continue to be dedicated to agriculture, an integral component of Maui Land & Pineapple Company's vision to create holistic communities.

Most importantly, the traditional neighborhood model is in harmony with the hopes and aspirations that community members have shared with us throughout the design and planning process.

Another alternative that would address the demand for affordable residential housing would be to develop an "all affordable" subdivision. With the increase in West Maui's population, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income. However, there is also a demand for homes in West Maui at moderate and market rates.

By design, Pulelehua is planned as a holistic, inclusionary, mixed-income community. Holistic communities embrace a diversity of people and activities and Pulelehua will be a place where Maui's resort employees, police, teachers, fire fighters, doctors, lawyers, and others can live side-by-side. As a mixed income community, Pulelehua will contain a variety of housing options integrated into complete neighborhoods. Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income-segregated, affordable "project" which almost always leads to other social issues.

Pulelehua's inclusionary design also allows for young families to purchase their first home along side more established families or senior citizens, thereby allowing for social diversity of age ranges and life experiences within the community. In the long-term, Pulelehua's mixed housing types, lot, sizes, and flexible design standards will allow for residents' changes over time. For example, a young couple will be able to start out in home they can currently afford, move to a larger home when they have children and their incomes rise, and later more to an apartment or condo close to stores and services when they retire. This range of options will allow residents to remain within the community

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they helped to establish and where they have raised their kids and made lifelong friends. It also allows for multiple generations of an extended family to all live in the same community, within walking distance of each other.

The “affordable housing project” alternative would not address the need or the objective to create a holistic community that builds a sustainable future for Maui and other objectives stated in Section 2.2.1.

6.5 THE ALTERNATIVE OF POSTPONING ACTION PENDING FURTHER STUDY

The alternative of postponing action pending further study may allow some of the objectives of Pulelehua to be met eventually; however, this alternative is not necessary for the following reasons:

1. This ~~draft~~ final environmental impact statement and its related technical studies provide a thorough evaluation of the Pulelehua’s impacts.
2. Entitlement processing for Pulelehua will include a State Land Use District Boundary Amendment, a Community Plan Amendment, and County Project District Processing. All of these steps provide for public input and comments, as well as opportunities for the public and decision makers to ask for more information or further study. Notwithstanding the entitlement process, the community kicked off the design process with the community design charrette in early 2004. Since then, the community has been encouraged to call or email comments and/or suggestions. Currently, there is a list of approximately ~~2,000~~ 2,700 interested parties which demonstrates the need for Pulelehua to move forward as soon as possible.
3. Affordable and moderate-priced housing in West Maui is in high demand as stated in County and privately initiated marketing studies (see Section 4.8.2). The cost of housing is increasing at a fast pace. In ~~January~~ May 2005, the median sales price of a home on Maui was ~~\$612,000~~ \$780,000, an ~~18~~ 26 percent increase from 2004. However, in the Lahaina area, the median home price increased ~~39~~ 59 percent from ~~\$509,500~~ \$615,000 in ~~January~~ May 2004 to ~~\$710,000~~ \$975,000 in ~~January~~ May 2005. These recent increases in median home prices are even more significant considering that in 2000 the island-wide median price of a home was \$275,000 and the Lahaina median price was \$260,000 (Realtors Association of Maui, Inc. 2005). Delays for more studies will only amplify housing demand and increase prices.

CONTEXTUAL ISSUES



7.0 CONTEXTUAL ISSUES

Key issues within the context of the Pulelehua Community are presented in this section.

7.1 RELATIONSHIP BETWEEN THE SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The Pulelehua community site currently contains fallow and cultivated pineapple fields. As described in Section 3.4, Maui Land & Pineapple Company, Inc., maintains a long-term commitment to agriculture and has long-term goals for agricultural use of its productive agricultural lands. While soil surveys indicate the Pulelehua site contains productive agricultural soils (see Section 3.3), in many cases these evaluations are based on irrigation and modern farming techniques as a basis for the ratings. In practice, much of the Pulelehua site has been left fallow because Maui Pineapple Company has other fields that produce higher yields or are more feasible to farm. Thus, the use of the Pulelehua site for a holistic, inclusionary, affordable community will not impact Maui Land & Pineapple Company, Inc.'s long-term goals for continuing agricultural operations on Maui. Further, with the closure of Pioneer Mill in Lahaina, and the end of sugar cultivation in West Maui, there are currently vast amounts of suitable agricultural land available for future agricultural pursuits.

While there are vast amounts of agricultural land in West Maui, there is a critical shortage of housing in all price segments—affordable, moderate, or market-price range. This shortage is, in part, due to long-term State and County policies to protect agricultural land from development. However, with Maui's shift from reliance on an agricultural-based economy to a tourism and service-based economy, the long-term impact of these policies has been high appreciation in real estate prices due to high demand versus low supply of available residential land.

The demand for housing has pushed the median price for a home on Maui to a point where most residents cannot afford to buy a home. In ~~January~~ May 2005, the median sales price of a home on Maui was ~~\$612,000~~ \$780,000, an ~~18~~ 26 percent increase from last year. In Lahaina, the median home price increased even more sharply than the island-wide median: a ~~39~~ 59 percent increase from ~~\$509,500~~ \$615,000 in ~~January~~ May 2004 to ~~\$710,000~~ \$975,000 in ~~January~~ May 2005. These recent increases in median home prices are even more significant considering that in 2000 the island-wide median price of a home was \$275,000 and the Lahaina median price was \$260,000 (Realtors Association of Maui, Inc. 2005).

As discussed in Section 4.8.2, it is estimated that the West Maui housing sector is currently undersupplied by approximately 470 to 1,168 units (Hallstrom 2005). With the increase in West Maui's population, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140

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percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the HUD figures for the County of Maui.

The population of West Maui is expected to increase by 28.5 percent by 2020 (SMS 2002) and employment forecasts project 30 percent more jobs in the region by 2020 (SMS 2002). In addition to just meeting the needs of a growing population, there will be a need for housing for West Maui's employees within the income ranges of the positions created. The ability to attract and retain employees to fill employment positions is critical to Maui's economy as currently the West Maui region provides 28 percent of all Maui jobs, generates upward of \$3.2 billion in economic activity annually, and represents more than 30 percent of the island tax base (Hallstrom 2005).

Pulelehua will help to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui. At least 51 percent of the Pulelehua homes will be for sale or rent to families making between 50 to 140 percent of the County of Maui median income, which is currently ~~\$60,700~~ \$62,350 per year, based on the HUD figures for the County of Maui. Other Pulelehua homes will help to satisfy the demand for other market segments and are expected to be within the range of comparable homes in West Maui.

Short-term uses and long-term productivity consists of the community's short-term construction phases and the long-term benefits of Pulelehua after construction. Short-term construction impacts can be mitigated while they occur. In the long-term, the creation of affordable, moderate, and market rate homes within a holistic community will contribute to substantial positive economic and social benefits as discussed throughout this EIS. Pulelehua will contribute to the maintenance and enhancement of long-term productivity for Maui in general.

7.2 CUMULATIVE AND SECONDARY IMPACTS

Cumulative and secondary impacts are impacts that may result from other reasonably foreseeable actions within the area, regardless of who initiates the action. To assess the cumulative and secondary impacts of the Pulelehua community in context with other projects, Maui Land & Pineapple Company, Inc., worked with the Department of Planning to confirm a list of proposed projects for West Maui. Not all of the projects on the list are approved or even certain to be approved; however, some of the projects are approved and few are in construction or near completion. This list of current and proposed projects is the basis of reasonably anticipated development in the area (see Table 2 in Section 4.4).

Projects on the list include Kā'anapali 2020, Waine'e Village, Pu'unoa, The Villages of Leiali'i, Kapalua Mauka, and homes on the DHHL Honokōwai property. Other smaller projects are also proposed. These projects are in various stages of the planning and permitting process, but it is unlikely all will proceed or be built as currently proposed. For example, the Pu'unoa project has been rejected twice by the Maui County Council and

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the Villages of Leiali'i has been tied up in a legal dispute for over 10 years, although an agreement was recently reached to allow DHHL to provide 104 homes on the site.

Cumulative and secondary impacts resulting from these projects are likely to include increased population and greater demands on public infrastructure systems and services. However, the population of Maui is projected to grow and the needs of a growing population relating to traffic, infrastructure, public services, and other issues will need to be addressed regardless if some or all of these projects are built.

The challenge will be to manage growth in acceptable manner. Pulelehua presents a new paradigm to manage growth by concentrating development in a compact, defined area; thus preserving more open spaces and agricultural land, rather than allowing continued sprawl—the unintended consequence of “doing nothing.”

Pulelehua is a community designed for, and by, the people who work in West Maui—a place for families who want to reduce stress, commuting times and pollution by living minutes away from where they work and go to school. By providing housing opportunities close to employment centers, Pulelehua will reduce commuting traffic on Honoapi'ilani Highway, improve public safety and enhance the quality of life for its residents.

Holistic communities offer residents the opportunity to meet many of their daily needs within walking distance—including shopping, education, fitness and civic participation—thereby reducing traffic within and beyond Pulelehua. Because of the mix of uses and the potential for residents to live closer to their workplaces, the Pulelehua community will place less strain on infrastructure and public services than other similar-sized developments.

The traffic study that was prepared for Pulelehua (see section 4.4 and Appendix H) shows traffic patterns over 10 miles of Honoapi'ilani Highway, and includes the potential impacts of aforementioned developments in West Maui in addition to Pulelehua. This study represents the most exhaustive and comprehensive analysis of existing and future West Maui traffic conditions assembled to date.

Each potential development was analyzed separately and then integrated. The number of trips generated by each development was calculated and distributed on the 10-mile study area. The results were then compiled to look at total traffic impact. The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed as projected.

Certain components of Pulelehua, like the elementary school and affordable housing closer to employment centers, are in fact, hoped to improve traffic conditions in Lahaina during peak traffic hours and contribute to improved conditions. More details regarding traffic are included in Section 4.4.

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The marketing study for Pulelehua (see section 4.8 and Appendix A) also analyzes the cumulative housing demand in relation to projects listed in Table 2. In total, it is estimated that 4,027 units will be proposed or approved by 2011, with only 45 percent for long-term residents. Again, it is unlikely that all projects will be approved or approved as planned. In comparison, studies show that by the year 2020, 3,917 (SMS 2002) to 6,608 (Hallstrom 2005) additional homes in West Maui are needed (this includes the current unmet demand of 470 to 1,168 unit plus 3,447 to 5,440 anticipated units) for population growth in West Maui. The majority of this demand will be for affordable homes. Pulelehua will help to satisfy the demand for housing by providing 882 homes.

Other cumulative and secondary impacts are likely to include greater demand on public infrastructure systems and services, such as water. Both the Honokōwai and Honolua aquifers are well below 50 percent of their sustainable yield. Ground water resources are available at this time for Pulelehua and likely for the other planned developments.

Another infrastructure system that is likely to see greater demand is wastewater. Pulelehua will contribute its fair share toward additional allocation for wastewater at the Lahaina Wastewater Reclamation Facility, and thus will not place additional burdens on the County for these resources or be competing with other projects.

In addition to water and wastewater systems, solid waste is likely to increase. In the *Public Facilities Assessment Update County of Maui* (2002), R.M. Towill Corporation projected that the Central Maui Landfill will have adequate capacity to accommodate residential and commercial waste through the year 2020, with a surplus of approximately one million cubic yards of landfill space. Pulelehua will incorporate recycling during construction and in the built neighborhoods to help reduce the amounts of solid waste going to the landfill.

With increased housing and population, the community character of West Maui will change. This is an inevitable consequence of growth and has been occurring gradually as evident in Lahaina town, Luniupoko, and Kā'anapali. The challenge facing political decision makers, business leaders, and the public in general is how to manage this opportunity to create an environment in which the goods, services, and facilities essential for a thriving community are present and provide opportunities for people to live, work, play, and learn in West Maui without having to commute daily to and from the "other side."

Finally, while many projects are proposed, it is not likely that all will be built, or built with as many units as currently envisioned. Any proposed development will be subject to regulatory review to ensure compliance with applicable land use policies. Projects must have the appropriate State land use designation, the appropriate County zoning, and comply with other applicable regulatory review and approval procedures to ensure the project will not have major adverse effects on infrastructure, public services, and the

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natural or socio-economic environment, or result in adverse cumulative and secondary impacts. Developers of other projects in the region will be required to satisfactorily mitigate impacts of their projects before proceeding with development. Growth in West Maui is a natural progression. Careful planning will ensure that growth does not negatively effect and overburden infrastructure systems.

7.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The creation of the Pulelehua community would result in the irreversible and irretrievable commitment of certain natural and fiscal resources. Major resource commitments include the ~~342~~ 310-acre site and the money, construction materials, non-renewable resources, labor, and energy required for the community's completion.

Use of the land for the Pulelehua community will require approximately 150 acres of land be removed from pineapple cultivation. However, there are currently vast amounts of suitable agricultural land on Maui for future agricultural pursuits. The land withdrawn from pineapple cultivation amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation by Maui Pineapple Company, Ltd.

In addition, the site is well-suited for urban use because of its: 1) proximity to the West Maui employment areas; 2) proximity to Honoapi'ilani Highway; 3) location contiguous to existing urban areas; and 4) proximity to existing infrastructure systems.

The impacts represented by the commitment of these resources, however, should be weighed against the positive socio-economic benefits that could be derived from the community versus the consequences of either taking no action or pursuing another less beneficial use of the property. As previously mentioned, a critical design element of Pulelehua is the creation of a compact, holistic community, clustering housing and other uses in a specified area adjacent to existing urban uses (between the airport and residential areas makai of the highway) and thus preserving surrounding agricultural land and open space. Compact communities allow for needed housing and other services but respect and acknowledge the value of agricultural land and open spaces by limiting development to appropriate areas. Compared to traditional, sprawling, large-lot subdivisions, Pulelehua will concentrate urban uses in a defined area, allowing more of the surrounding land to remain in agriculture or open space.

7.4 PROBABLE ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

Land Use Character. Land uses in the West Maui region are undergoing gradual changes as major agricultural crops traditionally grown in the region, such as sugar cane and pineapple, can no longer be profitably grown. Lands mauka of Lahaina, which were once vibrant green with sugar cane, are now brown, abandoned fields. While productive uses for the vast amount of this fallow agricultural land have not been decided, some areas will invariably be rezoned for residential uses. The Pulelehua community, with its mixed use

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and residential and recreational uses, would contribute to this gradual transition in land uses, while limiting development to a more compact area than the typical, conventional subdivision (again allowing more of the surrounding land to remain in agriculture or open space).

An important objective of Pulelehua is to preserve surrounding agricultural land and open space vistas by the creation of a compact community in an appropriate setting. The in-fill location of Pulelehua—between the existing urban uses makai of Honoapiʻilani Highway and the urban land of the Kapalua West Maui Airport and between the urban uses of Kahana Ridge and the airport—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.

Visual Resources. With the creation of the Pulelehua community, existing views mauka from Honoapiʻilani Highway up to the Kapalua West Maui Airport will change from fallow agricultural fields to urban uses. Māhinahina Gulch will not be developed and so primary views to mauka peaks should not change significantly where Honoapiʻilani Highway crosses Māhinahina Gulch. Also the play fields of the school site on the north side of Māhinahina Gulch will provide substantial open space along the highway and gulch.

A key design element of Pulelehua is the creation of a wide landscaped greenway along the length of Honoapiʻilani Highway. This greenway is in accord with provisions of the West Maui Community Plan calling for landscaping along the highway.

Traffic. As discussed in Section 4.4, the Traffic Impact Assessment Report (TIAR) for Pulelehua concludes that when built as planned, by 2011, Pulelehua will generate 745 new AM peak hour external trips, and 987 new PM peak hour external trips. However, it is important to note that not all of these trips will be distributed along entire length of the Honoapiʻilani Highway corridor (some cars from Pulelehua will be traveling north toward Kapalua, others will be traveling south, but not all of these cars will travel all the way through Lahaina) and actual trip generation may be much lower. Due to the walkability of Pulelehua’s traditional town plan, many of these trips will be captured on-site, rather than become external trips.

Currently, some West Maui employees reside outside of West Maui, and it is expected that a percentage of these employees will move to Pulelehua, reducing the vehicle trips coming into and out of West Maui on Honoapiʻilani Highway. This work trip shift is not included in the Traffic Impact Assessment Report.

Trips generated by Pulelehua parents taking their children to school may be overstated with the establishment of a public DOE elementary school within Pulelehua. It is expected the school will have significant positive impact on travel on Honoapiʻilani

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Highway as elementary school children residing approximately north of Kā'anapali, including Pulelehua children, will not have to travel to the Lahaina area for school.

The traffic analysis indicates that peak hour traffic will continue to operate at acceptable levels of service, as long as: 1) Maui Land & Pineapple Company adds four additional, non-signalized, well-spaced intersections along Honoapi'ilani Highway to adequately distribute Pulelehua in and outbound trips; and 2) when the PM peak traffic reaches projected levels, a left turn lane is added to the south approach of the intersection of Lower Honoapi'ilani Road and Honoapi'ilani Highway (and an additional westbound lane is added on the west leg).

While the additional traffic can be accommodated, the Pulelehua community will contribute to the cumulative traffic impacts of the region. However, the community will not reach full build out for several years, and many traffic improvements may be in place by then.

Solid Waste. As detailed in Section 4.9.7, there will be solid waste generated during construction and after development of the Pulelehua community. Pulelehua will encourage recycling, however, solid waste that cannot be recycled will be disposed in the County's central landfill in Pu'unēnē. In the *Public Facilities Assessment Update County of Maui* (2002), R.M. Towill Corporation projected that the Central Maui Landfill will have adequate capacity to accommodate residential and commercial waste through the year 2020, with a surplus of approximately one million cubic yards of landfill space. This projection was arrived at by multiplying the Maui County's de facto population projections by an estimated number of pounds per person per day of waste generated and assumes that solid waste generated by commercial and industrial growth will be captured by a corresponding trend in projected population growth.

Electrical Power. When built out, monthly residential electrical demand for the Pulelehua community is estimated to be 838,800 kilowatt-hours. This estimate is based on the use of solar water heaters on all homes and room air conditioners, although it is expected that not all homeowners will install air conditioning. Further, the estimate includes the electrical demand from all potential ohana units; however, it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

By design, the Pulelehua street grid allows for most buildings to be oriented with primary roof façade within 30 degrees of due south, to facilitate use of solar panels, as well as providing for passive solar design. Homes will include solar water heaters which will minimize energy loads. In addition, buildings will be oriented to take advantage of natural cooling of interior spaces by channeling trade winds which will minimize energy use. Ceiling fans and radiant barrier, when feasible, will be provided to avoid using air conditioning whenever appropriate. Further efforts to minimize energy consumption may include inclusion of items from the "Hawaiian Design Strategies for Energy Efficient

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Architecture” (State Department of Business, Economic Development and Tourism – Strategic Industries Division) and “Guidelines for Sustainable Building Design in Hawaii (Office of Environmental Quality Control 1999) into the Pulelehua’s design guidelines.

All utility lines serving the community will be underground to reduce visual impacts.

Air Quality. In the short-term, construction of the Pulelehua community will unavoidably contribute to air pollutant concentrations due to fugitive dust releases at construction areas, however, appropriate mitigative measures including frequent watering of exposed surfaces will help to establish controls. Over the long-term, an air quality modeling analysis of estimated community related traffic indicates that even during worst-case conditions predicted concentrations of pollutants will remain within national and state standards.

Noise. In the short-term, construction of the Pulelehua community will generate short-term noise impacts. The dominant noise sources during construction will most likely be earth moving equipment such as bulldozers and diesel trucks. Construction activity will occur during daytime hours. Noise from construction activity will be short-term and will comply with DOH noise regulations. Traffic generated noise due to the development of the Pulelehua community is predicted to be imperceptible to people with normal hearing, and no traffic noise mitigation measures are planned. After the establishment of the Pulelehua community, the ambient quality of the site will be changed from the current agricultural uses (including tilling, planting and harvesting) to typical residential and commercial sound patterns. These include, people talking, children playing, cars entering and exiting the community, and other sounds from human habitation.

7.4.1 Rationale for Proceeding with the Pulelehua Community Notwithstanding Unavoidable Effects

In light of the above mentioned unavoidable effects, the creation of the Pulelehua community should proceed because the relatively minor negative impacts of the community will be offset by substantial positive impacts, including:

- Responsible stewardship of the land provided by Maui Land & Pineapple Company, Inc.’s vision for the creation of the Pulelehua community.
- Provision of high quality affordable housing for the workers of West Maui, to allow people to live near where they work.
- Provision of a complete community, with a mix of housing types, recreation areas, an elementary school, and neighborhood commercial uses.
- Incorporation of sustainable design features into the Pulelehua community to minimize impacts and conserve non-renewable resources.
- Promotion of walkability and healthy lifestyles.
- Wages, taxes, and overall positive economic impacts of the community.

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7.5 UNRESOLVED ISSUES

Unresolved issues are invariably associated with projects in the planning and preliminary design stages. Notwithstanding Maui Land & Pineapple Company, Inc.'s efforts, some issues remain unresolved at this stage of the planning process. The unresolved issues are as follows:

Water. Maui Land & Pineapple Company, Inc., will participate in the funding and construction of an adequate water source, storage, and transmission facilities and other improvements to accommodate total water demand generated by Pulelehua. ~~It is currently envisioned that water wells will be drilled in the vicinity of the Pulelehua site to provide a new source of water for Pulelehua. The current plan is to draw water from the Honokōwai Aquifer.~~ While Maui Land & Pineapple Company, Inc., continues to evaluate water supply alternatives, the most likely source for Pulelehua's potable water will be from new wells. These wells will likely be located mauka of the Pulelehua site in the Honokowai or Honolua aquifer. As the current pumpage from the Honokōwai Aquifer of 3.171 MGD is well below the aquifer's sustainable yield of eight MGD, the wells are not expected to impact the sustainable yield of the Honokōwai Aquifer. If the new wells draw water from the Honolua Aquifer, the sustainable yield of the Honolua Aquifer is not expected to be impacted the as the current pumpage from the Honolua Aquifer of 2.73 MGD is also well below the Honolua Aquifer's sustainable yield of eight MGD.

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Maui Land & Pineapple Company, Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

These water system improvements will need to be developed with the cooperation and consent of the County of Maui and the State Commission on Water Resource Management. Maui Land & Pineapple Company, Inc., will work with the DWS for the development and construction of the new wells, which will be built in accordance with

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DWS standards and all requirements of the Commission on Water Resource Management. Agreements concerning these planned improvements are currently not finalized.

Wastewater. The County of Maui's Lahaina Wastewater Reclamation Plant in Honokōwai services the Lahaina District. According to the Wastewater Reclamation Division, County of Maui, the Lahaina Wastewater Reclamation Plant has a design capacity of 9 million gallons per day (MGD). Currently, it is processing approximately an average daily flow of 4 MGD of sewerage. Of the remaining capacity, approximately 1.38 MGD are allocated to AMFAC, 1.80 are allocated to the Housing Finance Development Corporation and 303,350 gallons per day are allocated to Kapalua Land Co., Ltd (a subsidiary of Maui Land & Pineapple Company, Inc.), including purchasable capacity.

It is projected that Pulelehua will generate approximately 345,688 gallons per day of wastewater based on the current mix of uses (see Section 4.9.4).

Maui Land & Pineapple Company, Inc., or its subsidiaries currently envisions building the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect to a new sewer line located along the east (mauka) side of Honoapi'ilani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet and will connect directly to the Lahaina Wastewater Reclamation Plant.

Maui Land & Pineapple Company, Inc., is working with the Wastewater Reclamation Division to determine the capacity of the existing facilities to confirm that the Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua. These wastewater system improvements will need to be developed with the cooperation and consent of the County of Maui and conform to the applicable provisions of HAR, Chapter 11-62, "Wastewater Systems." At the time of this writing, agreements concerning these planned improvements are currently not finalized.

Honoapi'ilani Highway Connections and Street Sections. Pulelehua is designed as a walkable community following traditional town planning concepts. Circulation through the community was an important consideration during the design process. Vehicular circulation is to occur along a network of interconnected roads to disperse traffic throughout the neighborhood, but design of Pulelehua's internal roadways assumes that pedestrian movement is the key function of the town's streets.

Streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds within the community. This is often called traffic calming by design, thus preventing the need to install traffic humps and other devices later. Short block faces and parallel parking on most streets allow more efficient use of paved surfaces. Short blocks, buildings closer to the sidewalk, narrower street sections,

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internal roundabouts, and on-street parking, all contribute to the traditional traffic calming effect.

Pulelehua's modified street grid system provides multiple routes (for cars, as well as pedestrians and cyclists) to reach a specific destination. Providing multiple routes increases connectivity to all points, decreases congestion by distributing traffic flows, increases emergency vehicle access by providing redundancy, and facilitates pedestrian movement by calming traffic and allowing for a mix of land uses within a walkable distance. In correspondence to Maui Land & Pineapple Company Inc, the County Fire Department stated: "We would like to commend the design committee for the multiple access options that residents & emergency responders will have."

An important element of Pulelehua's street system is the four additional connections to Honoapi'ilani Highway. The existing connection of Akahale Street with Honoapi'ilani Highway will provide a fifth access to Pulelehua. The location of these access points has been carefully considered and selected to provide evenly spaced intersections on Honoapi'ilani Highway which will facilitate Honoapi'ilani Highway traffic flow. As opposed to only providing a single access point to Pulelehua, the additional connections will also ease traffic flow on Honoapi'ilani Highway and within Pulelehua by distributing turning movements to and from Pulelehua at several points, thus eliminating long queuing within turn lanes. Maui Land & Pineapple Company, Inc., will work with the DOT on an agreement for the connections to the Highway.

To achieve walkability and traditional neighborhood design, internal streets within Pulelehua require slightly narrower dimensions than contemporary County practice. Specifically, street widths and parking lanes within Pulelehua will be narrower than the dimensions called for in the roadway design standards in Chapter 18.16 of the Maui County Code.

Maui Land & Pineapple Company, Inc., will build all Pulelehua internal roadways and they are working with the County Planning Department and Department of Public Works to allow the Pulelehua streets to be dedicated to the County upon completion.

~~The Fire Department has approved Pulelehua's street designs and stated they were very pleased with the design details and see no major hurdles with what has been proposed.~~

The Fire Department has attended several meetings over the past year regarding Pulelehua and has participated in discussions pertaining to roadway design and emergency access road widths and routes. Maui Land & Pineapple Company, Inc., and the Fire Department continue to work together to ensure Pulelehua roadways meet Fire Department requirements.

Medical Center. Maui Land & Pineapple is currently in discussions with Hawaii Health Systems Corporation (HHSC) to provide up to 15 acres in Pulelehua's south Māhinahina

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neighborhood to support a medical facility as well as other medical related businesses like doctor's offices and clinics. It is uncertain at this time if this plan will move forward. A Needs Analysis and other steps will be taken before a final decision can be made.

HHSC's initial vision for the medical center would include a 30 to 50-bed long-term care facility. This facility may be based on the "Greenhouse Project" concept and be made up of four to five buildings. Each building could house eight to ten residents and would be approximately 6,000 square feet in size. The residents would enjoy separate living areas and bathrooms, situated around a common kitchen and dining area. These buildings could be designed to fit into the neighborhood in such a way as to look like large single-family homes.

In addition, an urgent/emergency care medical clinic could be developed. This facility would address critically injured or sick patients to provide stabilization and diagnostic services. The patients would then be released or transported to more full service facilities, such as Maui Memorial Medical Center.

The long-term care and urgent/emergency care medical facilities, as well as and other medical related businesses could be located relatively close to the Honoapi'ilani Highway to facilitate quick and easy access.

In the event the medical center moves forward certain assumptions and conditions within the Pulelehua community may change. The number of residential units for example will be reduced. Internal neighborhood traffic patterns may change slightly, but the intent will be to build the facilities within the fabric of the traditional town plan.

It is difficult to quantify the impacts of the medical center because it has not been designed. Based on conceptual information the medical facility will generate less demand for water, sewer and electricity than the houses that will be replaced in the plan. Other potential impacts may also be reduced accordingly.

Affordable Housing Provisions. Pulelehua is intended for the working families of West Maui. As noted in other sections, housing prices on Maui are escalating to the point where most residents cannot afford to purchase a home. Pulelehua will provide 51 percent of its homes as affordable homes.

~~To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.~~

Maui Land & Pineapple Company, Inc., will continue to work with the County of Maui Department of Housing and Human Concerns ~~on developing~~ to develop an Affordable Housing Agreement ~~that will contain more specific information of the buy back and limited appreciation provisions that will be used to prevent speculation in the resale of the~~

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affordable units and refine the Pulelehua's affordable housing requirements and restrictions (see Section 2.6.4). Maui Land & Pineapple Company, Inc., is also working with the Department of Housing and Human Concerns to receive affordable housing credits for Pulelehua.

Chemicals and Fertilizers. Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine the possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and/or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

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CONSULTATION



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8.0 CONSULTATION

The preparation of this ~~draft~~ final EIS and planning of Pulelehua involved communicating with Federal, State, and County agencies, and individuals, private companies, and community organizations, including those listed below. While most consultation occurred in meetings, Appendix ~~N~~ Q contains various correspondences relating to Pulelehua.

Affiliation	Name	Date
County of Maui	Affordable Housing Technical Review Committee	03-19-04
Community	Public Community Meeting Pulelehua Charrette Kick off Presentation Approximately 300 attendees	03-19-04
Community	Public Community Meeting Pulelehua Design Session Approximately 100 participants	03-20-04
County of Maui	Department of Planning	03-22-04
Community	Public Community Pulelehua Design Studio Open House Approximately 300 attendees	03-23-04
County of Maui	Department of Transportation	03-24-04
County of Maui	Mayor and Various Department Heads	05-05-04
County of Maui	Department of Housing and Human Concerns	05-11-04
County of Maui	Councilmember JoAnn Johnson	05-24-04
State of Hawai'i	Housing and Community Development Corporation of Hawaii	05-25-04
State of Hawai'i	Office of Planning	05-25-04
State of Hawai'i	Department of Land and Natural Resources	05-25-04
County of Maui	Department of Public Works and Environmental Management	05-26-04
County of Maui	Affordable Housing Technical Review Committee	05-28-04
County of Maui	Councilmember Danny Mateo	05-28-04
County of Maui	Department of Planning	06-01-04
State of Hawai'i	Department of Transportation	06-02-04
State of Hawai'i	Department of Hawaiian Home Lands	06-02-04
County of Maui	Department of Housing and Human Concerns	06-15-04
County of Maui	Department of Water Supply	06-17-04
Community	Rotary Club of Lahaina	06-17-04

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Affiliation	Name	Date
County of Maui	Department of Public Works and Environmental Management	07-01-04
County of Maui	Councilmember Charmaine Tavares	07-09-04
State of Hawai'i	Department of Education	07-13-04
County of Maui	Department of Fire and Public Safety	07-21-04
State of Hawai'i	Land Use Commission Site Visit	07-22-04
County of Maui	Councilmember Dain Kane	08-05-04
County of Maui	Councilmember Ricky Hokama	08-05-04
County of Maui	MECO	08-05-04
County of Maui	County Housing and Human Concerns Committee	08-13-04
County of Maui	Police Department Lahaina Station	08-17-04
County of Maui	Mayor	08-24-04
County of Maui	Department of Public Works and Environmental Management	08-26-04
County of Maui	MECO	08-30-04
County of Maui	Mayor	08-31-04
County of Maui	Corporation Counsel	09-07-04
County of Maui	Department of Parks and Recreation	09-29-04
State of Hawai'i	Department of Transportation	10-07-04
State of Hawai'i	Department of Hawaiian Home Lands	10-07-04
County of Maui	Councilmember Joe Pontanilla	10-18-04
County of Maui	Department of Planning Ann Cua	10-22-04
County of Maui	Councilmember Ricky Hokama	10-28-04
County of Maui	Maui Economic Opportunity Housing Task Force	11-05-04
Private Companies	Betsill Brothers Construction, Inc.	11-18-04
Private Companies	Lifestar Homes	11-24-04
Private Companies	Texas Solar Power	11-26-04
County of Maui	Mayor	12-10-04
County of Maui	Department of Water Supply	12-10-04
Private Companies	Sterling Management Companies	12-14-04
State of Hawai'i	Department of Transportation	02-09-05
State of Hawai'i	Land Use Commission Tony Ching	02-09-05
State of Hawai'i	Federal Aviation Administration	02-09-05
State of Hawai'i	Department of Education	02-15-05
County of Maui	Affordable Housing Technical Review Committee	02-25-05
Private Companies	Tom Nance Water Resource Engineer	02-25-05

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<u>Affiliation</u>	<u>Name</u>	<u>Date</u>
<u>County of Maui</u>	<u>Department of Public Works and Environmental Management</u>	<u>03-29-05</u>
<u>Joe Bertram</u>	<u>Individual: Project introduction</u>	<u>03-31-05</u>
<u>County of Maui</u>	<u>Department of Planning Department of Public Works and Environmental Management</u>	<u>04-06-05</u>
<u>Maui Memorial Hospital</u>	<u>Mark Hyde</u>	<u>04-07-05</u>
<u>Private Companies</u>	<u>Sugar Cane Train: Transit opportunities</u>	<u>04-08-05</u>
<u>State of Hawaii</u>	<u>Land Use Commission</u>	<u>04-13-05</u>
<u>Private Companies</u>	<u>Hawaiiana: HOA Fees</u>	<u>04-13-05</u>
<u>Private Companies</u>	<u>Colliers: HOA Fees</u>	<u>04-14-05</u>
<u>Private Companies</u>	<u>Spencer Development Affordable Housing Program</u>	<u>04-19-05</u>
<u>County of Maui</u>	<u>Department of Public Works and Environmental Management Solid Waste Division</u>	<u>04-21-05</u>
<u>County of Maui</u>	<u>Department of Public Works and Environmental Management Engineering Division</u>	<u>05-03-05</u>
<u>Private Companies</u>	<u>Habitat for Humanity</u>	<u>05-09-05</u>
<u>County of Maui</u>	<u>Cultural Resource Commission</u>	<u>06-02-05</u>
<u>Community Groups</u>	<u>Na Kupuna O Maui</u>	<u>06-03-05</u>
<u>Community Groups</u>	<u>WMTA (hospital meeting)</u>	<u>06-08-05</u>
<u>County of Maui</u>	<u>Planning Commission Site Visit</u>	<u>06-13-05</u>
<u>County of Maui</u>	<u>Urban Design Review Board</u>	<u>06-21-05</u>
<u>Community Groups</u>	<u>Maui Tomorrow</u>	<u>06-22-05</u>
<u>Community Groups</u>	<u>Sierra Club</u>	<u>06-22-05</u>
<u>Community Groups</u>	<u>Maui Board of Realtors/ TGI</u>	<u>06-23-05</u>
<u>State of Hawaii</u>	<u>DOT</u>	<u>06-23-05</u>
<u>Community Groups</u>	<u>MEO Maui Affordable Housing Task Force</u>	<u>06-24-05</u>

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LIST OF PREPARERS



9.0 LIST OF PREPARERS

The ~~draft~~ final EIS has been prepared by PBR HAWAII, 1001 Bishop Street, ASB Tower, Suite 650, Honolulu, Hawai'i, 96813. The staff involved in the preparation of this document includes:

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Vivaswan Verawudh	Cartography
Lacey Kazama	Planner
Kanai'a Nakamura	Graphic Design
Chris Chavez	Graphic Design
Dionne Talia	Production
Gretchen Tomas	Production
Jeanne Sumait	Production

Several key technical consultants were employed to provide specific assessments of environmental factors for this project. These consultants, their company affiliation, and their specialty are listed below:

<u>Name</u>	<u>Firm</u>	<u>Area of Expertise</u>
Jeffrey Pantaleo	Archaeological Services Hawaii, LLC.	Archaeological Surveys
Paul Titchenal	Archaeological Services Hawaii, LLC.	Archaeological Surveys
Phillip L. Bruner		Faunal Studies
Winona P. Char	Char & Associates	Botanical Studies
Thomas W. Holliday	The Hallstrom Group, Inc.	Economic/Fiscal Research
Steve Dollar	Marine Research Consultants	Marine Research
Stacy Otomo	Otomo Engineering, Inc.	Engineering
Maria E. Ka'imipono Orr		Cultural Assessment
Rick Hall	Hall Planning & Engineering, Inc.	Traffic Impact Analysis
	Mestre Greve Associates/ Edward K. Noda & Associates	Noise Impact Assessment
Barry Neal	B.D. Neal & Associates	Air Quality Studies

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REFERENCES



10.0 REFERENCES

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- B.D. Neal & Associates. (February 2005) *Air Quality Study for the Proposed Pulelehua Community*. Report prepared for Maui Land & Pineapple Company, Inc. Kailua-Kona, Hawai‘i.
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FINAL ENVIRONMENTAL IMPACT STATEMENT

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FINAL ENVIRONMENTAL IMPACT STATEMENT

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COMMENTS ON THE ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE



11.0 COMMENTS ON THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

The environmental impact statement preparation notice (EISPN) was sent to the following agencies, organizations, and individuals. The public comment period on the EISPN was from July 23, 2004 to August 23, 2004. Where indicated, the agency, organization, or individual submitted comments.

AGENCY		EISPN Mail Date	Date of Comments
State			
1	Department of Business, Economic Development and Tourism	07-23-04	
2	Department of Business, Economic Development and Tourism – Strategic Industries Division	07-23-04	07-27-04
3	Department of Business, Economic Development and Tourism – Office of Planning	07-23-04	09-01-04
4	Department of Human Services – Housing and Community Development Corporation of Hawaii	07-23-04	08-23-04
5	Department of Land and Natural Resources	07-23-04	08-17-04
6	Department of Land and Natural Resources – State Historic Preservation Division	07-23-04	09-01-04
7	Department of Health	07-23-04	
8	Department of Health – Office of Environmental Quality Control		07-26-04
9	Department of Health – Clean Water Branch		08-24-04
10	Department of Agriculture	07-23-04	
11	Department of Defense	07-23-04	
12	Department of Hawaiian Home Lands	07-23-04	
13	Office of Hawaiian Affairs	07-23-04	09-07-04
14	UH Environmental Center	07-23-04	
15	UH Water Resources Research Center	07-23-04	
16	Department of Transportation	07-23-04	08-26-04
17	Lahaina Public Library	07-23-04	
18	Maui Regional Library	07-23-04	
Federal			
19	US Fish and Wildlife Service	07-23-04	
20	US Natural Resource Conservation Service	07-23-04	
21	US Federal Aviation Administration	07-23-04	09-14-04
22	US Army Engineer Division	07-23-04	
County of Maui			
23	Affordable Housing Technical Review Committee	07-23-04	

**PULELEHUA
FINAL ENVIRONMENTAL IMPACT STATEMENT**

AGENCY		EISPN Mail Date	Date of Comments
24	Department of Housing and Human Concerns	07-23-04	07-23-04
25	Department of Planning	07-23-04	08-23-04
26	Department of Public Works and Environmental Management	07-23-04	08-27-04
27	Department of Parks and Recreation	07-23-04	
28	Department of Fire and Public Safety	07-23-04	07-28-04
29	Police Department	07-23-04	08-19-04
30	Department of Water Supply	07-23-04	
Private Companies, Organizations & Individuals			
31	Maui Electric Company, Ltd.	07-23-04	08-23-04
32	Verizon Hawaii, Inc.	07-23-04	08-20-04
33	The Kahana Ridge Organization	07-23-04	
34	Maui Tomorrow	07-23-04	
35	Na Kupuna O Maui	07-23-04	
36	Nell Woods		08-20-04
37	West Maui Residents		08-19-04
38	Kathleen Escobar		08-08-04
39	Roberto Escobar		08-11-04
40	Bonnie		08-09-04

LINDA LINGLE
THEODORE E. LIU
STEVE BRETSCHNEIDER

DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM

Strategic Industries Division
235 South Beretania Street, Lidoopapa A Kamohamaha Bldg., 5th Floor, Honolulu, Hawaii 96813
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July 26, 2004
Page 2

RECEIVED
AUG 25 2004
PBR HAWAII

July 27, 2004

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

Attn: Tom Schnell, AICP

Subject: Environmental Impact Statement Preparation Notice (EISP/N)
Pulelehua; Mahinahina, Lahaina, Maui
Tax Map Key: 4-3-01:31 (portion)

Thank you for the opportunity to comment on the EISP/N for Pulelehua, a residential, retail, and mixed-use project in Mahinahina, Lanai, Maui. We note that this will be a project that has "affordable housing with dignity" and that is a holistic community based on traditional Hawaiian ahupua'a. We also note that technologies from the 1999 "Guidelines for Sustainable Building Design in Hawaii: a Planner's Checklist" will be considered. Our comments are addressed to (1) State energy conservation goals, (2) energy saving design practices and technologies, and (3) recycling and recycled-content products.

(1) **Energy conservation goals.** Project buildings, activities, and site grounds should be designed with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c) (4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies. We suggest that you contact Maui Electric Co, Inc., which may offer demand-side management rebates for energy efficient technologies.

(2) **Energy saving design practices and technologies.** Methods and technologies to be considered during the design phase of the project include:

- a. Use site shading, orientation, and use of naturally ventilated areas to reduce cooling load;
- b. Maximize use of day lighting;
- c. Use high efficiency compact fluorescent lighting;

PBR

- d. Exceed Model Energy Code requirements;
- e. Use technologies such as solar water heating systems, roof and wall insulation, radiant barriers, and energy efficient windows
- f. Use solar parking lot lighting;
- g. Use light color or "green" roofs;
- h. Use roof and gutter to divert rainwater for landscaping;
- i. Limit or eliminate the use of potable water for golf course irrigation;
- j. Use landscaping for dust control and to minimize heat gain to area; and
- k. Use photovoltaics, fuel cells and other renewable energy sources.

(3) **Recycling and recycled-content products.**

- a. Develop a job-site recycling plan for the construction phase of the project and recycle as much construction and demolition waste as possible;
- b. Incorporate provisions for recycling into the project – a collection system and space for bins for recyclable;
- c. Specify and use products with recycled-content such as: steel, concrete aggregate fill, drywall, carpet and glass tile; and
- d. Specify and use locally produced products such as plastic lumber, hydromulch, soil amendment and glass tile.

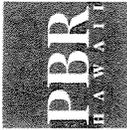
Please do not hesitate to call on us for clarification of any of the above.

Sincerely,

Maurice H. Kaya
Chief Technology Officer

c: Maui Land & Pineapple Company, Inc.
State Land Use Commission
OEQC

P.S. Please note that the name of our organization has changed from the Energy, Resources, and Technology Division to Strategic Industries Division.



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March 10, 2005

Mr. Maurice H. Kaya, Chief Technology Officer
Department of Business, Economic Development & Tourism
Strategic Industries Division
P.O. Box 2359
Honolulu, Hawaii 'i 96804

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Kaya:

Thank you for your letter dated July 27, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

1. State Energy Conservation Goals:

The project will address the applicable provisions of Hawaii Revised Statutes, Chapter 344 "State Environmental Policy" and Chapter 226 "Hawaii State Planning Act." Project buildings, activities, and site grounds will be designed with energy-saving considerations, and the project will be consistent with the State's objective to promote cost-effective energy conservation through the adoption of energy-efficient practices and technologies. Maui Land & Pineapple Company, Inc. will probably take advantage of demand-side management rebates for energy-efficient technologies incorporated in the project. Please note that it is the company's policy to further sustainable practices throughout the company and its landholdings. To that end, it has hired William McDonough & Partners, an internationally recognized expert in sustainability, to provide suggestions to the project site plan to incorporate strategies to maximize solar water heating, electricity from photovoltaics, increase natural ventilation for tradewinds, as well as capturing surface runoff for reuse.

2. Energy-saving Design Practices and Technologies:

The Draft EIS will include the energy-saving methods and technologies suggested in your letter, as well as those developed by William McDonough & Partners.

3. Recycling and Recycled-content Products:

The selected contractors will be instructed to provide a job-site recycling plan for construction waste and to use products with recycled content, where feasible. The project will incorporate provisions for recycling. These are all compatible with

Mr. Maurice H. Kaya, Chief Technology Officer
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 2

Maui Land & Pineapple Company, Inc.'s vision for creating sustainability within the Pulelehua community.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmanson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNair, Maui Land & Pineapple Company, Inc.



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ECONOMIC DEVELOPMENT & TOURISM**

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Mr. Tom Schnell
Page 2
September 1, 2004

Ref. No. P-10599

September 1, 2004

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

Dear Mr. Schnell:

Subject: Pulelehua Environmental Impact Statement Preparation Notice, Mahinahina and Kahana, West Maui, Island of Maui

We have reviewed the Environmental Impact Statement Preparation Notice (EISP/N) for the proposed Pulelehua Project Development Area Plan. We offer the following comments and recommendations for consideration for inclusion into the Draft Environmental Impact Statement (DEIS).

Maui Land & Pineapple Company, Inc. (Petitioner) proposes to petition the State Land Use Commission to reclassify approximately 312 acres of land situated at Mahinahina and Kahana, Lahaina, Maui, from the State Land Use Agricultural District to the Urban District. The property is a portion of a 1,746-acre parcel identified by Tax Map Key 4-3-01: 31. Maui Land and Pineapple Company, Inc. (ML&P) is the fee simple owner of the Petition Area, identified by Tax Map Keys 4-3-01: por. 31. Akahela Street, an east-west arterial road providing direct access to the Kapalua West Maui Airport bisects the property. The State of Hawaii is the owner of an interest in Akahela Street identified by Tax Map Keys 4-3-01: por. 75 and the owner of the Kapalua West Maui Airport, identified Tax Map Key 4-3-01: 68, 73, and 74. The eastern boundaries of the 312-acre portion proposed for the Pulelehua project bounds the Kapalua West Maui Airport on the facility's northern, western and southern boundaries.

Affordable housing projects are eligible for exemptions under 201G if at least 50 percent of the residential units are affordable. ML&P intends to develop approximately 895 residential units and to offer "at leasys" fifty-one percent (51%) or approximately 456 of the units for sale or for rent to low, moderate and gap-group income Maui residents, thereby qualifying the Pulelehua project for various County zoning, construction and subdivision exemptions.

County approvals for the project will be processed in accordance with Section 201G Hawaii Revised Statutes (HRS) as implemented by the County of Maui Department of Housing and Community Concerns and approved by the County Council. Information provided in the EISP/N indicates that ML&P will request exemptions from existing and applicable planning and subdivision ordinances including the West Maui Community Plan's Agriculture and Park designation, the Maui County's Zoning Code's Agriculture designation and the County's Subdivision Codes related to lot size, height, setback and parking requirements.

The Pulelehua community will consist of three distinct neighborhoods: Kahanaiki (north neighborhood), the central neighborhood, and Mahinahina (south neighborhood). The central neighborhood is described in the EISP/N as a "complete neighborhood unit", providing the community the variety of uses and "down-town" atmosphere generally found in a village center. The central neighborhood will include retail and commercial uses, public uses including an elementary school and wellness center, recreational areas and housing types, with the more intense uses and higher densities in the central area, and less intense lower density uses towards the edges.

POTENTIAL IMPACTS

Planned projects in West Maui include Kapalua Mauka, Kaanapali 2020 and the State project for the Villages at Leialii. Together with Pulelehua, these projects alone will produce in excess of 8,300 housing units over the next 20 to 30 years, placing considerable demand on public facilities including roads, highways, airports, water, schools, wastewater treatment and solid waste facilities.

Smart Growth

The EISP/N identifies the proposed Pulelehua community as a "Smart Growth" community that will be created as a sustainable, holistic community based on the traditional Hawaiian concept of the ahupuaa that embraces among other things, "containing settlements in compact clusters and preserving surrounding agricultural land and open space." Within this context, the DEIS should provide information regarding any plans that ML&P may have for the remaining 1,434 acres mauka of the Kapalua West Maui Airport and an approximately 68-acre strip in cultivation located south of the property.

In accordance with Section 201G, ML&P will request exemptions from the Maui Community Plan, Maui County Zoning Code and Subdivision Code. The exemptions will allow ML&P to deviate from subdivision, building, roadway standards, and parking requirements and to construct streets and buildings that may not be consistent with zoning and subdivision standards required for new subdivisions. The DEIS should provide the purpose for each of the County zoning and subdivision standards from which ML&P proposes to request exemptions, and the rationale for the project's variance from each of those standards.

ML&P further intends to request exemptions from Section 18.16.320 - Maui County Design Standards for Parks and Playgrounds. Section 18.16.320 provides that parks or playgrounds that are not provided in perpetuity or dedicated are facilities that are owned and maintained by or on behalf of the ultimate users of the subdivision. The DEIS should provide information regarding provisions that will be made for the maintenance of park facilities. The DEIS should include information regarding provisions that will be made for covering costs related to maintenance of the common areas (parks, roadways, trails, areas around multi-family units-affordable and market) proposed within the property.

Roadways/Traffic

The Petitioner proposes to integrate communities within the Pulelehua project (north neighborhood, central neighborhood, south neighborhood) by way of a traffic circulation system that will include dedicated lanes for pedestrian, vehicular and bicycle traffic. The proposed circulation system will allow residents to walk, bike, or drive between the communities. The EISPN states that Pulelehua will also provide an opportunity to complete the Kahana Ridge neighborhood, and link the Department of Hawaiian Home Lands property to the south. Such a plan would require a highly structured system to satisfy the dissimilar riding/driving/pedestrian patterns characteristic for each mode of travel and still allow emergency vehicles to enter and exit.

The conceptual project plans for Pulelehua envision the development of a sustainable community, independent from the proposed mixture of housing types with "mixed uses for livability." The project will also incorporate commercial, retail, and civic spaces. These areas proposed for businesses and civic activities may become very attractive amenities for residents from the surrounding existing communities looking for alternatives to downtown Lahaina.

Compliance with 201G Hawaii Revised Statutes (HRS) as implemented by the County of Maui Department of Housing and Community Concerns, includes the provision that the project meet the minimum requirements of health and safety. The intention to exempt construction of inner roadway systems and parking accommodations from county zoning and subdivision rules, may render Pulelehua's infrastructure inadequate to accommodate 'visitors' from communities who may want to make use of the commercial, civic, recreational opportunities proposed for Pulelehua.

Assuming Pulelehua's inner roadway systems will facilitate the linkage between the existing Kahana Ridge community and Department of Hawaiian Home Lands (DHHL) lands, the DEIS should discuss the impact these communities would have on the amenities proposed for Pulelehua Communities. The DEIS should provide information regarding the anticipated maximum resident population for Pulelehua at build-out, and the number of persons that would be required to support the various types of business and commercial uses envisioned for the

community. Further, if access to the commercial, civic, public and recreation spaces will not be restricted or limited to Pulelehua residents, the TIAR should include information regarding the management of traffic circulation patterns to accommodate incoming and outgoing traffic and the number of outside trips to and from Pulelehua.

The DEIS should provide detailed information and illustrations to show how the roadway system proposed for Pulelehua will link the adjacent Kahana Ridge community and the community proposed for the DDHL property to the south. We understand that an approximate 68-acre strip of nearly 2 miles separates the ML&P parcel containing the Pulelehua project site from the DDHL-owned lands (790 acres) in Honokowai proposed for development. We also understand that this parcel (68-acre strip) is not owned by DHHL, is currently under cultivation by ML&P, and that a road and County of Maui Pipeline right-of-way extends along the southern boundary of the cultivated strip.

DDHL recently submitted an EISPN for the Honokowai Master Plan. Information on the clarification of ownership and the status of any discussions with DHHL, the county, or the State regarding the aforementioned cultivated strip and right-of-way, and coordination of road and or trail plan between the two communities should be provided in the DEIS.

The development of Pulelehua could be the first phase of what may be a multi-phased development that would continue mauka of the West Maui Kapalua Airport. The DEIS should provide information regarding ML&P plans for the remaining approximate 1,434 acres for parcel 4-3-01: 31.

The conceptual master plan for the project (Figure 1), indicates that a roundabout is proposed for the Akahole Street and Honoapi'iiani Highway intersection. According to the Federal Highway Administration, a roundabout is a circular intersection that is designed to meet the needs of all road users (drivers, pedestrians, pedestrians with disabilities, and cyclists). Modern roundabouts (as opposed to traffic circles) have been designed and built in many states, including California, Colorado, Florida Maryland, Nevada, and Vermont. The use of a roundabout has been found to be an effective tool for reducing speed and improving safety. However, inadequate road markings and signage, and failure to incorporate provisions for cyclists and pedestrians could compromise its purpose.

Taking into consideration the project's intention to develop Pulelehua as a community where pedestrian movement and motor vehicle mobility will be the primary function of the streets, and where a proposed system of linked paths will provide pedestrians and cyclists to access living, working and recreational areas, the DEIS should provide more detail on the proposed configuration for the roundabout. Further, the DEIS should describe and illustrate possible considerations that will be provided for pedestrians, and cyclists to negotiate a way through all options afforded by the proposed roundabout as some options may be less desirable. Pedestrian crosswalks in a heavily used intersection may not be practical, and bridges or

crossovers may prove inappropriate for the environmental setting of the Lahaina area. However, all alternatives should be presented, including the alternative preferred by ML&P. The DEIS should further address whether the roundabout will be constructed to accommodate Honoapiilani Highway's existing two-lane configuration or if it will be coordinated with the Department of Transportation's plans to widen Honoapiilani Highway to four (4) lanes.

Based on the project's conceptual plan, the EISPN includes an estimate of the maximum square footage for lots that would accommodate retail and other commercial uses mixed with residential options. The flexibility incorporated into the mixed-use community concept would permit residential units to convert to commercial spaces and vice versa. A higher commercial use of the residential spaces may result in a need for more parking areas. For example, the EISPN identifies the potential development of 323 ohana units. In a mixed-use community, that number could translate into a potential for 323 bed and breakfast facilities. The commercial activity associated with a bed and breakfast could attract traffic from outside the community and increase the need for more on or off-street parking. The Traffic Impact Analysis Report, and Market and Economic Impact Study should identify potential impacts from higher than anticipated commercial use within the project, and measures to direct the development and growth of the community as originally designed.

There is a growing concern that traffic studies do not adequately access the regional and cumulative impacts of traffic resulting from existing and proposed projects within an area. The Maui County Department of Public Works has directed traffic consultants to:

- Expand traffic study areas to evaluate cumulative impacts.
- Rather than relying on counts only, traffic engineers should observe and document traffic patterns.
- Consult and interview police officers for their first hand knowledge and observations of traffic patterns within the community.

We recommend that the TIAR for Pulelehua also include the above guidelines in the traffic study.

Kapalua West Maui Airport

The Pulelehua community will be located makai of the West Maui Kapalua Airport. In addition to aircraft noise, there are other issues such as safety and other environmental impacts to land uses around airports. The Federal Aviation Administration (FAA) does have noise standards and guidelines; however, the State and the County have primary responsibility for integrating airport considerations into land use planning.

Aircraft operations at West Maui Kapalua are regulated according to Section 19-13-8.1 Hawaii Administrative Rules (HAR), and County Ordinance No. 1535. The County ordinance

approved a change in zoning from agricultural to conditional zoning (Airport District) in 1986 to allow development of the airport. Among the conditions included under Ordinance No. 1535 are the following:

2. ...the runway, runway apron and other facilities shall not be expanded, nor shall any portion of the runway safety area be paved or utilized for displaced landing or takeoff thresholds.
4. ...airport operations shall be limited to one half hour after sunrise to 6:30 p.m. (amended 2001)
15. all aircraft operated at the airstrip ...shall have a current "Aircraft Type" or "Airworthiness" certificate... certifying that such aircraft generates noise levels no greater than the following:
 - (1) For propeller-driven aircraft of 12,000 pounds or less... (not to exceed) in no event in excess of a noise level of 80(db)....
 - (2) For all other aircraft... as follows: ("Effective Perceived Noise" (EPN) Levels)
 - (a) for takeoff: 80.5 EPNdb
 - (b) for sideline: 84 EPNdb and
 - (c) for approach: 91.6 EPNdb

In view of the proximity of the project to Kapalua West Maui Airport, we recommend that ML&P consider incorporating provisions for adequate sound control measures to be incorporated into the project for the construction of residential units, schools, childcare facilities, health clinics and any other noise sensitive uses that may be proposed for the Pulelehua community.

As mentioned previously, the number of housing units planned for West Maui could exceed 8,000 units. While the ordinance (and geography) prohibits airport expansion, the subsequent increase in population may justify more flight service for the region. The DEIS should provide information on the number of aircraft per day that currently fly into and out of West Maui Airport. Further, based upon the projected population increase for West Maui over the next 20 years, the DEIS should also provide an estimate of the number of people who could use West Maui Airport, and the maximum number of flights per day (between ½ hour after sunrise to 6:30 P.M.) that would be allowed to satisfy that demand.

Schools

A site within Pulelehua's central community will be reserved for a new elementary school. Currently, there are four public schools in West Maui and all are located in Lahainaluna. The Lahainaluna complex consists of Kamehameha III Elementary, Princess Nahienaena Elementary, Lahaina Intermediate, and Lahainaluna High schools. Although DOE prefers quiet locations for new school sites, rather than close proximity to noise such as airports, freeways, and heavy industry, the DOE finds the location at Pulelehua acceptable.

The DEIS should provide information on the age range and the number of school age children anticipated to result from the Pulelehua development and Pulelehua's impact on enrollment for each of the schools within the Lahainaluna complex.

Water

The site for the Pulelehua community will have access to two water sources: surface water from the Honokohau Ditch, and groundwater from County wells Honokohua Wells A and B, Napili Wells A, B, and C.

Water collected from Honokohau and Honolua Streams via Honokohau Ditch is processed at the Mahinahina Water Treatment Facility (WTF). The Mahinahina WTF is designed to process approximately 2.5 million gallons per day (gpd), and currently processes approximately 2.4 gpd. Once treated, the surface water is potable and used to service the communities of Honolua, Napili, Alaeloa, Kahana, Mahinahina, and parts of Lahaina. As well as drawing and treating water from the Honolua/Honokohau Ditch, the WTF also uses water from Kahana Stream. Water from Mahinahina WTF is conveyed to a 2.0 million gallon reservoir (Honokowai Reservoir), within a 5.10-acre parcel (4-4-02.18) situated within the adjacent DHHL property. Located at an elevation between approximately 200 to 250 feet, approximately 1,000 feet southeast from the project area, the reservoir appears to one of three that are on the Hawaiian Home Lands parcel.

The County wells (Honokohua Wells A and B, Napili Wells A, B, and C), are part of the Lahaina System that provides potable water to the communities of Puamana, Waiee, Kelawea, Wahikui, Honokowai, Mahinahina, Kahana, Alaeloa, and Napili. Honokohua Well A, Napili Well A and Napili Well C are not in use, leaving only Honokohua Well B and Napili Well B in operation. Water from these wells fills a 1.0 million gallon Kahana Ridge Reservoir located approximately at the 250-foot elevation, approximately 3,000 feet north of the proposed Pulelehua community.

The DEIS should provide information regarding why Honokohua Well A, Napili Well A and Napili Well C systems are not used. These and the wells that are in use are located in areas

previously used for agriculture. There is the possibility that pesticides and or fertilizers used could have seeped to the water source. The DEIS should provide information on the type and levels of contamination that may be found in the wells.

The DEIS should provide information regarding the amount of water that will be required for each segment (neighborhood) of the proposed Pulelehua community.

Wastewater Treatment

The region's wastewater requirements are provided by the County of Maui's wastewater collection and transmission system and the Lahaina Wastewater Reclamation Facility (WWRF). The facility has a design capacity of 9.0 million gallons per day (mgd). Currently, the facility processes approximately 4mgd of sewage per day. Of the remaining capacity, approximately 3.42 mgd is allocated to Kapalua (0.24 mgd), AMFAC (1.38 mgd) and Hawaii Finance Development Corporation (1.80 mgd), leaving a reserve capacity of 1.58 mgd.

The DEIS should provide an estimate of the wastewater to be generated from each of the neighborhoods in the proposed Pulelehua community. The DEIS should discuss the status of the reserve (1.58 mgd) and the capacity of the WWRF to process wastewater from the Pulelehua community at build-out. Maui Land and Pineapple has initiated a baseline marine environmental assessment to determine the impacts of existing land uses on the marine environment waters near the project before construction. The DEIS should provide information on whether future studies will be undertaken as the project develops towards build-out.

Solid Waste

The EISPN states that the County provides collection services for solid waste in West Maui. The Olowalu transfer station, approximately four miles southeast of Lahaina accepts self-haul waste from residents. The DEIS should verify if only the single-family residences will be serviced by the County Department of Public Works, or whether the collection services will apply also to the multi-family residential units and the commercial areas within Pulelehua. The DEIS should separately identify the daily and annual tonnage of solid waste anticipated from the residential and commercial areas within each of Pulelehua's neighborhoods.

The DEIS should also identify plans for the disposal of solid waste generated from the construction of the Pulelehua community and green waste resulting from yard and park maintenance.

Maui has several recycling programs. The DEIS should identify those programs and provide discussion on whether the Pulelehua community will either implement recycling programs of its own or participate in the County programs.

Mr. Tom Schnell
Page 9
September 1, 2004

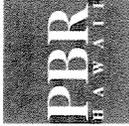
Thank you for the opportunity to comment on the subject EISPN. Should you have any questions, please call Judith Henry at 587-2803.

Sincerely,



Mary Lou Kobayashi
Administrator
Office of Planning

c: Theodore E. Liu



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

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FAX: (808) 242-2002
E-Mail: pbbwaikoloa@hawaii.net

March 10, 2005

Ms. Mary Lou Kobayashi, Administrator
Department of Business, Economic Development & Tourism
Office of Planning
P.O. Box 2359
Honolulu, Hawaii 96804

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Kobayashi:

Thank you for your letter (P-10599) dated September 1, 2004 regarding the Pulelehua Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the applicant, Maui Land & Pineapple Company, Inc. (ML&P), we are responding to your comments. Excerpts from your letter which bear responses are italicized below:

...The DEIS should provide information regarding any plans that ML&P may have for the remaining 1,434 acres mauka of the Kapalua West Maui Airport and an approximately 68-acre strip in cultivation located south of the property.

Response: In an effort to evaluate all options and gauge community feedback, Maui Land and Pineapple included the entire portion of land around the Kapalua West Maui Airport for discussion at the charrette in March 2004. During the course of the charrette, many individuals did voice support for a large multi-phased project that would address the overwhelming demand for long term residential affordable, gap and market rate homes on the west side of Maui.

As research was conducted and the planning evolved, Maui Land and Pineapple decided to develop a single phase property of 312 acres (including open space and gulches) which was made up of 882 residential units with 51 percent being made up of affordable units. This formed the basis of the EIS, the ensuing studies and preparation of plans and development standards.

Pulelehua will be entirely engineered and all improvements will be constructed at one time. Based on available labor, material delivery issues and market absorption rates, the construction of all units will take place over several years.

At this time, Maui Land and Pineapple has no intention on planning, engineering or constructing any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

...The DEIS should provide the purpose for each of the County zoning and subdivision standards from which ML&P proposes to request exemptions, and the rationale for the project's variance from each of those standards.

Response: Subsequent to the publication of the EISPN, ML&P has decided not to pursue obtaining County approvals under Section 201G-118, Hawaii Revised Statutes (HRS). Issues such as seeking alternative roadway standards from the County Subdivision standards will be addressed through the County's Project District process.

Response: The DEIS will include an "Illustrative Plan" that shows the transportation network of vehicles, bike, and pedestrians. As previously noted, Ho'ohui Road is a privately owned and maintained road allowing access to/from Honoapi'ilani Highway. In a letter dated May 10, 2004, the Association clearly states that no access will be provided for Pulelehua.

DHHL recently submitted an EISPN for the Honokowai Master Plan. Information on the clarification of ownership and the status of any discussions with DHHL, the county, or the State regarding the aforementioned cultivated strip and right-of-way and coordination of road and/or trail plan between the two communities should be provided in the DEIS.

Response: It is our understanding that the EISPN for the DHHL Honokowai Master Plan has been withdrawn and they are focusing their efforts on providing 104 homes within the Villages of Leali'i.

...The DEIS should provide information regarding ML&P plans for the remaining approximate 1.434 acres for parcel 4-3-01-31.

Response: As previously noted, ML&P's current plans for the remaining acreage of this particular parcel are to actively cultivate pineapple and/or other crops.

Taking into consideration the project's intention to develop Pulelehua as a community where pedestrian movement and motor vehicle mobility will be the primary function for the streets, and where a proposed system of linked paths will provide pedestrians and cyclists to access living, working and recreational areas, the DEIS should provide more detail on the proposed configuration for the roundabout. Further, the DEIS should describe and illustrate possible considerations that will be provided for pedestrians, and cyclists to negotiate a way through all options afforded by the proposed roundabout as some options may be less desirable. Pedestrian crosswalks in a heavily used intersection may not be practical, and bridges or crossovers may prove inappropriate for the environmental setting of the Lahaina area. However, all alternatives should be presented, including the alternative preferred by ML&P. The DEIS should further address whether the roundabout will be constructed to accommodate Honoapi'ilani Highway's existing two-lane configuration or if it will be coordinated with the Department of Transportation's plans to widen Honoapi'ilani Highway to four (4) lanes.

Response: Subsequent to the publication of the EISPN, ML&P decided not to include the proposal for a roundabout in the Pulelehua design.

...The Traffic Impact Analysis Report and Market and Economic Impact Study should identify potential impacts from higher than anticipated commercial use within the project, and measures to direct the development and growth of the community as originally designed...

Response: The proposed commercial uses within the Pulelehua community are modest at best and are sized to accommodate the market presented by Pulelehua community residents (and even with that - not all of their retail needs). Their location within the midst of each of the three neighborhoods (and away from the visibility of Honoapi'ilani Highway) limits the possibility of expansion or the possibility of development as regional shopping centers. As previously noted, the DEIS will include information regarding Neighborhood Commercial uses and placement within the community in Chapter 4.

There is a growing concern that traffic studies do not adequately access the regional and cumulative impacts of traffic resulting from existing and proposed projects within an area. The Maui County Department of Public Works has directed traffic consultants to:

The DEIS should provide information regarding provisions that will be made for the maintenance of park facilities...

Response: The DEIS will provide information regarding maintenance of park facilities.

...The DEIS should include information regarding provisions that will be made for covering costs related to maintenance of the common areas (parks, roadways, trails, areas around multi-family units-affordable and market) proposed within the property.

Response: Research was conducted on existing Home Owner Association (HOA) fees in Maui, as well as the level of service provided for the fees. Long term residential development consisting of condos, single family home and a mix of both were evaluated.

In general, HOA fees on Maui range from \$100 to \$400 per month. Isolated developments were found which have higher fees. These developments usually included special amenities such as pools, tennis courts, or outdoor gas barbecues.

Based on the size of Pulelehua and the services currently envisioned, it is estimated, the HOA fees for Pulelehua will be similar to the average fees found in our research (plus future escalation). Maui Land and Pineapple Company Inc. will consider a graduated type of fee structure based on affordable and market rate homes, and/or other criteria such as number of bedrooms, lot size or housing type.

Assuming Pulelehua's inner roadway systems will facilitate the linkage between the existing Kahana Ridge community and Department of Hawaiian Home Lands (DHHL) lands, the DEIS should discuss the impact these communities would have on the amenities proposed for the Pulelehua Communities...

Response: Kahana Ridge Association privately owns and maintains Ho'ohui Road and does not want any connections to Pulelehua. We intend to create a trail path near Ho'ohui Road to enable connectivity to Pulelehua for Kahana Ridge residences and to allow Kahana Ridge children a pedestrian friendly path to the school. We are actively negotiating with DHHL to coordinate development plans. ML&P believes that connectivity between the project and surrounding communities will only add to the livability of all of the communities affected. Parks, trail systems, open space and civic uses will be open to the public.

...The DEIS should provide information regarding the anticipated maximum resident population for Pulelehua at build-out, and the number of persons that would be required to support the various types of business and commercial uses envisioned for the community.

Response: The DEIS will provide the anticipated resident population for Pulelehua at build-out, and a market analysis regarding support of neighborhood businesses by residents.

...Further, if access to the commercial, civic, public and recreation spaces will not be restricted or limited to Pulelehua residents, the TIAR should include information regarding the management of traffic circulation patterns to accommodate incoming and outgoing traffic and the number of outside trips to and from Pulelehua.

Response: The TIAR incorporates the traffic patterns within a traditional neighborhood design community.

The DEIS should provide detailed information and illustrations to show how the roadway system proposed for Pulelehua will link the adjacent Kahana Ridge community and the community proposed for the DHHL property to the south...

- Expand traffic study areas to evaluate cumulative impacts. We did, 24 projects, take language from traffic section, in the top summary into section
- Rather than relying on counts only, traffic engineers should observe and document traffic patterns. We did visual and manual counts,
- Consult and interview police officers for their first hand knowledge and observations of traffic patterns within the community we did

We recommend that the TIAR for Pulelehua also include the above guidelines in the traffic study.

Response: The TIAR that will be summarized and appended to the DEIS. As you suggested, the TIAR includes traffic study areas extending to the Lahaina corridor, visual observations, and consultation with the beat Police Officer.

In view of the proximity of the project to Kapalua West Maui Airport, we recommend that ML&P consider incorporating provisions for adequate sound control measures to be incorporated into the project for the construction of residential units, schools, childcare facilities, health clinics, and any other noise sensitive uses that may be proposed for the Pulelehua community.

Response: The Airport Noise Study will be summarized and appended to the DEIS. All residences are situated outside critical airport noise contours or will be built with proper noise mitigation measures in accordance with the requirements of the Federal Aviation Administration (FAA), the Department of Housing and Urban Development (HUD), and the State of Hawaii Department of Transportation Airports Division. Limited commercial uses will be allowed near the airport to serve as a buffer and transition zone between the airport and residential areas.

The DEIS should provide information on the number of aircraft per day that currently fly into and out of West Maui Airport...

Response: The DEIS will include information on current operations at the Kapalua West Maui Airport.

...Further, based upon the projected population increase for West Maui over the next 20 years, the DEIS should also provide an estimate of the number of people who could use West Maui Airport, and the maximum number of flights per day (between 1/1 hour after sunrise to 6:30 P.M.) that would be allowed to satisfy that demand.

Response: The DEIS will include projection of the Kapalua West Maui Airport usage as to the future and maximum allowable flights per day.

The DEIS should provide information on the age range and the number of school age children anticipated to result from the Pulelehua development and Pulelehua's impact on enrollment for each of the schools within the Lahainaluna complex.

Response: The DEIS will provide an estimate of school aged children and of that number, how many are likely to attend either public or private schools. It will also contain information regarding current DOE school capacity West Maui public schools.

The DEIS should provide information regarding why Honokohua Well A, Napili Well A, and Napili Well C systems are not used. These and the wells that are in use are located in areas previously used for

agriculture. There is the possibility that pesticides and/or fertilizers used could have seeped to the water source. The DEIS should provide information on the type of levels of contamination that may be found in the wells.

Response: Honokohua Well A, Napili Well A, and Napili Well C will not be used as a source of water for Pulelehua. The potable water source for Pulelehua will be from new wells most likely drilled in the Honokohua aquifer. The DEIS will provide information regarding aquifer capacity and usage. Common area irrigation and irrigation for the school will be provided by a mixture of R-1 water and ditch water.

The DEIS should provide information regarding the amount of water that will be required for each segment (neighborhood) of the proposed Pulelehua community.

Response: The DEIS will include information regarding the amount of water that will be required for the proposed Pulelehua community.

The DEIS should provide an estimate of the wastewater to be generated from each of the neighborhoods in the proposed Pulelehua community.

Response: The DEIS will include estimates of the amount of wastewater that might be generated from the Pulelehua community.

The DEIS should discuss the status of the reserve (1.58 mgd) and the capacity of the WWRP to process wastewater from the Pulelehua community at build-out.

Response: The DEIS will provide information regarding processing wastewater. According to the Wastewater Reclamation Division, County of Maui, the Lahaina WWRP has a design capacity of 9 million gallons per day (mgd). Currently, it is processing approximately 4 mgd of sewerage. Maui Land & Pineapple Company, Inc. will work with the Wastewater Reclamation Division to determine the current available capacity of the Wastewater Reclamation Plant.

Maui Land and Pineapple has initiated a baseline marine environmental assessment to determine the impacts of existing land uses on the marine environment waters near the project before construction. The DEIS should provide information on whether future studies will be undertaken as the project develops towards build-out.

Response: The Near Shore Water Quality Study will be summarized and appended to the DEIS. This study indicates the water quality should improve when the Pulelehua is complete based on reduced amounts of erosion from runoff. As such, further studies may not be necessary.

...The DEIS should verify if only the single-family residences will be serviced by the County Department of Public Works, or whether the collection services will apply also to the multi-family residential units and the commercial areas within Pulelehua...

Response: The County Department of Public Works will service the solid waste refuse collection for the single family residences. A solid waste collection agency will service the multi-family residential units and commercial areas.

...The DEIS should separately identify the daily and annual tonnage of solid waste anticipated from the residential and commercial areas within each of Pulelehua's neighborhoods.

Ms. Mary Lou Kobayashi, Administrator
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
March 10, 2005
Page 6

Response: The County of Maui's Solid Waste Division estimates that households on Maui generate approximately nine pounds of solid waste per day. Using this estimate, after build-out and sales of all homes, total waste from all households in the Pulelehua community would be approximately 7,965 pounds per day (PPD).

The DEIS should also identify plans for the disposal of solid waste generated from the construction of the Pulelehua community and green waste resulting from yard and park maintenance.

Response: The DEIS will provide information regarding construction and green waste recycling.

Maui has several recycling programs. The DEIS should identify those programs and provide discussion on whether the Pulelehua community will either implement recycling programs of its own or participate in the County programs.

Response: Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community (and managed by the community association). After the community is occupied by residents, to the extent practical, wastes such as aluminum, paper, newspaper, glass, and plastic containers will be recycled.

Thank you for reviewing the EISPN. Your comments will be included in the draft environmental impact statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Chung, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Mike Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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LINDA LINGLE
GOVERNOR



STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

STATE OF HAWAII

DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:
04; PEO/163

August 23, 2004

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

Dear Mr. Schnell:

Re: Environmental Impact Statement Preparation Notice (EISPN) for Pulelehua

We have reviewed the subject EISPN and find the proposed Pulelehua master planned community is consistent with the homeownership and rental housing objectives of the State Housing Functional Plan.

Thank for the opportunity to comment.

Sincerely,



Stephanie Aveiro
Executive Director

c: Mr. Bob McNatt, Maui Land & Pineapple Company
Office of Environmental Quality Control
State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
HONOLULU, HAWAII 96809

POST OFFICE BOX 621
HONOLULU, HAWAII 96809
July 23, 2004

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
DAN DAVIDSON
DEPUTY DIRECTOR - LAND
YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING REGISTRATION
BUREAU OF CONVEYANCES
COMMUNITY DEVELOPMENT AND PLANNING
CONSERVATION AND RESOURCES ENFORCEMENT
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
MARINE BIOMASS RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
Suspend Date 8/9/04

MEMORANDUM:

TO: *XXX Division of Forestry & Wildlife
XXX Engineering Division
*XXX Division of State Parks
XXX Commission on Water Resource Management
XXX Office of Conservation and Coastal Lands
XXX Land-Maui District Land Office
*XXX Land-Planning and Development

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Applicant: Maui Land & Pineapple Company
Project: Pulelehua
TMKS: (2) 4-3-001: 031 (portion)
Consultant: PBR Hawaii

Please review the document (CD-PDF File) pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

*Note: One copy of the document (CD) is available for your review in the Land Division Office, Room 220.

Should you have any questions, please contact Nicholas A. Vaccaro at 587-0394. If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments. (✓) Comments attached.
Division: CWRM Signed: *Edwin T. Sakoda*
Date: 8/3/04 Print Name: Edwin T. Sakoda

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
HONOLULU, HAWAII 96895

August 2, 2004

TO: Ms. Dede Mamiya, Administrator
Land Division

FROM: *for* Yvonne Y. Izu, Deputy Director
Commission on Water Resource Management (CWRM)

SUBJECT: EISPN Pulelehua, Lahaina, Maui TMK: 4-3-001:031
FILE NO.: PULELEHUAPBR-EISPN.CMT

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below. In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas, which are important for the maintenance of streams and the replenishment of aquifers.

- We recommend coordination with the county government to incorporate this project into the county's Water Use and Development Plan.
- We recommend coordination with the Land Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- We are concerned about 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.
- A Well Construction Permit and/or a Pump Installation Permit from the Commission would be required before ground water is developed as a source of supply for the project.
- The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the Commission would be required prior to use of this source.
- Groundwater withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- We are concerned about the potential for degradation of instream uses from development on highly erodible slopes adjacent to streams within or near the project. We recommend that approvals for this project be conditioned upon a review by the corresponding county's Building Department and the developer's acceptance of any resulting requirements related to erosion control.
- If the proposed project includes construction of a stream diversion, the project may require a stream diversion works permit and amend the instream flow standard for the affected stream(s).
- If the proposed project alters the bed and banks of a stream channel, the project may require a stream channel alteration permit.
- OTHER: Attached additional comments.

If there are any questions, please contact David Higa 587-0249.

LINDA LINGLE
GOVERNOR OF HAWAII



PETER T. YOUNG
Commissioner
MEREDITH J. CHING
Assistant Commissioner
CLAYTON A. HARRIS
JAMES A. FRAZER
CHYOMIE L. FUKINO, M.D.
LAWRENCE H. MIKE, M.D., J.D.
STEPHANIE A. WHALEN
YVONNE Y. ZU
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

Pulelehua Environmental Impact Statement Preparation Notice

The Draft and Final EIS for this project should provide a detailed breakdown for both the potable and non-potable water demand for type of water use in the project. We offer the following comments for your consideration.

Potable Water:

If the water from the Mahinahina Water Treatment Plant will be expanded as a result of this proposed development, or if other stream water will be used, the petitioner should disclose whether constitutional water rights will be affected. Constitutional water rights include appurtenant water rights awarded to kuleana lands.

If water from wells listed on page 39 (Napili Wells A, B, C; Honokohua Well A) will be used, the petitioner should disclose the cost of water pumping, distribution and treatment of the well water. It is our understanding that some or all of these wells are contaminated with 1,2-Dibromo, 3-Chloropropane. Possible alternate uses including alternate development proposals for the well water listed on page 39 should also be disclosed.

Wastewater:

The following disclosures should be considered:

Whether an on site wastewater treatment plant was considered, and what the capital and operating cost of such treatment plant together with operational cost would be.

Whether xeriscaping is considered in the landscaping plan and how effective xeriscaping would be in reducing water demand.

Whether the water demand includes R1 wastewater reuse as an alternative method of reducing water demand.

Water Use and Development Plan:

Disclose whether the proposed water use for this project is addressed in the Maui Water Use and Development Plan. If it is not addressed in the Water Use and Development Plan, what steps are necessary to address this proposed water use with respect to future availability of water and competing uses for water in West Maui.

###

LINDA LINGLE
GOVERNOR OF HAWAII



2004 AUG 11 A 10:51

JUL 23 2004

PETER T. YOUNG
Commissioner
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
DAN DAVIDSON
DEPUTY DIRECTOR - LAND
YVONNE Y. ZU
DEPUTY DIRECTOR - WATER
ADULTIC RESOURCES
BOATING AND OCEAN RECREATION
COMMISSION ON WATER RESOURCE MANAGEMENT
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND COASTAL LANDS
ENGINEERING
FORESTRY AND WILDLIFE
HAWAIIAN CULTURE
MAHOLAWE ISLAND RESERVE COMMISSION
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

July 23, 2004

LD/NAV
Suspense Date 8/9/04

PULELEHUAPBR-EISEN.CMT

MEMORANDUM:

TO: *XXX Division of Forestry & Wildlife
*XXX Engineering Division
*XXX Division of State Parks
*XXX Commission on Water Resource Management
*XXX Office of Conservation and Coastal Lands
*XXX Land-Maui District Land Office
*XXX Land-Planning and Development

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Applicant: Maui Land & Pineapple Company
Project: Pulelehua
TMKS: (2) 4-3-001: 031 (portion)
Consultant: PBR Hawaii

Please review the document (CD-PDF File) pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

*Note: One copy of the document (CD) is available for your review in the Land Division Office, Room 220.

Should you have any questions, please contact Nicholas A. Vaccaro at 587-0384. If this office does not receive your comments by the suspense date, we will assume there are no comments.

We have no comments. Comments attached.

Division: State Parks Signed:

Date: AUG. - 9 2004 Print Name: Daniel S. Quinn

TO: ADMINISTRATOR
ASST ADMIN
PLANN BR LT
REG MGT BR
CLERICAL
ADMMN ASST
INTER BR
FOR: CRK/POST STAFF RM
COMMENTS & REC
DRAFT REPLY
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INFO
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LINDA LINGLE
GOVERNOR OF HAWAII



PETER T. YOUNG
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2004 JUL 29 P 3:44
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

July 23, 2004

LD/NAV
Suspense Date 8/9/04

PULELEHUAPBR-EISPN.CMT

MEMORANDUM:

TO: *XXX Division of Forestry & Wildlife
*XXX Engineering Division
*XXX Division of State Parks
*XXX Commission on Water Resource Management
*XXX Office of Conservation and Coastal Lands
*XXX Land-Maui District Land Office
*XXX Land-Planning and Development

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Applicant: Maui Land & Pineapple Company
Project: Pulelehua
TMKS: (2) 4-3-001: 031 (portion)
Consultant: PBR Hawaii

Please review the document (CD-PDF File) pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

*Note: One copy of the document (CD) is available for your review in the Land Division Office, Room 220.

Should you have any questions, please contact Nicholas A. Vaccaro at 587-0384. If this office does not receive your comments by the suspense date, we will assume there are no comments.

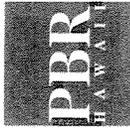
We have no comments. () Comments attached.

Signed: *[Signature]*

Division: PAUL J. CORY, ADMINISTRATOR

Date: JUL 28 2004

Print Name: DIVISION OF FORESTRY AND WILDLIFE



LAND PLANNING
LANDSCAPE ARCHITECTURE
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KEVIN NISHIKAWA, ASLA
ASSOCIATE

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Waialae Office
2125 Kalia Street
Waialae, Hawaii 96721-2034
Tel: (808) 242-2805
E-Mail: pbrwaialae@hawaii.net

March 10, 2005

Ms. Dierdre S. Mamiya, Administrator
State of Hawai'i
Department of Land and Natural Resources
Land Division
P.O. Box 621
Honolulu, Hawai'i 96809

SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Ms. Mamiya:

Thank you for your letter (PULELEHUAPBR-EISPN.RCM(MLD-NAV) dated August 17, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

We acknowledge that the EISPN was reviewed by the following DLNR Divisions:

- Division of Forestry and Wildlife (no comments);
- Engineering Division (no comments);
- Division of State Parks (no comments);
- Commission on Water Resource Management (see response to comments below);
- Office of Conservation and Coastal Lands (no comments);
- Land-Maui District Land Office (no comments); and
- Land-Planning and Development (no comments).

We offer the following responses to comments provided by the Commission on Water Resource Management:

1. Maui Land & Pineapple Company, Inc. will coordinate with the County to incorporate this project into the Water Use and Development Plan.
2. Three drainage ways traverse or bound the Pulelehua community site. Kahanaiki Gulch traverses the northern boundary and joins Kahana Stream before crossing Honoapi'iani Highway. Pohakuka'anapali Gulch traverses the central portion of the site and is very shallow. The Kapalia West Maui Airport intercepts drainage from the upper limits of this gulch so that it is primarily dry. Mahinahina Gulch traverses the site from the southern boundary. No stream diversions will be constructed, and as such, a stream diversion works permit is not required and the in-stream flow standard for each of the streams will not be amended. The

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND
WYNNE Y. BUI
DEPUTY DIRECTOR - WATER

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HISTORIC PRESERVATION
KŌHOLOLE ISLAND RESERVE COMMISSION
STATE PARKS



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING, ROOM 555
801 KAMOKILA BOULEVARD
KAPOLEI, HAWAII 96707

LINDA LINGLE
GOVERNOR OF HAWAII



Ms. Diedre S. Mamiya, Administrator
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 2

proposed project will not alter the bed and banks of a stream channel, and as such, a stream channel alteration permit is not required.

- The Draft EIS and Final EIS will provide a breakdown of both the potable and non-potable water demand for Pulelehua.
- Pulelehua will not use water from the Mahinahina Water Treatment Plant; however, R-1 water and surface water will be mixed and used for fire protection needs and irrigation of common landscaped areas. Relative to the existing use of surface and R-1 water for irrigation of the pineapple fields, it is not expected that additional surface water will be necessary. As water demands are refined to more precise amounts, the issue of constitutional water rights will be monitored.
- Maui Land & Pineapple Company, Inc. is not planning to use water from Napili Wells A, B, or C, or Honokohua Well A for Pulelehua.
- No wastewater treatment plant will be constructed on-site. Maui Land & Pineapple Company, Inc. is working with the County of Maui to connect Pulelehua to the Lahaina Wastewater Treatment Plant.

A landscaping plan for Pulelehua will be developed and will consider the effectiveness of xenscaping. To reduce the total potable water demand, mixed R1 and surface water will be used for fire protection needs and irrigation of common landscaped areas.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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September 1, 2004

Tom Schnell
PBR Hawaii
2123 Kaahu Street
Wailuku, Hawaii 96793-4262

Dear Mr. Schnell,

SUBJECT: Chapter 6E-42 Historic Preservation Review – Environmental Impact Statement Preparation Notice for the Proposed Pulelehua New Traditional Community

Mahinahina 1, 2, & 3, Mahinahina 4, and Kahana Ahupua`a, Lahaina District, Island of Maui
TMK: (2) 4-3-001:031

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for the proposed Pulelehua New Traditional Community, which was received by our staff July 30, 2004. Based on the submitted document, we understand the proposed undertaking consists of the development of a community comprised of 895 homes, commercial buildings, a school, churches, trails, community gardens, and open space.

Archaeological Services Hawaii has recently completed an archaeological inventory survey of the proposed project area. We have received the report documenting the findings of the survey (*Archaeological Inventory Survey Report for the Pulelehua Community Project TMK: 4-3-01:31 por. Mahinahina 1, 2, 3, Mahinahina 4, and Kahana Ahupua`a, Lahaina District, Island of Maui... Pantaleo and Titchener 2004*). We have reviewed this report and requested revisions (SHPD DOC NO.: 0408MK11/LOG NO.: 2004.2545). To date we have not received the requested revisions. Thus, we are unable to provide comments at this time.

If you have any questions, please call Cathleen A. Dagher at 692-8023.

Aloha,

wp. Holly McElDowney

P. Holly McElDowney, Administrator
State Historic Preservation Division

CD:jen

c: Michael Foley, Director, Dept of Planning, 250 S. High Street, Wailuku, HI 96793
Maui Cultural Resources Commission, Dept of Ping, 250 S. High St, Wailuku, HI 96793



LAND PLANNING
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Senior Associate

TOM SCHNELL, AICP
Associate

RAYMOND T. HIGA, ASLA
Associate

KEVIN NISHIKAWA, ASLA
Associate

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Fax: (808) 961-4999
E-Mail: pbrhilo@pbrhawaii.com

WAILUKI OFFICE
2122 Kaimi Street
Wailuku, Hawaii 96793-2304
Tel: (808) 242-2007
E-Mail: pbrwailu@pbrhawaii.com

March 10, 2005

Ms. Melanie A. Chinen, Administrator
State of Hawai'i
Department of Land and Natural Resources
Historic Preservation Division
Kakuhihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, Hawai'i 96707

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Chinen:

Thank you for your letter from the Historic Preservation Division (LOG NO: 2004.2634 and DOC NO: 0408CD52) dated September 1, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

Since we received the Historic Preservation Division's comments on the EISPN, we have submitted revisions to the Pulelehua archaeological inventory survey report to your office and have received your letter (LOG NO: 2005.0411 DOC NO. 0502MK22), stating that you have found the report to be acceptable.

Thank you for reviewing the EISPN. Your letter will be included in the draft environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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LINDA LINGLE
GOVERNOR OF HAWAII

**STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL**

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 696-4185
FACSIMILE (808) 696-4185
E-MAIL: eqc@hawaii.gov

GENEVEVE SALMONSON
DIRECTOR

July 26, 2004

Anthony Ching
Land Use Commission
235 South Beretania St., 4th floor
Honolulu HI 96813

Dear Mr. Ching:

**Subject: Environmental impact statement (EIS) preparation notice
Pulelehua Development, West Maui**

We have the following comments to offer:

Water availability: Maui has had a long-standing water shortage. Will enough water be available to accommodate this development? In the draft EIS document your consultations with the Maui Department of Water Supply and the state Commission on Water Resource Management.

Visual impacts: In the draft EIS include drawings or diagrams of the site, the proposed buildings and any proposed landscaping that show the final appearance of the project. Identify public viewpoints of the project site from which visual impacts may occur, especially of mauka and makai viewplanes. Show these impacts by superimposing a rendering of the proposed development onto photographs taken from public vantage points.

Kapalua West Maui Airport:

- a. How will the development impact access to and from the airport? Only one airport road is mentioned in the EISPN. Will another airport access road be built?
- b. On one of the figures in the draft EIS show the boundaries of the airport clear zone. If this is not an issue, explain why.

Contacts: Copies of correspondence received during the pre-consultation phase were not included in the EIS preparation notice. Be sure to include them in the draft EIS.

Funding: In the draft EIS indicate what percentages of the funding are from county, state and federal sources.

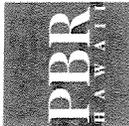
Anthony Ching
July 26, 2004
Page 2

If you have any questions please contact Nancy Heinrich at 586-4185.

Sincerely,

Genevieve Salmon
GENEVIEVE SALMONSON
Director

c: Bob McNatt, Maui Land & Pineapple
Tom Schnell, PBR



LAND PLANNING
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SENIOR ASSOCIATE

TOM SCHNELL, AICP
ASSOCIATE

RAYMOND T. HIGA, ASLA
ASSOCIATE

KEVIN NISHIKAWA, ASLA
ASSOCIATE

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2123 KAHU STREET
WAILUKU, HAWAII 96793-2294
TEL: (808) 242-8778
FAX: (808) 242-2002
E-MAIL: pbrmail@hawaii.com

March 10, 2005

Ms. Genevieve Salmonson, Director
State of Hawaii
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Salmonson:

Thank you for your letter to the Land Use Commission dated July 26, 2004 regarding the Pulelehua Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

Water Availability: Water wells will be drilled in the vicinity of the Pulelehua site to provide a new source of water for Pulelehua. It is envisioned that wells will draw water from the Honokowai Aquifer. As the current pumpage from the Honokowai Aquifer of 3.171 MGD is well below the aquifer's sustainable yield of eight MGD, the wells are not expected to impact the sustainable yield of the Honokowai Aquifer. If the new wells draw water from the Honolua Aquifer, the sustainable yield of the Honolua Aquifer is not expected to be impacted as the current pumpage from the Honolua Aquifer of 2.73 MGD is also well below the Honolua Aquifer's sustainable yield of eight MGD.

The Commission on Water Resource Management has not designated the Honolua Aquifer or the Honokowai Aquifer as groundwater management areas.

The Draft EIS will contain more detailed information regarding water demands required for Pulelehua.

In addition, the Maui Land & Pineapple Company, Inc. (ML&P) is planning to use reclaimed and surface water for fire protection and irrigation of common areas. Currently, reclaimed (R-1) water is being pumped from the Lahaina Wastewater Treatment Plant to a ML&P reservoir at an elevation of approximately 300 feet. ML&P then mixes the reclaimed water with surface water, which is used for irrigation.

The Draft EIS will include information from State Commission on Water Resource Management. To date, the Maui Department of Water Supply has provided no comments.

Visual Impacts: The Draft EIS will include the Pulelehua Design Book as an appendix, which contains additional Pulelehua planning, design, and building details, including

Ms. Genevieve Salmonson, Director
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 2

renderings and conceptual floor plans. The Draft EIS will also contain photographs of the property and discuss visual impacts.

Kapalua West Maui Airport: While the existing access road to the airport (Akahahele Street) will be maintained, Pulelehua includes four additional access points to Honoapi'iiani Highway, providing at least five routes to/from the airport. If a connection is allowed through Kahana Ridge, residents from this subdivision would no longer have to get back on Honoapi'iiani Highway just to access Akahahele Street, but will be able take a more direct route to the airport.

The Draft EIS will contain a figure showing the boundaries of the Kapalua West Maui Airport and all FAA and State DOT airport safety areas. These clear zones include the Runway Obstacle Free Area, Runway Protection Zone and the Runway Safety Area.

Contacts: Copies of correspondence received during the pre-consultation phase will be included in the Draft EIS.

Funding: At this preliminary stage, ML&P does not have information regarding funding from federal, state, and county sources. Possible elements within Pulelehua that may require federal, state, or county funding include the proposed school and a possible medical center.

Thank you for reviewing the EISPN. Your comments will be included in the draft environmental impact statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Mike Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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LINDA LINGLE
GOVERNOR OF HAWAII

CHYOMEL L. FUMINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
EIS/JCW8

08087PKP-04

August 24, 2004

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

Dear Mr. Schnell:

**Subject: Pulelehua
Environmental Impact Statement Preparation Notice**

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject application and offers the following comments:

1. The Army Corps of Engineers should be contacted at (808) 438-9258 to identify whether a Federal license or permit (including a Department of Army permit) is required for this project. Pursuant to Section 401(a)(1) of the Federal Water Pollution Control Act (commonly known as the "Clean Water Act"), a Section 401 Water Quality Certification is required for "if/any applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters...."
2. A National Pollutant Discharge Elimination System (NPDES) general permit coverage is required for the following activities:
 - a. Storm water associated with industrial activities, as defined in Title 40, Code of Federal Regulations, Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi).
 - b. Construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre 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 commencement of the construction activities.**
 - c. Discharges of treated effluent from leaking underground storage tank remedial activities.
 - d. Discharges of once through cooling water less than one (1) million gallons per day.
 - e. Discharges of hydrotesting water.
 - f. Discharges of construction dewatering effluent.
 - g. Discharges of treated effluent from petroleum bulk stations and terminals.
 - h. Discharges of treated effluent from well drilling activities.

Mr. Tom Schnell, AICP
August 24, 2004
Page 2

- i. Discharges of treated effluent from recycled water distribution systems.
- j. Discharges of storm water from a small municipal separate storm sewer system.
- k. Discharges of circulation water from decorative ponds or tanks.

The CWB requires that a Notice of Intent (NOI) to be covered by an NPDES general permit for any of the above activities be submitted at least 30 days before the commencement of the respective 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/index.html>

3. The applicant may be required to apply for an individual NPDES permit if there is any type of activity in which wastewater is discharged from the project into State waters and/or coverage of the discharge(s) under the NPDES general permit(s) is not permissible (i.e. NPDES general permits do not cover discharges into Class 1 or Class AA State waters). An application for the NPDES permit is to be submitted at least 180 days before the commencement of the respective activities. The NPDES application forms may also be picked up at our office or downloaded from our website at:
<http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>
4. Hawaii Administrative Rules (HAR), Section 11-55-38, also requires the applicant to either submit a copy of the new 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 DOH that the project, activity, or site covered by the NOI or application has been or is being reviewed by SHPD.

5. The DOH is in the process of readopting HAR, Chapters 11-54 and 11-55 to regulate the application of pesticides to surface waters of the State. This may include overspray of pesticide applied adjacent to surface waters. Therefore, the applicant may be required to apply for NPDES permit coverage should the revised regulations be in effect during the length of the project.

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

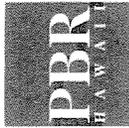
Sincerely,



DENIS R. LAU, P.E., CHIEF
Clean Water Branch

KP:bt

- c: Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.
Mr. Anthony Ching, State Land Use Commission
Office of Environmental Quality Control



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SENIOR ASSOCIATE

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ASSOCIATE

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ASSOCIATE

KEVIN NAKAGAWA, ASLA
ASSOCIATE

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E-Mail: pernell@pluhawaii.com

March 10, 2005

Mr. Denis R. Lau, P.E., Chief
State of Hawai'i
Department of Health
Clean Water Branch
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Lau:

Thank you for your letter (08087PKP.04) dated August 24, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

1. The Army Corps of Engineers will be contacted to determine whether a Federal license or permit (including a Department of Army permit) is required for this project. There are no navigable waters within the approximately 312-acre site. As such, a Section 401 Water Quality Certification will not be required.
2. A NPDES general permit is required and will be obtained prior to the commencement of construction activities. A NOI will be submitted to the CWB at least 30 days prior to the commencement of construction activities.
3. No wastewater will be discharged from the project into State waters (the project will connect to the Lahaina Wastewater Treatment Plant).
4. Archaeological Services Hawai'i conducted an archaeological inventory survey of the Pulelehua community site between May and June 2004 to document archaeological sites and recommend mitigation measures. The survey did not reveal any significant cultural manifestations with the exception of a plantation-era irrigation flume and isolated surface artifacts. The archaeological report was submitted to the SHPD for its review and will be included in the Draft EIS. In compliance with Section 11-55-38, HAR, a copy of the new NOI or NPDES permit application will be submitted to the SHPD.
5. We understand that the DOH is in the process of readopting Chapters 11-54 and 11-55, HAR to regulate the application of pesticides to surface waters of the State; however, no pesticides will be applied to State surface waters from the Pulelehua community.



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

Mr. Denis R. Lau, P.E., Chief
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 2

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

September 7, 2004

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

HRD04/1498

**RE: Request for review and comment on the Environmental Impact Statement
Preparation Notice for Pulelehua, Mahinahina, Lahaina, Maui, TMK: 4-3-001:031**

Dear Tom Schnell,

The Office of Hawaiian Affairs (OHA) is in receipt of your July 23, 2004, request for comments on the above project, which would include the development of an affordable housing community in West Maui of 895 homes, and related retail space, commercial areas, civic spaces, a public school, open space and recreational areas. OHA apologizes for the delayed response and offers the following comments.

The design of this project is commendable, creating a relatively affordable community of neighborhoods with an infrastructure to support it instead of simply adding more homes and resource users to an already overburdened landscape. OHA looks forward to the further analysis of mitigating impacts on existing infrastructure in the forthcoming Draft Environmental Impact Statement. The current infrastructure inadequacies and drought situation on Maui mean that descriptions of the impacts of yet another subdivision must include the estimated impacts on existing infrastructure and water resources, and any necessary mitigations. This is a classic example of the importance of examining the cumulative impact of all related and surrounding impacts on the resource in that resource's present condition. It is not clear that such a cumulative study has been done.

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

OHA has concerns about the planned request to the State Land Use Commission for a boundary amendment to change the site from Agricultural to Urban, particularly as this land has already been determined to be "Prime Agricultural Land." It is in the State and County's best interests to keep agricultural lands in agriculture whenever possible. Because the proposed development also would require amendments to the *West Maui Community Plan*, and County of Maui Zonings, OHA questions the placement of this project.

Also, OHA notes that much of the Maui Land and Pine's land in the proposal area is ceded land, and whether the land for the proposed project is ceded should be addressed in any further, future proposals.

The use of open space, trails and gardens as a buffer between the Kapalua West Maui Airport runway and the proposed Pulelehua homes shows the intentions of good planning, and OHA requests that all landscaping include native plantings as often as possible. This will not only save on irrigation costs, but also promote a reestablishment of native habitat and slow the influx of aggressive alien ornamentals.

Because Maui's infrastructure has been found to already be overburdening its water supply, OHA also recommends that the project implement water conservation measures wherever possible. These could include, but not be limited to, the use of brackish and/or reclaimed water for irrigation and non-potable water uses; native plantings; low-flow fixtures and devices; a maintenance plan for fixtures to prevent leaks; limited irrigated turf; and other creative water conservation methods.

Despite the extensive history of ground disturbance for pineapple cultivation in the area, OHA will rely on your assurances that you will include in the Draft EIS language to the effect that should iwi or Native Hawaiian cultural or traditional deposits be found during ground disturbance or excavation, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Finally, we request that you contact Thelma Shimaoka, OHA's Maui Community Resource Coordinator, for further consultation and suggestions if you have not already. Her contact information can be found at the end of this letter.

OHA looks forward to receiving the Draft EIS for this project. Thank you for the opportunity to comment on the EIS Preparation Notice. If you have further questions or concerns, please contact Heidi Guth at 594-1962 or e-mail her at heidig@oha.org.

Sincerely,



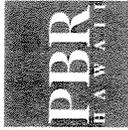
Clyde W. Nāmu'o
Administrator

CC: Bob McNatt
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, HI 96761

Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Office of Environmental Quality Control
235 South Beretania St., Suite 702
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Thelma Shimaoka
Community Affairs Coordinator
OHA – Maui Office
140 Hoohana Street, Suite 206
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March 10, 2005

Mr. Clyde W. Namuo, Administrator
Office of Hawaiian Affairs
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 'i 96813

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Namuo:

Thank you for your letter (HRD04/1498) dated September 7, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we have reviewed your letter and are offering the following responses to your comments.

1. We appreciate your positive comments on the design of the project. By providing a more compact community than the standard residential subdivision, the Pulelehua project will minimize the impacts on existing infrastructure (for example, reducing the area that must be serviced, reducing the area that could increase storm runoff, and minimizing the area on each lot which must be irrigated). Furthermore, the intended market for these homes is residents who are already employed in West Maui. Thus, for those that already reside in West Maui, the regional impact should be minimal (mostly affecting local traffic patterns); for those that reside outside of West Maui and must commute to/from work/home, there is expected to be less traffic along Honoapi'iiani Highway (between Lahauna and Ma'alaea) and more quality time at home.

2. We appreciate OHA's concerns about the need to ensure that there is adequate agricultural land in the State and in particular, Maui. However, there is a demand for Maui residents to reside in this region where employment is available. The project area requested is just a small portion of the actively cultivated and fallow agricultural land inventory on Maui and in the State, and will not impact Maui Land and Pineapple's short or long term plans to continue pineapple and other agricultural activities over large land holdings.

3. It is our understanding that ceded lands are specifically lands granted by the State of Hawaii 'i in 1959 by the US, pursuant to Section 5(b) of the Admissions Act of March 18, 1959. These lands were originally Government Lands or Crown Lands ceded or transferred by the Government of the Hawaiian Islands to the US under the 1898 Joint Resolution of Annexation. Section 5(f) of the Admissions Act provides that these lands, together with proceeds from the sale or disposition of these lands is to be held in trust for five purposes, among them the betterment of the conditions of Native Hawaiians. See OHA v. State, 96 Haw. 388 (2001). It is also our understanding that the subject property has been in Maui Land & Pineapple Company, Inc.'s possession before 1959, which would make it highly unlikely the project site that would be part of the ceded lands trust. We wonder if there is any chance that the project site is being mistaken for the adjoining property to the south (and mauka of Honoapi'iiani Highway), which is owned by the State of Hawaii 'i, being cultivated by Maui Land & Pineapple Company, Inc. and is being contemplated for residential development by the Department of Hawaiian Home Lands.

Mr. Clyde W. Namuo, Administrator
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
March 10, 2005
Page 2

4. We also appreciate your positive comments on the planned provision of open space, trails and gardens between the airport and the proposed residences. Your request that all landscaping include native plantings as often as possible is consistent with what is being contemplated for the design guidelines for the project.

5. Please be assured that many of your suggested water conservation measures are already being considered, along with reuse of treated effluent and collecting and reusing storm runoff. The applicant is planning to utilize reclaimed water for fire protection systems and of irrigation common landscaped areas, including the school playfields.

Please note that it is Maui Land & Pineapple Company, Inc.'s policy to further use sustainable practices throughout the company and its landholdings. To that end, it has hired William McDonough & Partners an intentionally recognized consultant in sustainability to provide suggestions to the project site plan to incorporate strategies to maximize solar water heating, electricity from photovoltaics, increase natural ventilation for tradewinds, as well as capturing surface runoff for reuse.

6. As suggested, the Draft EIS will include language to the effect that "should iwi or Native Hawaiian cultural or traditional deposits be found during ground disturbance or excavation, work shall cease, and the appropriate agencies shall be contacted pursuant to applicable law."

7. As requested, we will contact Thelma Shimaoka, OHA's Maui Community Resource Coordinator.

8. Please be assured that OHA will be sent a copy of the Draft EIS.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.
Ms. Thelma Shimaoka

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

August 26, 2004

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

Mr. Bob McNatt
Vice President-Land Planning & Development
Mau Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. Tom Schnell and Mr. Bob McNatt:

Subject: Pulelehua
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (2) 4-3-01: 31 (portion)

Thank you for requesting our review of the subject Environmental Impact Statement Preparation Notice (EISPN). We have the following comments on the proposed project:

The Pulelehua project will have an adverse impact on both our airport (Kapalua Airport) and highway (Honoapiilani Highway) facilities. We feel that this development is incompatible with our current operations, and significant mitigation measures and/or improvements will be required for the project to proceed as proposed.

Based on the preliminary plans presented in the EISPN, we are providing the following concerns and requirements at this time:

A. Highways Issues

1. A total regional circulation network for the project, with the potential future development of a second phase of Pulelehua and any new project mauka of the subject project should be presented in the traffic impact analysis report (TIAR) being prepared by the developer. The study should cover a thorough review of the existing and planned roadways, including lateral connections paralleling Honoapiilani

Deputy Directors
BRUCE Y. MATSUI
LINDEN H. J. DEBTING
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.1335

Mr. Tom Schnell & Mr. Bob McNatt
Page 2
August 26, 2004

STP 8.1335

Highway and traffic generation from other proposed or planned land development projects in the region.

Piecemealing of a development project should be discouraged.

2. The TIAR should address potential improvements such as, but not limited to:

- (a) The various access points along Honoapiilani Highway proposed for the project. (Note: Honoapiilani Highway is a limited access arterial).

- (b) Widening of Honoapiilani Highway.

3. The proposed roundabout on Honoapiilani Highway is not acceptable. We will not compromise the operating conditions on the main thoroughfare through the area.

4. The TIAR should also reflect the cumulative impacts of continuing development in the Mahinahina and Kapalua areas.

5. The TIAR should include provisions for a local internal roadway connector systems that parallel Honoapiilani Highway to mitigate impacts to the State System.

6. The changes to the land area by both the proposed project and any potential mauka development will have an impact on drainage facilities, both natural and manmade, and other infrastructure facilities, which can affect our highways. A drainage master plan should be submitted and any infrastructure impacts should also be identified and submitted for our review and approval.

7. The developer should agree to participate in and contribute to its fair share of regional and local transportation improvements as determined by our department and the county.

B. Airports Issues

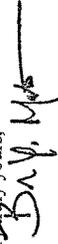
1. Access to Akahahele Street will be limited. As the primary access to Kapalua Airport and to ensure its principal use as dedicated to airport purposes, we may consider access to Akahahele Street to the Pulelehua Project only via a connection acceptable to the DOT. In the event of security alert levels elevated for inspection purposes, major portions of Akahahele Street will be closed and/or used for security screening purposes.

- c. Enlarging the runway obstacle free area (ROFA) width to 800 feet is required. The ROFA is an area on the ground centered on a runway to enhance the safety of aircraft operations by having an area free of objects, except for objects that need to be located in the ROFA for air navigation or aircraft ground maneuvering. When practical, ownership or control of the ROFA should be held by the airport operator (our Airports Division). Because the lands are not owned by the State, reservation, or dedication of, or imposition of aviation easements on the land will be necessary.
- d. The impact of placing the proposed community next to the airport creates airfield/aircraft noise concerns. We will need to examine, evaluate and approve the noise assessment study that is being prepared by the developer for the environmental impact statement before we provide any specific comments. However, in general, we can state at this time that the noise assessment study will have to meet our standards and any FAA criteria. Also, noise mitigation measures, such as the use of appropriate construction design and materials, and aviation easements will be required of the developer if noise contours (above 45 DNL) affecting residential type uses, including schools, are identified. We may also require the developer in its perpetuity to provide a continuous noise monitoring system.
- e. Any design or construction work affecting our existing infrastructure lines, equipment and facilities, such as water, electrical service, drainage, etc., will need to be identified and submitted to us for our review and approval.
- f. All applicable FAA forms and documents must be completed, submitted and approved by both the Airports Division and the FAA before any work is to commence.

We believe the above list of items, while not exhaustive, indicates our many concerns about the proposed community development, especially with its residential areas, being placed next to and around our airport.

We appreciate the opportunity to provide our comments.

Very truly yours,

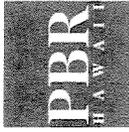


RODNEY K. HARAGA
Director of Transportation

- c: Michael Foley, Maui Department of Planning
Anthony Ching, Land Use Commission
Mary Lou Kobayashi, Office of Planning, DBEDT
Genevieve Salmanson, Office of Environmental Quality Control
Steven Wong, Federal Aviation Administration

for

- 2. The Pulelehua project will be surrounding Kapalua Airport and if the lands mauka of the airport are developed in the future, the airport will be completely encircled by the proposed community. This has significant impacts on the airport that need to be mitigated, such as but not limited to:
 - a. Both ends of the runway will be affected and, in particular, the runway protection zones (RPZ) at both ends extend outside the airport's boundary. The lands under the RPZ would be subject to restrictions, limitations or other controls:
 - (1) When practical, ownership or control of the RPZ should be held by the airport operator (our Airports Division). If the lands are not owned by the State, reservation, or dedication of, or imposition of aviation easements on the land will be necessary.
 - (2) The proposed recreational fields on the south end (Runway 2) are being placed directly in the flight track of aircraft landing or taking off. The developer should provide indemnifications and other protections acceptable to the State for airport and aircraft incidents or accidents related to the placement of the recreation site and its use.
 - (3) The proposed gardens on the north end (Runway 20) of the runways could attract birds and other life that may fly, which raises a potential for or can constitute a wildlife hazard to aircraft operations. Appropriate wildlife controls acceptable to the Airports Division will have to be implemented. Similar indemnifications and other protections acceptable to the State recreational field noted above should also be provided because of the gardening activities and users or visitors.
 - (4) The proposed roadways on both ends of the runways, which are intended to connect the subject project to the lands and any future development mauka of the airport, should be located outside of the RPZ or designed into the land, so as not to be an obstruction, hazard, risk, hindrance or other obstacle to such operational safety zone, acceptable to our Airports Division and the FAA.
 - b. Extending the present runway safety area (RSA) an additional 300 feet beyond both runway ends is required. No public roadways or any other developed facilities, including gardens are authorized in RSA's. The developer would be responsible to participate as part of direct mitigation to pay for the grading and other site work requirements which is estimated at \$1,000,000.



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October 6, 2004

Mr. Rodney K. Haraga, Director of Transportation
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Haraga:

We received your letter (STP 8.1335) dated August 26, 2004 concerning the Pulelehua Environmental Impact Statement Preparation Notice (EISPN). As the planning consultant for the applicant, Maui Land & Pineapple Company, Inc. (ML&P) we are responding to your letter.

In planning Pulelehua, ML&P partnered with the community, government officials, and an impressive team of local and mainland planners, engineers, and other experts to conceive the best ideas for balancing the demand for growth with the desire to preserve Maui's special character and fragile environment. It should be clear now that simply doing the same thing over and over will result in more of the same. Pulelehua will show what is possible when the best ideas of planning, community, and sustainability are put together to create a new model to respond to the need for affordable housing, containing growth, and meeting the needs of Maui's growing population.

ML&P selected Pulelehua's West Maui location to address the need for affordable housing near the major employment centers of Kaanapali and Kapalua and enable people to live closer to work and reduce commuting time and traffic. This will reduce the commuting traffic on Honoapiilani Highway and help prevent increasing bottlenecks in Lahaina. It will improve quality of life by reducing commuting time and increasing family time.

Pulelehua will provide convenient access to goods and services, thereby reducing traffic to and from the community. The community's physical layout will encourage residents to walk or bike to stores, school, and recreation, which will reduce traffic within Pulelehua and on Honoapiilani Highway. The neighborhood elementary school will reduce Lahaina traffic during peak hours and help address the need for educational facilities in West Maui. Concentrating development in a defined space and creating a compact community reduces dependency on cars and ensures preservation of surrounding agricultural and open space lands.

Mr. Rodney K. Haraga, Director of Transportation
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
October 6, 2004
Page 2

As you know from the letter addressed you from ML&P Chairman, President, and CEO, David Cole, dated September 8, 2004, ML&P invited DOT to participate in the planning of Pulelehua and ML&P and their planning consultants met with your staff on three occasions to gain input regarding Pulelehua from the Department of Transportation. At this point we again seek your collaboration to further refine the Pulelehua plan and provide the following responses to your concerns.

Highway Issues

1) The traffic impact analysis report (TIAR) for Pulelehua, currently being prepared by our traffic consultants, will take into account the regional impacts of traffic generated by Pulelehua and other proposed projects. We have prepared a detailed list of proposed projects in West Maui and will project cumulative traffic impacts of future projects in conjunction with Pulelehua.

As currently proposed, Pulelehua will be built all in one phase. As presented in the EISPN, the Pulelehua site is between Honoapiilani and the Kapalua West Maui Airport, an area of approximately 312 acres. At our planning charrette in March 2004, our site planners, Dover Kohl & Partners, along with community members present, explored some scenarios for an extension of Pulelehua mauka of the airport. These were only conceptual ideas that have not been further explored.

2) The TIAR will address potential improvements to Honoapiilani Highway. We acknowledge that Honoapiilani Highway is supposed to be a limited access highway, however, as the only through road in Lahaina, it cannot function with limited access and still serve community transportation needs. We are requesting four additional access points for Pulelehua. Providing multiple accesses is a component of smart growth. Multiple access points will increase circulation within Pulelehua and are preferable to channeling all trips to and from the community to a single access point at Akahahele Street. Multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, therefore lessening the traffic on arterial streets. A single access would result in long cueing times at the intersection of Akahahele and Honoapiilani and would cause long back ups of traffic on both streets. Multiple access points will distribute traffic more evenly, resulting in smoother flowing traffic conditions.

3) We believe the proposed roundabout at the intersection of Honoapiilani Highway and Akahahele Street will improve operating conditions on the highway as roundabouts provide for a continuous flow of traffic, slow traffic down, and provide much greater safety. They also provide a great place for visitors and residents to do u-turns with safety. Our TIAR will contain projections for traffic conditions at this intersection with a roundabout

and with a traffic signal. ML&P is willing to build the roundabout at no cost to the State. Depending on permit processing required under Section 210G, Hawaii Revised Statutes (HRS), the roundabout may or may not be included in the current application. We note that DOT is currently developing a roundabout at the intersection of Kamehameha and Kahekili Highways on Oahu.

4) As stated above, the traffic impact analysis report (TIAR) for Pulelehua will take into account the regional impacts of traffic generated by Pulelehua and other proposed projects, including projects in Mahinahata and Kapalua.

5) As shown on Figure 1 of the EISPN, Pulelehua includes an internal roadway parallel to Honoapiilani Highway. We agree that parallel roadway systems provide for increased capacity and can mitigate impacts on the main highway. The TIAR will include an analysis of circulation due to this parallel route.

6) We acknowledge that Pulelehua will alter existing drainage patterns on the site; however, the site plan for Pulelehua preserves substantial open space, maintains existing drainage ways and gulches, and provides for additional retention areas. In addition, ML&P's vision for Pulelehua is to make the community truly sustainable. These measures, combined with proper engineering, will ensure that off-site drainage does not increase over existing conditions. Our project engineer has developed a preliminary drainage report and a detailed drainage master plan will be prepared before subdivision approval.

7) ML&P will implement reasonable mitigation measures to mitigate traffic attributable to Pulelehua. Please note, however that approvals for Pulelehua most likely will be sought under Section 210G-118, Hawaii Revised Statutes. Under this statute, affordable housing projects are allowed exemptions from "all statutes, ordinances, charter provisions, and rules of any governmental agency relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of units," provided the project meets minimum health, safety, and other requirements. As such, ML&P may be requesting an exemption from Chapter 14.62, Maui County Code (MCC), Impact Fees for Traffic and Roadway Improvements in West Maui, to exempt Pulelehua from traffic impact fees, if established pursuant to Section 14.62.070, MCC, or any other traffic impact fee established in the future.

Airport Issues

1) Access from Akahahele Street is vital to the traditional neighborhood design of Pulelehua. Please inform us of the specific security requirements for Akahahele Street in regard to the Kapalua West Maui Airport and we will incorporate security measures into our plan. To reduce your airport operating costs, ML&P would be willing to obtain Akahahele Street

from the State and dedicate it to the County when the other streets of Pulelehua are dedicated to the County.

2) ML&P recognizes the importance of the Kapalua West Maui Airport and does not want to jeopardize airport operations. ML&P is also aware that the airport does not meet all Federal Aviation Administration (FAA) requirements. As you may be aware, ML&P owns all the land surrounding the airport. Since DOT obtained ownership of the airport in the 1990s, DOT has not approached ML&P to obtain additional land or easements surrounding the airport to bring it up to FAA standards. ML&P is willing to enter into negotiations with DOT so that DOT may obtain a reasonable area required to increase the Runway Protection Zones (RPZs), Runway Safety Area (RSA), and Runway Obstacle Free Area (ROFA). However, ML&P does not agree that it is their responsibility to pay for upgrades to a substandard State facility.

Regarding your specific concerns about elements of the Pulelehua plan that may impact airport safety or the safety of people using areas near the airport, such as the location of play fields, community gardens, and roadways, these elements of the plan can be modified to comply with established FAA and State DOT Airport Division safety regulations. It is for reasons such as these that ML&P sought comments from your staff while developing the preliminary Pulelehua plan. ML&P wants to work with your engineering staff in revising the plan to comply with airport safety requirements.

We are aware of the potential impact of airport noise on the Pulelehua community. The school and all homes and will either be situated outside the airport noise contours or be built with proper noise mitigation measures in accordance with the requirements of the Federal Aviation Administration (FAA), the Department of Housing and Urban Development (HUD), and the State DOT Airports Division.

We have heard that the State DOT Airports Division is planning a master plan for the airport. ML&P would like to partner with you to expedite this planning process. ML&P is also willing to fund an airport noise study in conjunction with the master plan process; however ML&P will fund their own independent airport noise study if necessary. Whether in partnership with the State Airports Division or independently, we agree that the study should be prepared in accordance with FAA and State DOT Airports Division requirements. If conducted independently we will provide the study to you for review when it is completed.

The development of Pulelehua presents an opportunity to improve the infrastructure to, and surrounding, the airport. We would be happy to work with you to protect and enhance an asset we both want to keep. Any design or construction work affecting your infrastructure lines, equipment, and facilities will be identified and submitted to you for



U.S. Department
of Transportation
Federal Aviation
Administration

Western-Pacific Region
Airports District Office

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Telephone: (808) 541-1232
Facsimile: (808) 541-3566

September 14, 2004

Mr. Tom Schnell, AICP
FBR Hawaii
1001 Bishop St.
ASB Tower, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Schnell:

Pulelehua Community Development
Environmental Impact Statement
Preparation Notice (EISPN)
Review and Comments

We acknowledge receipt of the EISPN for the proposed Pulelehua Community development at Kapalua Airport, Lahaina, Maui.

We have reviewed the document and provide the following comments:

1. Section 3.0 Description of Existing Environment, Potential Impacts of Proposed Action and Mitigative Measures. Need to identify impacts to the airport access road (i.e. security issues, maintenance).
2. FAA imaginary surfaces as identified in Federal Aviation Regulations (FAR) Part 77 and Advisory Circular 150/5300-13 Airport Design (i.e. runway safety area, runway protection zone, obstacle free zone, aviation easements, etc.) should be addressed to determine possible impacts.
3. Section 6.0 Determination, Findings and Reasons for Supporting the Determination needs to include Kapalua Airport and what findings (positive or negative) and determinations resulted.
4. Please submit FAA Form 1460-1, Notice of Proposed Construction or Alteration. The form may be downloaded from our website at www.faa.gov.

Thank you for allowing us the opportunity to review these documents.

Sincerely,

Steven Y. Wong
Civil Engineer

Ronnie V. Simpson
Manager, Airports District Office

cc: State Land Use Commission, Anthony Ching
Office of Environmental Quality Control
HDOT Airports Div. AIR-P, Stephen Takashima

Mr. Rodney K. Haraga, Director of Transportation
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
October 6, 2004
Page 5

your review and approval. We seek the cooperation of your staff in identifying and locating these items.

We will complete and submit all applicable FAA forms to the FAA for their approval. Since you also request that the FAA forms be submitted the State DOT Airport Division for approval, please inform us if the criteria for the State approval of the FAA forms differs from the FAA criteria. This will ensure that we meet all requirements.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

- cc: Mayor Alan Arakawa
Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
David C. Cole, Chairman, President & CEO, ML&P
Mr. Bob McNair, Maui Land & Pineapple Company, Inc.
Mr. Steven Wong, Federal Aviation Administration



DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
COUNTY OF MAUI

200 SOUTH HIGH STREET • WAILUKU, HAWAII 96793 • PHONE: (808) 270-7815 • FAX: (808) 270-7165

July 23, 2004

March 10, 2005

Mr. Steven Y. Wong, Civil Engineer
Mr. Ronnie V. Simpson, Manager
Airports District Office
Federal Aviation Administration
U.S. Department of Transportation
Box 50244
Honolulu, Hawaii 96850-0001

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Wong and Mr. Simpson:

Thank you for your letter dated September 14, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

1. The Draft EIS will contain information relating to impacts to Akahele Street gained from the information from the FAA and State DOT from numerous contacts made with these agencies during the planning of Pulelehua.
2. FAA imaginary surfaces identified in Federal Aviation Regulations (FAR) Part 77 and Advisory Circular 150/5300-13 Airport Design (i.e., runway safety area, runway protection zone, obstacle free zone, aviation easements, etc.) will be addressed in the Draft EIS.
3. Potential impacts (positive or negative) to the Kapalua Airport will be identified and addressed in the Draft EIS.
4. As requested, Maui Land & Pineapple Company, Inc. will submit FAA Form 7460-1.

Thank you for reviewing the EISP/N. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salomonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.



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

Dear Mr. Schnell:

SUBJECT: PULELEHUA DEVELOPMENT

We have reviewed the Environmental Impact Statement Preparation Notice and would like to offer the following comments:

1. We are pleased that the draft EIS will contain more specific information regarding affordable income groups and affordable home prices.
2. Please include a detailed description of the buy-back and limited appreciation provisions that will be used to prevent speculation in the resale of the affordable units.
3. Please include a map showing the development phases of the project.
4. We would like to know why the applicant has decided to secure a state land use district boundary amendment (agriculture to urban) under the State Land Use Commission's regular processing requirements as opposed to the Section 201G-118, HRS, process.

TO SUPPORT AND ENHANCE THE SOCIAL WELL-BEING OF THE CITIZENS OF MAUI COUNTY

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LAND PLANNING
LANDSCAPE ARCHITECTURE
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March 10, 2005

Ms. Alice L. Lee, Director
Department of Housing and Human Concerns
County of Maui
200 South High Street
Wailuku, Hawaii 96793

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Lee:

Thank you for your letter received July 23, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we have reviewed your comments and are offering the following responses.

1. The Draft EIS will contain more specific information regarding affordable income groups and affordable housing prices.
2. Maui Land & Pineapple Company, Inc. will continue to work with you and your department in developing buy-back, limited appreciation, and other provisions that will be used to prevent speculation in the resale of the affordable units.
3. Pulelehua is currently planned to be built in one phase, depending on the pacing of infrastructure development and market demand.
4. Since the EISPN comment period, Maui Land & Pineapple Company, Inc. decided not to seek County approvals for Pulelehua under the 201G process. The processing of the State Land Use District Boundary Amendment (SLUDBA) continues under State Land Use Commission's regular processing procedure also.

The decision to process both the State and County land use entitlements under regular processing procedures allows State and County agencies and the public to have more input into the planning of Pulelehua during the entitlement phase. In light of this, Maui Land & Pineapple Company, Inc. reserves the right to possibly request expedited processing under regular processing procedures in the future.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Mr. Tom Schnell, AICP
Page 2
July 23, 2004

Thank you for the opportunity to comment.

Very truly yours,

ALICE L. LEE
Director

ETO:hs

c: Deputy Director of Housing and Human Concerns
Housing Administrator
Mr. Bob McNatt
Mr. Anthony Ching
Ms. Genevieve Salmonson

ALAN M. ARAKAWA
Mayor
MICHAEL W. FOLEY
Director
WAYNE A. BOTEILHO
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

August 23, 2004

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

Mr. Bob McNatt
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Maui, Hawaii 96761

Dear Mr. Schnell and Mr. McNatt:

RE: Environmental Impact Statement Preparation Notice for the Proposed Pulelehua Community located on Approximately 312 Acres of Land at TMK 4-3-001: 031 (Portion), Mahinahina, West Maui, Island of Maui, Hawaii (LTR 2004/2673)

The Maui Planning Department (Department) is in receipt of the Environmental Impact Statement (EIS) Preparation Notice (PN) for the above referenced project and provides the following comments in preparation of the Draft EIS.

1. The EISPN indicates Pulelehua will contain 895 homes. However, as represented in an informational presentation to the County Council, an additional 319 ohanas will be contained within the proposed community. As such, this indicates a total of 1,207 units are proposed.
 - a. Clearly describe all proposed units, including the ohanas.
 - b. Define the proposed home types as listed in the Land Use Summary.
 - c. Define the type and number of units proposed for construction each year.

Mr. Tom Schnell, AICP
Mr. Bob McNatt
August 23, 2004
Page 2

2. The EISPN indicates the project will apply for approvals under Section 201G-118, HRS, to expedite the provision of affordable housing.

- a. The 201G process requires the project provide 51% affordable which should be applied to the total proposed unit count of the Pulelehua community, which includes ohana units. Define the number and type of units proposed as affordable.
 - b. As represented to County Council, the affordable housing commitment for Kapalua Mauka is proposed in the Pulelehua community. However, the affordable commitment for Kapalua Mauka should be in addition to the 51% affordable for Pulelehua. Identify the number of affordable units required by Kapalua Mauka as proposed in the Pulelehua subdivision.
 - c. Identify the affordability criteria and the anti-speculation measures.
 - d. Maintenance fees have a tendency to be subsidized initially by the developer but are eventually borne by the buyer. Discuss how the maintenance fees for common amenities affect the affordability of the project for potential buyers.
 - e. Include housing data for West Maui and an analysis of how this project in addition to other proposed projects affect housing demands.
 - f. Discuss how this project relates to other proposals for housing, including but not limited to, Kaanapali 2020, Puunoa III Village, the gentrification of agricultural lands from Puamana to Olowalu, and the future development of Olowalu.
 - g. As a potential 201G project, list the requested exemptions from County requirements and discuss potential impacts for such exemptions. Provide a discussion of mitigation measures.
3. The site plan indicates a number of landscape features (e.g., public parks, open spaces, etc.) which will require ongoing maintenance. Identify the responsible party for maintaining such features both in the short and long term.

4. Discuss any provisions for transient vacation rentals (TVRs), bed and breakfast (B&B) operations, and home occupations.
5. As represented, the proposed commercial component of the project includes those uses that will support the day to day needs of the Pulelehua community.
 - a. Discuss how the standards for development will support this intent.
6. Identify the projected employment centers for residents of the community and discuss the expected commutes from the project. Are people seeking housing in Pulelehua all West Maui residents or commuters who work in West Maui? Discuss demographics.
7. The development of the project should be proportional (e.g., market units, affordable units, park sites, bike and pedestrian trails, school site, wellness center, etc.). Provide a rationale and development schedule for the build out of all aspects of the proposed project. The Department anticipates that Phase I of the project will actually likely be a 6-8 year build-out.
8. Discuss how the applicant proposes to develop the school site. Identify proposed assurances to the County for the development.
9. Provide a detailed description of development for the 312 acres by acreage and percentages for all aspects of the project (e.g., residential component, commercial component, school site, civic sites, parks, pedestrian and bike trails, gulches, open space, etc.).
10. The West Maui Community Plan identifies a 50 acre park site included within the boundaries of Pulelehua. Provide a discussion of the proposed usable open space and parks sites proposed in Pulelehua in relation to the 50 acre park designation.
11. The Department supports the narrow streets, bike and pedestrian trails, and building types which creates a liveable feel to the community. The Department will continue to work with the applicant in creating standards for development that will facilitate building permit review.

12. Agricultural Lands
 - a. Provide a breakdown of the Land Study Bureau and ALISH classifications in acreage and percentages for the 312 acres.
 - b. Discuss the cumulative impacts the proposed project has on the loss of agricultural lands when considered in respect to other proposals by Maui Land & Pineapple Company (MLP); such as, Kapalua Mauka, Maui Preparatory Academy, the relocation of MLP Corporate Offices to Napili, etc.
 - c. Discuss potential impacts of the proposed project on encouraging future urbanization of agricultural lands from Mahinahina to Kaanapali and from Mahinahina to Kapalua. Discuss any known future proposals to extend the urbanization above the airport.
 - d. Discuss why the proposed site was chosen for the project given the close proximity to Mahinahina Airport and the use of prime agricultural lands currently in cultivation. Justify the use of this site as compared to other areas owned by MLP (over 23,000 acres in West Maui) which may involve marginal and/or vacant agricultural lands rather than Class A and B agricultural lands.
13. Regional Transportation Systems
 - a. Discuss impacts on Honoapiilani Highway, especially from Kaanapali to the Pali.
 - b. Justify the use of a round-a-bout.
 - c. Discuss how the additional roadway outlets from Pulelehua affect traffic on Honoapiilani Highway, which is a limited access roadway. Discuss the anticipated delays expected from the project and the potential impacts to secondary streets.
 - d. Discuss how much traffic will be mitigated with the proposed school site.

Mr. Tom Schnell, AICP
Mr. Bob McNatt
August 23, 2004
Page 5

14. Regional Infrastructure Systems

- a. Discuss the proposed projects commitments for public services, water, and sewer systems.
 - b. The Puunoa III Village proposal was informed that there may not be enough capacity to handle the sewage requirements. Does Kapalua have a commitment from the County for water and sewers?
 - c. Discuss how the additional housing will affect our solid waste facilities.
15. Discuss the impacts to open space resources. The existing cultivated fields provide open space relief for West Maui. Discuss how this resource will be impacted by the development.
16. Provide an assessment which includes a discussion of potential hazardous, regulated, or toxic substances from historical and current uses of the property. Include a discussion of potential contaminants of concern used in relation to both historical and current agricultural practices.
17. One exemption sought through the 201G process is a waiver from the parking requirements set forth in Title 19, Maui County Code. Provide a parking analysis of all uses for the proposed project. Discuss how the project will accommodate the parking needs of the community as well as commuters to the area for proposed commercial uses.
18. Most of the residential lots in West Maui consist of R-3 and R-2 densities with the exception of a few rental apartments for residents and the transient vacation rentals along the shoreline. The site plan indicates higher densities in Pulelehua than those provided in surrounding areas. Discuss the impact that these higher densities will have on the West Maui community.

19. Mahinahina Airport

- a. Discuss impacts of the proposed project on the Mahinahina Airport. Will the project require additional improvements given the close proximity and convenience of use? Are there any

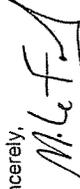
Mr. Tom Schnell, AICP
Mr. Bob McNatt
August 23, 2004
Page 6

existing plans to further expand the airport or extend the runway?

- b. With prevailing wind patterns and final approach patterns, discuss potential impacts from aircraft landings and take offs to the proposed development.
 - c. Include a discussion of air quality impacts to residents of Pulelehua from aircraft operations.
20. The proposed round-a-bout may be subject to review under Chapter 205A, HRS, and the Special Management Area Rules of the Maui Planning Commission.

Thank you for the opportunity to comment. Please include the Department on the mailing list for the Draft EIS. Should you require additional clarification, please contact Ms. Kivette A. Caigoy, Environmental Planner, of this office at 270-7735.

Sincerely,



MICHAEL W. FOLEY
Planning Director

MWF:KAC:lar

- c: Wayne Botelho, Deputy Planning Director
Clayton I. Yoshida, AICP, Planning Program Administrator
Kivette A. Caigoy, Environmental Planner
Anthony Ching, State Land Use Commission
OEQC
Project File
General File
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March 10, 2005

Mr. Michael W. Foley, Director
Department of Planning, County of Maui
250 South High Street
Wailuku, Maui, Hawaii 96793

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Foley:

Thank you for your letter (2673_Pulelehua.wpd) dated August 23, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). As the consultant for the applicant, Maui Land & Pineapple Company, Inc. (ML&P), we are responding to your comments.

We appreciate your Department's detailed comments and are assuming that the comments were prepared in anticipation of ML&P submitting a 201G-118, Hawaii Revised Statutes (HRS) application. Subsequent to the publication of the EISP/N (and the receipt of your letter), ML&P has decided not to pursue obtaining County approvals under Section 201G, HRS.

1. The Draft EIS will describe all proposed units and home types. Pulelehua is proposed to be constructed all in one phase, with build out by 2011. The Draft EIS will state this. Please note the actual phasing of the Pulelehua is subject to market forces that cannot be controlled (such as interest rates, construction costs, unemployment rate, etc.).

2. As previously stated, ML&P has decided not to pursue obtaining County approvals under Section 201G, HRS.

- a. While some lots within Pulelehua will have the potential for ohana units, ML&P will not build the ohanas, which will be built at the discretion of individual owners.
- b. As part of the State Land Use District Boundary amendment for Kapalua Mauka, ML&P agreed to provide 125 affordable units. Most likely these units will be provided within Pulelehua. ML&P is no longer pursuing County approvals under Section 201, HRS, but is still making 51 percent of the homes in Pulelehua affordable.
- c. ML&P is continuing to work with the Department of Housing and Human Concerns to develop an affordable housing agreement that includes affordability criteria and anti-speculation provisions.
- d. The Draft EIS will contain an estimate of Pulelehua maintenance fees.
- e. Housing data and housing demand in West Maui and will be included in the Draft EIS.

Mr. Michael W. Foley, Director
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 2

- f. Other proposed West Maui projects will be discussed in the Draft EIS.
- 3. The "Pulelehua Community Association" will be responsible for the maintenance of common areas, neighborhood parks, open spaces and other landscape features. The Department of Parks and Recreations will maintain the recreational fields.
- 4. The project's Project District Ordinance and Covenants Conditions and Restrictions (CC&Rs) will state that transient vacation rentals (TVRs) and bed and breakfast (B&B) operations will not be allowed in Pulelehua. The Project District Ordinance and CC&Rs will include provisions for Home Occupations in selected districts.
- 5. The project's Project District Ordinance and Covenants Conditions and Restrictions (CC&Rs) will set development standards for commercial components.
- 6. ML&P has a database of people who are interested in becoming a resident at Pulelehua. Currently 1727 individuals are registered in the database. The Pulelehua database has demographic information that confirms the market demand and objectives of Pulelehua. In regard to commuters, 1507 or 87 percent of the individuals work in West Maui. Of the 1507 individuals that work in West Maui, 179, or 11 percent of the West Maui employees live in regions outside of West Maui, such as Central, South, or Upcountry Maui. If these individuals live in Pulelehua, traffic over the Pali and through the Lahaina corridor could be substantially mitigated.
- 7. Morevoer, data from Department of Education reveals that the designated public elementary school for students who reside in the West Maui area from Honokohau Valley to Ka'anapali is King Kamehameha III Elementary School. This means that all students must be transported to and from school—other modes of transportation from these areas such as walking and biking would be treacherous for an elementary school child. Of the 698 student population, 254, or 36 percent of elementary children are transported via bus to King Kamehameha III Elementary School. Presumably, the other 456, or 64 percent of students must be transported via their parents. If at least 50 percent of the students carpool, parents contribute to approximately 228 am and pm trips to drop their children off at school. In total, Pulelehua has the potential to mitigate many trips in the congested Lahaina corridor by providing homes closer to employment locations and providing an elementary school.
- 8. Pulelehua is proposed to be constructed all in one phase with build out by 2011. The Draft EIS will state this. Please note the actual phasing of the project is subject to market forces that cannot be controlled (such as interest rates, construction costs, unemployment rate, etc.).
- 9. ML&P will provide infrastructure to the school site and then dedicate the land to the Department of Education. ML&P has been in discussions with Department of Education regarding the construction of an Elementary School. This information will be included in the Draft EIS.

- d. The Draft EIS will include a discussion why the proposed site was chosen for the project. The Draft EIS will also include a justification of the use of this site as compared to other areas owned by ML&P.
13. Regional Transportation Systems
- a. The TIAR will be summarized and appended to the Draft EIS. The TIAR includes traffic study areas extending to the Lahaina corridor.
 - b. Subsequent to the publication of the EISPN, ML&P decided not to include the proposal for a roundabout in the Pulelehua design.
 - c. The TIAR that will be summarized and appended to the Draft EIS. The TIAR includes a discussion on access points to Honoapi'ilani Highway.
 - d. As noted above, an on-site elementary school is expected to decrease traffic to the Lahainaluna intersection.

14. Regional Infrastructure Systems

- a. The Draft EIS will discuss Pulelehua's impacts on public services, water, and sewer systems.
- b. ML&P will be providing water from new wells (and will be utilizing R-1 reclaimed water and surface water for irrigation of the landscaped common areas of Pulelehua (as well as irrigation for the school). ML&P understands that wastewater system capacity cannot be ensured until the issuance of the building permit.
- c. Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the built Pulelehua community (and managed by the community association). After the community is occupied by residents, to the extent practical, wastes such as aluminum, paper, newspaper, glass, and plastic containers will be recycled. Green waste from yard and park maintenance will be processed on-site. This information will be included in the Draft EIS.

15. The Draft EIS will contain a discussion regarding visual impacts. Please note that as shown on Figure 1 of the EISPN, Pulelehua is significantly different from the existing Kahana Ridge Subdivision. While the Pulelehua contains more homes, these would be on smaller lots – requiring less land area and leaving more open space. The gulches provide unobstructed view corridors mauka. In addition, there is a 100-foot wide open space buffer being proposed along Honoapi'ilani Highway.

16. The Draft EIS will include a section on chemicals and fertilizers used on the site. Maui Pineapple Company's application and use of all fertilizers, pesticides, and herbicides is in compliance with all product labeling and applicable government regulations.

17. Information regarding parking will be included in the Draft EIS.

18. The Draft EIS will contain information on traditional neighborhood designed communities and positive social impacts these communities offer.

9. A revised version of Figure 5 from the EISPN will be included in the Draft EIS. This figure includes a land use summary and description of Pulelehua for the 312 acres by acreage and percentages for all aspects of the project (e.g., residential component, commercial component, school site, civic sites, parks, pedestrian and bike trails, gulches, open space, etc.).

10. As requested, the Draft EIS will provide a discussion of the parks sites proposed in Pulelehua in relation to the 50 acre park designated in the West Maui Community Plan.

11. We concur with the Department's support for the proposed narrow streets, bike and pedestrian trails, and building types which create a livable feel to the community. ML&P also greatly appreciates the Department's role in creating new development standards that will facilitate building permit review.

12. Agricultural Lands

- a. The Draft EIS will provide a breakdown of the Land Study Bureau and ALISH classifications in acreage and percentages for the 312 acres.
- b. The Draft EIS will discuss the cumulative impacts Pulelehua has on the loss of agricultural lands when considered in respect to other proposals by ML&P. Please note that the ML&P Corporate Offices in Napili are not proposed on agricultural land, and that the Maui Preparatory Academy site, while on agricultural land, is primarily a renovation of an old dormitory complex.
- c. In an effort to evaluate all options and gauge community feedback, ML&P included the entire portion of land around the Kapalua West Maui Airport for discussion at the charrette in March 2004. During the course of the charrette many individuals did voice support for a large multi-phased project that would address the overwhelming demand for long term residential affordable, gap and market rate homes on the west side of Maui.

As research was conducted and the planning evolved, ML&P decided to develop a single phase property of 312 acres (including open space and gulches) which was made up of 882 residential units with 51 percent being made up of affordable units. This formed the basis of the EIS, the ensuing studies and preparation of plans and development standards.

Pulelehua will be entirely engineered and all improvements will be constructed at one time. Based on available labor, material delivery issues and market absorption rates, the construction of all units will take place over several years.

At this time, ML&P has no intention of planning, engineering, or constructing any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

Mr. Michael W. Foley, Director
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 5

19. Mahinahina Airport

- a. The Draft EIS will include a discussion of the impacts of the proposed project on the Kapalua West Maui Airport including expansion of the runway.
- b. The Draft EIS will discuss the potential impacts from aircraft landings and take offs to the proposed development.
- c. An Air Quality Study will be summarized and appended in the Draft EIS.

20. As previously noted, ML&P has decided to withdraw the idea of building a roundabout at the intersection of Honoapi'iiani Highway and Akahahele Street.

Thank you for reviewing the EISPN. Your previous letter will be included in the environmental impact statement and your department will be included on the mailing list for the Draft EIS.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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ALAN M. ARAKAWA
Mayor
GILBERT S. COLOMA-AGARAN
Director
MILTON M. ARAKAWA, A.I.C.P.
Deputy Director
Telephone: (808) 270-7845
Fax: (808) 270-7955



COUNTY OF MAUI
**DEPARTMENT OF PUBLIC WORKS
AND ENVIRONMENTAL MANAGEMENT**

200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793

August 27, 2004

RALPH NAGAMINE, L.S., P.E.
Development Services Administration
TRACY TAKAMINE, P.E.
Wastewater Reclamation Division
LOYD P.C.W. LEE, P.E.
Engineering Division
BRIAN HASHIRO, P.E.
Highways Division
JOHN D. HARDER
Solid Waste Division

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

Dear Mr. Schnell:

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
PULELEHUA
TMK: (2) 4-3-001:031 (POR)

We reviewed the subject application and have the following comments:

1. Address recycling/disposal plans in the Environmental Impact Statement (EIS).
2. The proposed project impacts our erosion-control facilities at Kahana and at Mahinahina. The proposed roads will impact our emergency overflows from the erosion-control dams. Please describe how the proposed project will allow for emergency overflows from both facilities.
3. The proposed road over the Kahana gulch appears to utilize the top of our earthen dam. Please describe any impacts to the earthen dam and how any negative impacts will be mitigated.
4. Access to the Kahana dam facility and the Mahinahina dam facility must be provided for our heavy equipment (bulldozers, loaders, dump trucks, mowers, etc.).

5. One of the purposes of the dam facilities at Kahana and Mahinahina is to settle earthen particles from the stream flow before rain waters get to the ocean. When the trapped mud dries, the earthen material is removed. We will require areas where we can dispose of this material in close proximity to the dams to lessen our disposal cost (i.e., transporting the material off site).
6. The proposed developments around the dam facility at Mahinahina should be advised of our use of heavy construction equipment in the maintenance of the facility during normal daylight working hours. This includes the use of back-up alarms which can be irritating to residents and students. Provisions for noise abatement at the perimeters of the development may be in order.
7. A discussion of the proposed interior roadway system, including use of alleys, cross sections, right-of-way widths, sidewalks, on-street parking and trails, shall be included. In addition, the intent to dedicate components of the system shall be discussed.
8. Any drainage systems exterior to roads that are to be dedicated to the County will not be accepted by the County.
9. The developer should be advised that the Department of Public Works and Environmental Management and the Department of Parks and Recreation are seeking legislation requiring adjacent property owners to maintain street trees fronting their properties. This is due to the increased cost of street tree maintenance and the lack of funding/personnel for such maintenance.
10. The use of open swales for drainage will result in higher maintenance, especially for grated drains within such swales. These gratings tend to become clogged with debris (leaves, litter, etc.) and need to be kept clear for the drainage to work. County work crews may not be readily available to keep such drainage ways clear and could result in localized flooding. (Low lying areas are harder hit during storms and crews are normally dispatched to such areas before tackling higher elevation drains.)
11. We request that the developer provide an estimate of electrical costs on an annualized basis for all roadway street lights and traffic signals to be dedicated to the County of Maui. Such information will be useful in projecting budgetary amounts needed.

12. Although wastewater system capacity is currently available as of August 21, 2004, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit.
13. Provide discussion and calculations (sewer impact study) to substantiate that the existing wastewater system is adequate to serve this project.
14. Wastewater contribution calculations are required before building permit is issued.
15. Developer is not required to pay assessment fees for this area at the current time.
16. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations.
17. Plans should show the installation of a single service lateral and an advance riser for each lot.
18. Commercial Kitchen Facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens etc.).
19. Non-contact cooling water, condensate, etc. should not drain to the wastewater system.
20. Development shall include the use of recycled water for open space and commercial irrigation (if available).
21. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property.
22. Hold-Harmless Agreement should be executed. Signed agreement required before the Wastewater Reclamation Division will give recommendations for final subdivision approval.
23. Include analysis of wastewater impacts in Draft EIS Report.

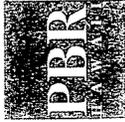
Mr. Tom Schnell, AICP
August 27, 2004
Page 4

If you have any questions regarding this letter, please call Milton Arakawa at
(808) 270-7845.

Sincerely,


for GILBERT S. COLOMA-AGARAN
Director

GSCA:MA:da
S:\LUCA\ZMP\Pulelehua_eis_prep_43001031_da.wpd



LAND PLANNING
ARCHITECTURE
ENVIRONMENTAL STUDIES

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R. STAN DUNGAN, ASLA
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PRINCIPAL
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SENIOR ASSOCIATE

TOM SCINNEL, AICP
ASSOCIATE

RAYMOND T. HOA, ASLA
ASSOCIATE

KYVIN NAKAKAWA, ASLA
ASSOCIATE

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MAIL: sysadmin@pbhawaii.com

Field Office:
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101 Luanao Center Street 310
Honolulu, Hawaii 96829-4262
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Fax: (808) 961-1099
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WAILUKU OFFICE:
2123 KAHANI STREET
WAILUKU, HAWAII 96791-2204
Tel: (808) 242-2678
Fax: (808) 242-2802
E-Mail: pbhawaii@hawaii.gov

March 10, 2005

Mr. Milton Arakawa, Director
County of Maui
Department of Public Works and Environmental Management
200 South High Street
Wailuku, Maui, Hawaii: 96793

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Arakawa:

Thank you for your Department's letter (43001031_da.wpd) dated August 27, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc. (ML&P), we are responding to your comments.

We appreciate your Department's detailed comments and are assuming that the comments were prepared in anticipation of ML&P submitting a 201G-118, Hawaii Revised Statutes (HRS) application. Subsequent to the publication of the EISPN (and the receipt of your letter), ML&P has decided not to pursue obtaining County approvals under Section 201G, HRS.

1. Provisions for recycling, such as collection systems and space for bins for recyclables, will be incorporated into the Pulelehua community (and managed by the community association). After the community is occupied by residents, to the extent practical, wastes such as aluminum, paper, newspaper, glass, and plastic containers will be recycled. Green waste from yard and park maintenance will be processed on-site.
2. The DEIS will address the potential impacts of the proposed project impacts the County's erosion-control facilities at Kahana and at Mahinahina, specifically in regards to how the proposed project will not impact emergency overflows from both facilities.
3. A preliminary civil engineering master plan will be prepared and it will address the proposed road through the Kahana Gulleh. At this time, the current development plan shows the road being routed to the bridge just mauka of Honouliuli Highway and not crossing the earthen dam. No modification to the dam is currently envisioned.
4. ML&P has been informed by way of a copy of your letter that accommodations must be made to ensure continued access to the Kahana dam facility and the Mahinahina dam facility for the County's heavy equipment.

5. ML&P has been informed by way of a copy of your letter that the Department of Public Works and Environmental Management is requesting areas in close proximity to the dams where the County can dispose of dredged material from Kahana dam facility and the Mahinahua dam facility to lessen the County's disposal cost.
6. We appreciate the information you provided regarding the possible noise that might be generated by the heavy construction used in the maintenance of the dam facility at Mahinahua. As recommended future residents of the Pulelehua community will be advised of the County's use of heavy construction equipment in the maintenance of the facility during normal daylight working hours in the Kahanaiki Neighborhood Covenants Conditions and Restrictions (CC&Rs). Otherwise, we believe that since the most of the removal of the dredged material will be occurring in the gulch, below the grade of the Kahanaiki Neighborhood the gulch itself will help to attenuate the noise from the heavy construction equipment.
7. The Draft EIS will include a discussion of the proposed interior roadway system, including use of alleys, cross sections, right-of-way widths, sidewalks, on-street parking and trails. In addition, the intent to dedicate components of the system will be discussed.
8. We appreciate the information provided that any drainage systems exterior to roads that are to be dedicated to the County will not be accepted by the County.
9. We appreciate the information provided on the increased cost of street tree maintenance and the lack of funding/personnel for such maintenance. ML&P will attempt to select plant materials (street tree species) with roots that are not too invasive and produce low amounts of litter, and will take into consideration that the Pulelehua community association may eventually be responsible for street tree maintenance.
10. Thank you for pointing out the possible maintenance considerations of the use of open swales for drainage, especially of grated drains within such swales. The regular maintenance of drainage swales will be included in the project's landscape maintenance plan.
11. When more specific civil engineering work has been done, ML&P's electrical engineer will provide an estimate of electrical costs on an annualized basis for all roadway street lights and traffic signals to be dedicated to the County of Maui.
12. Through a copy of your letter, ML&P has been informed that wastewater system capacity cannot be ensured until the issuance of the building permit. However, ML&P and its civil engineering consultant will be closely coordinating with your Department prior to applying for the building permit.

13. A detailed civil engineering study will be prepared which will provide a discussion and calculations to estimate projected sewer demand and to substantiate that the design capacity of the existing wastewater system is adequate to service this project. A summary of this information will be included in the Draft EIS.
14. By a copy of your letter, ML&P has been informed that wastewater contribution calculations are required before building permit is issued.
15. We appreciate the information you provided on the sewer assessment fees.
16. We appreciate the information you provided that ML&P is required to fund any necessary off-site improvements to the wastewater collection system and wastewater pump stations.
17. By a copy of your letter, ML&P has been informed that building plans should show the installation of a single service lateral and an advance riser for each lot.
18. By a copy of your letter, ML&P has been informed that commercial kitchen facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens, etc.).
19. By a copy of your letter, ML&P has been informed that non-contact cooling water, condensate, etc. should not drain to the wastewater system.
20. ML&P is planning to use reclaimed water for irrigation of project landscaped areas. Currently, reclaimed (R-1) water is being pumped from the Lahaina Wastewater Treatment Plant to a ML&P reservoir at an elevation of approximately 300 feet. ML&P then mixes the reclaimed water with their ditch water, which is used for irrigation. The common landscaped areas, parks, school ballfields of the project site will be irrigated with this mixed water. This non-potable water will also be used for fire protection.
21. By a copy of your letter, ML&P has been informed the building plans should show the ownership of each easement (in favor of which party). ML&P has also been informed that the County will not accept sewer easements that traverse private property.
22. By a copy of your letter, ML&P has been informed that a Hold-Harmless Agreement between ML&P (or a designated entity, such as the "Pulelehua Community Association") and the County should be executed. ML&P has also been informed that such a signed agreement is required before the County Wastewater Reclamation Division will give recommendations for final subdivision approval.
23. The Draft EIS will include an analysis of wastewater impacts.

Mr. Milton Arakawa
SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE
March 10, 2005
Page 4

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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ALAN M. ARAKAWA
MAYOR



CARL M. KAUPALOLO
CHIEF
NEAL A. BAL
DEPUTY CHIEF

COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY

200 DAIRY ROAD
KAHULUI, MAUI, HAWAII 96732
(808) 270-7561
FAX (808) 270-7919

July 28, 2004

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

Subject: Pulelehua Project, TMK (2)4-3-001:031

Dear Mr. Schnell,

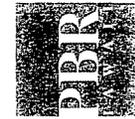
Our department has been in contact with the subdivision designers and developer. Our main concerns are emergency vehicle access throughout and water for fire protection. At this time, we have not seen anything that would prevent the project from moving ahead. We will still be reviewing the detailed plans when the permit is submitted in the future. Any problems or concerns found will be brought out at that time. Please feel free to contact me at 270-7568 if there are any questions.

Sincerely,



Valeriano F. Martin
Captain
Fire Prevention Bureau

cc: Bob McNatt, Maui Land & Pine
Anthony Ching, State Land Use Commission
Office of Environmental Quality Control



LAND PLANNING
VISUAL ARCHITECTURE
ENVIRONMENTAL STUDIES

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PRINCIPAL

JAMES LEONARD, AICP
PRINCIPAL
Hilo Office

RANDY MURAKAMI, AICP
SENIOR ASSOCIATE

TOM SCARBELL, AICP
ASSOCIATE

ANDREW T. HIGA, ASLA
ASSOCIATE

PURN NISHIKAWA, ASLA
ASSOCIATE

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Tel: (808) 242-2878
Fax: (808) 242-2922
E-Mail: pbrmail@earthlink.net

March 10, 2005

Mr. Valeriano F. Martin, Captain
County of Maui
Department of Fire and Public Safety
Fire Prevention Bureau
200 Dairy Road
Kahului, Hawaii 'i 96732

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Captain Martin:

Thank you for your letter dated July 28, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

- As you noted, the subdivision designer and developer of the Pulelehua community have been, and will continue to be, in contact with the Department of Fire and Public Safety.
- We acknowledge that your department's main concerns are related to emergency vehicle access throughout Pulelehua and water for fire protection, and that your department has not seen anything that would prevent the project from moving ahead.
- We also acknowledge that your department will review the detailed plans for Pulelehua when the permit is submitted, and any problems or concerns may be raised at that time.

Thank you for reviewing the EISP/N. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Stinsonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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ALAN M. ARAKAWA
MAYOR

OUR REFERENCE

YOUR REFERENCE

POLICE DEPARTMENT
COUNTY OF MAUI

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

August 19, 2004



THOMAS M. PHILLIPS
CHIEF OF POLICE
KEKUHAUPIO R. AKANA
DEPUTY CHIEF OF POLICE

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

Dear Mr. Schnell:

SUBJECT: Pulelehua
TMK: 4-3-01: 31 (portion)

Thank you for your letter of July 23, 2004, requesting comments on the above subject.

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

Very truly yours,

Acting Assistant Chief Charles Hirata
for: Thomas M. Phillips
Chief of Police

Enclosure

c: Michael Foley, Maui County Planning Department
Bob McNatt, Maui Land and Pineapple Co., Inc.
Mr. Anthony Ching, State Land Use Commission
Office of Environmental Quality Control

COPY

TO : THOMAS M. PHILLIPS, CHIEF OF POLICE
VIA : CHANNELS
FROM : RICKY C. UEDO, SERGEANT, LAHAINA PATROL DIVISION
SUBJECT : PULELEHUA - A NEW TRADITIONAL NEW COMMUNITY

Sir, this form of communication is being forwarded to your office regarding the Environmental Impact Statement Preparation notice prepared by PBR Hawaii for the Maui Land & Pineapple Company, Inc., who is proposing a new community in the West Maui area.

The Maui Land & Pineapple Company, Inc., is proposing to build a new, affordable community called Pulelehua in West Maui between Honoapiilani Highway and the Kapalua West Maui Airport. The project will contain 895 homes, at least 51 percent of which will be made available for sale or rent to low, low-moderate and gap-group income Maui residents. Mixed with the homes will be approximately 21,000 square feet of community-serving retail space, 75,000 square feet of mixed use specialty retail space with homes integrated on the same street or on second floors and approximately 78,000 square feet of "workplace edge" space uses for homes, offices, and other more commercial uses.

Pulelehua will also contain a public elementary school, civic places, places of worship, parks, a network of trails, community gardens, and other open space. Of the approximately 312 acres on the site, only about half will be for buildings and roads.

The concern from the police standpoint would be the need to increase more beat officers. With the abundance of capital improvements and new developments on the west side, our district will be taking on more people residing and visiting this side of the island. Currently, the Lahaina district staffs five beats which covers north of the tunnel to Nakalele Point. I strongly believe that in the near future, our district will be strained with the amount of calls for police service and to distribute these cases will be taxing on the officers. Especially with our resort and Honokowai areas making improvements and developments, there are only two officers assigned to cover these areas. Although we do have two funded Community Police Officer position allocated, they remain vacant.

This EIS report also mentions a portion regarding police protection in Lahaina, which is listed on page 35. The report mentions... "The Lahaina Station is currently staffed with 56 uniformed patrol officers and an estimated 18 investigative officers". This is far from the truth. The Lahaina Patrol District has an authorized strength of 53 uniformed officers and six investigative officers. Of the 53 authorized positions, only 36 positions are filled which brings us to 68% staffing.

Based on the proposed development along with the shortage in police personnel, I would recommend that the project not move forward until the Maui County Council can look into providing more funding for police officers in the West Maui area.

Pulelehua

Page #2

Until these concerns can be addressed, these projects should not be allowed to move further.

Handwritten:
Lahaina
07 304 @ 2100hrs

Respectfully submitted,

Signature:
Sgt. Ricky C. Uedo #1512
Lahaina Patrol Division
July 29, 2004 @ 1345 hours

Handwritten:
POLICE SERVICE NOT KEEPING UP WITH GROWTH. STAFFING NUMBERS CANNOT MEET IN THIS AREA, REQUIRING TRANS PORTATION TO LAHAINA TOWN. PUBLIC SCHOOLS SERVED BY LAHAINA ROAD, SO HAVING A SCHOOL IN THE VICINITY IS A MUST.

Handwritten:
TRAFFIC IN THE AREA IS MOVING AT AN ACCEPTABLE LEVEL AT THIS TIME. THIS PROJECT NEEDS TO PROTECT THE LEVEL OF SERVICE THAT WILL EXIST IF THIS PROJECT PROCEEDS. PROVIDING MOST RESIDENTS WILL WORK IN THE LAHAINA OR WEST SIDE DISTRICT IMPACTS WILL BE MINIMIZED SOUTH OF SHAW STREET WILL BE SEEN SOME DEGRADATION OF LEVEL WILL DEFINITELY BE SEEN

Handwritten:
ACTING ASSISTANT CHIEF
CHANNELS



LAND PLANNING
AND
ENVIRONMENTAL STUDIES

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SHILY J. CHONG, ASLA
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VINCENT SHERKLEW
PRESIDENTIAL
COUNCIL

AMUS LEONARD, AICP
PRESIDENTIAL
COUNCIL OFFICER

MART MURKAWAMI, AICP
SENIOR ASSOCIATE

TOM SCHIBEL, AICP
ASSOCIATE

ANDREW T. HON, ASLA
ASSOCIATE

IWIN NISHIKAWA, ASLA
ASSOCIATE

MANUELA QUINCY
BOB BROWN, ASLA
AND TORRES, SUITE 650
94101, HAWAII 96813-3484
TEL: (808) 521-5631
FAX: (808) 521-1802
E-MAIL: pbr@pbr.com

HONOLULU OFFICE
101 ALAHI, SUITE 310
10 LARGES CENTER STREET, 3RD
FLOOR, HAWAII 96813-3482
TEL: (808) 961-3333
FAX: (808) 961-3669
E-MAIL: pbr@pbr.com

WARREN OFFICE
1111 KAWAHI STREET
SUITE 100, HAWAII 96931-2914
TEL: (808) 241-2902
FAX: (808) 241-2902
E-MAIL: pbr@pbr.com

March 10, 2005

Mr. Thomas M. Phillips, Chief of Police
Police Department
County of Maui
55 Mahalani Street
Wailuku, Hawaii 96793

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Chief Phillips:

Thank you for your letter dated August 19, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to comments made for you by Sergeant Ricky Uedoi (Lahaina Patrol Division) and Acting Assistant Chief Charles Hirata.

1. We acknowledge your concern for increased calls for police service and the need for additional beat officers to accommodate the new developments in West Maui. The Draft EIS will discuss potential impacts on the Maui County Police Department resulting from Pulelehua. The EISPN contained inaccurate information regarding police staff obtained from the *Public Facilities Assessment Update County of Maui* (2002). The Draft EIS will reflect current staffing of the Lahaina Patrol District as stated in your letter.

2. We acknowledge your Department's position that the proposed Pulelehua development should not progress until the Maui County Council considers providing additional funding for police officers in the West Maui area. However, please note that the proposed Pulelehua community will provide affordable housing for Maui residents, enabling them to live close to their workplace and also decreasing traffic congestion. Since Pulelehua will be built for current Maui residents, the overall island population is not expected to increase, although the West Maui population might increase.

Providing affordable homes near employment centers will allow employees to spend less time commuting to and from Central & South Maui and more time with their families—which should have a positive impact on lessening crime. Fewer commuters will also reduce the need for traffic patrols, allowing the police force to focus on other issues.

Maui Land & Pineapple Company, Inc. envisions Pulelehua as a complete community that will encourage walking and community based activities. Pulelehua will include a mix of community-building uses including some retail, a public elementary school, a Wellness Center, parks and recreation, hiking trails.

Mr. Thomas M. Phillips, Chief of Police
**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE**
March 10, 2005
Page 2

and community gardens. Maui Land and Pineapple Company, Inc. is willing to discuss providing a police substation in the community.

We agree that a school in the area is needed and have included a site for a school within Pulelehua. It is anticipated that the public elementary school in Pulelehua will relieve some of the traffic congestion related to transportation to schools on Lahainaluna Road.

3. A traffic impact analysis report (TIAR) has been prepared to identify potential traffic impacts (and projected levels of service) on Honoapi'iani Highway and several related intersections, that may result from Pulelehua. The TIAR will be included in the Draft EIS. The TIAR covers an area of 10 miles along the highway (three miles north and seven miles south of the Akahahele Street intersection).

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.



August 23, 2004

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

Bob McNatt
Maui Land & Pineapple Company, Inc.
1000 Kapalua Dr.
Kapalua, HI 96761

Dear Mr. Schnell and Mr. McNatt:

Subject: Pulelehua – Environmental Impact Statement Preparation Notice (EISPN)

Thank you for allowing us to comment on the subject project.

In reviewing the information transmitted and our records, we have no objection to the subject project. The following are comments in section 3.3.5 Electrical Service:

1. HC&S has a purchase power contract with MECO to provide 12MW of firm power.
2. MECO has an electrical substation above the Kapalua West Maui Airport, not at the Kapalua West Maui Airport.
3. The service for this project will probably be served by the electrical substation above the Kapalua West Maui Airport. Either by installing new lines to feed this project or extending service from the existing lines along Akahahele St.

Since this is a substantial load which will impact the load capacity at the existing substation, we encourage the developer's electrical consultant to meet with us as soon as practical to verify the project's electrical requirements so that service can be provided on a timely basis.

Pulelehua
August 23, 2004
Page 2

If you have any questions or concerns, please call Dan Takahata at 871-2385.

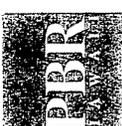
Sincerely,

Neal Shinyama
Manager, Engineering

Cc: Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Office of Environmental Quality Control
235 S. Beretania St., Suite 702
Honolulu, HI 96813





LAND PLANNING
NSC&P ARCHITECTURE
VANGUARD STUDIOS

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SHELLY Y.J. CHUNG, ASLA
EXECUTIVE VICE-PRESIDENT

VINCENT SINGEKUNI
PRINCIPAL

JAMES LEFERNAND, AICP
PRINCIPAL
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BRYAN MURAKAMI, AICP
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March 10, 2005

Mr. Neal Shinyama, Manager
Maui Electric Company, Ltd.
P.O. Box 398
Kahului, Maui, Hawaii 96733-6398

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Mr. Shinyama:

Thank you for your letter dated August 23, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

1. We acknowledge that MECO has reviewed its records and the EISPN, and has no objection to the Pulelehua project.
2. The Draft EIS will include the following:

- HC&S has a purchase power contract with MECO to provide 12 MW of firm power.*
- MECO has an electrical substation above the Kapalua West Maui Airport.*
- Electrical service for Pulelehua will likely be served by the electrical substation above the Kapalua West Maui Airport, either by installing new lines to the project site or extending service from the existing lines along Akalele Street.*

3. We acknowledge that the load resulting from Pulelehua will impact the load capacity at the existing substation. As such, Maui Land & Pineapple Company, Inc.'s electrical consultant will meet with MECO to verify the project's electrical requirements and ensure that electrical service is provided on a timely basis.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmanson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Verizon Hawaii Inc.
P.O. Box 2200
Honolulu, HI 96841

AUG 24 2004

August 20, 2004

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

Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Maui, Hawaii 96761

ATTN: Tom Schnell, AICP
Phone: (808) 521-5631
Fax: (808) 523-1402

Bob McNatt, Maui Land & Pineapple Company, Inc.
Phone: (808) 669-5625
Fax: (808) 669-5454

**SUBJECT: PULELEHUA, MAHINAHINA, LAHAINA, ISLAND OF MAUI
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISPN); TMK: 4-3-01:31 (FOR)**

Dear Mr. Schnell and Mr. McNatt:

Thank you for providing Verizon Hawaii Incorporated, the opportunity to comment on the Environmental Impact Statement Preparation Notice (EISPN) for the State Land Use Commission and the Office of Environmental Quality Control for the proposed Pulelehua Community, Mahinahina, Lahaina, on the island of Maui.

Verizon Hawaii has no comments on this project at this time.

If there are any questions, please call Sheri Thada at (808) 242-5258.

Sincerely,

Lynette Yoshida
Section Manager -
Network Engineering & Planning

C: State Land Use Commission
Office of Environmental Quality Control
File (3045 LHNA)
S. Thada

ISSUES WHICH THE PULELEHUA EIS NEEDS TO ADDRESS

Origination and Genesis of the project

The proponent is required to provide affordable housing as a condition of approval for its Kapalua Mauka project and offered to build 125 affordable rental units (a number in excess of the County guidelines, but proponent intends to reserve a number of those units for its own employees). The proponent makes a point of opening each of his presentations with the comment that the Mayor of Maui County came to them to ask their assistance in providing additional units meeting the affordability definition. A review of Mayor Arakawa's letter in the flyer which was sent out to the community in March reveals his expectation that Pulelehua would "offer affordable housing along with neighborhood amenities". There is absolutely no mention of the market rate component which the proponent has now added to the project and I doubt seriously if Mayor Arakawa had any idea that the result of his request would be this massive project. Why is the required affordable component for Kapalua Mauka not being built within the confines of the Kapalua Mauka project district? The southern portion of the development could certainly spare 5 acres (out of 925) for the 125 permanently affordable rental units. The residents would then have the convenience of the services available at Napili Plaza within easy walking distance as well as the bus stop at the Napilihau St intersection. The proponent should be required to meet his affordable housing requirement for Kapalua Mauka within the designated boundaries of that project district for Kapalua Mauka. Pulelehua should then be considered as a completely separate project standing on its own merits (or lack thereof) as it goes forward with the planning/permit process.

Quantification of the need for affordable housing

How many people/families currently living or working in West Maui would qualify at the various percentages (up to 120%) of median income and are likely to submit an application to rent or buy? Can/will those needs be met by the DHHL project which will be built just south of this one and the Villages at Leali'i?

Justification of the need for market rate component

If ML&P already owns the land, why are they unable to simply build a modest affordable housing village without adding enormously to the congestion from which the Kahana/Mahinahina area already suffers? Construction costs are in the vicinity of \$100 per square foot, which means that a 1,000 sq ft home can be built for approximately \$100,000. As someone making 80% of median income qualifies for a home valued at almost \$200,000, there would seem to be more than sufficient cushion to cover the costs of the infrastructure within the new smaller neighborhood. West Maui does not need additional market rate housing which will only further negatively impact the inadequate highway, water/sewer capacity shortage, not to mention fire and police capabilities. Unless and until the County and the State are willing to upgrade all the areas which are currently so woefully inadequate, West Maui cannot tolerate the surge of people that additional market rate housing would encourage and the only

March 10, 2005

Ms. Lynette Yoshida, Section Manager
Network Engineering and Planning
Verizon Hawaii Inc.
P.O. Box 2200
Honolulu, Hawaii'i 96841

SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Ms. Yoshida:

Thank you for your letter dated August 20, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge that Verizon Hawaii has no comments to offer at this time.

Your letter will be included in the environmental impact statement.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

04/09/05-11/11/05EISPNComment Letter Responses\Final Letter\Verizon.doc



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ISSUES WHICH THE PULELEHUHA EIS NEEDS TO ADDRESS

projects which they should approve should be confined to affordable housing only!

Viability of the commercial/retail/industrial component

What is the likelihood of success for the small "mom and pop" type of retail, commercial and light industrial operations envisioned for Pulelehua? Even a small corner grocer will need to sell a lot of "quarts of milk on a Sunday morning" in order to pay the rent and make a modest profit. There are currently available for lease many thousands of square feet of business space in Lahaina Town which cannot find tenants.

Assessment of school needs

The most recent figures available indicate that enrollment in the current West Maui elementary schools is under capacity. Intermediate school enrollment is moderately over capacity and the high school enrollment is well over capacity. Unless Maui County/the state proposes to close the Lahainaluna elementary school and move all the students and staff to the new school, there is no need for the proposed elementary school.

Quality of life for the residents

What impact will living with the level of noise generated by a small airport have on the physical and mental health of those who don't leave the area to go to work elsewhere during the day? What impact will the fuel exhaust have on those same people as well as the green space/community gardens planned at both ends of the runway?

Cumulative effects of the various developments planned for West Maui

There are currently fewer than 230 homes on the mauka side of Honoapiilani Highway between the intersection with Lower Honoapiilani Highway and the intersection with Napilihau St (a section of the highway that is currently only two lanes and likely to remain that way for the foreseeable future). An additional 117 will be added when the Villas at Kahana Ridge are completed within the next year. The DHHL site will add another 400 when and if they go forward. Pulelehua, as proposed, will almost triple the number of residents and cars currently accessing those two lanes of highway from mauka.

Ingress and Egress from the project

Proponent envisions additional new access points to Honoapiilani Highway in addition to the two which currently exist (Akahele St and the cane haul roadway to the north of the proposed project). The addition of that many more cars to that section of two lane road boggles the imagination. The proponent proposes to realign the current cane haul road in such a way that the roadbed would cross an existing levee across the gulch which has a drainage culvert through it. Examination of that levee makes it obvious that the levee is no where near capable of supporting that plan. Any effort to strengthen/widen the levee will wreak havoc on the gulch environment.

ISSUES WHICH THE PULELEHUHA EIS NEEDS TO ADDRESS

West Maui Community Plan

The area in question is designated as Agricultural and Park in the West Maui Community Plan. Any amendment to the Plan should require approval by the West Maui community.

Hawaii State Constitution

It is a requirement that supporting infrastructure be in place before approval of any project which impacts that infrastructure. Approval of Pulelehua as currently proposed would be unconstitutional in light of the current inadequate Maui County and Hawaii State infrastructure to support it.

Respectfully submitted,

Neil Woods

Neil Woods
72 Kahana Nui Rd
Lahaina, HI 96761
(808) 669-1003



MAUI LAND & PINEAPPLE COMPANY, INC.

March 10, 2005

Ms. Nell Woods
72 Kahana Nui Road
Lahaina, Hawaii 96761

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Woods:

Thank you for your letter dated August 23, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). We appreciate your concerns addressed in your letter. As such, we are responding to your comments under the same headings as you used in your letter.

Origination and Genesis of the Project

Maui Land and Pineapple feels that clustering 125 affordable homes in isolation on five acres, as suggested in your letter, is not in the best interest of the community or the residents of the affordable housing project.

Maui Land and Pineapple envisions a holistic community at Pulelehua that will embrace a diversity of people and activities. Pulelehua will be a place where Maui's resort employees, police, teachers, fire fighters, doctors, lawyers, and others can live side-by-side. As a mixed income community, Pulelehua will contain a variety of housing options integrated into complete neighborhoods.

Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income segregated, affordable "project" which almost always leads to other social issues.

Quantification of the Need for Affordable Housing

The Draft Environmental Impact Statement (EIS) contains a marketing study that demonstrates an overwhelming demand in the near future for affordable housing, as well as gap and moderately priced market rate homes. Independent studies show that between 3,400 and 5,400 additional homes will be needed in West Maui by 2020. The majority of this demand, according to these studies, will be for affordable homes. The DHHL project is no where near as far along as Pulelehua in terms of planning and design and, as your own letter states, may never be built.

Justification of the Need for Market Rate Component

As stated above, the Draft EIS contains a marketing study that addresses the need of gap and moderately priced market rate homes. The median price for single family homes in the Napili/Kahana/Honokowai area was \$725,000 in January of this year with the average sales price of over \$1 million. Maui Land and Pineapple feels that the market rate homes that will be offered in Pulelehua will meet a market demand that is currently unaddressed in the area.

The concerns you raised about infrastructure in this area are fully addressed in the Draft EIS. The Traffic Study that was prepared shows traffic patterns over 10 miles of Honoapi'iiani Highway and includes the potential impacts of 24 other planned developments in West Maui. The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed.

The Fire Department has raised no concerns over Pulelehua. In fact, in correspondence to Maui Land & Pineapple Company Inc, the County Fire Department stated: "We would like to commend the design committee for the multiple access options that residents & emergency responders will have."

Water will be addressed by drilling wells in aquifers that are currently being pumped at less than 50% of their sustainable capacity. Maui Land and Pineapple, Inc. plans to install a new water system mauka of the Pulelehua community which will be over designed to support Pulelehua, as well as provide for additional capacity.

Viability of Commercial/Retail/Industrial Component

The Draft EIS contains a marketing study that addresses the demand for commercial, retail and industrial uses. Maui Land and Pineapple Company, Inc., feels confident that the neighborhood commercial uses will thrive in Pulelehua. Much of the interest that has been demonstrated by the general public includes inquiries about this aspect. Pulelehua will have small, compact retail and commercial centers instead of the traditional strip mall retail spaces currently being built, some of which have not been successful.

Currently, only approximately 75,000 square feet of neighborhood commercial uses are planned in Pulelehua.

The walkable neighborhoods will encourage patronage of the retail, commercial and other areas by residents who would otherwise get into their cars and drive down the highway. Inclusion of these components will actual mitigate the traffic impact from Pulelehua onto the highway.

Through research it has been shown that retail space that is not attractive, authentic in design, or easily accessible will not be successful. On the other hand, there are many examples of well thought out and well designed neighborhood retail space that is very successful in Lahaina.

Assessment of School needs

Information from the DOE shows that the elementary schools in West Maui are over 96% capacity. The Market Study and Economic Impact Analysis prepared for the Pulelehua community estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on State Department of Education figures, with about 75 percent (308 children) attending grades Kindergarten to 8th, and 25 percent (103) attending high school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapiilani Highway as elementary school children residing north of Kaanapali, will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahina) to walk to school, further reducing trips on to Honoapi'ilani Highway. Additionally, Maui Preparatory Academy will open in the fall starting with a middle school and expanding to a high school, thus addressing some of the shortfall in classrooms for these types of schools as well as mitigate traffic in Lahaina.

Quality of Life for the Residents

An Airport Noise Study and an Air Quality Study have been commissioned by Maui Land and Pineapple for the Draft EIS. The Airport Noise Study shows that all residential units are well under State and Federal noise guidelines. The Air Quality Study demonstrates that airplane exhaust will not be a concern due to the small number of flights, prevailing winds, and location of the development makai of the airport.

Cumulative Effects of Various Developments Planned for West Maui

As mentioned above, an extensive Traffic Study was undertaken, covering 10 miles of highway which included 24 other planned developments in West Maui. The results show that Pulelehua will not cause a major impact to the highway traffic. In fact the

elementary school and retail space will mitigate traffic which now travels from the north into Lahaina during peak hours.

Ingress and Egress from the Project

The current plan for Pulelehua contained in the Draft EIS shows the road to the north being routed down to the bridge that is just mauka of the highway. This routing no longer crosses the levee.

West Maui Community Plan

Maui Land and Pineapple is seeking an amendment to the Community Plan. To affect this amendment, Maui Land and Pineapple is following the existing legal process of going through the County Council, including all required public hearings. Notwithstanding the process, the design of Pulelehua includes approximately 135 acres of parks, trails, open space and gulches mixed into the community. This is well over the 50 acre designation in the West Maui Community Plan for Agricultural, Open Space, and Park uses. The parks and trails will be open to the public. Additionally, parks closer to residential uses encourages other modes of transportation such as pedestrian and biking to the parks instead of a regional park location where children must be driven to the regional parks. This allows for less traffic on Honoapiilani Highway.

Hawaii State Constitution

Approval of the Pulelehua Project by a two thirds vote of both the Maui County Council and the State Land Use Commission based on Maui Land & Pineapple Company, Inc.'s assurances of satisfaction of State imposed standards will satisfy the mandate of Article XI, Section 3 of the State Constitution regarding reclassification and rezoning of important agricultural lands.

Of course Maui Land & Pineapple Company, Inc. will contribute its fair share of the cost of necessary public facilities and other infrastructure required for the Pulelehua Project.

Thank you for reviewing the EISP. Your letter will be included in the environmental impact statement.

Mahalo,



Karl Bossert
Development Manager

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Saimonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Pulelehua Environmental Impact Statement Comments

LETTER OF TRANSMITTAL
August 19, 2004

West Maui Residents
178 Kahana Ridge Drive
Lahaina, HI 96761

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

Dear Tom:

We appreciate the hard work you are doing to help ensure the impacts of Pulelehua are objectively analyzed and communicated.

Enclosed are our comments to the EISPN for the Pulelehua Development. Please incorporate these comments in their entirety into the Environmental Impact Statement.

In addition, as you write the EIS, please address every issue and answer every question raised in our comments, within the appropriate paragraphs in the EIS. For example, if Section 3.3.1 of the EIS covers traffic impacts, please state and answer all our concerns about traffic within that section, and so forth.

Any place the EIS discusses public support for Pulelehua, also please refer readers to our comments as a whole.

Decisions which will affect our community forever depend on your work. We hope our comments help you. Please notify us of any future actions, presentations or hearings where the public can provide input, and put us on any related mailing lists.

Respectfully submitted by West Maui residents:

- | | |
|--|---|
| Ron Boudreaux mauiswinds@hotmail.com | Warren Montoya wmontoya@aol.com |
| Terry Boudreaux mauiswinds@hotmail.com | Diane Stanislaw zzzcat@maui.net |
| Kathleen Escobar eskys2@maui.net | Alex Stanislaw zzzcat@maui.net |
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| Deborah Montoya wmontoya@aol.com | |

We all live in West Maui, many have children living here, we know our community well, and will be severely impacted by Pulelehua if it proceeds as planned. We've decided to submit all our comments together.

ML&P has offered to develop 125 affordable housing units to qualify for approval of their large luxury Kapalua Mauka development. But rather than incorporate those units at Kapalua Mauka they have responded with a proposal creating a new additional development "Pulelehua Town," which in Phase I alone encompasses 1,218 residences (895 units and 323 ohanas), including upscale "market-priced" units, plus commercial development and industrial development. Phase I of Pulelehua will triple the population of this rural neighborhood, changing it to an urban area, overwhelming infrastructure, and contradicting the West Maui Community Plan. Approval of Phase I would tend to encourage development of Phases II and beyond, which would create a new city in West Maui to rival Lahaina in size, on land that is currently productive agricultural and open space.

Conclusions

We have come to the following conclusions based on our understanding of the Pulelehua proposal:

1. We support the need for construction of affordable housing in West Maui, both to provide for families, and to maintain the mixed economic blend of people which helps make our community wonderful.
2. Development of 895 units and 323 ohanas in Phase I of Pulelehua, plus the proposed industrial and commercial development, plus ML&P's proposed 690 unit Kapalua Mauka luxury development, together would completely overwhelm our already dangerous and overcrowded one-lane regional Highway 30. Highway 30 is the only road in and out of West Maui. We strongly oppose such a large plan for Pulelehua Phase I.
3. Pulelehua is just 1 of 16 developments planned for West Maui, with about 13,000 units, 32,000 new people, and 20,000 more cars. The impact of Pulelehua combined with these other developments would triple the population of West Maui. Every square foot of Pulelehua violates the West Maui Community Plan, which is designed to make sure that all development is controlled in a way that allows West Maui infrastructure to adapt and support it, and preserves the landscape that makes West Maui a cornerstone of Hawaii's tourism industry.
4. It would be inappropriate for the State to grant 201G "fast track" status to Pulelehua because such a large development will forever completely change our West Maui community. Pulelehua is so big, has so many variables and so many consequences here

Impact on the West Maui Community

1. Pulelehua will have a major impact on the density, changing it from a sparsely populated rural to a dense urban area. The existing developed area between Kaanapali and Napili is largely contained within a narrow corridor between the Honoapiʻilani Highway and the coast, about 2 blocks wide and 4 miles long. By contrast, the uphill side of the highway is mostly agricultural with currently only 230 homes in one compact area, and an affordable housing condo complex under construction with 117 units, and the small Kapalua/West Maui airport. Phase I of Pulelehua plans to add another 895 units and 323 ohanas, more than tripling the population of this area, plus commercial and industrial development. Future Phases of Pulelehua appear to include an area 4-times the size of Phase I. As envisioned, Pulelehua will overwhelm our neighborhood.
2. It is unfair to place affordable homes directly next to the Kapalua airport, exposed to noise and safety issues, while the upscale Kapalua Mauka development is far from the airport.
3. Pulelehua will cause additional population to immigrate to the island of Maui, rather than alleviate the problem. The EIS should evaluate the increase in Maui's population that Pulelehua will cause.

The Location and Size of the Pulelehua Development

Pulelehua is designed to fulfill the 125-unit affordable housing requirement agreed to by ML&P in exchange for approval of their "Kapalua Mauka" resort development of 690 luxury units on 925 acres. The EIS should ask why these affordable units are not contained within the 925 acre Kapalua Mauka?

However, if one accepts the concept that ML&P can satisfy their requirement for affordable housing at another site, it should not be in a rural/agricultural area, but in an area already zoned for urban growth, designated residential in the West Maui Community Plan, and with sufficient infrastructure already in place.

Wherever they are built, these 125 affordable homes serve ML&P by fulfilling their obligation undertaken in exchange for permission to build Kapalua Mauka. These affordable homes are supported by Kapalua Mauka. ML&P has no justification to build anything more than 125 units, which should be entirely affordable housing.

Any affordable housing should provide appropriate safeguards against speculation. It should be targeted to current residents of Maui to avoid encouraging a rise in the population. No commercial development or industrial development should be permitted, to avoid encouraging a rise in the population. Any development at Pulelehua Phase I should require a permanent agreement between ML&P and appropriate State and County entities dedicating the remainder of Pulelehua (including all "future phases" as identified in their original proposal flyer) as agricultural or open space in perpetuity, as a condition

that we need to have an open detailed public discussion of it before moving forward. The 45 day period offered to the Maui County Council under 201G is insufficient for the local people to learn about the specifics of this complex project, research and debate its many consequences, and sort out the PR from the facts.

5. If ML&P is seeking to satisfy their commitment to build affordable housing in exchange for permission to build the luxury 925-acre Kapalua Mauka development (gated homes in the \$1-to-\$10-million range), then consideration should first be given to integrating that affordable housing into Kapalua Mauka, not placed miles off site at Pulelehua. ML&P mentions repeatedly in their Pulelehua materials that they are committed to mixed neighborhoods, and that un-mixed neighborhoods don't work. Yet they don't support mixing at Kapalua Mauka?

6. Development of the Future Phases of Pulelehua would create a city to rival Lahaina in size, totally altering the character and environment of West Maui. We oppose this adamantly.

7. By building Pulelehua and beginning the process of urbanizing the area, ML&P will set a precedent that will open the door to future development of large agricultural areas which are adjacent or near Pulelehua.

8. If no urban location in West Maui is deemed possible, then we believe our infrastructure could absorb the impact of a development such as Pulelehua if it was limited to 125 affordable residential units (total of all phases combined), with no commercial or industrial development, and if access to Highway 30 is limited only to the existing Akahole Road intersection where there is already an existing traffic light. And as a condition, the remaining area of Phase I and all areas marked "Future Phases" on ML&P's public announcement published in March 2004 should be placed permanently off limits to any development.

Include All Phases of the Development in EIS

See Map (page 16 of these comments). According to the applicant's public presentations in March 2004, Pulelehua Phase I is only the first segment of a final development several times as large as Phase I. According to the Hawaii Administrative Rules, Chapter 200 - Environmental Impact Statement Rules, Subchapter 5 Applicability §11-200-7:

"Multiple or Phased Applicant or Agency Actions.

A group of actions proposed by an agency or an applicant shall be treated as a single action when:

- A. The component actions are phases or increments of a larger total undertaking,
- B. An individual project is a necessary precedent for a larger project."

We understand this to mean that the EIS must consider the impact of the total plan for Pulelehua (all Phases, not just Phase I), for every subject addressed in the EIS.

of project approval. And require covenants and a strong homeowner's association to ensure maintaining a quality neighborhood.

Approval of Phase I amounts to tacit approval of future phases

Approval of Phase I would open the gate to massive future development. On the ML&P Pulelehua announcement flyer, a large area east and north of Phase I is labeled "future phases". This area is at least 4 times the size of Phase I, and extends off the map in 2 directions. If even a small portion of the Phase I plan is approved, the door will be open to additional phases, unless permanently placed off-limits to development.

Cumulative Impact

The Environmental Impact Statement must consider Pulelehua Phase I in the context of the cumulative impacts of all planned development in the West Side. There are *currently sixteen* major large scale developments in various stages of planning for West Maui, many of these include affordable housing. These combine are a rough total of approximately 13,000 residential units, approximately 32,000 people, 20,000 cars, and potential major impact on water, sewage, storm drainage, electric and telephone utilities, and the coastal marine environment. It is vital that each project needs to be evaluated based on the cumulative impact of the full build-out of all projects combined.

The Honolulu Advertiser dated February 8, 2004 lists the following development in various stages of planning for West Maui:

Pulelehua – 895 units and 323 ohanas (including ohanas)
Kapalua Mauka – 690 units
Kihune -- 20 units
Villas at Kahana Ridge-- 117 units
Pu'u Kahana -- 117 units
Akahahe Heights -- 400 units
Hawaiian Homes -- 411 units
Maui Breakers -- 170 units
Intrawest -- 700 units
Kaanapali 2020 -- 3032 units
North Beach lots 2&3 -- 1090 units
Villages of Leaili -- 4813 units
Lokahi Kuhua -- 13 units
West Maui Resource Center -- 40 units
Makila/Kaua'ula -- 295 units
~~Olowalu -- 350 units~~
TOTAL 13,476 units

According to the Hawaii State Constitution and the West Maui Community Plan, none of these projects can be approved until infrastructure improvements such as roads are in place to support them. We absolutely agree, and advocate a slow-growth approach in

West Maui to avoid creating worse problems than exist today. Please approve only one small increment of development at a time and only after new highways and other infrastructure is in place.

Traffic Impacts

1. Impact on Regional Traffic

Highway 30 is the only road connecting the communities of West Maui with each other and with urban Kahului and Wailuku. All traffic from West Maui to urban Central Maui must drive on this road, everyone uses it to go in for business, shopping, the hospital or airport. As a result the road is often jammed between Lahaina and Kahului/Wailuku, where highway 30 has only one-lane each direction. Residents know to plan for long delays. Daily traffic is already at or beyond capacity. Pulelehua will exacerbate this problem, interfering with tourism, commerce and public safety.

Because Highway 30 runs along the beach and along steep cliffs, it is subject to inundation, high winds and landslides and would be impassible in a hurricane or tsunami, isolating West Maui. The only hospital on Maui is in Wailuku. It would be irresponsible to encourage any further population growth in West Maui until this potential for disaster is corrected by providing an alternative inland route connecting Lahaina with the rest of Maui. The EIS should attempt to answer what would happen to the residents of Pulelehua in the event of a major hurricane or Tsunami, and how the addition of Pulelehua would affect the safety of all residents of West Maui in such an event.

ML&P claims that by including small neighborhood stores and walkways in Pulelehua, they will decrease traffic, however everyone who lives on the West Side drives frequently to Kahului for Costco, Wal Mart, Home Depot, the mall, government business, school sports events, to see friends and relatives, etc. The EIS must quantify how adding 1,218 homes to West Maui will increase traffic between Lahaina and Kahului, and the effect on drive times at peak hours.

ML&P's plan to include industrial and commercial development in Pulelehua will also increase the regional traffic as people drive to Pulelehua businesses, and it will encourage population growth by drawing more people to live in the area. The EIS should include the effect of commercial and industrial development on regional traffic.

2. Impact on Lahaina Traffic

Today traffic jams occur daily on Highway 30 through downtown Lahaina, and any additional traffic will cause gridlock. According to the State Dept. of Transportation, the Highway 30 traffic load at Lahainaluna Road in Lahaina averaged 31,776 per 24-hour period vehicles in 2001 (the most recent figures available). Since 2001 approximately 600 residential units have been built north of Honokowai, plus a large time-share hotel (the Westin) at Kaanapali, increasing the number of cars by about 2,500. Building Pulelehua Phase I and Kapalua Mauka would contribute another 2,500-to-3,500 vehicles to the area. This totals about 5,500-to-6,500 new vehicles in the area north of Lahaina. If

each vehicle travels to Lahaina one round-trip per day, that creates an additional 11,000- to-13,000 trips, for a total in excess of 40,000 vehicle trips per day on Highway 30 in Lahaina (both directions of the round trip). The EIS should examine the effect of Pulelehua and Kapalua Mauka on: (a) the increased daily average number of trips on Highway 30 through Lahaina; (b) the increased traffic during peak hours and its effect on drive times. Additionally, drivers should be interviewed about their experiences in traffic on Highway 30 through Lahaina and their opinion about increasing it.

All school age children over 5th grade will have to commute to Lahaina for intermediate and high school and school sports. The EIS should examine the impact of these additional trips.

The "Lahaina Bypass" has been under discussion for over a decade. If eventually built, the reduced portion of the "Lahaina Bypass" that is currently being considered would lessen congestion from the schools at the top of Lahainaluna Road in early-morning and mid-afternoon, but will any other drivers choose to drive all the way up the long hill merely to go around a few blocks in Lahaina? The EIS should determine when the reduced portion of the "Lahaina Bypass" will be completed, and if it will have more than negligible effect on traffic through Lahaina.

Another issue to address is the availability of parking for the additional vehicles when in Lahaina, where there is already a severe shortage of spaces.

3. *Impact on Local Traffic*

See photo (page 17 of these comments). Highway 30 is only one lane in each direction adjacent to the Pulelehua site. According to the State Department of Transportation, the traffic count on Highway 30 in Honokowai was last measured in 2001, the traffic averaged 20,515 vehicles in both directions in a 24 hour period. When we include existing development added since 2001, plus adding Pulelehua and Kapalua Mauka, we will increase the average traffic load on Highway 30 at Akahahele Road and at Honokowai to near 30,000 vehicles per day. This is similar to the number of trips experienced in downtown Lahaina today where traffic jams occur daily -- where the highway is two lanes per direction. The EIS should examine the effect of Pulelehua and Kapalua Mauka on traffic between Kapalua and Lahaina, specifically: (a) the increased daily average number of trips on Highway 30; (b) the increased traffic during peak hours and its effect on drive times.

The EIS should consider the traffic impact of adding the proposed commercial development such as offices, stores, restaurants, coffee shops and tourism shops, which all draw customers, employees and deliveries, creating additional local traffic and parking problems.

Plus the proposed industrial development, which brings employees and large trucks slowing traffic, adding to problems of pollution, noise, and safety.

Plus the proposed elementary school, adding hundreds of trips twice daily.

For reasons stated in the following section on Public Safety below, we believe stop signs and the roundabout suggested for Pulelehua's entry points to Highway 30 will prove insufficient, so the EIS must also evaluate the effect of traffic lights at all intersections on traffic and drive times.

Impact on Public Safety

According to the Maui Police Department, there were 4 traffic fatalities and 126 motor vehicle accidents on Highway 30 between Front Street (the north end of the Lahaina urban area) and Napili, in the 1-year period from August 1, 2003 to July 31, 2004. Two of the fatalities occurred on Highway 30 in Honokowai and at the intersection of Honoapiilani Road, both within about a mile of the proposed Pulelehua location.

Highway 30 adjacent to Pulelehua is an undivided road with one lane in each direction, the posted speed limit is 45 mph, however drivers routinely travel at 55 mph and often faster. Many tourists use this road who are unfamiliar with it, often bringing their "speeding fatiguing style" with them. The road is mostly unlit at night and subject to torrential "inauka" rainstorms many nights of the year. Driving across or entering Highway 30 at a signal requires great care as often people on Highway 30 fail to stop in time because of the high speed.

Pulelehua Phase I envisions adding 4 additional intersections to Highway 30, including stop sign intersections and a circular roundabout. Stop signs are totally inadequate to the speed and traffic volume at these intersections, and represent a serious danger. Inserting a roundabout (the only one on Highway 30) will surprise drivers such as tourists who are unfamiliar and not expecting such an unusual interruption. The EIS should address the public safety impact of all these. We believe stop signs and the roundabout if built will prove insufficient, so the EIS must also evaluate the effect of traffic lights at all intersections on public safety.

The EIS should address the effect of additional traffic on police, fire and ambulance response times, especially from Lahaina to the hospital in Kahului.

Contradicts Community Plan

The most recent (1996) West Maui Community Plan and Map #1 designate all of the proposed Pulelehua land "Open Space," "Park," "Airport," and "Agricultural" (a copy of the Community Plan map is attached). None of the land is designated residential, business or industrial. The West Maui Community Plan states that, "All zoning and land use approvals shall be consistent with the West Maui Community Plan..." (page 51)

The West Maui Community Plan specifically designates "Mahinahina regional park on approximately 50 acres of land below the Kapalua/West Maui Airport." (page 17) This is located right in the middle of the proposed Pulelehua Phase I. The green small strips and

pocket parks envisioned in Pulelehua Phase I can't accommodate the uses of a 50 acre park, or replace its beauty.

"Infrastructure improvements need to be constructed prior to the issuance of building permits in order to prevent the lag time needed for infrastructure to catch up with development." (page 10)

"The Community Plan and its map shall define the urban growth limits for the region and all zoning requests and/or proposed land uses and developments shall be consistent with the West Maui Community Plan and its land use map." (page 16)

"Drainage channels and siltation basins should not be considered for building sites, but used, rather for public open space. The following streams and gulches as named on the USGS topographic maps (Lahaina and Honolua, Hawaii, 7.5 minute series, 1:24,000 scale), are to be kept as open space. ... Kahana Stream..." (page 23) Kahana Stream is the gulch forming the north boundary of Pulelehua Phase I, a new road is shown in this gulch on the Pulelehua proposal map.

Additionally, Pulelehua Phase I would adversely affect about 220 residential property owners who purchased their properties partly based on the West Maui Community Plan map designation of "Agricultural" or "Open Space" for the property near their homes.

Proposed Elementary School

The EIS should give specific answers to the following questions about the proposed new elementary school:

1. Is there a need for this school? Currently there are 4 elementary schools in West Maui: Naheihana and Kamehameha III public schools, Sacred Hearts and the Carden Academy. Neither of the public elementary schools are over capacity according to the State Department of Education, with the enrollment at Naheihana projected to decline 6% by 2009, and the enrollment at Kamehameha III to hold steady.

2. Do the population age demographics justify the cost of creating, staffing and maintaining a new elementary school? It appears that the age demographic in the area from Kaanapali to Kapalua is growing older, with fewer families with children, and more childless families of middle-aged-to-older residents.

3. If we create another elementary school and encourage population to move in, where will these students go to intermediate and high school? There is only one intermediate school and one high school in West Maui. These do not appear to have the capacity to absorb the additional students from a new elementary school. The capacity of Lahaina Intermediate is 597 students, currently there are 625 enrolled. The capacity of Lahainaluna High School is 794, currently there are 987 students enrolled, 24% over capacity. Lahaina is a 1-hour drive from the other public intermediate and high schools on Maui.

4. Has funding been committed for the cost of staffing and maintaining a school? Lahaina's intermediate school and high school are severely under funded. Many classes cannot afford text books. The PTA had to purchase and install ceiling fans for classrooms last year because the school couldn't afford them. Will staffing a new elementary school drain funds from the other schools?

5. What is the traffic impact? An elementary school will draw hundreds of vehicles to the neighborhood twice daily, including busses, teachers and staff, food delivery, etc. Most of the traffic will funnel through the one main road, Highway 30, which is only 1-lane each direction along Pulelehua.

6. Who will teach in this school? Currently there is a teacher shortage in Maui and statewide.

7. Will adding an elementary school encourage further growth in population? Will it cause pressure to develop nearby agricultural lands surrounding Pulelehua Phase I?

Impact of Proposed Road Across Flood Control Dam at North End of Pulelehua

The EIS should address the following concerns about the proposed northern access road to Pulelehua, which crosses a Maui County Dam Site Easement. The current design shows the road actually built on top of an existing Maui County earthen dam in Kahana Stream, this dam is too narrow to support even a single lane road. Construction in this gulch area could interfere with flood control and cause erosion to neighboring properties.

We strongly oppose this design, for the following reasons:

1. The flood control dam is not designed to carry a road, it is not wide enough to carry even a single-lane. There are large height differences to overcome at both ends of the dam. The angle of the dam relative to the south property boundary would require a sharp curve in a road. Construction would be disruptive to the wildlife in the creek and lake. Placing a road on top of the dam will increase traffic noise because of its raised position, and there is no space to plant trees to buffer the noise. Placing traffic and streetlights atop the dam make them highly visible.

2. Such a road would damage the natural environment surrounding and below the existing flood control basin, including mature trees and wetlands vital to the animal and bird life there. Currently the gulch is teeming with wildlife, fish, greenery, a year-round lake (siltation basin) and stream. The West Maui Community Plan requires preservation of gulch areas and specifically names the Kahana Stream (page 23, West Maui Community Plan).

3. Any design should avoid placing a road in the gulch area, frequently subject to flash flooding. Since this area includes a Maui County Dam Site Easement for flood control,

there is the concern that any construction might cause erosion to adjoining property. As designed it places a major road next to existing residential properties unnecessarily.

If a northern access road cannot be avoided altogether, the following restrictions should apply: The road should connect to Pulelehua straight north from the Kapalua Airport runway and cross the gulch straight north from the Kapalua Airport runway, then turn west, following a course well north of the gulch area, across open land well away from planned Pulelehua homes and existing residential areas, until it intersects Highway 30. Do not begin construction of the road until actual construction of Pulelehua Phase II is well underway, so that the road is completed only when residents begin to occupy Phase II. Build the road below the surrounding ground level so that vehicle noise is contained and vehicles travelling the road cannot be seen from adjacent property. Minimize night time light pollution from street lights and vehicle lights. If possible do not use street lights. If street lights are required, the design should include low profile street lights which minimize direct and reflected sky light pollution, and do not shine directly on adjacent properties. Any design should also orient a proposed road so vehicle lights do not aim at adjacent properties when vehicles use the road. Do not use a proposed road for construction vehicles, only for residents. Contractors and suppliers would be required in their contract to abide by a provision that this road is not to be used by construction vehicles, workers' personal vehicles or construction deliveries. Place signs at both ends of the road to this effect. Post a low speed limit to minimize noise. Place speed bumps. Install a permanent radar speed sign in each direction that displays the actual speed of approaching vehicles to help drivers be aware if they are speeding. Minimize construction dust and noise during road construction. Build any proposed road in as short a time period as practical. Plant trees along the road to mitigate noise and dust. Restrict access to gulch. No vehicles will be allowed in the gulch except for flood control maintenance by County vehicles.

Questions About the Architectural Design

The conceptual drawings do not provide sufficient information to evaluate them. For example, sketches of houses are drawn from a perspective that will not exist when the houses across the street are built, making the streets appear wider than they will actually be.

The drawings show very dense 2-and-3 story neighborhoods, denser than any other neighborhoods on Maui. Many streets appear to be very narrow single lane 1-way. Many buildings lack front yards and face on narrow streets. This will produce a highly crowded, uniform urban cityscape. The EIS should note that although the designers have attempted to copy the look of traditional buildings in Maui, this crowded urban style of construction is completely different than anything else in Maui. The EIS should evaluate the density of this construction style, compare it to urban areas with similar density elsewhere to see the long term effect on residents, such as living conditions, noise, heat, fire, safety of children in the narrow streets, crime, etc. Do similar over-crowded neighborhoods tend to gradually deteriorate over the long term?

The designs show corner grocery stores and small business fronts. These seem like a good idea except they will be economically unsustainable because they will be unable to compete with supermarkets and big box stores, and parking is inconvenient. There are currently a number of vacant store fronts in Napii, Honokowai and Kaanapali. What will be the impact if the corner store concept fails?

On the designs sketches presented to the Maui community, there are no parking spaces indicated in the residential areas, or they are colored green on the sketches.

Commercial store fronts will create noise and draw outside traffic into residential areas. Where will these additional cars park?

Walking and bicycling is suggested in the plan as an alternative to cars. This is commendable, however the project is located on steep hilly terrain in one of the most rainy areas of West Maui, unsuitable to bicycles and walking except for the most athletic. The proliferation of pathways will not discourage driving.

Please define exactly what kind of activities will be permitted in the Commercial and Industrial areas, and the impacts of these activities.

Minimal public input to the ML&P planning process

The EIS should note that public participation in the planning process for Pulelehua to date has been very minimal.

ML&P first publicly announced Pulelehua and requested public input on March 3rd, 2004. Their only community input meetings were held March 20th and 23rd barely 2 weeks later, giving local residents insufficient time to digest the proposal, research it, discuss it and prepare meaningful input. No detailed information about the development was provided prior to the meetings.

We attended the March 20th meeting titled "Hands-on Design Session". Many attending may have been employees of ML&P. We were divided into groups of 2-5 people and seated at about a dozen separate tables, also seated at each table was a representative of ML&P and a representative of their project design firm. Each table was presented with a single map of the Pulelehua project boundaries, given crayons and asked to "draw in your idea of where to place the houses, parks, schools, stores, industrial areas, or whatever else you want."

The format of the meeting excluded the most important questions: Whether or not the public wants Pulelehua to be developed at all, or if the public wanted to revise the boundaries or limit the overall size of Pulelehua. For example, when residents asked for an estimate of the proposed number of units, population or traffic impact, we were told, "that is unknown at this time."

As a result there was no meaningful discussion of the desirability of Pulelehua, its size or its impact on the community.

Administrators and legislators need to be aware of this as they weigh the value of these meetings. The meetings were not part of any recognized public process with requirements for balance and notice. From our observation these meetings were staged by ML&P as a public relations effort solely to create the illusion of public participation and support for this controversial project. If the EIS refers in any way to these meetings, the EIS must clearly inform readers that the meetings are NOT evidence of endorsement by the West Maui community. The EIS must not use these staged meetings or any products from them as evidence of public support.

Quantify the Need for Affordable Housing, and Define the Solution

Pulelehua is offered to as the solution to a problem. Have they defined the problem clearly and fashioned an appropriate solution?

Some of us have children or relatives who already live on Maui who cannot currently afford home ownership on Maui, and we understand the need for affordable housing. But what is the scope of this need? Has there been any demographic study to determine the actual need for affordable home ownership in West Maui? How many units do we need? Before making recommendations for "affordable homes," the EIS should precisely quantify how many families currently in Maui need them, would move to them, and what price and conditions will induce them to voluntarily purchase.

Questions which need to be quantified demographically in the EIS include: How many families would actually relocate to Pulelehua from Central Maui? Would they move their kids to a new school? Or do they have a spouse who works outside West Maui, preventing them from moving to West Maui, or who would have to commute also on Highway 30 to Central Maui? Will people who might otherwise be interested in an "affordable home" reject the high density of Pulelehua? Put off by the airport noise? Rainy weather? Distance from Central Maui? The crowded urban design? Or do they simply prefer living in another area of Maui? Are the "affordable homes" large enough for the size of the families they are targeted to help, based on a demographic study of those families? What are the typical wages of West Maui employees, and will this "affordable housing" be within their means – exactly how many units and at what wage level? Will the price make "affordable homes" available to dual income households only? Can the above families qualify for home financing? What is their own estimate of the price of a home which they would be willing and able to purchase? Does this correspond to the proposed cost of "affordable homes" at Pulelehua? What guarantee is ML&P offering that the ultimate sales price will not go up if their costs change? Are there sufficient competing financial institutions willing to finance homes on those terms? How will ML&P ensure that the "affordable homes" are purchased by people who have a real need and already live or work in West Maui? What is to prevent people from outside Maui moving here to live in these homes? Will outside buyers crowd out the local buyers, making this an ineffective solution to the problem of affordable housing? If an

"affordable home" is re-sold, will it only be available to people who have a real need and already work in West Maui? If outside buyers can purchase "affordable homes" on resale, they will eventually displace the local employees, defeating the purpose. What portion of ownership is limited to ML&P employees, and does that limitation still qualify to fulfill the commitment for affordable housing which ML&P undertook as part of their Kapatua Mauka agreement?

Unless we clearly define the problem first, Pulelehua will fail to provide a solution. And before we contemplate such a large urban development with all the impacts on the West Maui community, we should clearly define the need.

In its study of the need for affordable housing, the EIS should also consider the appropriateness of the solution offered by Pulelehua. Have alternatives been fully explored? For example, locating affordable housing in areas designated residential in the West Maui Community Plan? Or other solutions such as rent subsidies or controls.

The demographic study should note that some of the need for affordable housing will be satisfied by 4 other affordable housing developments either recently completed, under construction or well into the planning process in the Honokowai-Kahana neighborhood, Villas at Kahana Ridge and West Maui Breakers, Napili Villas (all in areas designated residential on the West Maui Community Plan) and the Kapua subdivision.

Affordable housing should not be an excuse for uncontrolled growth and the destruction of rural areas.

Additional issues that should be addressed in the EIS:

Kapalua Airport

According to the FAA publication, "Land Use Compatibility and Airports", page V-36: "Residential development, particularly high density development, is not compatible with airport operations due to noise impacts and for safety reasons." The EIS should evaluate the impact of airport noise on Pulelehua, to ensure compliance with the Federal Air Regulation Part 150 Noise Compatibility Program, including preparation of a Part 150 Study and noise exposure maps. The EIS should ensure that Pulelehua plans conform with the Kapalua Airport Master Plan and Land Use Drawing, and comply with Federal regulations regarding the FAA clearway area setbacks surrounding the airport, per FAA Advisory Circular #150/5300-13.

Fire and Police

Evaluate the cost and impact on service and response times of 1218 additional residences.

Does the closeness of buildings and narrowness of streets in Pulelehua represent an increased fire hazard? Does this require increased staffing and additional equipment for the fire department?

Plants and Wildlife

Evaluate the impact of construction activities on plants and wildlife, particularly road construction in the gulch areas. Pulelehua is located close to the shoreline, evaluate the impact of construction and the increased population on the coastal marine environment, including increased runoff on the coral reefs.

Other Infrastructure

Evaluate impact on water, sewer, water runoff, flood control, electric utility, and emergency services.

Night time light pollution

Maui is home to an international center for astronomy research and strategic national defense observatories, with one of the best "dark skies" in the world. The EIS should quantify the effect of Pulelehua on these facilities.

Health effects of chemicals and dust from surrounding pineapple field operations and airport operations.

The proximity of Pulelehua phase I to large pineapple fields raises the issue of the health effects of airborne pesticides, fertilizers and dirt particulate pollution.

Impacts of Construction

The EIS should evaluate the effect of construction on the community, including increased traffic and traffic delays on Highway 30 brought on by construction vehicles and workers vehicles, danger posed by trucks, parking on the highway, noise, dust and all other impacts.

Objective Presentation

Much of the EIS Preparation Notice reads like ML&P's promotional materials, beautifully written, but more like a sophisticated marketing brochure than an objective analysis. Vague descriptions should be avoided, such as "smart growth," "innovative," "holistic," "vibrant community," "more than a subdivision," "A unique site, a unique opportunity," "true Hawaii," "livability" and "human scale." Such words don't contribute to a factual understanding of the environmental impact of this development and should be eliminated.

Some of the writing is actually misleading, for example, the introduction calls Pulelehua "a compact, sustainable community that conserves West Maui's agricultural land and open space" Pulelehua is not compact it is very large new town. What does sustainable mean? Pulelehua does not "conserve," it converts designated agricultural land and open space to urban use. Characterizing Pulelehua as "a new affordable community" disguises

the fact that half of it is market-priced housing. Saying "Buildings will be located close to the street to provide a comfortable environment for pedestrians," is a nice way of saying there is only limited space for kids to play and no front yards. Claiming "a holistic community respects Hawaii's natural beauty and fragile ecosystems and protects the islands in perpetuity," contradicts the fact that the entire subdivision is on land dedicated agricultural and open space.

The Overview and Sections 2.1 and 2.2 are particularly slanted and filled with warm generalities instead of facts, to make the development sound appealing and accepted by the community without controversy. In section 5.0 the term "The preferred alternative" is a clear illustration of bias.

Policy makers need to be able to rely on a fair, unbiased EIS when making decisions that affect many people's lives. please write a reasoned factual impact analysis and remove all promotional language. The purpose of the EIS is to analyze and communicate the impacts of the proposed development only.

MAP of Pulelehua "FUTURE PHASES" Published by ML&P 3-04
The EIS must include the impact of full development of all phases of the project.

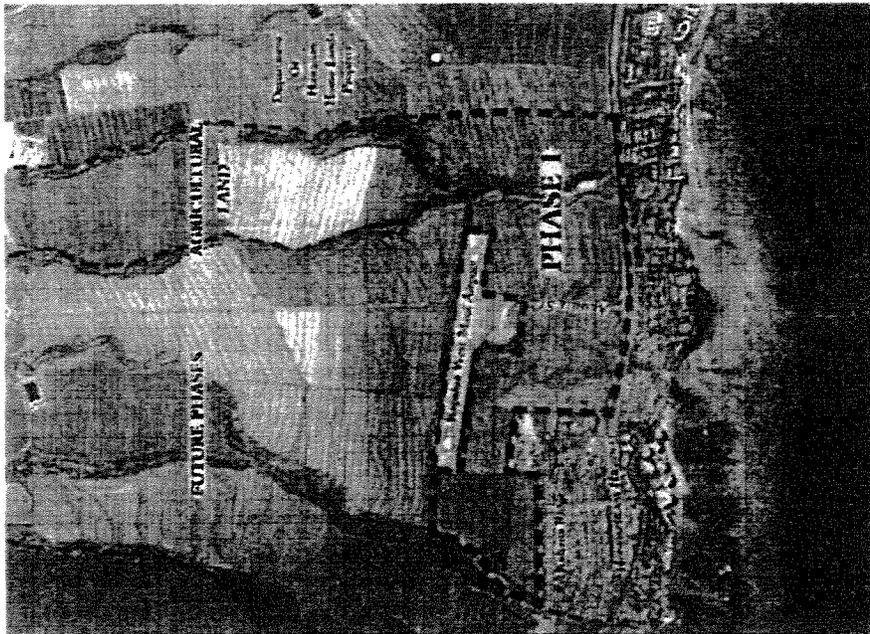
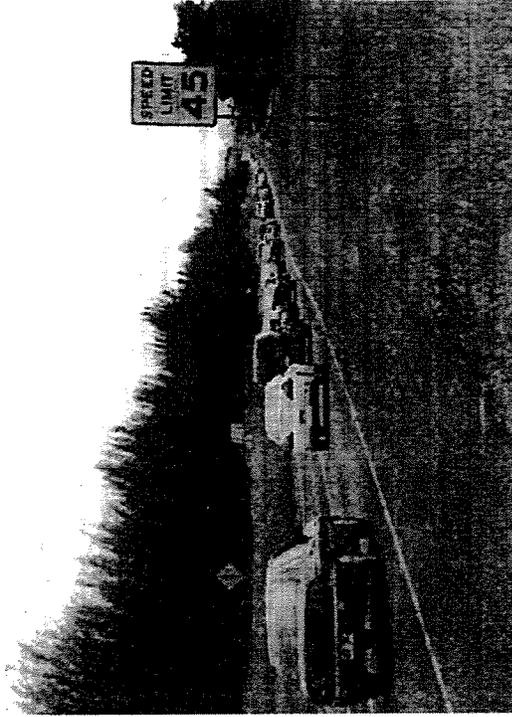


PHOTO looking south: Traffic on Highway 30 adjacent to the proposed Pulelehua site, near the intersection with Akahahele Road. This photo shows typical traffic on a cloudy morning, probably including many tourists driving to Lahaina seeking sunny skies.





MAUI LAND & PINEAPPLE COMPANY, INC.

March 11, 2005

West Maui Residents
178 Kahana Ridge Drive
Lahaina, Hawaii 96761

SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Dear Residents:

Thank you for your letter dated August 11, 2004 pertaining to the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). We appreciate your concerns addressed in your letter and are responding to your comments.

Complete Community Vision

Maui Land & Pineapple Company, Inc. envisions a holistic community at Pulelehua that will embrace a diversity of people and activities. While 125 affordable units could be put into Kapalua Mauka with ease, this location was chosen mainly due to the close proximity of the two major employment centers of Kapalua and Kaanapali. Further, this location is closer to both the water and wastewater treatment plants.

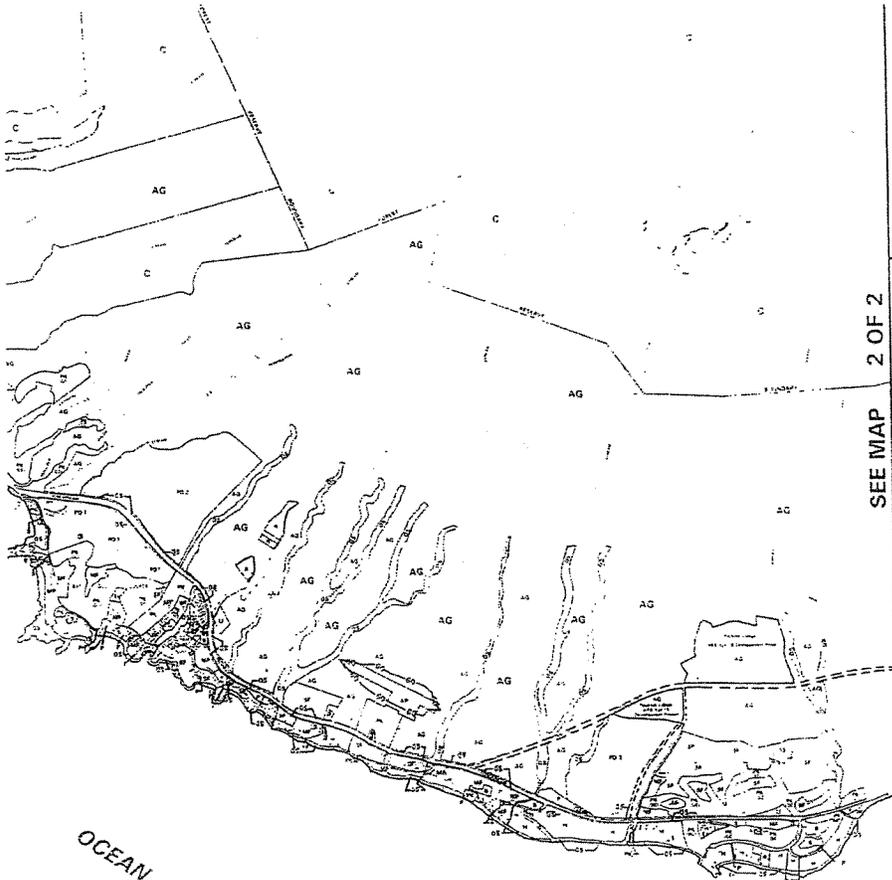
Pulelehua will be a place where all Maui's residents like resort employees, police, teachers, fire fighters, doctors, lawyers, and others can live side-by-side. As a mixed income community, Pulelehua will contain a variety of housing options integrated into complete neighborhoods.

Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income segregated, affordable "project" which almost always leads to other social issues.

Future Growth, Supply and Demand

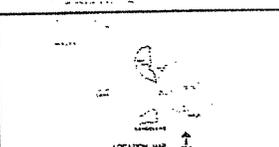
Maui Land & Pineapple Company, Inc., worked with the Department of Planning to confirm a list of proposed projects for West Maui. Not all of the projects on the enclosed list are approved or even certain to be approved, however some of the projects are already approved and few are in construction or near completion. In reviewing the list, several projects are geared towards tourism related real estate such as timeshare and hotel. Other projects are resort residential and still others are large lot agricultural subdivisions.

P.O. Box 187, Kahului, Hawaii 96733-6687
(808) 877-3351 • Fax (808) 871-0953 • www.mauiand.com



SEE MAP 2 OF 2

SF	Single Family Residential
MF	Multi Family Residential
B	Business Commercial
SBR	Service Business Residential
BMF	Business/Multi-Family
HI	Heavy Industrial
LI	Light Industrial
H	Hotel
P	Public/Quasi-Public
PK	Park (GC) Golf Course
OS	Open Space
PD	Project District
AP	Airport
AG	Agricultural
R	Rural
C	Conservation
ASCD	Airport Special Control District



MAUI COMMUNITY PLANS
WEST MAUI
LAND USE MAP 1 OF 2
COUNTY OF MAUI

APPROVED _____ DATE _____ PUBLIC HEARING _____
ADOPTED 2-27-99

APPROVED _____ DATE _____ ORDINANCE 2475
REVISED _____

SCALE 1" = 1 MILE

West Maui Residents
March 11, 2005

3

In addition, Pulelehua will include 125 affordable rental units. These units will be made available at the HUD affordable housing rental rate in perpetuity, thus ensuring a permanent core of affordable housing in Pulelehua.

201G Application

Maui Land & Pineapple Company, Inc., will not be seeking approval through the 201G process. All State and County land use requirements will be met. We are instead seeking a reclassification from agricultural to urban from the State Land Use Commission. From the County, we will request a Community Plan Amendment and a Change In Zoning from Agricultural Zoning to Project District.

This process will include all normal steps, including required public hearings. While this will delay the availability of needed affordable housing, this process will allow the County and the public every opportunity to provide feedback and input into the creation of Pulelehua.

Future Phases

In an effort to evaluate all options and gauge community response and support, Maui Land & Pineapple Company, Inc., included the entire portion of land around the Kapalua West Maui Airport for discussion at the charrette. During the course of the charrette many individuals did voice support for a large multi-phased project that would address the overwhelming demand for affordable, gap market and market rate homes on the west side of Maui.

As research was conducted and the planning evolved, Maui Land & Pineapple Company, Inc., decided to develop a single phase property of 312 acres (including open space and gulches) which was made up of 882 residential units with 51% being made up of affordable units. This formed the basis of the EIS, the ensuing studies and preparation of plans and development standards.

Pulelehua will be entirely engineered and all improvements will be constructed at one time. Based on available labor, material delivery issues and market absorption rates, the construction of all units will take place over several years.

At this time Maui Land & Pineapple Company, Inc., has no intention on planning, engineering or constructing any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

Airport Noise and Safety

An Airport Noise Study and an Air Quality Study have been commissioned by Maui Land & Pineapple Company, Inc. These studies are included in the Draft EIS for Pulelehua. The Airport Noise Study shows that all residential units are well under state and federal noise guidelines. The Air Quality Study demonstrates that airplane exhaust will not be a concern due to the small number of flights, prevailing winds, and location of the development makai of the airport.

West Maui Residents
March 11, 2005

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In total, it is estimated 4,027 units are proposed or approved by 2011 with only 45% for long term residences, not 13,000 units as you suggest. In comparison, independent studies show that by the year 2020, 3,917 to 6,608 additional homes in West Maui are needed (current unmet demand of 470 to 1,168 plus 3,447 to 5,440 units for population growth). The majority of this demand, according to these studies, will be for affordable homes. A full marketing study is included in the Draft EIS.

The projected population growth of Maui is independent of Pulelehua. As the population grows, demand for housing will grow. If supply lags behind, price escalation will continue. Housing prices in West Maui have escalated at a faster pace than other regions on Maui. In January 2005, the median sales price of a home in Lahaina was \$710,000, an increase of 39 percent from 2004. Prices have increased for many reasons, but mainly due to lack of housing supply.

Pulelehua will help to satisfy the housing demand of a growing population by providing 882 homes in West Maui. At least 51 percent of the Pulelehua homes will be for sale or rent to families making between 50 to 140 percent of the Housing and Urban Development (HUD) median income. As of February 2004, this figure is \$60,700 for the County of Maui. Based on this February figure, a family of four earning between \$30,350 and \$84,980 would qualify for affordable housing.

Using the 2004 guidelines and assuming a 6.5% interest rate with a 5% down payment, a single family home would be priced no higher than \$187,400 if a family earned 50% to 80% of the median family income. If a family earned 81% to 100% of the median family income, the price would be set no higher than \$238,000 and prices would top out at \$349,200 if a family earned 100% to 140% of the median family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 50% of Pulelehua's affordable housing is shown below:

10% of the total units	50% to 80% of HUD median family income
21% of the total units	81% to 100% of HUD median family income
20% of the total units	101% to 140% of HUD median family income

At the present time Maui Land & Pineapple Company, Inc., has a list of over 2,000 registered individuals who are interested in buying or renting homes in Pulelehua. Based on information provided in the registration process over 82% of the registered individuals qualify for affordable housing based on income between 50% to 140% of HUD income requirement for Maui County in 2004.

Affordable Housing Speculation

Every effort will be made to ensure speculation on the affordable housing units does not occur. For example, an aggressive buy back policy will be put in place limiting the appreciation which can be realized by the purchaser. This will be a long term program, with limits which could be in place for up to 25 years. Applicants for affordable housing will have to meet a rigorous set of qualifications which are set forth by government agencies.

Based on total annual operations at the Kapalua West Maui Airport in 2004, there was an average of 12.5 flights per day, an average of 2.5 operations per hour (25 take offs and 25 landings, generally referred to as flight operations, over a 10 hour day). The current operations are minimal and are not expected to increase substantially. In fact, the most current available forecast from the State of Hawaii DOT, Airport Division, indicates the number of flights only increase a total of 10% over the next 20 years.

After consulting with the State DOT and the FAA, the original Pulelehua plan was substantially revised to ensure no uses associated with Pulelehua will be within any safety area required for the airport.

Roadway Infrastructure

The concerns you raised about infrastructure in this area are fully addressed in the Draft EIS. The Traffic Study that was prepared shows traffic patterns over 10 miles of Honoapiʻilani Highway and includes the potential impacts of 24 other planned developments in West Maui in addition to Pulelehua. Maui Land & Pineapple Company, Inc., feels this study represents the most exhaustive and comprehensive analysis of existing and future West Maui traffic conditions assembled to date.

Each potential development was analyzed separately and then integrated into nationally recognized traffic modeling software. The number of trips generated by each development was calculated and distributed on the 10 mile study area. The results were then compiled to look at total traffic impact.

The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed. Certain components of the Pulelehua, like the elementary school and affordable housing closer to employment centers, are in fact, hoped to improve traffic conditions in Lahaina during peak traffic hours.

Water:

Water will be addressed by drilling wells in aquifers that are currently being pumped at less than 50% of their sustainable capacity. Maui Land & Pineapple Company, Inc., plans to install a new water system for the Pulelehua community. In addition, the current water plan includes the use of reclaimed (R-1) water to be used for irrigation of parks, common areas and the school. This will reduce the consumption of potable water by over 29%.

Sewer:

Maui Land & Pineapple Company, Inc., currently envisions building the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect a new to sewer line located along the east (mauka) side of Honoapiʻilani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet and will connect directly to the Lahaina Wastewater Reclamation Plant.

Community Plan

As mentioned above, Maui Land & Pineapple Company, Inc., will seek an amendment to the Community Plan through the Maui County Council. The current West Maui Community Plan does show a 50 acre park in the area of Pulelehua.

By contrast, Pulelehua will include over 100 acres of community parks (which will include playgrounds and ball fields), neighborhood parks and landscaped open space (which will include walking and biking trails, exercise circuits and other amenities). All the parks and open spaces will be made available to everyone. In addition much of the 13 acres of the elementary school will be made up of playgrounds and ball fields.

The 50 acres designated as a regional park in the community plan are on land owned by Maui Land & Pineapple Company, Inc. To date, no attempt has been made by the county to purchase this land. It is unclear when and if this land would be purchased and developed as a regional park. Pulelehua provides the West Maui community an opportunity to have twice the area developed as recreational area in just a few years.

Constitutionality of Development

Approval of the Pulelehua community by a two thirds vote of both the Maui County Council and the State Land Use Commission based on Maui Land & Pineapple Company, Inc.'s assurances of satisfaction of State imposed standards will satisfy the mandate of Article XI, Section 3 of the State Constitution regarding reclassification and rezoning of important agricultural lands.

Of course Maui Land & Pineapple Company, Inc., will contribute its fair share of the cost of necessary public facilities and other infrastructure required for Pulelehua.

Kahana Gulch

No residential development will take place in Kahana Gulch. The Pulelehua plan does show a road along the south side of the gulch. The future paved road follows the routing of an unpaved road which already exists. Improving the existing road will not impact the gulch except to reduce the amount of any soil run off that enters the gulch currently.

The routing of the road has been modified since the EIS Prep Notice. The current routing does not cross the earthen dam, but instead, continues down along the south side of the gulch. The proposed routing now crosses the DOT constructed bridge that is just mauka of Honoapiʻilani Highway.

School

Information from the DOE shows that the elementary schools in West Maui are over 96% capacity. The Market Study and Economic Impact Analysis prepared for the Pulelehua community estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on State Department of Education figures, with about 75 percent (308 children) attending grades Kindergarten to 8th, and 25 percent (103) attending high school.

It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapi'iiani Highway as elementary school children residing north of Kaanapali will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahina) to walk to school, further reducing trips on to Honoapi'iiani Highway. Additionally, Maui Preparatory Academy will open in the fall starting with a middle school and expanding to a high school, thus addressing some of the shortfall in classrooms for these types of schools as well as mitigating traffic in Lahaina during peak hours.

Architectural Design

Maui Land & Pineapple Company, Inc., has hired Dover Kohl & Partners, one of the best planning firms in the Country, to assemble a complete and extremely well thought out "Traditional Neighborhood Design" community. Much time was invested by ensuring Dover Kohl & Partners understood the style and architecture of Maui and to look to the best examples available when developing the concept plans for Pulelehua.

The public charrette was an example of the effort to gather community input into the design. Meetings with county, site visits around Maui, and review of published information were still more steps taken to ensure Pulelehua exhibited an authentic feel and sense of place.

The core area will incorporate the best aspects of areas like Front Street, Waiuku Town, Lanai Town, Paia and Makawao. The placement of homes closer to the street and narrow streets is consistent with older towns on Maui and throughout Hawaii. This design feature provides several advantages. It encourages a closer knit community where people know and talk to each other compared to typical subdivision design. Narrow (pedestrian friendly) street has been proven to make neighborhoods safer.

The placement of homes close to smaller streets is made possible by deeper lots and a system of alleys located in the rear. The alley system keeps garages and carport from being visible. This also reduces the number of cars driving down the front of streets. Alleys allow a location for utilities cabinets so they don't have to be located at the front of the properties. In addition, solid waste pickup can be made from the alleys, keeping trash cans from being visible. All these aspects make for a more inviting, attractive and safer neighborhood.

Public Input and Planning

Maui Land & Pineapple Company, Inc., has gone to extraordinary lengths to include the public as early as possible in the development of Pulelehua's concept and design. Most developments are designed first and presented to the public once the initial concept design is complete.

By using a public charrette, the community was allowed into the processes at the earliest stages; literally blank paper. Very little was known at this time because very little had been decided. Through this process, the planners, designers and community developed the content and layout of Pulelehua together. During the workshops, facilitators and members of the community had no limits placed on what could be included or excluded.

The follow-up design was done in an open and inviting way by using a design showroom where the public could continue to monitor and participate in the refinement of the ideas they themselves put forth during the charrette. At the end of this process, the conceptual layout and content of Pulelehua had been jointly developed by everyone involved.

Hundreds of people from the community attended and participated during this process. County representatives also attended and participated in these meetings. Valuable information was obtained from the public about exactly what they wanted see in Pulelehua. It was very clear to Maui Land & Pineapple Company, Inc., that there was great interest and demand for a new type of community. Pulelehua is the result of all the input which was provided.

Fire and Police

The Fire Department has approved Pulelehua's streets. A letter from the department is included in the Draft EIS. The Fire Department commended the design for its network of interconnecting roadways, versus the typical subdivision design with multiple cul-de-sacs.

Plants, Wildlife and Near-shore Water

Complete Flora and Fauna studies are included in the Draft EIS. There are not endangered species of plants or animals found at the site. No concerns were listed in this report.

A Near-shore Water Quality Study was also prepared and is included in the Draft EIS. This report shows that near-shore water quality will improve once Pulelehua is built. The study anticipates that soil run-off will be reduced because of the residential landscaping. Further, the study projects that nutrient flux will also be reduced as residential fertilizations levels will be lower than that of agriculture.

Night Time Light Pollution

Light pollution will be reduced through the careful selection of outdoor lighting fixtures and bulb type and wattage. The fact that Pulelehua is located on the other side of a 5,000 foot mountain range will greatly reduce the impact to the observatories compared with building Pulelehua in central or up-country Maui.

Air Quality

An Air Quality Study was prepared and is included in the Draft EIS. This study shows that the air quality of the residents in Pulelehua will not be adversely affected by pineapple operations or by the airport. This is due to the careful selection of the Pulelehua site, whereby almost no developed areas are down wind of any agricultural operations or the airport.

Air quality during the construction phase was also evaluated. In addition, all applicable regulations and standards governing dust control during construction, such as watering, tarping of trucks etc., will be followed.

Medical Facilities

One possible land use in the Mahinahina neighborhood, located on the south side of Pulelehua, is a medical facility. According to one study, it was found that there is current demand for between 60 and 80 long-term care beds in West Maui. It is uncertain, at this time, if this plan will move forward. A Needs Analysis and other steps need to be taken before a final decision can be made.

West Maui Residents
 March 11, 2005
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Maui Land & Pineapple Company, Inc., is currently in discussions with Hawaii Health Systems Corporation (HHSC) to develop a medical facility in Pulelehua. Maui Land & Pineapple Company, Inc. could provide up to 15 acres of land to support the medical facility, as well as other medical related businesses like doctor's offices and clinics.

HHSC's initial vision for the medical center would include a 30 to 50-bed long-term care facility. This facility may be based on the "Greenhouse Project" concept and be made up of four to five buildings. Each building could house eight to ten residents and would be approximately 6,000 square feet in size. The residents would enjoy separate living areas and bathrooms, situated around a common kitchen and dining area. These buildings could be designed to fit into the neighborhood in such as way as to look like large single family homes.

In addition, an Urgent/Emergency Care Medical Clinic could be developed. This facility would address critically injured or sick patients to provide stabilization and diagnostic services. The patients would then be released or transported to more full service facilities such as Maui Memorial Medical Center.

The Long Term Care and Urgent/Emergency Care medical facilities, as well as other medical related businesses could be located relatively close to Honopi'iiani Highway to facilitate quick and easy access.

In the event the medical center moves forward certain assumptions and conditions within the Pulelehua community may change. The number of residential units for example will be reduced. Internal neighborhood traffic patterns may change slightly, but the intent will be to build the facilities within the fabric of the traditional town plan.

It is difficult to quantify the impacts of the medical center because it has not been designed. Based on the conceptual information that we have, our opinion is that the medical facility will generate less demand for water, sewer and electricity than the houses that will be replaced in the plan. Other potential impacts would also be reduced accordingly.

Thank you for reviewing the EISPN and sending us your concerns. Your letter will be included in the environmental impact statement.

Mahalo,


 Karl Bossert
 Development Manager

cc: Mr. Anthony Ching, State Land Use Commission
 Ms. Genevieve Salmonson, Office of Environmental Quality Control
 Mr. Michael Foley, County of Maui Planning Department
 Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Enclosure

Summary of West Maui Project

Project #	Project Name	Location	Proposed Buildout	Estimated Development by 2011
1	Honolua Ridge	North of Kapa'ua	Phases I & II; 49 SF lots	25 units
2	Kapa'ua Mauka	Kapa'ua; mauka of Honoapi'iani Hwy.	690 units; 390 SF; 300 MF most units resort residential	75 SF 90 MF
3	Pailolo	North Kāhāna/Nepili	25 SF units	25 SF units
4	Maui Preparatory Academy	Mauka of Honoapi'iani Hwy; Mahinahina area	540 students; pre-K to Grade 12	540 students; pre-K to Grade 12
5	Villas at Kāhāna Ridge	Kāhāna Ridge	117 MF units	117 MF units
6	Pulelehua	Mahinahina mauka of Honoapi'iani Hwy	882 mixed residential; commercial; public with 318 potential Ohanaas	882 mixed residential; commercial; public with 318 potential Ohanaas
7	Maui Breakers	Mahinahina	90 MF units	90 MF units
8	DHHL Honokowai	Honokowai/next to Pulelehua	411 SF units	0 units
9	Marniott expansion	Kaanapali	303 addl. timeshare units; 336 fewer hotel rooms	457 timeshare units; 55 hotel rooms
10	Hyatt expansion	Kaanapali	326 lockout units	196 timeshare units
11	Kihune	Nepili	20 MF units	20 MF units
12	Intrawest	North Beach Lot 4	700 MF units	700 MF units
13	Kaanapali 2020	Kaanapali; mauka of Honoapi'iani Hwy.	1,257 SF; 1,163 MF; 390 mixed-use MF; commercial; public; golf	200 SF; 200 MF
14	Starwood	North Beach Lot 2	258 MF units + 258 lockout units	258 MF units + 65 lockout units
15	Palisades at Ka'anapali	Kaanapali mauka of Honoapi'iani Hwy.	132 SF units	132 SF units
16	Land Tech	Kaanapali	18 SF units	18 SF units
17	Villages at Leialii	West Maui	4,846 units; 2006 SF 2840 MF	104 SF
18	West Maui Resource Center -- Phase II	Above Lahaina Regional Park	16 units transitional housing; 10 units long-term housing	26 units
19	Lokahi Pacific	Lahaina	12 SF units	12 SF units

Saturday, August 8, 2004

To Whom It May Concern;

I am writing to say I would not like to see the 895 unit housing development. Pulelehua, as it has been proposed by Maui Land & Pineapple, be built in Kahana. I think the impact on the surrounding community is too much for one project. I think developers should be limited in project size to be able to give each project a good critique to know what works and what does not. To give ML&P carte blanche to perhaps overbuild the area with this huge development and then in hindsight say they could have done it better, is too much of a gamble for our small neighborhood. Please understand I've lived in this area for 30 years and would not like to see this beautiful destination, my home, turned into another Kapolei on Oahu, or even South Maui with their traffic congestion problems.

I do believe you can satisfy the need for housing in a smaller, more manageable scale without sacrificing the charm of our existing district.

I do not think there was true or accurate representation of the noise and pollution factors from the West Maui Airport at Kapalua on the day of the Land Use Commission's site inspection or "field trip" on Thursday, July 22, 2004, 10:00am.

On that day, and I know, as I was there, only one small plane landed at 10:16 am, and then another departed at 10:26 am, just as the presentation was finishing. I remember Mr. McNatt could not finish his sentence because of the noise, and he laughed and alluded to the 35 operations that are going on at this airport on a daily basis.

As I sit and write this letter, during the same time slot as this field trip was slated for 10:00-11:00 am, (one hour,) I have counted 6 planes arriving or departing the airport. 2 large Aloha Island Air planes, and 4 smaller aircraft including Fedex and charter planes. I also know this as I live near the north end of the runway and absolutely cannot fathom why you would want to put families any closer to the airport than they already are. The buffer zone they have around the airport is not enough and it is sad to think the developers will make money on the placement of families on previously undesirable land. There are good reasons not to put these families at risk, and money is not a very good reason to do so. I think another look at the airport site is in order, and I think if you sit yourselves there for a few days, rather than 40 minutes, you will smell, hear, and see why I feel this is a mistake to build a town this close to the airport.

I think the Pulelehua development the way it is proposed is not going to be as good for West Maui as ML&P would like us to think it will be... please take out the airport site and limit this development in size to something we can be proud of.

Thank You,

Kathleen Escobar
16 Kahana Ridge Dr,
Lahaina, HI. 96761

Kathleen Escobar

20	Waihee Village	Lahaina mauka of Honoapiilani Hwy	575 units; 400 SF; 175 MF	100 SF; 50 MF
21	Plantation Inn	Lahaina	14 MF units	14 MF units
22	Puunoa Village	Lahaina, mauka of Honoapiilani Hwy	268 SF units	0 units
23	Makila	Launiupoko	40 SF units + 40 Ohana units	40 SF units + 40 Ohana units
24	Olowalu	Olowalu	20 SF units + 20 Ohana units	20 SF units + 20 Ohana units
25	Ukumehame	Ukumehame	46 SF units + 46 Ohana units	46 SF units + 46 Ohana units

Page 2
March 10, 2005 letter to Kathleen Escobar

homes will be for sale or rent to families making between 50 to 140 percent of the HUD median income.

Airport Noise and Safety Zones

Based on total annual operations at the Kapahua West Maui Airport in 2004, there was an average of 12.5 flights per day, an average of 2.5 operations per hour (2.5 take-offs and 2.5 landings, generally referred to as flight operations, over a 10 hour day). In comparisons to flight forecasts, the current operations are minimal and are not expected to increase substantially. In fact, the most current available forecast from the State of Hawaii DOT, Airport Division, indicates the number of flights have a growth rate of 10% over the next 20 years.

After consulting with the State DOT and the FAA, the original Pulelehua plan was substantially revised to ensure no uses associated with Pulelehua will be within any safety area required for the airport.

As part of the EIS process, a noise study was prepared. Results of the airport noise contour study also show that even with maximum "worst case scenario" conditions, airport noise will not significantly impact the community. All homes would meet all requirements of the FAA and State DOT Airports Division airport noise compatibility guidelines.

Thank you for reviewing the EISPN and sending us your concerns. Maui Land & Pineapple is working hard to create a community that you can be proud of. Your letter will be included in the environmental impact statement.

Mahalo,



Karl Bossert
Development Manager

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

March 10, 2005

Ms. Kathleen Escobar
16 Kahana Ridge Drive
Lahaina, Hawaii 96761

**SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

Dear Ms. Escobar:

Thank you for your letter dated August 8, 2004 pertaining to the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISPN). We appreciate your concerns addressed in your letter and are responding to your comments.

Development Size

As a long time resident of Maui, you may already be aware of escalating prices and availability of homes, especially in West Maui. In January, the median sales price of a home in Lahaina was \$710,000, an increase from 39 percent over the last year alone. Prices have increased (faster escalation compared to other Maui regions) for many reasons, but mainly due to lack of housing supply. In fact, it is estimated that West Maui is currently undersupplied by approximately 470 to 1,168 units.

Added to that fact, West Maui's population is expected to increase and create an additional need for 3,447 to 5,440 additional housing by the year 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income, which is currently \$60,700 per year, based on the Housing and Urban Development (HUD) figures for the County of Maui.

The marketing study projects that during the next two decades, approximately 31 percent of the housing demand in West Maui will be for homes affordable to families making 80 percent or less of the median income and approximately 25 percent of the housing demand in West Maui will be for homes affordable to families making 81 to 140 percent or less of the median income.

Pulelehua will help to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui. At least 51 percent of the Pulelehua

Wednesday, August 11, 2004

To Whom It May Concern;

This is the breakdown of the proposed planned projects for West Maui, as I know it:

Kapahua Mauka -- 690 units
Kihune -- 20 units
Kahana Ridge-- 117 units
Pu'u Kahana -- 117 units
Akahele Heights -- 400 units
Hawaiian Homes -- 411 units
Maui Breakers -- 170 units
Intrawest -- 700 units
Kaanapali 2020 -- 3032 units
North Beach lots 2&3 -- 1090 units
Villages of Leali'i -- 4813 units
Lokahi Kuhua -- 13 units
West Maui Resource Center --40 units
Makila/Kauna'ula -- 295 units
Olowatu -- 350 units

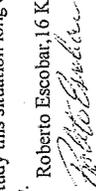
*This list is comprised of figures from the Honolulu Advertiser dated February 8, 2004.

And now we have Pulelehua --at 895 units.

Quite an impressive list...how will all of us who already live here, live here then? Our roads will be inundated with traffic and I have not seen any evidence that any significant new roads will be built in the near future. No new large medical facilities, schools, or infrastructure, just more and more people. More money for developers and we, who live here now, lose our way of life. For every family you can put into one of these developments, another family from somewhere else will move into their spot, so we get twice the population from each of these developments.

When will the Maui County Council finally understand this is too much for our small community...NOI, to the huge development Pulelehua, for many, many reasons. Smaller, more defined, affordable housing should be our goal right now to keep the West Side stable for existing residents and attractive to our visitors as well. Please study this situation long and hard...it means everything to us who live here now.

Roberto Escobar, 16 Kahana Ridge Drive, Lahaina, HI, 96761



Thank You,



MAUI LAND & PINEAPPLE COMPANY, INC.

March 10, 2005

Mr. Roberto Escobar
16 Kahana Ridge Drive
Lahaina, Hawaii 96761

SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

Dear Mr. Escobar:

Thank you for your letter dated August 11, 2004 pertaining to the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). We appreciate your concerns addressed in your letter and are responding to your comments.

Proposed Planned Projects:

Maui Land & Pineapple Company, Inc. worked with the Department of Planning to confirm a list of proposed planned projects for West Maui. Many projects on the enclosed list are projects that are already approved and few are in construction or near completion. In reviewing the list, several projects are geared towards tourism related real estate such as timeshare and hotel. Other projects are resort residential and still others are large lot agricultural subdivisions. In total, it is estimated 4,027 units are proposed or approved by 2011 with only 45% for long term residential homes. If every proposed project were completed by 2011 this would only provide 1,812 new homes in West Maui over the next six years.

The marketing study contained in the EIS indicates that by the year 2020, 3,917 to 6,608 additional homes in West Maui are needed (this is made up of current unmet demand of 470 to 1,168 plus 3,447 to 5,440 units for population growth). While it is unlikely that every project listed will move forward to completion, this would just keep up with the current unmet demand plus anticipated population growth.

Housing prices in West Maui have escalated at a faster pace than other regions on Maui. In January, the median sales price of a home in Lahaina was \$710,000, an increase of 39 percent over the last year alone. Prices have increased for many reasons, but mainly due to lack of housing supply.

P.O. Box 187, Kahului, Hawaii 96733-6687
(808) 877-3351 • Fax (808) 871-0953 • www.mauland.com

Pulelehua will help to satisfy the housing demand of a growing population and expanding job base by providing 882 homes in West Maui. At least 51 percent of the Pulelehua homes will be for sale or rent to families making between 50 to 140 percent of the HUD median income.

Roadway Infrastructure

The concerns you raised about infrastructure in this area are fully addressed in the Draft EIS. The Traffic Study that was prepared shows traffic patterns over 10 miles of Honoapiʻilani Highway and includes the potential impacts of 24 other planned developments in West Maui. The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed.

Water will be addressed by drilling wells in aquifers that are currently being pumped at less than 50% of their sustainable capacity. Maui Land and Pineapple plans to install a new water system mauka of the Pulelehua which will be over designed to support Pulelehua, as well as provide for additional capacity.

School

Information from the DOE shows that the elementary schools in West Maui are at over 96% capacity. The Market Study and Economic Impact Analysis prepared for the Pulelehua community estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on State Department of Education figures, with about 75 percent (308 children) attending grades Kindergarten to 8th, and 25 percent (105) attending high school.

It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapiʻilani Highway. Approximately 250 elementary school children residing north of Kaʻanapali, will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahina) to walk to school, further reducing trips on to Honoapiʻilani Highway. Additionally, Maui Preparatory Academy will open in the fall starting with a middle school and expanding to a high school, thus addressing some of the shortfall in classrooms for these types of schools, as well as mitigate traffic in Lahaina.

Medical Facilities

We are in agreement that medical facilities are needed in West Maui. Maui Land & Pineapple Company, Inc. is currently in discussions with HHSC to develop such a medical facility in Pulelehua. Maui Land & Pineapple Company, Inc. could provide up to 15 acres of land to support the medical facility as well as other medical related

businesses like doctor's offices. The medical center could include a Long Term Care Facility and Urgent/Emergency Care Medical Clinic could also be developed.

Thank you for reviewing the EISPN and sending us your concerns. Your letter will be included in the environmental impact statement.

Mahalo,



Karl Bossert
Development Manager

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Enclosure

Summary of West Maui Project

Project #	Project Name	Location	Proposed Buildout	Estimated Development by 2011
1	Honouliua Ridge	North of Kapalua	Phases I & II; 49 SF lots	25 units
2	Kapalua Mauka	Kapalua; mauka of Honoapiilani Hwy.	690 units; 390 SF; 300 MF most units resort residential	75 SF 90 MF
3	Paliolo	North Kahana/Napili	25 SF units	25 SF units
4	Maui Preparatory Academy	Mauka of Honoapiilani Hwy; Mahinahina area	540 students; pre-K to Grade 12	540 students; pre-K to Grade 12
5	Villas at Kahana Ridge	Kahana Ridge	117 MF units	117 MF units
6	Pulelehua	Mahinahina mauka of Honoapiilani Hwy	882 mixed residential; commercial; public with 318 potential Ohana's	882 mixed residential; commercial; public with 318 potential Ohana's
7	Maui Breakers	Mahinahina	90 MF units	90 MF units
8	DHHL Honokowai	Honokowai/next to Pulelehua	411 SF units	0 units
9	Marriott expansion	Kaanapali	303 addl. timeshare units; 336 fewer hotel rooms	457 timeshare units; 55 hotel rooms
10	Hyatt expansion	Kaanapali	326 lockout units	196 timeshare units
11	Kihuna	Napili	20 MF units	20 MF units
12	Intrawest	North Beach Lot 4	700 MF units	700 MF units
13	Kaanapali 2020	Kaanapali; mauka of Honoapiilani Hwy.	1,257 SF; 1,163 MF; 390 mixed-use MF; commercial; public; golf	200 SF; 200 MF
14	Starwood	North Beach Lot 2	258 MF units + 268 lockout units	258 MF units + 65 lockout units
15	Palisades at Kaanapali	Kaanapali mauka of Honoapiilani Hwy,	132 SF units	132 SF units
16	Land Tech	Kaanapali	18 SF units	18 SF units
17	Villages at Leialii	West Maui	4,846 units; 2005 SF 2840 MF	104 SF
18	West Maui Resource Center -- Phase II	Above Lahaina Regional Park	16 units transitional housing; 10 units long-term housing	26 units
19	Lokahi Pacific	Lahaina	12 SF units	12 SF units

20	Wainee Village	Lahaina mauka of Honoapiilani Hwy	575 units; 400 SF; 175 MF	100 SF; 60 MF
21	Plantation Inn	Lahaina	14 MF units	14 MF units
22	Puunoa Village	Lahaina, mauka of Honoapiilani Hwy	268 SF units	0 units
23	Makia	Launilupo	40 SF units + 40 Ohana units	40 SF units + 40 Ohana units
24	Olowalu	Olowalu	20 SF units + 20 Ohana units	20 SF units + 20 Ohana units
25	Ukumehame	Ukumehame	46 SF units + 46 Ohana units	46 SF units + 46 Ohana units

Dear Sir,

This letter is concerning the proposed Pulelehua development. This huge development is going to impact the West side of Maui in an extremely detrimental way. Currently the traffic backup begins before you even get near Lahaina and it continues all the way to Kapana. Adding 895 homes is insanity. Our infrastructure is just not set up to handle all of this new traffic. The promised proposed Lahaina by-pass road is a joke. Nor is it slated to go all the way to this new proposed development. It is never going to happen unless the cost of building the road is tied to the developers and made a condition of their receiving approval to build any new tracts. **HAS THIS EVEN BEEN PROPOSED?**

The next issue is how this area is going to be able to provide medical (since we have no hospital on the West side), water, sewers and additional Middle and High Schools for these new residents.

The most important reason to deny this development is the location. Putting a huge housing complex right next to an airport is just a set up for disaster. Eventually there is going to be an accident and people will be killed. Lawsuits will be filed and the big question is going to be **WHY DID THEY BUILD HOMES NEAR AN AIRPORT!** People who buy in this complex will know that there is an airport, but as soon as they get in the complaints will begin about the noise and exhaust. **THIS IS NOT THE RIGHT PLACE FOR THIS DEVELOPMENT.**

Why do we have zoning and planning statutes if developers can side step these procedures. An environmental impact report will clearly show that the increase in traffic alone is going to make life on the West side impossible. This property was zoned agricultural and it should stay that way.

Everyone says we have to be very careful that Maui doesn't become another Oahu. If we don't stop all of this rampant development it will look and sound just the same. Please reconsider this development. I know the developers have promised "affordable housing" and that is the key phrase now to get anything through the planning department. But if you look at other affordable housing, such as the Villas at Kahana you will see that only 10 units are at the lowest cost(which is still unaffordable for most Maui residents) and then the costs escalate upwards rapidly.

The economy on the West side is largely dependent on tourism. When the tourist come and spend hours in traffic jams they are going to go elsewhere for their next vacations. At the meeting at the Ritz-Carlton the emphasis was that those people working in the Lahaina area could live in Pulelehua and work nearby without driving across the island. Well, if the tourists stop coming because of all the traffic and developments then a lot of those people will lose their jobs.

We are at a critical point on Maui. Either we decide to stop the growth and keep our island serene and peaceful or we continue building and island flavor of Maui will be lost forever.

Thank You,
Bonnie

RECEIVED

AUG - 5 2004

MAIL ROOM

Tom Schnell
PBR Hawaii
1001 Bishop St
Suite 650
Honolulu 96813



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March 10, 2005
Page 2 Letter to Bonnie

MAUI LAND & PINEAPPLE COMPANY, INC.



March 10, 2005

Bonnie (no last name given)
NO RETURN ADDRESS

SUBJECT: PULELEHUA ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE

Aloha Bonnie:

Thank you for your letter we received on August 9, 2004 concerning the proposed Pulelehua Community Environmental Impact Statement Preparation Notice (EISP/N). We appreciate your concerns addressed in your letter. As such, we are responding to your comments.

Roadway Infrastructure:
The concerns you raised about infrastructure in this area are fully addressed in the Draft EIS. The Traffic Study that was prepared shows traffic patterns over 10 miles of Honopi'iani Highway and includes the potential impacts of 24 other planned developments in West Maui. The study quantifies the generally good conditions in the Pulelehua area and shows that widening the highway will not be required, even if all planned projects are constructed. For your information, developments are sometimes accessed a highway impact fee as a condition of approval.

Medical Facilities:
We are in agreement that medical facilities are need in West Maui. Maui Land & Pineapple Company, Inc. is currently in discussions with HHSC to develop such a medical facility in Pulelehua. Maui Land & Pineapple Company, Inc. could provide up to 15 acres of land to support the medical facility as well as other medical related businesses like doctor's offices. The medical center could include a Long Term Care Facility and an Urgent/Emergency Care Medical Clinic could also be developed on this land.

Water:
Water will be addressed by drilling wells in aquifers that are currently being pumped at less than 50% of their sustainable capacity. Maui Land and Pineapple plans to install a new water system mauka of the Pulelehua which will be over designed to support Pulelehua as well as provide for additional capacity. In addition, the current water plan includes the use of reclaimed (R-1) water to be used for irrigation of parks, common areas and the school. This will reduce the consumption of fresh water by over 29%.

P.O. Box 187, Kahului, Hawaii 96713-6687
(808) 877-3351 • Fax (808) 871-0953 • www.mautiland.com

Sewer:
Maui Land & Pineapple Company Inc., currently envisions building the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect a new to sewer line located along the east (mauka) side of Honopi'iani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet and will connect directly to the Lahaina Wastewater Reclamation Plant.

School
Information from the DOE shows that the elementary schools in West Maui are over 96% capacity. The Market Study and Economic Impact Analysis prepared for the Pulelehua community estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on State Department of Education figures, with about 75 percent (308 children) attending grades Kindergarten to 8th, and 25 percent (103) attending high school.

It is expected that the Pulelehua school will have a significant positive impact on traffic on Honopi'iani Highway as elementary school children residing north of Kaanapali, will not have to be transported to the Lahaina area for school. The public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honopi'iani Highway. Additionally, Maui Preparatory Academy will open in the fall starting with a middle school and expanding to a high school, thus addressing some of the shortfall in classrooms for these types of schools.

Airport Noise and Safety Zones
Based on total annual operations at the Kapalua West Maui Airport in 2004, there was an average of 12.5 flights per day, an average of 2.5 operations per hour (25 take-offs and 25 landings, generally referred to as flight operations, over a 10 hour day). In comparison to flight forecasts, the current operations are minimal and are not expected to increase substantially. In fact, the most current available forecast from the State of Hawaii DOT, Airport Division, indicates the number of flights will only grow a total 10% over the next 20 years.

After consulting with the State DOT and the FAA, the original Pulelehua plan was substantially revised to ensure no uses associated with Pulelehua will be within any safety area required for the airport. According to the FAA, no accidents have occurred at Kapalua West Maui Airport since its inception.

Change In Zoning
All State and County change in zoning requirements will be met. We are seeking a reclassification from agricultural to urban from the State Land Use Commission. For the County, we will request a Community Plan Amendment, Change In Zoning from agricultural to Project District.

Affordable Housing:
Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may

March 10, 2005
Page 3 Letter to Bonnie

not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income segregated, affordable "project" which almost always leads to other social issues.

The Draft Environmental Impact Statement (EIS) contains a marketing study that demonstrates an overwhelming demand in the near future for affordable housing as well as gap and moderately priced market rate homes. Independent studies show that between 3,917 to 6,608 additional homes in West Maui are needed (this is made up of current unmet demand of 470 to 1,168 plus 3,447 to 5,440 units for population growth). The majority of this demand, according to these studies, will be for affordable homes.

Pulelehua will provide housing to families earning between 50% and 140% of the median-family income on Maui. As of February 2004, this figure is \$60,700 based on the Housing and Urban Development (HUD) for the County of Maui. Based on this February figure, a family of four earning between \$20,250 and \$84,980 would qualify for affordable housing.

Using the 2004 guidelines and assuming a 6.5% interest rate with a 5% down payment, a single family home would be priced no higher than \$187,400 if a family earned 50% to 80% of the median family income. If a family earned 81% to 100% of the median family income, the price would be set no higher than \$238,000 and prices would top out at \$349,200 if a family earned 100% to 140% of the median family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 50% of Pulelehua's affordable housing is shown below:

10% of the total units	50% to 80% of HUD median family income
21% of the total units	81% to 100% of HUD median family income
20% of the total units	101% to 140% of HUD median family income

To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy-back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.

Thank you for reviewing the EISPN. Your letter will be included in the environmental impact statement.

Mahalo,



Karl Bossert
Development Manager

cc: Mr. Anthony Ching, State Land Use Commission
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Michael Foley, County of Maui Planning Department
Mr. Bob McNair, Maui Land & Pineapple Company, Inc.

COMMENTS ON THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT



12.0 COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The *Pulelehua Draft Environmental Impact Statement* was sent to the following agencies, organizations, and individuals. The public comment period on the Draft EIS was from March 23, 2005 to May 6, 2005. Where indicated, the agency, organization, or individual submitted comments.

	<u>AGENCY</u>	<u>DEIS Mail Date</u>	<u>Date of Comments</u>
State			
<u>1</u>	<u>Department of Business, Economic Development and Tourism (DBEDT)</u>	<u>03-23-05</u>	
<u>2</u>	<u>Department of Business, Economic Development and Tourism – Strategic Industries Division</u>	<u>03-23-05</u>	<u>03-31-05</u>
<u>3</u>	<u>Department of Business, Economic Development and Tourism – Planning Office Land Use Division</u>	<u>03-23-05</u>	
<u>4</u>	<u>Department of Business, Economic Development and Tourism – State Land Use Commission</u>	<u>03-23-05</u>	<u>04-28-05</u>
<u>5</u>	<u>Department of Human Services – Housing and Community Development Corporation of Hawaii</u>	<u>03-23-05</u>	
<u>6</u>	<u>Department of Land and Natural Resources</u>	<u>03-23-05</u>	
<u>7</u>	<u>Department of Land and Natural Resources – State Historic Preservation Division</u>	<u>03-23-05</u>	
<u>8</u>	<u>Department of Land and Natural Resources – Commission on Water Resource Management</u>	<u>03-23-05</u>	<u>04-05-05</u>
<u>9</u>	<u>Department of Transportation – Statewide Planning Office</u>	<u>03-23-05</u>	<u>05-06-05</u>
<u>10</u>	<u>Department of Transportation – Airports Division</u>	<u>03-23-05</u>	
<u>11</u>	<u>Department of Agriculture</u>	<u>03-23-05</u>	
<u>12</u>	<u>Department of Transportation – Maui Airports Office</u>	<u>03-29-05</u>	
<u>13</u>	<u>Department of Transportation – Maui Highways Office</u>	<u>03-29-05</u>	
<u>14</u>	<u>Department of Defense</u>	<u>03-23-05</u>	
<u>15</u>	<u>Department of Hawaiian Home Lands</u>	<u>03-23-05</u>	
<u>16</u>	<u>Office of Hawaiian Affairs</u>	<u>03-23-05</u>	<u>05-04-05</u>
<u>17</u>	<u>UH Environmental Center</u>	<u>03-23-05</u>	<u>05-06-05</u>
<u>18</u>	<u>UH Water Resources Research Center</u>	<u>03-23-05</u>	
<u>19</u>	<u>Department of Education – Office of Business Service</u>	<u>03-23-05</u>	<u>05-17-05</u>
<u>20</u>	<u>Department of Accounting and General Services</u>	<u>03-23-05</u>	<u>04-18-05</u>
<u>21</u>	<u>Department of Health – Safe Drinking Water Branch</u>	<u>03-23-05</u>	<u>04-11-05</u>
<u>22</u>	<u>Department of Health – Office of Environmental Quality Control</u>	<u>03-23-05</u>	<u>05-02-05</u>

PULELEHUA
FINAL ENVIRONMENTAL IMPACT STATEMENT

	<u>AGENCY</u>	<u>DEIS Mail Date</u>	<u>Date of Comments</u>
23	<u>Department of Health – Maui District Health Office</u>	<u>03-23-05</u>	<u>04-25-05</u>
24	<u>Department of Health – Wastewater Branch</u>	<u>03-23-05</u>	<u>04-04-05</u>
Federal			
25	<u>US Fish and Wildlife Service</u>	<u>03-23-05</u>	
26	<u>US Natural Resource Conservation Service</u>	<u>03-23-05</u>	
27	<u>US Federal Aviation Administration</u>	<u>03-23-05</u>	
28	<u>US Army Engineer Division</u>	<u>03-23-05</u>	
29	<u>US Department of the Interior – USGS Survey</u>	<u>03-23-05</u>	<u>05-06-05</u>
30	<u>US Transportation Safety Administration</u>	<u>03-23-05</u>	
County of Maui			
31	<u>Mayor’s Office of Economic Development</u>	<u>03-23-05</u>	
32	<u>Department of Housing and Human Concerns</u>	<u>03-23-05</u>	<u>04-04-05</u>
33	<u>Department of Planning</u>	<u>03-23-05</u>	<u>05-06-05</u>
34	<u>Department of Public Works and Environmental Services Management</u>	<u>03-23-05</u>	<u>05-18-05</u>
35	<u>Department of Parks and Recreation</u>	<u>03-23-05</u>	
36	<u>Department of Fire and Public Safety</u>	<u>03-23-05</u>	<u>04-22-05</u>
37	<u>Police Department</u>	<u>03-23-05</u>	
38	<u>Maui Civil Defense</u>	<u>03-23-05</u>	
39	<u>Department of Water Supply</u>	<u>03-23-05</u>	<u>05-09-05</u>
40	<u>Maui Nui Housing Task Force</u>	<u>03-23-05</u>	<u>04-28-05</u>
41	<u>Maui County Cultural Resources Commission</u>		<u>06-13-05</u>
Libraries			
42	<u>Lahaina Library</u>	<u>03-23-05</u>	
43	<u>State Main Library</u>	<u>03-23-05</u>	
44	<u>Regional Libraries – Pearl City, Kaneohe, Kaimuki, Lihue, Kahului, and Hilo</u>	<u>03-23-05</u>	
45	<u>DBEDT Library</u>	<u>03-23-05</u>	
46	<u>UH Hamilton Library</u>	<u>03-23-05</u>	
47	<u>Legislative Reference Bureau</u>	<u>03-23-05</u>	
48	<u>Maui Community College Library</u>	<u>03-23-05</u>	
Private Companies, Organizations & Individuals			
49	<u>Maui Electric Company, Ltd.</u>	<u>03-23-05</u>	<u>04-15-05</u>
50	<u>Verizon Hawaii, Inc.</u>	<u>03-23-05</u>	
51	<u>The Kahana Ridge Organization</u>	<u>03-23-05</u>	<u>05-05-05</u>
52	<u>Na Kupuna O Maui</u>	<u>03-23-05</u>	
53	<u>West Maui Community Association, LLC</u>	<u>03-23-05</u>	<u>05-05-05</u>
54	<u>West Maui Taxpayers Association</u>	<u>03-23-05</u>	
55	<u>Honolulu Advertiser</u>	<u>03-23-05</u>	
56	<u>Honolulu Star-Bulletin</u>	<u>03-23-05</u>	
57	<u>Maui News</u>	<u>03-23-05</u>	

**PULELEHUA
FINAL ENVIRONMENTAL IMPACT STATEMENT**

	<u>AGENCY</u>	<u>DEIS Mail Date</u>	<u>Date of Comments</u>
<u>58</u>	<u>Cal Lewin</u>	<u>03-23-05</u>	
<u>59</u>	<u>Joe Bertram III</u>	<u>03-23-05</u>	
<u>60</u>	<u>County Councilmember JoAnn Johnson</u>	<u>03-23-05</u>	
<u>61</u>	<u>County Councilmemeber Michelle Anderson</u>	<u>03-23-05</u>	
<u>62</u>	<u>Maui Tomorrow</u>	<u>03-23-05</u>	<u>05-06-05</u>
<u>63</u>	<u>Dick Mayer</u>		<u>05-06-05</u>
<u>64</u>	<u>Maui Sierra Club</u>	<u>04-05-05</u>	<u>05-06-05</u>
<u>65</u>	<u>Kallie Keith</u>	<u>04-06-05</u>	
<u>66</u>	<u>Robert Denton</u>	<u>04-29-05</u>	
<u>67</u>	<u>Don Gerbig</u>		<u>05-06-05</u>

While the public comment period on the Draft EIS has ended, continued comments on Pulelehua are sought.

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PULELEHUA
FINAL ENVIRONMENTAL IMPACT STATEMENT

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**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

State's Industries Division
234 State Barakatahala Street, Laloopapa A, Kamehameha Bldg., 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

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ACTING DEPUTY DIRECTOR

Telephone: (808) 587-3807
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Web site: www.hawaii.gov/dbedt/sid

RECEIVED

APR - 5 2005

PBR HAWAII

March 31, 2005

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

Attn: Tom Schnell, AICP

Subject: Draft Environmental Impact Statement (DEIS)
Pulelehua, Mahinahina, Lahaia, Maui
Tax Map Key: 4-3-01:31 (portion)

Thank you for the opportunity to comment on the DEIS for Pulelehua, a residential, retail, and mixed-use project in Mahinahina, Lanai, Maui. We have no further comments to those of July 24, 2004, on the EISPN.

Sincerely,

Maurice H. Kaya
Chief Technology Officer

c: Maui Land & Pineapple Company, Inc.
State Land Use Commission
OEQC



LAND PLANNING
LANDSCAPE ARCHITECTURE
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May 31, 2005

Mr. Maurice H. Kaya, Chief Technology Officer
State of Hawaii
Department of Business, Economic Development & Tourism
Strategic Industries Division
P.O. Box 2359
Honolulu, Hawai'i 96804

**SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT
STATEMENT**

Dear Mr. Kaya:

Thank you for your letter dated March 31, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge that you have no further comments to offer to those you provided on the EISPN.

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cue, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.



STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
LAND USE COMMISSION

P.O. Box 2359
Honolulu, Hawaii 96804-2359
Telephone: 808-597-3822
Fax: 808-597-3827

April 28, 2005

Mr. Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. Bossert:

Subject: LUC Docket No. A04-751/Maui Land & Pineapple Company, Inc.
Draft Environmental Impact Statement (DEIS)
Pulelehua Subdivision
Mahinahua, Maui, Hawaii
Tax Map Key: 4-3-01: por. 31

We have reviewed the DEIS for the subject project and have the following comments:

- 1) According to its Petition for Land Use District Boundary Amendment (Petition) filed on June 28, 2004, Maui Land & Pineapple Company, Inc. (MLPC), represented that it intended to include Akahahele Street, identified as IMK: 4-3-01: por. 75, within the Petition Area and submit the required written authorization from the State Department of Transportation (DOT) to do so with the EIS (see page 5 of the Petition). Our review of the DEIS, however, indicates that although Akahahele Street is discussed along with the Pulelehua community site within the context of ownership, it is unclear whether the Petition Area includes the street as no written authorization is included nor is the tax map key referenced above identified. As we previously noted, if Akahahele Street is included, the applicable documents/maps in the Petition would need to be amended.

MLPC also represented in the Petition that a metes and bounds description and map as well as a deed evidencing MLPC's title to the Petition Area would be submitted with the EIS (see pages 4 and 5 of the Petition). However, there are no such documents in the DEIS. Although their inclusion is not a requirement of chapter 343, Hawaii Revised Statutes, please be advised that under sections 15-15-50(c)(3) and 15-15-50(c)(5)(A), Hawaii Administrative Rules, they will need to be furnished before the Petition may be considered a proper filing and accepted for processing.

Mr. Karl Bossert
April 28, 2005
Page 2

- 2) The DEIS states that MLPC is agreeable to entering into negotiations with the DOT in order that the DOT may obtain the land area comprised by the Runway Obstacle Free Area and Runway Protection Zone. As this new development with the DOT may affect the size, configuration, ownership, and other elements of the Petition Area, clarification should be provided as to the status of any negotiations thus far, and an anticipated timeframe in which such negotiations may be completed relative to the boundary amendment process.
- 3) There should be an analysis of the projected revenues that would be generated and expenditures that would be incurred by the State and County governments during the construction and operation of the proposed development. The analysis should take into account revenues from general excise taxes, personal and corporate income taxes, and real property taxes, while expenditures should be assessed in terms of roadway improvements and maintenance (both to State and County facilities), schools, fire and police protection, water and sewer services, drainage improvements, refuse collection, and parks and recreational facilities.
- 4) We note that during the hearings on LUC Docket No. A03-741, MLPC represented that affordable rental and for-sale housing units at Pulelehua may partially satisfy MLPC's affordable housing requirements for the Kapalua Mauka development. As such, there should be discussion of Pulelehua's specific role in addressing any of MLPC's affordable housing requirements imposed by the County of Maui. During the hearings, MLPC also represented that it desired to give some priority to its employees for the affordable housing. Of the approximately 51 percent of units that will make up the affordable housing at Pulelehua, how much will be earmarked for MLPC's employees?
- 5) Pursuant to section 11-200-17(h), HAR, the status of each identified governmental approval required for the proposed action should be described. It is our understanding that MLPC has filed applications for community plan amendment, change in zoning, and project district development approval for Pulelehua with the County of Maui Planning Department.
- 6) We note that the Petition Area is adjacent to the Kahana Ridge subdivision, a single-family residential development approved pursuant to LUC Docket No. A91-671/3521 Corporation. The docket involved the reclassification of approximately 44.684 acres of land from the Agricultural District to the Urban District by Decision and Order dated January 19, 1993.

Mr. Karl Bossert
April 28, 2005
Page 3

We have no further comments to offer at this time. Please feel free to contact Bert Saruwatari of my office at 587-3822, should you require clarification or any further assistance.

Sincerely,



ANTHONY J. H. CHING
Executive Officer

c: Office of Environmental Quality Control
Tom Schnell, PBR Hawaii



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

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June 27, 2005

Mr. Anthony Ching, Executive Officer
State of Hawai'i
Department of Business, Economic Development, & Tourism
Land Use Commission
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Ching:

Thank you for your letter dated April 28, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to your comments.

1. The State Department of Transportation (DOT) denied MLP's request to include Akahahele Street and remnant parcels around the Kapalua West Maui Airport in the Land Use District Boundary Amendment for Pulelehua. Therefore, Akahahele Street and various parcels around the airport owned by DOT will not be included in the Petition Area and the applicable documents/maps in the Petition will be amended to exclude Akahahele Street.

A metes and bounds description and map, as well as ownership evidence of the Petition Area, will be provided. We understand this information is necessary to ensure proper filing and acceptance for processing the Petition.

2. MLP is willing to enter into negotiations with DOT so that DOT may obtain the area necessary for the Runway Obstacle Free Area and Runway Protection Zone. At this time, no negotiations have commenced; however, a meeting has been requested with DOT. At present, MLP intends to include all of its land up to the makai airport boundaries in the Petition Area. The metes and bounds description and map submitted to complete the petition, as noted above, will reflect this. Currently, there is no timeframe for the completion of the negotiations. MLP will inform the Land Use Commission of the progress of any negotiations relative to the boundary amendment process.

3. In response to your comment requesting an analysis of the projected revenues that would be generated and expenditures that would be incurred by the State and County governments relative to Pulelehua, MLP commissioned an economic analysis and cost/benefit study. The complete study will be included as an appendix to the Final Environmental Impact Statement (EIS). In addition, the Final EIS will include a new section summarizing the study as shown in Attachment 1 of this letter.

4. A condition of the State Land Use District Boundary Amendment for Kapalua Mauka (Docket No. A03-741) is for 125 affordable homes to be provided as part of Pulelehua. At the time of the Land Use Commission (LUC) hearing on Kapalua Mauka in May 2004, this was more affordable housing than was typically required by the County of Maui, and MLP voluntarily offered and agreed to this condition. At present, the County of Maui has not imposed any affordable housing conditions on

the Kapahua Mauka project. MLP will keep the LUC informed as to Pulelehua's specific role in addressing any of MLP's affordable housing requirements imposed by the County of Maui.

Of the affordable homes within Pulelehua, MLP intends to provide approximately 225 homes for MLP's employees. In the Final EIS, Section 2.6.5 (Section 2.6.4 in the Draft EIS) will be revised to include details of Pulelehua's affordable housing program as shown in Attachment 2 of this letter.

5. In the Final EIS, the approvals and permits table, contained in Sections 1.9.3 and 5.3 of the Draft EIS, will be revised to include the status of each identified governmental approval required for Pulelehua as shown in Attachment 3 of this letter.

MLP has filed applications with the County of Maui for a Community Plan Amendment, Change in Zoning, and Project District Phase I approval.

6. We acknowledge that the Petition Area is adjacent to the Kahana Ridge subdivision, a single-family residential development in the Urban District.

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Attachments

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Attachment 1

In the Final EIS, Section 4.8.5 (Economic Impacts) will be revised to include the following:
An economic cost/benefit analysis for the Pulelehua community (Appendix O) provides the following conclusions:

- The County of Maui will receive some \$8 million in real property tax revenues during the first decade of development and use of Pulelehua, and stabilized receipts of \$1.5 million annually thereafter. The revenues would be substantially higher (upwards of 30 percent) were the community entirely market-priced; however, the inclusion of a significant affordable-price housing component will limit the assessment base.
- The State of Hawai'i will receive circa \$64.4 million in income gross excise tax revenues during the first ten years of the community's existence, stabilizing at \$12.7 million per year thereafter. Again, these revenues would be much higher were the community designed as a typical subdivision, exploiting highway frontages for intense commercial uses, maximizing housing densities and minimizing open space allowances.
- If analyzed on an "actual cost" basis, the additional government operations associated with the Pulelehua will total some \$992,000 to the County and \$3.5 million to the State annually at build-out.
- From a "per capita" public costs perspective, the additional government operations associated with Pulelehua after completion will total circa \$5.8 million per year for the County of Maui and \$14.7 million for the State.
- Overall during its first decade of development and existence, the estimated net returns to the State and County governments will be positive from an "actual cost" perspective. On a "per capita cost" basis, the State will have receipts greater than expenses during the first ten years, and the County will have higher expenses than income.
- At stabilized use levels, both the County and State should experience some net "actual" cash flow benefits: the State more so. However, both will have operating losses from a "per capita" viewpoint, which is typical for a local resident-oriented development having significant affordable-priced components.
- Additional direct benefits include the proposed donation of a 13-acre serviced school site, 10 acres of improved parks, and provisions for seven civic/community lots. Community amenities, including parks, pathways and open/nature spaces will be available for the general public.
- The commitment by Maui Land & Pineapple Company Inc., to price 51 percent of the proposed homes to affordable and gap group housing needs, as opposed to market-priced homes, is inferring some \$35.4 million in equity-based benefits directly into the West Maui community via Pulelehua. Additionally, Maui Land & Pineapple Company Inc., will be making a long-term capital commitment to regional housing needs of \$40.6 million through the construction of 125 rental apartments.
- Supplemental regional public benefits from a real estate perspective include protection of highway frontage from large-scale commercial or residential uses; a lower overall housing unit density (2.8 per acre) than typical for a residential development with significant affordable components; and, actualization of a quality, modern, holistic, lifestyle community which will become a standard for future regional urbanization.

Attachment 2

In the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised as follows:

2.6.6 2.6.4 Affordability

Pulelehua will emphasize "affordable housing with dignity" an integrated affordable housing approach by providing a range of affordable homes integrated with market priced homes into complete neighborhoods housing types throughout the community. Affordable homes will not be segregated into fringe neighborhoods or placed in the least desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low-moderate and gap-group income Maui residents.

Pulelehua will provide housing to families earning between 50 and 140 percent of the median-family income on Maui. As of February 2004 2005, this figure is \$60,700 \$62,350 based on the HUD guidelines for the County of Maui. Based on this February 2005 figure, a family of four earning between \$30,350 \$33,950 and \$84,980 \$87,290 would qualify for affordable housing.

Based on the 2004 2005 HUD guidelines and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than \$187,400 \$193,500 if a family earned 50 to 80 percent of the median-family income. If a family earned 81 percent to 100 percent of the median-family income, the price would be set no higher than \$238,000 \$245,600 and prices would top out at \$349,200 \$359,800 if a family earned 100 percent to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 51 percent of Pulelehua's affordable housing is shown below:

Percentage of Units	Percentage of HUD Median-family Income
10	50 to 80
21	81 to 100
20	101 to 140

To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy-back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

Lottery Pool	Preference
A	MLP Employees and subsidiaries
B	Kapalua Nui Partners
C	West Maui residents who are police officers, public school teachers, and firefighters
D	Maui residents who work in West Maui, but do not live in West Maui
E	West Maui residents

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold a affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Based on the size of Pulelehua and the services currently envisioned, it is estimated, the Home Owner Association (HOA) fees for Pulelehua will be similar to the average fees found in similar associations (plus future escalation). Maui Land & Pineapple Company Inc. will consider a graduated type-of-fee-structure based on affordable and market-rate homes or other criteria such as number of bedrooms, lot size or housing type.

Attachment 3

Research regarding HOA fees on Maui found fees ranging from \$100 to \$400 per month depending on amenities such as pools, tennis courts, or outdoor gas barbecues, as well as the level of service provided for the fees. Isolated developments were found which have higher fees. Pulelehua HOA fees are currently estimated to be \$150 per unit. Maui Land & Pineapple Company Inc. will consider a graduated type of fee structure based on affordable and market rate homes or other criteria such as number of bedrooms, lot size, or housing type.

In addition to affordable homes, Pulelehua's marketing study (Hallstrom 2005) projects that during the next two decades approximately 25 percent of the housing demand in West Maui will be for homes ranging from \$380,000 to \$550,000 and 19 percent of the demand will be for homes above \$550,000. Pulelehua's moderate and market homes rate will help to satisfy the demand for homes in these ranges.

In the Final EIS the table in Section 1.9.4 (Required Permits and Approvals) and Section 5.3 (Approvals and Permits), will be revised as follows:

Permit/Approval	Responsible Agency	Status
Chapter 343, HRS Compliance	State Land Use Commission	Submitted 6-28-05; action pending
State Land Use District Boundary Amendment	State Land Use Commission	Submitted 6-28-05; action pending
Community Plan Amendment	County of Maui Planning Department Maui Planning Commission Maui County Council	Submitted 3-18-05; action pending
Project District Phase I/ Change in Zoning	County of Maui Planning Department Maui Planning Commission Maui County Council	Submitted 3-18-05; action pending
Project District Phases II and III	County of Maui Planning Department Maui Planning Commission Maui County Council	Expected submittal 4-5-06
Project District Phase III	County of Maui Planning Department	Expected submittal 7-5-06
Chapter 6E, HRS Compliance	State Historic Preservation Division	Submitted 06/25/04; accepted 03/03/05
National Pollutant Discharge Elimination System (NPDES) Permit Subdivision Approval	State Department of Health	Expected submittal 8-5-06
Grading/Building Permits	County of Maui Department of Public Works and Environmental Management	Expected submittal 8-5-06
Well Construction Permit/ Pump Installation Permit	County of Maui Department of Public Works and Environmental Management DUNR Commission on Water Resource Management	Expected submittal 4-5-06



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 651
HONOLULU, HAWAII 96809

April 5, 2005

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

Dear Mr. Schnell:

SUBJECT: Pulelehua DEIS

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below.

In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas, which are important for the maintenance of streams and the replenishment of aquifers.

- We recommend coordination with the county government to incorporate this project into the county's Water Use and Development Plan.
- 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.
- We are concerned about 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.
- A Well Construction Permit and/or a Pump Installation Permit from the Commission would be required before a new ground water source is developed for supplying the project.
- The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the Commission would be required prior to use of this source.
- Groundwater withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- We are concerned about the potential for degradation of instream uses from development on highly erodible slopes adjacent to streams within or near the project. We recommend that approvals for this project be conditioned upon a review by the corresponding county's Building Department and the developer's acceptance of any resulting requirements related to erosion control.

Mr. Tom Schnell, AICP
Page 2
April 5, 2005

PETER T. YOUNG
Commissioner
MEREDITH J. CHING
Commissioner
C. J. HERRERA
Commissioner
JAMES A. FRAZER
Commissioner
CHYONGE L. FUKINO, M.D.
Commissioner
LAWRENCE H. MIKE, M.D., J.D.
Commissioner
STEPHANIE A. WYDLLEN
Commissioner
DEAN A. NAKANO
Acting Deputy Director

- If the proposed project includes construction of a stream diversion, the project may require a stream diversion works permit and amend the instream flow standard for the affected stream(s).
- If the proposed project alters the bed and banks of a stream channel, the project may require a stream channel alteration permit.
- OTHER:

The document identifies existing wells and capacities, and surface water treatment capacities, as well as both potable and irrigation demand estimates. But it does not link them up to identify certain sources. Presumably this is under discussion. Surface sources are subject to petitions for review instream flow standards. Groundwater sources are subject to aquifer pump tests to determine appropriate pumpage levels.

If there are any questions, please contact Charley Ica at 587-0251.

Sincerely,

DEAN A. NAKANO
Acting Deputy Director

Ct:ss

c: Karl Bossert, Maui Land & Pineapple Company, Inc.
DLNR, Land Division



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

MR. FRANK BRANDT, FASLA
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June 27, 2005

Mr. Dean A Nakano
Acting Deputy Director,
State of Hawaii
Commission on Water Resource Management
P.O. Box 621
Honolulu, HI 96809

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Nakano:

Thank you for your letter dated April 5, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to your comments.

As stated in Section 4.9.3 (Water System) of the Draft Environmental Impact Statement (EIS), MLP is committed to conserving Maui's valuable water resources by using non-potable water for irrigation, low-flow fixtures, climate appropriate landscaping and limiting irrigated turf where possible.

MLP will work with the County of Maui, Department of Water Supply to incorporate Pulelehua into Maui's Water Use and Development Plan.

MLP will apply for a Well Construction Permit and a Pump Installation Permit from the Commission prior to developing any new ground water sources.

MLP does not plan to adversely impact any streams or build any stream diversions at this time. In the event this is required, MLP will seek a Stream Diversion Works Permit, a Stream Channel Alteration Permit, and amend the instream flow standard for the affected stream(s).

To include information on water sources, as well as information from other comment letters, in the Final EIS, Section 4.9.3 (Water System) will be revised as shown in Attachment 1.

MLP will prepare the required studies to determine the appropriate pumpage levels of the wells. MLP will also amend any instream flow standards. We acknowledge surface water sources are subject to petitions for review of instream standards.

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

Mr. Dean A Nakano
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

Attachment

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Attachment 1

In the Final EIS, Section 4.9.3 (Water System) will be revised as shown:

4.9.3 Water System

Existing Conditions

There are two existing water sources which serve the Māhinahina area. The first is surface water from the Honokōhau Ditch which collects water from Honokōhau Stream and Honolua Stream. The surface water from the Honokōhau Ditch is then diverted to the Māhinahina Water Treatment Plant which was designed to process 2.5 million gallons per day (MGD). Presently, the treatment plant is processing an average of approximately 2.4 MGD.

The second water source is groundwater from the Honokahua wells and Nāpili wells. The capacities of the wells are 700 gallons per minute (gpm) from Honokahua Well A, 1,250 gpm from Honokahua Well B, 700 gpm from Nāpili Well A, 700 gpm from Nāpili Well B, and 1,000 gpm from Nāpili Well C. According to the County of Maui Department of Water Supply (DWS), Honokahua Well A, Nāpili Well A, and Nāpili Well C currently are not in use. Available information indicates that at least one of these wells is non-operational due to mechanical problems. All wells are owned and operated by the DWS.

The wells draw water from the Honolua Aquifer. According to the Commission on Water Resource Management, the Honolua Aquifer has a sustainable yield of eight MGD. In addition to the wells listed above, two other wells draw water from the Honolua Aquifer. All totaled, the wells pumped an average of 2,731 MGD from the aquifer between January 2002 to October 2004. This total is substantially less than the aquifer's eight MGD sustainable yield.

The Honokōwai Aquifer adjoins the Honolua Aquifer to the south. According to the Commission on Water Resource Management, the sustainable yield of the Honokōwai Aquifer is also eight MGD. Nine wells draw water from the Honokōwai Aquifer. All totaled, these wells pumped an average of 3,177 MGD from the aquifer between May 2003 to October 2004. This total is substantially less than the aquifer's eight MGD sustainable yield.

The Commission on Water Resource Management has not designated the Honolua Aquifer or the Honokōwai Aquifer as groundwater management areas.

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokōwai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP

was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

There are two potable water storage areas for the region: 1) the 2.0 million gallon Honokōwai Reservoir; and 2) the 1.0 million gallon Kahana Ridge reservoir. The Honokōwai reservoir is located at an elevation of 250 feet, approximately 1,000 feet south of the southern boundary of the Pulelehua site. The Kahana Ridge Reservoir is also located at an elevation of 250 feet approximately 3,000 feet to the north of the Pulelehua site. Both reservoirs are owned and operated by the DWS.

The Honokōwai Reservoir is filled from the Māhinahina Water Treatment Plant. The Kahana Ridge Reservoir is filled from the Honokahua and Nāpili wells. A 16-inch waterline along Honoapiʻilani Highway transports water from the Kahana Ridge Reservoir to the Kahana Ridge subdivision. There are no other waterlines along Honoapiʻilani Highway in the vicinity of the Pulelehua site.

Maui Pineapple Company Ltd., currently uses a mix of reclaimed (R-1) water from the Lahaina Wastewater Treatment Plant and surface water from the Honokōhau Ditch for irrigation of nearby pineapple fields. There is a 2.0 million gallon reservoir for this water at the 300 foot elevation on the south side of the Kapalua West Maui Airport. Maui Pineapple Company Ltd., currently has agreements in place with the County of Maui to receive R-1 water from the Lahaina Wastewater Reclamation Plant as part of its agricultural operations. As with other R-1 users, Maui Pineapple Company Ltd., pays a fee to the County of Maui based on use. The fee helps offset the cost, including pumping, of providing R-1 water.

Potential Impacts

In accordance with the DWS's Domestic Consumption Guidelines, the average daily water demand for Pulelehua is estimated to be approximately 919,313 gallons per day (including irrigation of parks, open spaces, common areas and the school) based on the current mix of uses (see Section 2.6). This estimate includes the water demand from all potential ohana units; however it is expected that not all ohana units will be built, as ohana units are limited to specific lots and will be built at the discretion of individual owners.

Fire flow demand for single-family residential development is 1,000 gallons per minute for two-hour duration and 2,000 gallons per minute for 2-hour duration for A-2 apartment, schools, and neighborhood businesses and light industrial. Fire hydrants will be installed with a maximum spacing of 350 feet within the single-family residential area and at 250 feet spacing within all other areas.

Water wells will be drilled in the vicinity of the Pulelehua site to provide a new source of water for Pulelehua. It is envisioned that wells will draw water from the Honokōwai

Aquifer: While Maui Land & Pineapple Company Inc., continues to evaluate water supply alternatives, the most likely source for Pulelehua's potable water will be from new wells. These wells will likely be located mauka of the Pulelehua site in the Honokowai or Honolua aquifer. As the current pumpage from the Honokowai Aquifer of 3.171 MGD is well below the aquifer's sustainable yield of eight MGD, the wells are not expected to impact the sustainable yield of the Honokowai Aquifer. If the new wells draw water from the Honolua Aquifer, the sustainable yield of the Honolua Aquifer is not expected to be impacted as the current pumpage from the Honolua Aquifer of 2.73 MGD is also well below the Honolua Aquifer's sustainable yield of eight MGD.

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

Mitigative Measures

Maui Land & Pineapple Company Inc., will work with the DWS for the development and construction of the new wells, which will be built in accordance with DWS standards and all requirements of the Commission on Water Resource Management. In addition, all new sources of potable water will be developed in compliance with Section 11-20-29, HAR and at the appropriate time Maui Land & Pineapple Company Inc., will submit a water engineering report for the approval of the Director of the State Department of Health.

A 1.0 million gallon water storage tank will be required at an elevation of approximately 375 feet to accommodate the domestic water for Pulelehua. The tank will also be constructed to DWS standards and dedicated to the DWS.

The landscaped areas of the Pulelehua community will be irrigated with mixed R-1 and surface water from the reclaimed water reservoir above the Kapalua West Maui Airport. The community parks, neighborhood parks, open spaces, common area for 151 multifamily units and the school will be irrigated using R-1 water. R-1 water will also be used for fire flow requirements. The total R-1 water use demand is estimated at 199,747 gallons per day. The County has confirmed that there is sufficient R-1 capacity from the Lahaina Wastewater Treatment Plant to supply this demand. Maui Land & Pineapple Company Inc., intends to continue or increase its current agreements with the County to supply R-1 water to Pulelehua. The mixed water will also be used for fire flow requirements. R-1 water from the Lahaina Wastewater Treatment Plant will be pumped to the reclaimed water reservoir above the Kapalua West Maui Airport for distribution to Pulelehua. The recycled/mixed water system within Pulelehua will be built and operated in conformance with all applicable laws and regulations, including HAR, Section 11-62-

27, Recycled Water Systems and HAR Title 11, Chapter 11-21, Cross-Connection and Backflow Control.

The use of the mixed R-1 water for irrigation will reduce the average daily water demand by almost 22 percent. Therefore, the Pulelehua community will require approximately 719,589 gallons of potable water per day.

To further conserve water within Pulelehua:

- Single pass cooling will not be allowed pursuant to Maui County Code Section 14.21.20.
- Low-flow fixtures and devices will be used pursuant to Maui County Code Section 16.20A.680.
- Individual homeowners and businesses will be encouraged to maintain fixtures to prevent leaks.
- Climate-adapted native and other appropriate plants will be used in landscaping as practical.
- Best management practices designed to minimize infiltration and runoff from daily operations will be implemented.
- Irrigated turf will be limited where possible.



RECEIVED
JUN 08 2005
P&S HAWAII

RODNEY K. HARAGA
DIRECTOR
Deputy Directors
BRUCE Y. MATSUI
BARRY FUKUNAGA
BRENNON T. MOROKA
BRIAN H. SEKIGUCHI
IN REPLY REFER TO:

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

June 1, 2005

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

Mr. Bob McNatt
Vice President, Land Planning & Development
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Hawaii 96701

Dear Messrs. Schnell and McNatt:

Subject: Pulelehua
Draft Environmental Impact Statement;
County Community Plan Amendment;
Change in Zoning and Project District Phase I Applications;
Day-Night Noise Level Contours Kapalua West Maui Airport (Noise Study);
Transportation Report (TIAR); and Request for Authorization to include Akahahele Street

We are responding to your request to review the subject items related to the proposed Pulelehua Development Project. Our comments are as follows:

1. The project will have an adverse impact on both the existing airport (Kapalua Airport) and highway (Honoapiilani Highway) facilities. We expressed our concerns and provided comments on the impacts in our earlier letters of August 26, 2004 (STP 8.1335) and February 23, 2005 (STP 8.1589) and in meetings with you. Our concerns are still applicable, and this letter supplements or updates our earlier comments.
2. Highway and Roadways
 - a. The Project proposes five (5) accesses along Honoapiilani Highway – four (4) new unsignalized intersections and one existing signalized intersection at Akahahele Street. A request for changes to the present permitted accesses and the new accesses should

Messrs. Schnell & McNatt
Page 2
June 1, 2005
STP 8.1736

STP 8.1736

be submitted to our Highways Division, Right-of-Way Branch, for review and approval.

The operational and construction requirements at the accesses should be discussed with our Highways Division early on, and signal warrant studies and specific intersection improvements may be required.

b. The maps for the project still reflect a sixth potential access resulting from a connection with Hooehui Road in the adjoining Kahana Ridge Subdivision. In our earlier meetings, we were informed that the subdivision residents were objecting to such a connection. An update on the status of this potential access should be provided. If this connection is implemented in the future, an analysis at the intersection of Hooehui Road and Honoapiilani Highway should be submitted and mitigation measures, if required, should be provided.

c. Right-of-way for the future widening of Honoapiilani Highway to a four-lane divided facility should be provided.

Related to this, the Draft EIS states that a berm and landscaped greenway will be used to reduce noise from the highway, with a retention basin/swale integrated into the greenway to control runoff. These items should be designed for placement outside the required right-of-way.

d. A use and occupancy agreement, coordinated through our Highways Division, will be required for all utilities located within our highway right-of-way.

e. We disagree with the position represented in the Draft EIS and Transportation Report that the Project will not create adverse traffic conditions on the roadways, such as the existing two-laned Honoapiilani Highway. Several years ago, Honoapiilani Highway was widened to four lanes between Kaanapali Parkway and Honokowai Bridge. At that time, that section of the highway was experiencing about 1,100 vph, each direction, during the afternoon peak. The projected build out of the project, as well as the other development projects in the area and other background traffic will exceed that volume of traffic.

f. The Draft EIS and Transportation Report should discuss what accommodations are being made to facilitate or provide for the connectivity of roadways parallel/lateral to Honoapiilani Highway with adjacent subdivisions or land developments on the north and south sides of the project.

3. Kapalua Airport

- a. The State Airports Division will retain ownership and control of Akahele Street for airport purposes. Further, while we appreciate your offer to include the road and other land remnants or pieces around the airport in your boundary amendment application, we see no need for the reclassification action of our properties at this time. Your request for authorization to include Akahele Street is therefore denied.
- b. There is a need to comply with the Federal Aviation Administration (FAA) requirements for the runway safety and protection areas. We understand the dimensions of the runway protection zones (RPZ), runway safety area (RSA) and runway obstacle free area (ROFA) provided by the FAA have been incorporated into the Project plans. We also understand that we will have your cooperation and participation in settling and finalizing (1) the boundary documentation, (2) needed mitigation to bring areas up to standard, and (3) control and/or ownership of certain lands by reservation, dedication, or easement in favor of the State to ensure FAA compliance. If the lands are not owned by the State, reservation, or dedication of, or imposition of avigation easements on the lands in favor of the State will be necessary.
- c. Disclosure to all occupants and users in the Project should be required to advise that the project is subject to aircraft overflights and, to occurrences of flight noise and related aircraft operation occurrences. The developer will be required to provide or cause to be provided indemnifications and other protections in favor of and acceptable to the State for airport and aircraft incidents, operations, construction, and accidents.

We concur with the use of the maximum operation scenario to plot noise contours and to place residential uses outside of the plotted 60 DNL and higher noise contour. Industrial-commercial-business office type uses, if located in the 60-65 DNL contours, should require mitigation measures to reduce the interior noise levels to 45 DNL and below for noise sensitive (i.e. office) uses. Residences located in areas of 55 DNL and above should be properly designed and constructed to meet, at a minimum, residential interior noise standards and also require the provisions of full disclosure of the potential for and occurrence of impacts from aircraft and airport operations.
- d. Plans to improve Akahele Street and for all other construction work within the Airport properties should be submitted to our Airports Division for their review and approval. At this time, the construction of a roundabout for security screening is not favored.
- e. An Agreement for the use of Akahele Street must be executed with our Airports Division. It will include requirements to upgrade and maintain the roadway, at no cost to the state.

- f. Creation of drainage detention basins or similar drainage control features mauka (east) of the airport should be designed to discourage their becoming bird attractants or nesting/breeding grounds for other creatures that can cause or create hazards to aircraft flight.
4. Plans for all construction work within and adjoining our highway and airport rights-of-way must be submitted to our Department for review and approval. At a minimum, our review will include construction work affecting airport operations, the highway right-of-way, airport and highway equipment and facilities, and drainage and storm water impacts. Preliminary plans may be submitted for advance review. The final submittal of plans should also include required environmental, construction and use approvals from the appropriate government agencies.

We appreciate the opportunity to provide our comments.

Very truly yours,


RODNEY K. HARAGA
Director of Transportation

Attach.

c: Anthony Ching, Land Use Commission
Laura Thelen, Office of Planning DBEDT
Genevieve Salmonson, Office Environmental Quality Control
Michael Foley, Maui Department of Planning

LINDA LINGLE
GOVERNOR



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

August 26, 2004

RODNEY K. HARAGA
DIRECTOR

Deputy Directors
BRUCE Y. MATSUI
LINDEN H. JOESTING
BRIAN H. SENGUCHI

IN REPLY REFER TO:

STP 8.1335

Mr. Tom Schnell & Mr. Bob McNatt
Page 2
August 26, 2004

STP 8.1335

Highway and traffic generation from other proposed or planned land development projects in the region.

Piecemealing of a development project should be discouraged.

2. The TIAR should address potential improvements such as, but not limited to:

(a) The various access points along Honoapiilani Highway proposed for the project. (Note: Honoapiilani Highway is a limited access arterial).

(b) Widening of Honoapiilani Highway.

3. The proposed roundabout on Honoapiilani Highway is not acceptable. We will not compromise the operating conditions on the main thoroughfare through the area.

4. The TIAR should also reflect the cumulative impacts of continuing development in the Mahinahina and Kapalua areas.

5. The TIAR should include provisions for a local internal roadway connector systems that parallel Honoapiilani Highway to mitigate impacts to the State System.

6. The changes to the land area by both the proposed project and any potential mauka development will have an impact on drainage facilities, both natural and manmade, and other infrastructure facilities, which can affect our highways. A drainage master plan should be submitted and any infrastructure impacts should also be identified and submitted for our review and approval.

7. The developer should agree to participate in and contribute to its fair share of regional and local transportation improvements as determined by our department and the county.

B. Airports Issues

1. Access to Akahahele Street will be limited. As the primary access to Kapalua Airport and to ensure its principal use as dedicated to airport purposes, we may consider access to Akahahele Street to the Pulelehua Project only via a connection acceptable to the DOT. In the event of security alert levels elevated for inspection purposes, major portions of Akahahele Street will be closed and/or used for security screening purposes.

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

Mr. Bob McNatt
Vice President-Land Planning & Development
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. Tom Schnell and Mr. Bob McNatt:

Subject: Pulelehua
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (2) 4-3-01: 31 (portion)

Thank you for requesting our review of the subject Environmental Impact Statement Preparation Notice (EISPN). We have the following comments on the proposed project:

The Pulelehua project will have an adverse impact on both our airport (Kapalua Airport) and highway (Honoapiilani Highway) facilities. We feel that this development is incompatible with our current operations, and significant mitigation measures and/or improvements will be required for the project to proceed as proposed.

Based on the preliminary plans presented in the EISPN, we are providing the following concerns and requirements at this time:

A. Highways Issues

1. A total regional circulation network for the project, with the potential future development of a second phase of Pulelehua and any new project mauka of the subject project should be presented in the traffic impact analysis report (TIAR) being prepared by the developer. The study should cover a thorough review of the existing and planned roadways, including lateral connections paralleling Honoapiilani

Mr. Tom Schnell and Mr. Bob McNett
Page 4
August 26, 2004

- c. Enlarging the runway obstacle free area (ROFA) width to 800 feet is required. The ROFA is an area on the ground centered on a runway to enhance the safety of aircraft operations by having an area free of objects, except for objects that need to be located in the ROFA for air navigation or aircraft ground maneuvering. When practical, ownership or control of the ROFA should be held by the airport operator (our Airports Division). Because the lands are not owned by the State, reservation, or dedication of, or imposition of aviation easements on the land will be necessary.
- d. The impact of placing the proposed community next to the airport creates airfield/aircraft noise concerns. We will need to examine, evaluate and approve the noise assessment study that is being prepared by the developer for the environmental impact statement before we provide any specific comments. However, in general, we can state at this time that the noise assessment study will have to meet our standards and any FAA criteria. Also, noise mitigation measures, such as the use of appropriate construction design and materials, and aviation easements will be required of the developer if noise contours (above 45 DNL) affecting residential type uses, including schools, are identified. We may also require the developer in its perpetuity to provide a continuous noise monitoring system.
- e. Any design or construction work affecting our existing infrastructure lines, equipment and facilities, such as water, electrical service, drainage, etc., will need to be identified and submitted to us for our review and approval.
- f. All applicable FAA forms and documents must be completed, submitted and approved by both the Airports Division and the FAA before any work is to commence. We believe the above list of items, while not exhaustive, indicates our many concerns about the proposed community development, especially with its residential areas, being placed next to and around our airport.

We appreciate the opportunity to provide our comments.

Very truly yours,



RODNEY K. HARAGA
Director of Transportation

DS/JU:km

- c: Michael Foley, Maui Department of Planning
Anthony Ching, Land Use Commission
Mary Lou Kobayashi, Office of Planning, DBEDT
Genevieve Salmonson, Office of Environmental Quality Control
Steven Wong, Federal Aviation Administration

Mr. Tom Schnell and Mr. Bob McNett
Page 3
August 26, 2004

- 2. The Pulelehua project will be surrounding Kapalua Airport and if the lands mauka of the airport are developed in the future, the airport will be completely encircled by the proposed community. This has significant impacts on the airport that need to be mitigated, such as but not limited to:
 - a. Both ends of the runway will be affected and, in particular, the runway protection zones (RPZ) at both ends extend outside the airport's boundary. The lands under the RPZ would be subject to restrictions, limitations or other controls:
 - (1) When practical, ownership or control of the RPZ should be held by the airport operator (our Airports Division). If the lands are not owned by the State, reservation, or dedication of, or imposition of aviation easements on the land will be necessary.
 - (2) The proposed recreational fields on the south end (Runway 2) are being placed directly in the flight track of aircraft landing or taking off. The developer should provide indemnifications and other protections acceptable to the State for airport and aircraft incidents or accidents related to the placement of the recreation site and its use.
 - (3) The proposed gardens on the north end (Runway 20) of the runways could attract birds and other life that may fly, which raises a potential for or can constitute a wildlife hazard to aircraft operations. Appropriate wildlife controls acceptable to the Airports Division will have to be implemented. Similar indemnifications and other protections acceptable to the State recreational field noted above should also be provided because of the gardening activities and users or visitors.
 - (4) The proposed roadways on both ends of the runways, which are intended to connect the subject project to the lands and any future development mauka of the airport, should be located outside of the RPZ or designed into the land, so as not to be an obstruction, hazard, risk, hindrance or other obstacle to such operational safety zone, acceptable to our Airports Division and the FAA.
 - b. Extending the present runway safety area (RSA) an additional 300 feet beyond both runway ends is required. No public roadways or any other developed facilities, including gardens are authorized in RSA's. The developer would be responsible to participate as part of direct mitigation to pay for the grading and other site work requirements which is estimated at \$1,000,000.

LINDA LINGLE
GOVERNOR



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

February 23, 2005

Mr. Bob McNatt
Sr. Vice President/Planning & Development
Kapalua Land Company, Ltd.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. McNatt:

Subject: Request for Authorization to Include Akahahele Street in
Pulelehua's Land Use District Boundary Amendment &
County of Maui Entitlement Applications

In the meeting of February 9, 2005, at our Airports Division, our Department's staff was advised by your representatives that Maui Land and Pineapple will be revising and resubmitting the subject authorization request to include certain strip or remnant pieces of land around Kapalua Airport.

At this meeting, our staff reiterated our airport operational and access concerns as well as roadway/highway access concerns that were conveyed in our earlier letters and meetings. These remain critical outstanding issues that need to be resolved; the draft authorization will not be a blanket and unconditional release in favor of your Pulelehua project.

We understand that, in addition to your inclusion of some additional pieces of land around Kapalua Airport, your revised request will also clarify the scope and parameters being sought in the authorization.

We look forward to continue working with your company on this matter.

Very truly yours,

RODNEY K. HARAGA
Director of Transportation

DS:sy

cc: Tom Schnell, PBR Hawaii
Mary Lou Kobayashi, Office of Planning
Michael Foley, Maui County Planning Department

RODNEY K. HARAGA
DIRECTOR

Deputy Directors
BRUCE Y. MATSUI
BARRY FUKUNAGA
BRENNON T. MORIOKA
BRIAN H. SEKIBUCHI

IN REPLY REFER TO:
DIR 0114
STP 8.1589



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Rodney K. Haraga, Director
Department of Transportation, State of Hawaii
Statewide Transportation Planning Office
869 Punchbowl Street, Room 404
Honolulu, Hawaii 96813-5097

Re: Pulelehua TMK (2) 4-3-01: 31. (portion)
DOT Response to Pulelehua Draft EIS.

Dear Director Haraga:

Thank you for your letter dated May 6, 2005 responding to our Pulelehua Draft Environmental Impact Statement, County Plan Amendment, Change in Zoning, and Project District Phase I applications (your reference: DIR 0352 & 0594, STP 05-037).

We would like to respond to your concerns. Also we would like to propose a series of meetings which we hope will move us toward a mutually agreeable resolution of unresolved issues.

1. GENERAL

Maui Land & Pineapple Company (MLP) has worked diligently with the DOT, FAA, TSA, and the County of Maui to address all of the concerns which were raised in your letter of August 26, 2004. This includes for example, revising the Pulelehua plan to accommodate the latest airport safety distances mandated by the FAA and expanding the TIAR to include 24 potential West Maui development projects.

While we understand the DOT continues to have concerns, we feel these changes addressed the concerns stated in your August 26, 2004 letter.

2. HIGHWAY AND ROADWAYS

- a. MLP would like to meet with the Highway Division's Right-of-Way Branch as soon as possible to: 1) coordinate the four new and one existing

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connections between Pulelehua and Honoapiʻilani Highway; and 2) discuss a possible signal warrant study as well as the possibility of specific intersection improvements.

b. The Kahana Ridge residents have expressed that Hoohui Road should not connect to Pulelehua. MLP respects this choice and does not plan to connect Pulelehua to Hoohui Road. However, the option of connecting has been provided in the Pulelehua plan.

In the event the Kahana Ridge residents decide to open access between their development and Pulelehua, MLP will work with your office to determine if any traffic analysis or mitigation measures would be required.

c. MLP is willing to discuss the issue of a right-of-way for a future widening of Honoapiʻilani Highway to four lanes. While we do not believe this is warranted at this time due to Pulelehua, we understand the DOT's long term interest in securing this right-of-way.

We request a meeting with the Highways Division to discuss the DOT's requirements for the four lane right-of-way. This will allow us to determine the proper location of the berm and landscaping greenway between Honoapiʻilani Highway and Pulelehua.

d. MLP will secure a use and occupancy agreement, through the Highways Division for any utilities located within the current highway right-of-way.

e. According to our Traffic Engineer, there are many variables, other than vehicle loads, that have an impact on the determination of the number of lanes required for any road, street or highway.

While certain traffic loads in specific locations have required the Honoapiʻilani Highway to be expanded to four lanes in the past, MLP is not convinced that this fact alone should be the sole determinant requiring a four lane expansion along the Pulelehua community.

It would seem prudent to evaluate several issues of traffic before making a final determination of the required number of lanes. These include but are not limited to:

1. Block Lengths

2. Vehicular Turning Patterns
3. Average Vehicular Travel Speeds
4. Signal Light Delay Times

MLP requests a meeting to discuss the details of the TIAR and existing conditions at and around Pulelehua to determine the methods for evaluating the future lane requirements along Honoapiʻilani Highway.

f. MLP is not planning any developments to the north of Pulelehua which would include internal roads parallel to Honoapiʻilani Highway. South of Pulelehua, DHHL owns land abutting Pulelehua. The Pulelehua plan provides for connections to the DHHL's land.

3. KAPALUA AIRPORT

a. MLP requested Akahahele Street to be included in State Land Use District Boundary Amendment petition. We acknowledge the denial of our request for authorization to include Akahahele Street and other remnant pieces of land owned by DOT in the boundary amendment.

b. As indicated in Section 4.10 (Kapalua West Maui Airport) of the Draft EIS, Pulelehua complies with all FAA requirements for runway safety and protection. We request a meeting with the DOT Airports Division to discuss control / ownership issues for lands that are needed to ensure FAA compliance.

c. As detailed in Section 4.10 (Kapalua West Maui Airport) of the Draft EIS, MLP intends to follow all State and Federal notification requirements regarding renters, lease tenants and buyers in Pulelehua. These notifications will cover airport noise, aircraft overflights and airport operations as required.

MLP agrees to meet or exceed the current State Land Use Compatibility guidelines for uses within specific DNL noise contours. This will be accomplished through proper design and construction for residential units that fall within the 55 to 60 DNL noise contour and for commercial units that fall within the 60 to 65 DNL noise contour.

d. MLP agrees to submit plans for improvement to the DOT Airports Division for any modification to Akahahele Street.

MLP will assume at this time that the roundabout on Akahahele will not be utilized by the DOT for security screening. As designed, the 300 foot safety distance from the terminal is mauka of the roundabout. In the event security screenings were initiated for the West Maui Airport, the check point could be located further mauka of the roundabout.

- e. MLP concurs with the requirement to enter into an agreement with the Airports Division regarding the use of Akahahele Street. MLP further concurs that this agreement will include a provision whereby MLP will upgrade and maintain the road at no cost to the State. We request a meeting with the Airports Division as soon as possible to work out an acceptable agreement.
- f. MLP agrees to design any water retention / detention basins and other water management facilities to discourage the attraction of birds or use as a nesting / breeding ground for other creatures that can cause or create hazards to aircraft flight.

CONSTRUCTION PLANS

MLP acknowledges that construction plans for the highway and airport rights-of-ways must be submitted for your review and approval. MLP will meet all required environmental, construction, and use approvals from the appropriate governmental agencies.

We look forward to meeting with the Highways Division to finalize necessary agreements and understandings and the Airports Division to work through the details of the land agreements that are being sought by the DOT.

We are equally motivated to meet with the Highways Division and the Right-of-Way Branch concerning the number of highway intersections. We would also like to discuss the need and timing of a highway expansion to four lanes.

Pulelehua addresses many needs currently not being met in West Maui, including affordable housing, walkable neighborhoods, and a new school site. We know that by working together with the State and County agencies, Pulelehua will be able to meet those needs. Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS.

Sincerely,



Karl Bossert
Development Manager

cc: Brain Sekiguchi, Department of Transportation, Airports Division
Steve Wong, Federal Aviation Administration
Mayor Arakawa, Mayor's Office, County of Maui
Keith Regan, Mayor's Office, County of Maui
Mike Foley, Department of Planning, County of Maui
Anthony Ching, Land Use Commission
Genevieve Salmonson, Office of Environmental Quality Control
Bob McNatt, Maui Land and Pineapple Co., Inc.
Randy Endo, Maui Land and Pineapple Co., Inc.
Leilani Pulmano, Maui Land and Pineapple Co., Inc.
Tom Schnell, PBR Hawaii



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

May 4, 2005

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

HRD05/1496 B

RE: Request for review and comment on the Draft Environmental Impact Statement for Pulelehua: A New Traditional Community; Mahinahina, Lahaina, Maui, TMK: 4-3-001:031

Dear Tom Schnell,

The Office of Hawaiian Affairs (OHA) is in receipt of your March 23, 2005, request for comments on the above project, which would include the development of an affordable housing community in West Maui of 882 homes (with the potential for as many as 267 ohana homes), and related retail space, commercial areas, civic spaces, a public school, open space and recreational areas within approximately 312 acres. OHA offers the following comments.

The design of this project is commendable, creating a relatively affordable community of neighborhoods with an infrastructure to support it instead of simply adding more homes and resource users to an already overburdened landscape. The Draft EIS is equally well-prepared, and OHA thanks the applicant for addressing the questions and concerns that we raised in our comments on the EIS Preparation Notice. OHA particularly appreciates the cumulative impact study that not only incorporated existing developments in the area, but planned developments over the next 6 years within West Maui.

The use of open space, trails and gardens as a buffer between the Kapalua West Maui Airport runway and the proposed Pulelehua homes shows the intentions of good planning, and OHA

Tom Schnell
May 4, 2005
Page 2

requests that all landscaping include native plantings as often as possible. This will not only save on irrigation costs, but also promote a reestablishment of native habitat and slow the influx of aggressive alien ornamentals.

OHA commends that the project's planned use of non-potable and surface water for irrigation. We continue to suggest the implementation of water conservation measures wherever possible. These could include, but not be limited to, native plantings; low-flow fixtures and devices; a maintenance plan for fixtures to prevent leaks; limited irrigated turf; and other creative water conservation methods.

Despite the extensive history of ground disturbance for pineapple cultivation in the area, and because of the many gulches in the area that may hold cultural sites, OHA will rely on your assurances that should iwi or Native Hawaiian cultural or traditional deposits be found during ground disturbance or excavation, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions or concerns, please contact Heidi Guth at 594-1962 or e-mail her at heidig@oha.org.

Sincerely,

Clyde W. Nāmu'o
Administrator

CC: Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, HI 96761

Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Office of Environmental Quality Control
235 South Beretania St., Suite 702
Honolulu, HI 96813

Tom Schnell
May 4, 2005
Page 3

Theima Shimaoka
Community Affairs Coordinator
OHA – Maui Office
140 Hooohana Street, Suite 206
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Laura Thielen
State of Hawai'i, DBEDT
Office of Planning
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June 27, 2005

Mr. Clyde W. Nāmu'ō
Administrator
State of Hawai'i
Office of Hawaiian Affairs
711 Kapi'olani Blvd., Suite 500
Honolulu, HI 96813

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Nāmu'ō:

Thank you for your letter dated May 4, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, we are responding to your comments.

Shaped by community input since the beginning of the planning process, Pulelehua will meet the real needs of its residents. Maui Land & Pineapple Company appreciates your positive comments on the design of the community and the preparation of the Draft EIS. The EIS process allows for issues to be addressed by various governmental and public agencies and positive feedback is always welcomed. Again, thank you for positive comments.

1. As noted in Section 3.8 of the Draft EIS new landscaping will include native plants.
2. Pulelehua will include water conservation measures wherever possible. Section 4.9.3 of the Draft EIS notes some of these measures.
3. Should iwi or Native Hawaiian cultural or traditional deposits be found during excavation, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. This is noted in Section 4.1 of the Draft EIS.

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

May 6, 2005
RE 0744

Bob McNatt
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. McNatt:

Draft Environmental Impact Statement (DEIS)
Pulelehua
Lahaina, Maui

Maui Land & Pineapple is proposing to create a 312-acre residential subdivision in west Maui. The subdivision is Pulelehua and will include 882 multi-family and single family homes. This development is one of 29 projects being proposed in the west Maui area. According to the DEIS, at least 51% of the houses will be affordable to residents making between 50 to 140% of the median income. As of February 2004, median income was \$60,700, based upon the HUD guidelines for the county of Maui. Based upon this figure, a family of four earning between \$30,350 and \$84,980 would qualify for affordable housing. The total costs for the project are estimated to be approximately \$342 million. The total elapsed time for project completion is five to nine years, with the first homes to be completed in 2007.

The Environmental Center conducted this review with the assistance of Dick Mayer, Maui Community College; and Kerry Halford, Environmental Center.

General Comments

The 29 (Pulelehua included) proposed projects in the west Maui area, will implicitly and explicitly exacerbate impacts to the unique ecosystem. An updated, comprehensive West Maui Master Plan elucidating unavoidable secondary and cumulative impacts arising from the rapid growth and development in this area is warranted. Regarding this draft EIS for the Pulelehua project, our reviewers found that the document underscores major impacts to the west Maui area. These impacts include but are not limited to increased water and wastewater demands, increased electrical demands; past agriculture land uses and practices, increased runoff, groundwater use and past contamination, and insufficient educational facilities.

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May 6, 2005
Page 2 of 4

West Maui Master Plan

Cumulative and secondary impacts are addressed on two full pages within the section (7.2) sporting the same title. With the proposed 29 project developments in the west Maui area, our reviewers suggest a full report on each project's relationship to the Master Plan. Table 2 on page 65 of the draft EIS lists only 25 projects; however, our reviewers cite 29 known proposed projects. This discrepancy should be addressed, and Table 2 should reflect the correct development scenario in the final EIS.

Section 7.2 in the draft EIS states:

Not all of the projects on the list (Table 2, p 65) are approved or even certain to be approved, however some of the projects are approved and few are in construction or near completion. The list of current and proposed projects is the basis of reasonably anticipated development in the area.

By implication, the draft EIS seems to understate the seriousness and capacity of the project developers to indeed build each of these projects. However, regardless of the de facto state of a proposed project, for planning purposes, the intent of a comprehensive cumulative impact analysis is to consider a full build-out scenario. For this reason the final EIS should consist of a more elaborate cumulative and secondary impact report. This report should take into consideration that each of these projects will be constructed and address the significance of each project's final effects.

Water and Wastewater Demands

According to the draft EIS, the Honokowai and Honolua aquifers are proposed water sources for the Pulelehua community. If this is the case, the final EIS should include a comprehensive study related to both of these aquifers. This study should provide source well data for determination of potential water quality and the existing demand already placed upon these groundwater sources. On page 92 of the draft EIS a sewer impact study is referenced:

(ML&P)...is working with the Wastewater Reclamation Division to determine the capacity of the existing facilities to confirm that Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua. A detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design.

This sewer impact study should have been included in the draft EIS, as the study will contain pertinent information for public review. It would seem premature to undertake a residential development of this magnitude in the absence of full understanding of the true capacity requirements and costs associated with such a basic development support requirement.

Electrical Demands

The Environmental Center applauds ML&P for the use of underground utility lines mentioned on page 93 of the draft EIS. Tsunami threat and visual impacts make underground utilities a viable solution for the Island community. Also on page 93, one mitigation measure for the additional electric demand is through implementation of renewable energy sources. What renewable energy sources will ML&P implement for the growing west Maui population?

Agricultural Past Use and Practices

The Pulelehua development will provide a proposed elementary school and 882 residential units. Prior applications of herbicide and pesticides on this former agricultural land likely will have created low-level residues in the soil. The draft EIS contains no discussion, either of agricultural chemical residual testing in the area or of potential cumulative impacts of low level exposure to residual toxins on playgrounds, gardens, and from wind blow up. In addition, groundwater supplies might also have been affected by years of toxin exposures, and a survey of groundwater concentration of agricultural residuals appears warranted.

Increased Runoff

Once the project is completed, an estimated 544.8 cubic feet per second (cfs) of additional water runoff will be created from urban cover-up. The Ocean Pointe development on the Island of Oahu caused an exorbitant amount of water runoff to the Oneita Beach Park area. Poor project planning necessitated a 500-foot wide drainage gulch to be tunneled through the beach park in order to meet the City and County of Honolulu's 100-year storm flow requirements. Page 87 of the draft EIS briefly discusses the mitigative measures for increased runoff due to the project development. Our reviewers suggest an appropriate drainage study to be completed and submitted in the final EIS, as an added reassurance for community members.

Educational Facilities

Given the present situation concerning overcrowding of the public school system in the west Maui area, will the proposed elementary school be built before or after the residential units? Also, the draft EIS discusses elementary school capacity, however, high school educational issues are not mentioned. Page 106, lists a chart of the four public school facilities in the west Maui area. One public high school services the entire west Maui area. Lanaihaluna high school currently enrolls 1,038 individuals, significantly above its stated capacity of 850. The additional enrollment of high school students from Pulelehua will create an even larger taxation on the presently overcrowded Lanaihaluna facility. How does ML&P propose to mitigate this issue?

Rapid Growth and the West Maui Community Plan

Rapid growth and development in the west Maui region constitutes an implicit assumption throughout the draft EIS. The adaptive capacity of ecosystems and environmental health in general are affected to a more substantial degree by rapid progress, rather than slow, controlled growth. If such rapid growth is imminent as a result of regional economic and immigration patterns, it stands to reason that greater effort should be expended towards development of a comprehensive regional master plan that accommodates such imminent and explosive expansion of human population. The West Maui Community Plan was created in 1996, when such developments were not considered a prudent solution to population demands. Pulelehua proposes to provide affordable housing with a "Traditional Neighborhood Design." The holistic community will be based on "authenticity, inclusiveness, sustainability, and eco-sensitivity." While this vision is a hopeful goal, the final EIS must incorporate an authentic, inclusive, sustaining, and eco-sensitive tone throughout.

Thank you for the opportunity to review this Draft EIS.

Sincerely,



John T. Harrison, Ph.D.
Environmental Coordinator

cc: OEQC
PBR
LUC
James Moncur, WRRRC
Dick Mayer
Kerry Halford



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Dr. John Harrison
Environmental Coordinator
University of Hawaii at Manoa
2500 Dole Street, Krauss Annex 19
Honolulu, Hawaii 96822

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Dr Harrison:

Thank you for your letter dated May 6, 2005. Maui Land & Pineapple Company (MLP) would like to take this opportunity to respond to your comments.

General Comments

While not cited in your letter, the 29 projects you refer to appear to be the same as a list compiled by Maui Tomorrow. Careful comparison of Maui Tomorrow's list with the list in the Draft EIS indicates that the list in the Pulelehua Draft EIS is similar to Maui Tomorrow's list. The additional number of projects in Maui Tomorrow's list is the result of counting some projects (such as Pulelehua) in separate phases, the inclusion of some small projects (such as Sunstone and Hale Mahaolu, with five units each), and the inclusion of some projects (such as Kepua Village) that are already built and thus should not be included on a list of proposed projects. Also there are some projects on the Maui Tomorrow list that are also included in the list in the Draft EIS, which are the same project, but with different names. In addition, one source of information cited for the Maui Tomorrow list is a *Honolulu Advertiser* article dated February, 8, 2004, which contained many inaccuracies.

The Draft EIS addresses cumulative impacts (see Section 7.2 (Cumulative and Secondary Impacts)), including a list of 25 proposed West Maui projects (including Pulelehua) (see Table 2 in Section 4.4 (Transportation)), and projects the cumulative number of units in West Maui that may be built by 2011, which is the year Pulelehua is projected to be complete. This methodology projects the impact of Pulelehua during build-out to completion. Thus in the Draft EIS, the cumulative impact of Pulelehua is considered in relation to other proposed projects. Projecting the impacts of other projects beyond the build out of Pulelehua would be highly theoretical and beyond the scope of the Pulelehua EIS. We chose a realistic timeframe to accurately project impacts of Pulelehua in context of other proposed projects. We find it highly unlikely that all proposed projects will be approved or, if approved, be built as currently conceived.

Without knowing final plans of other projects and without knowing if these projects will be approved, it is not possible to comprehensively detail all impacts from other projects. We agree that additional projects in West Maui will increase demands for resources and impact infrastructure, however, as we have done with Pulelehua, these other projects will have to plan

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Dr. John Harrison, Environmental Coordinator
Pulelehua Draft EIS
June 27, 2005
Page 2 of 6

accordingly to ensure impacts are minimized. As with Pulelehua, other proposed projects will be subject to regulatory review to ensure compliance with applicable land use policies. Projects must have the appropriate State land use designation, the appropriate County zoning, and comply with other applicable regulatory review and approval procedures to ensure the project will not have major adverse effects on infrastructure, public services, and the natural or socio-economic environment, or result in adverse cumulative and secondary impacts. Developers of other projects in the region will be required to satisfactorily mitigate impacts of their projects before proceeding with development.

In considering if an EIS is acceptable, the Hawaii Supreme Court has determined that the "rule of reason," shall apply; meaning that an EIS need not be exhaustive to the point of discussing all possible details bearing on a proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable a decision-maker to fully consider the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.

West Maui Master Plan

See above response.

Water and Wastewater Demands

The information contained in Section 4.9.3 (Water System) of the Draft EIS regarding the sustainable yield of the Honokowai and Honolua Aquifers is from the records of the Commission on Water Resource Management (CWRM). In their comments on the Draft EIS, CWRM did not note that the information was incorrect.

In response to your concern about water demand, Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

Maui Land & Pineapple Company, Inc. has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

Regarding your comments regarding wastewater, as stated in Section 4.9.4 (Wastewater Systems) in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete. As also stated in the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design.

In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant and it is not possible to prepare a detailed sewer impact study

for Pulelehua at this time. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

We are aware that the County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued. In the Final EIS Section 4.9.4 (Wastewater System) will include the following:

The County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued.

Maui Land & Pineapple Company Inc., will pay its fair share for any improvement fees assessed for Pulelehua. In the event the Lanaina Wastewater Reclamation cannot accommodate Pulelehua, Maui Land & Pineapple Company Inc. will evaluate the installation of a packaged sewer treatment plant to address Pulelehua's wastewater treatment demands.

Electrical Demands

MLP appreciates your positive comment on the use of underground utility lines.

MLP has contracted William McDonough + Partners to provide a study on sustainable solutions that might be appropriate for Pulelehua as reflected in Section 2.8 (Sustainable Building Design) of the Draft EIS. In terms of renewable electric sources, Pulelehua will include solar hot water heaters on all homes. Photovoltaic solar panels may be used in the school, civic buildings, apartment buildings and commercial buildings. Buildings will be carefully oriented to maximize daylight opportunities further reducing electrical loads. In addition, natural ventilation will be maximized to reduce the need for air conditioning homes.

Agricultural Past Use and Practices

In response to your concern about the potential impacts of chemicals used on the former pineapple fields of the Pulelehua site, Section 3.5 (Identification of Chemicals and Fertilizers) of the Final EIS will be revised to include the following:

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

In response to your concern about the potential impacts of chemicals to groundwater supplies, Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honouliuli Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii. This use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honouliuli aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

Increased Runoff

Pulelehua's stormwater management system will be designed during the engineering phase of the subdivision process and approved by various agencies, including the Department of Public Works and Environmental Management. As detailed in Section 4.9.2 (Drainage), "All drainage improvements will be developed in accordance with applicable DOH and County of Maui drainage requirements and standards. In addition, Maui Land & Pineapple Company Inc. will comply with all laws and regulations regarding runoff and non-point source pollution, ensuring that storm water run-off and siltation will not adversely affect the downstream marine environment and nearshore and offshore water quality."

Educational Facilities

In response to your comment regarding the timing of the school construction, in the Final EIS, Section 4.11.3 will be revised to include the following:

Plans for Pulelehua include a 13-acre site for a public elementary school. Maui Land & Pineapple Company Inc., will contribute the 13-acre school site as a portion of their standard fair-share school impact fee. Maui Land & Pineapple Company Inc., plans to develop Pulelehua in one phase and will keep the DOE informed regarding the progress of Pulelehua.

It should be noted that the State has appropriated funds for the preliminary design of the elementary school. In their comment letter on the Draft EIS the Department of Education (DOE) stated: "The DOE acknowledges the need for additional school facilities within the West Maui area and finds the Pulelehua site acceptable for an elementary school."

Dr. John Harrison, Environmental Coordinator
Pulelehua Draft EIS
June 27, 2005
Page 5 of 6

Of the individuals that have registered with MLP as interested in living in Pulelehua and provided information regarding whether they have children, 67 percent (1,768) have children living at home. Fifty percent (894) of these individuals have children that are elementary age or younger. In addition, 10 percent (267) of the individuals and families registered are between the ages of 20 and 40 but do not currently have children.

The DOE concludes that an elementary school within Pulelehua could accommodate all elementary students living in Pulelehua. To mitigate the impact of Pulelehua on Lahaina Intermediate School and Lahaina High School, the DOE requests that the State and County impose a standard school fair-share condition.

Regarding your comments on Lahaina area school enrollments, capacities, and enrollment projections, Section 4.11.3 (Schools) of the Final EIS will be revised as shown in Attachment 1 of this letter.

Rapid Growth and the West Maui Community Plan

The population projections cited in the Draft EIS are from a report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). This report was commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm. The report projects that the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

As stated in Section 4.8.2 (Housing) of the Draft EIS, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income. According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. MLP's list 2,411 individuals and families who are interested in owning a home in Pulelehua and provided income information indicates that approximately 74 percent of these individuals and families would likely qualify for affordable housing. Based on these facts it is clear that reasonably priced homes in West Maui are in severe under supply.

While adopted by the County Council in 1996, the process of updating the West Maui Community Plan started in 1992. Changes in the West Maui region since then (such as the closure of the Pioneer Mill and the exponential increase in housing costs) necessitate a new revision to the plan. However, the County of Maui is just now starting on updating the General Plan, to be followed by updates of the nine community plan regions. The process will take years, meanwhile West Maui's population is increasing and housing prices continue to escalate.

MLP has gone to great lengths to incorporate an authentic, inclusive, sustaining and eco-sensitive perspective in Pulelehua. The Traditional Neighborhood design by definition preserves open spaces. Pulelehua for example includes 45% of the 312 acres as parks, gulches and open space. The community will be a fully integrated and diverse population representing a variety of age groups, walks of life and economic means. The mix of building uses and walkable nature will represent one of the first attempts to return to the authentic town designs of older neighborhoods Maui. Pulelehua will represent our vision of a holistic community.

Dr. John Harrison, Environmental Coordinator
Pulelehua Draft EIS
June 27, 2005
Page 6 of 6

Thank you for comments. Your letter and text modifications to the Draft EIS, as listed above, will be included in the Final EIS.

Sincerely,



Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company Inc.

Attachment

cc: Anthony Ching, State Land Use Commission
Abe Mitsuda, State Office of Planning
Genevieve Salmonson, Office of Environmental Quality Control
Ann T. Cua, Department of Planning, County of Maui
Bob McNatt, Maui Land & Pineapple Company, Inc.
Tom Schnell, PBR Hawaii

ATTACHMENT 1

In the Final EIS, Section 4.11.3 (Schools) will be revised as shown:

4.11.3 Schools

Existing Conditions

Educational facilities in West Maui include four public schools and two private schools. The public schools are: King Kamehameha III Elementary (grades K-5), Princess Nahienaena Elementary (grades K-5), Lahaina Intermediate (grades 6-8), and Lahainaluna High (grades 9-12). The private schools are: Sacred Hearts School (grades K-8) and West Maui Carden Academy.

As of October 2004, the current enrollment at West Maui's public schools was as follows: In their comment letter on the Pulelehua Draft EIS, dated May 17, 2005 (see Section 12) the Department of Education (DOE) provided the following information on the enrollments for school year 2004-2005 and capacities for school year 2003-2004 of West Maui public schools:

	Current Enrollment (2004-2005)	Capacity (2003-2004)	Over Capacity (2004-2005)
Kamehameha III Elementary:	698	704	-2
Princess Nahienaena Elementary:	661	681	-17
Lahaina Intermediate:	637	677	40
Lahainaluna High School:	1,038	869	244

Kamehameha III Elementary School is the designated public elementary school for students from the area extending from Honokohau Valley to Ka'anapali (which includes the Pulelehua area). All Kamehameha III Elementary School students must be transported to and from school, either by school buses, or by other means such as their parents or car pools. The DOE operates six school buses to transport 254 students to Kamehameha III Elementary School from the Honokohau Valley to Ka'anapali area. Many of these students reside in the area near Pulelehua.

Potential Impacts and Mitigative Measures

Plans for Pulelehua include a 13-acre site for a public elementary school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoopi'iani Highway as elementary school children residing north of Ka'anapali, will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahine) to walk to school, further reducing trips on to Honoopi'iani Highway.

Planning Director Mike Foley has noted that the Pulelehua school will be a good traffic mitigation measure since West Maui Schools have the highest number of parents driving kids to school within the State. In their comment letter on the EISPN, the Police Department stated that "having a school in the vicinity is a must," in reference to the fact that there is currently no school in the Pulelehua area and all students must be driven to Lahaina area schools, including schools serviced by Lahainaluna Road.

The DOE has indicated that the Pulelehua school site is appropriate and acceptable for and elementary school.

The Market Study and Economic Impact Analysis prepared for the Pulelehua community (Hallett 2005) estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on DOE figures, with about 76 percent (308 children) attending grades Kindergarten to 5th, and 25 percent (103) attending high school.

In their comment letter on the Draft EIS, the Department of Education estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students. The number of students is dependent on the total number of residential units and the breakdown between single-family and multi-family homes.

The Department of Education also provided the following information regarding the projected enrollments and capacities for the 2009-2010 school year:

	Projected Enrollment (2009-2010)	Over Capacity (2009-2010)	Students
Kamehameha III Elementary:	683	-21	
Princess Nahienaena Elementary:	615	-66	239
Elementary Subtotal:	1,298		115
Lahaina Intermediate:	664	67	136
Lahainaluna High School:	996	172	

The Department of Education concludes that an elementary school within Pulelehua could accommodate all elementary students residing in Pulelehua and that Pulelehua will impact Lahaina Intermediate and Lahainaluna High by doubling the number of students currently over facility capacity. To mitigate this impact the Department of Education requests the state and Maui County to impose a standard school fair-share condition to offset the impact of Pulelehua on the Lahainaluna schools.

A new private school, Maui Preparatory Academy, will be located in Nāpili and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. In 2007, four classes of pre-Kindergarten will be added. The anticipated enrollment of pre-Kindergarten children is 18 students per classroom. In 2008, an additional primary grade level will be added. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-Kindergarten through 12.



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

OFFICE OF BUSINESS SERVICES
May 17, 2005

Mr. Michael W. Foley, Director
Department of Planning
Maui County
250 South High Street
Wailuku, Hawaii 96793

Attention: Ms. Ann T. Cua, Staff Planner

Dear Mr. Foley:

Subject: Pulelehua - Maui Land & Pineapple Company, Inc.
Lahaina, Maui, TMK: 4-3-001: 031 (por)
CPA 2005/0005, CIZ 2005/0004, PHI 2005/0001

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement (DEIS) along with applications for a Community Plan Amendment, Change in Zoning, and Project District Phase I for Pulelehua planned residential community. The project will be developed by Maui Land & Pineapple Company, Inc. (Applicant).

The DOE has held discussions with the Applicant concerning their interest in developing a 13-acre elementary school within Pulelehua. The DOE acknowledges a need for additional school facilities within the West Maui area and finds the Pulelehua site acceptable for an elementary school.

The current facility capacity of all schools in the Lahainaluna Complex is set out in Attachment A. The attachment indicates that the current enrollment of the elementary schools is just below their facility capacity. Lahaina Intermediate and Lahainaluna High have already exceeded their facility capacity.

The Pulelehua project is expected to have approximately 668 single-family residential units and 481 multi-family units although those figures do not seem to be explicitly stated in the DEIS. Based on those figures, the DOE estimates there could be 239 elementary students, 115 middle school students, and 136 high school students, for a total of 490 students. The number of students is dependent on the total number of residential units and the breakdown between single- family and multi-family units.

An elementary school within Pulelehua could accommodate all the elementary students residing in the project. The project will also impact Lahaina Intermediate and Lahainaluna High by doubling the number of students currently over facility capacity.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

Mr. Michael W. Foley
Page 2
May 17, 2005

The DOE requests that the state and Maui County impose a standard school fair-share condition on the Applicant so that a school contribution can be used to offset the impact of Pulelehua on the Lahainaluna schools. We also request use of the standard fair-share language which follows:

The Applicant shall contribute to the development, funding, and/or construction of school facilities, on a fair-share basis, as determined by and to the satisfaction of the Department of Education. Terms of the contribution shall be agreed upon in writing by the Applicant and the Department of Education prior to obtaining building permits for any area of development.

The DOE notes that the DEIS specifies that the applicant is planning to do a noise study specific to the school and prior to school construction. The DOE looks forward to reviewing the study.

The DEIS also states that Maui County Planning Director, Mike Foley, has noted that an elementary school in Pulelehua would be good traffic mitigation as more West Maui parents drive their children to school than anywhere else in the state. It would be helpful to know how that indicator was derived. While the Pulelehua community will be designed to encourage more pedestrian and bike traffic to the school, it may be useful for the Applicant to work with the DOE to estimate and isolate possible school traffic impact in greater detail.

The DOE appreciates the opportunity to comment on the Pulelehua DEIS. If you have any questions, please call me at 586-3444 or Heidi Meecker of the Facilities and Support Services Branch at 733-4862.

Sincerely,

Rae M. Loui
Assistant Superintendent

Attachment

RML:hy

- c: Ron Okamura, CAS, Hana/Lahainaluna/Lanai/Molokai Complex Area
Anthony Ching, SLUC
Genevieve Salmanson, OEQC
Abe Mitsuda, OP
Tom Schnell, PBR Hawaii

Lahainaluna Complex: Enrollments, Capacity, and Enrollment Projections

School	Capacity (2003-2004)	Enrollment (2003-2004)	Enrollment (2004-2005)	# of students over capacity '04-'05	Projected Enrollment 2009-2010	# of students over capacity '09-'10	# of students expected to live in Pulelehua
KAMEHAMEHA III	704	679	702	-2	683	-21	
NAHIENAENA	681	655	664	-17	615	-66	
Elementary School subtotal	1,385	1,334	1,366	-19	1,299	-87	239
LAHAINA INTER	597	625	637	40	664	67	115
LAHAINALUNA HIGH	794	1,000	1,038	244	966	172	136

* '09 projection made in 2004-2005 school year



LAND PLANNING
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HILLO OFFICE

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June 27, 2005

Ms. Rae M. Loui
State of Hawai'i
Department of Education
P.O. Box 2360
Honolulu, Hawai'i 96804

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Loui:

Thank you for your letter dated May 17, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, we are responding to your comments.

In your letter you acknowledge that Maui Land & Pineapple Company has held discussions with the Department of Education and note that the Pulelehua site is acceptable for an elementary school.

Thank you for providing information on Lahainaluna Complex enrollments, capacities, and enrollment projections. Section 4.11.3 (Schools) of the Final EIS will include this information as shown in Attachment I of this letter.

Because of the Traditional Neighborhood Design of Pulelehua, the Draft EIS does not segment home types into purely "single-family" or "multifamily" designations; however, we agree with your analysis of the breakdown of unit types for the purpose of providing estimates of school age students in Pulelehua. Section 4.11.3 (Schools) of the Final EIS will include your projections of Pulelehua students as shown in Attachment I of this letter.

Maui Land & Pineapple Company will work with the Department of Education to determine its fair-share contribution to offset the impact of Pulelehua on the Lahainaluna Schools.

The Environmental Noise Assessment Report contained in Appendix I of the Draft EIS states that a follow-up noise study will be conducted to evaluate the noise impact of exterior noises on the new school, prior to construction of the new school. Maui Land & Pineapple Company will provide the Department of Education with a copy of the follow-up noise study when it is available.

Regarding Maui County Planning Director Mike Foley's statement that an elementary school in Pulelehua would be good traffic mitigation for West Maui because more West Maui parents drive their children to school than anywhere else in the state, it is not

Rae M. Loui
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

known what indicator he was referring to in making this statement. However, it is known that nearly all students residing north of Kaanapali are either bussed or driven to school because all West Maui public schools are in the Lahaina area, which makes walking or biking to school impractical for students north of Kaanapali.

Maui Land & Pineapple Company will work with the Department of Education to estimate and isolate possible school traffic in greater detail.

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Attachment

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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ATTACHMENT 1

In the Final EIS, Section 4.11.3 (Schools) will be revised as shown:

4.11.3 Schools

Existing Conditions

Educational facilities in West Maui include four public schools and two private schools. The public schools are: King Kamehameha III Elementary (grades K-5), Princess Nahienaena Elementary (grades K-5), Lahaina Intermediate (grades 6-8), and Lahainaluna High (grades 9-12). The private schools are: Sacred Hearts School (grades K-8) and West Maui Carden Academy.

~~As of October 2004, the current enrollment at West Maui's public schools was as follows: In their comment letter on the Pulelehua Draft EIS, dated May 17, 2005 (see Section 12) the Department of Education (DOE) provided the following information on the enrollments (for school year 2004-2005) and capacities (for school year 2003-2004) of West Maui public schools:~~

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Princess Nahienaena Elementary:	664 664	681	-17
Lahaina Intermediate:	637	577 597	40
Lahainaluna High School:	1,038	850 794	244

Kamehameha III Elementary School is the designated public elementary school for students from the area extending from Honokohau Valley to Kā'anapali (which includes the Pulelehua area). All Kamehameha III Elementary School students must be transported to and from school, either by school buses, or by other means such as their parents or car pools. The DOE operates six school buses to transport 254 students to Kamehameha III Elementary School from the Honokohau Valley to Kā'anapali area. Many of these students reside in the area near Pulelehua.

Potential Impacts and Mitigative Measures

Plans for Pulelehua include a 13-acre site for a public elementary school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapiʻilani Highway as elementary school children residing north of Kā'anapali, will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honoapiʻilani Highway.

Planning Director Mike Foley has noted that the Pulelehua school will be a good traffic mitigation measure since West Maui Schools have the highest number of parents driving kids to school within the State. In their comment letter on the EISPN, the Police Department stated that "having a school in the vicinity is a must," in reference to the fact that there is currently no school in the Pulelehua area and all students must be driven to Lahaina area schools, including schools serviced by Lahainaluna Road.

RECEIVED

APR 19 2005



LINDA LINGLE
GOVERNOR

RUSSELL K. SAITO
COMPTROLLER

KATHERINE H. THOMASON
DEPUTY COMPTROLLER

STATE OF HAWAII

DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810

(P)1116.5

APR 18 2005

The DOE has indicated that the Pulelehua school site is appropriate and acceptable for an elementary school.

The Market Study and Economic Impact Analysis prepared for the Pulelehua community (Halestrom 2005) estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions based on DOE figures, with about 75 percent (308 children) attending grades Kindergarten to 8th and 25 percent (103) attending high school.

In their comment letter on the Draft EIS, the Department of Education estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students. The number of students is dependent on the total number of residential units and the breakdown between single-family and multi-family homes.

The Department of Education also provided the following information regarding the projected enrollments and capacities for the 2009-2010 school year:

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Princess Nahienaena Elementary:	615	-66	239
Elementary Subtotal:	1,298		115
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Lahainaluna High School:	996	172	

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A new private school, Maui Preparatory Academy, will be located in Nāpili and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. In 2007, four classes of pre-Kindergarten will be added. The anticipated enrollment of pre-Kindergarten children is 18 students per classroom. In 2008, an additional primary grade level will be added. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-Kindergarten through 12.

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

Dear Mr. Schnell:

Subject: Maui Pineapple Company, Inc.-Pulelehua, Mahinahina, Maui
Draft Environmental Impact Statement
TMK: (2) 4-3-01:31 (portion)

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Maui Pineapple Company, Inc. Pulelehua, Mahinahina, Maui project.

This project does not impact any of the Department of Accounting and General Services' projects or existing facilities. Therefore, we have no comments to offer.

If you have any questions, please have your staff call Mr. Allen Yamanoha of the Planning Branch at 586-0488.

Sincerely,

ERNEST Y. W. LAU
Public Works Administrator

AY:mo
c: Ms. Genevieve Salmonson, OEQC
Mr. Anthony Ching, State Land Use Commission



LAND PLANNING
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May 31, 2005

Mr. Ernest Y. W. Lau, Public Works Administrator
State of Hawai'i
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawai'i 96810

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Lau:

Thank you for your letter dated April 18, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge your statement that Pulelehua will not impact any of the Department of Accounting and General Services' projects or existing facilities, and that you have no comments to offer.

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cue, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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LINDA LINGLE
GOVERNOR OF HAWAII



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

April 11, 2005

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

Dear Mr. Schnell:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PULELEHUA
MAHINAHINA, LAHAINA, MAUI
TMK: (2)4-3-01:31

Thank you for the opportunity to review and comment on the draft EIS. We have the following comments to offer:

Drinking Water

1. The EIS indicates that the project will obtain potable water from the Maui Water Department and develop new sources of potable water. Section 11-20-29 of Chapter 20 requires that all new sources of potable water serving a public water system 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.
2. 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 may be required based on review of the information submitted.
3. Should the project use a non-potable water system and supplemented by a potable water source to meet irrigation or other needs, the system must be carefully designed and operated

CHYRONEL EUSONIO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EIS#2005

Mr. Tom Schnell, AICP
April 11, 2005
Page 2

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.

Underground Injection Control (UIC)

1. If injection wells are used for the subsurface disposal of wastewater, sewage effluent, or surface runoff, they will be subject to environmental regulation and permitting under Hawaii 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.
2. 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.
3. 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.

For further information about the UIC permit and the Underground Injection Control Program, please contact the UIC staff of the Safe Drinking Water Branch at 586-4258.

Sincerely yours,


WILLIAM WONG, P.E., CHIEF
Safe Drinking Water Branch
Environmental Management Division

WW:nbp

c: Mr. Tony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804



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June 27, 2005

Mr. William Wong, P.E., Chief
State of Hawaii
Department of Health
Safe Drinking Water Branch
Environmental Management Division
P.O. Box 3378
Honolulu, Hawaii 96801-3378

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Wong:

Thank you for your letter dated April 11, 2005 (your reference EMD/SDWB). As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

Drinking Water

1. We understand to comply with Section 11-20-29, Hawaii Administrative Rules (HAR), all new sources of potable water serving a public water system must be approved by the Director of the State Department of Health prior to use. At the appropriate time an engineering report addressing the requirements of Section 11-20-29 will be submitted for approval.

In response to your comment, in the Final Environmental Impact Statement (EIS) Section 4.9.3 (Water System) will be revised as follows:

Maui Land & Pineapple Company Inc., will work with the DWS for the development and construction of the new wells, which will be built in accordance with DWS standards and all requirements of the Commission on Water Resource Management. In addition, all new sources of potable water will be developed in compliance with Section 11-20-29, HAR and at the appropriate time Maui Land & Pineapple Company Inc., will submit a water engineering report for the approval of the Director of the State Department of Health.

2. The engineering report will identify all potential sources of contamination and evaluate alternative control measures that 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 will be submitted as part of the engineering report to demonstrate compliance with all drinking water standards. We understand that additional parameters may be required by the Director for this submittal, and that additional tests may be required based on the information submitted.

Mr. William Wong, P.E.
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

3. As discussed in Section 4.9.3 (Water Systems) of the Draft EIS, the landscaped areas of the Pulelehua community will be irrigated with non-potable water. The non-potable water system will be carefully designed and operated to prevent cross-connection of the potable and non-potable water systems and backflow of water from the non-potable water system to the potable water system. The two water systems will be clearly labeled and physically separated. In addition, backflow devices will be periodically tested to assure their proper operation. All non-potable spigots and irrigated areas will be clearly labeled with warning signs to prevent inadvertent consumption of non-potable water. The project will comply with Hawaii Administrative Rules, Title 11, Chapter 11-21, Cross-Connection and Backflow Control.

In response to your comment, Section 4.9.3 in the Final EIS (Water System) will be revised as follows:

The recycled/reused water system within Pulelehua will be built and operated in conformance with all applicable laws and regulations, including HAR, Section 11-62-27, Recycled Water Systems and HAR, Title 11, Chapter 11-21, Cross-Connection and Backflow Control.

Underground Injection Control (UIC)

1. No injection wells are planned to be used for the subsurface disposal of wastewater, sewage effluent, or surface runoff. As explained in Section 4.9.4 (Wastewater System) of the Draft EIS an on-site sewer collection system will be built within Pulelehua. The system will consist of a gravity sewer system and sewer pump stations that will connect to a new sewer line located along the mauka side of Honoapi'iiani Highway. The sewer line will continue south and connect directly to the Lahaina Wastewater Reclamation Plant.
2. As mentioned above, no injection wells are planned. The on-site sewer collection system will directly connect to the Lahaina Wastewater Reclamation Plant.
3. We acknowledge that a UIC permit may be valid up to five years, however, UIC permit will not be needed since no injects wells are planned.

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Mr. William Wong, P.E.
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 3

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-1188
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E-MAIL: oeqc@hawaii.gov

GENEVIEVE SALMONSON
DIRECTOR

Anthony Ching
May 2, 2005
Page 2

Alternatives: Section 6.2, *Alternative Locations*, notes that other locations were considered and rejected. Which locations were they and what were the reasons for rejecting them?

Permits and approvals: In your chart in section 5.3, also list the status of each permit and approval. If some applications have not yet been made, indicate the expected application dates.

If you have any questions please contact Nancy Heinrich at 586-4185.

Sincerely,

GENEVIEVE SALMONSON
Director

c: Bob McNatt, Maui Land & Pineapple
Tom Schnell, PBR

May 2, 2005

Anthony Ching
Land Use Commission
235 South Beretania St., 4th floor
Honolulu HI 96813

Dear Mr. Ching:

Subject: Draft environmental impact statement (EIS), Pulelehua Development

We have the following comments to offer:

Design details:

- a. Section 2.8, *Sustainable Building Design*, mentions "edible landscaping to provide nutrition for the community." What is edible landscaping?
- b. Section 2.8 also mentions limited use of curb cuts, as "parking and auto access will be located in the rear of the lot, served by alleys." Curb cuts are useful for other than motor vehicle users, such as children on bicycles, people using wheelchairs or baby carriages, and those that need to use hand trucks or dollies. Please reconsider the limitations of the curb cuts.

Soils:

Contamination: Section 3.5 lists chemicals and fertilizers used for agricultural activities. Is any of Pulelehua's soil contaminated and will it need to be remediated?

Natural hazard: In section 3.7 of the final EIS include a discussion of unstable soil as a natural hazard that may impact the project.

Historic perspective: A brief of discussion of how the Pulelehua project came to be is required. Chapter 2 is an appropriate place to include this.

Terminology: In section 4.9.5, *Electrical Service*, the term "radiant barrier" is used. In the final EIS include a definition.



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June 27, 2005

Ms. Genevieve Salomonson, Director
State of Hawaii
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Salomonson:

Thank you for your letter dated May 2, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, we are responding to your comments.

Design Details

a. Edible landscaping uses plant species that provide for consumption rather than only ornamental use; for example, vegetables, fruit trees, or herbs.

To clarify this, in the Final EIS, the bullet point in Section 2.8 will be revised to read as follows:

- o Use of edible landscaping, such as vegetables, fruit trees, and herbs, to provide nutrition for the community.

b. We agree that curb cuts are useful for non-motor vehicle users, such as children on bicycles, people using wheelchairs, baby carriages, hand trucks, or dollies. As such, curb cuts will be included in strategic locations along Pulelehua's streets; however, because garages will be accessed from rear alleyways, front streets will not require curb cuts for vehicle driveways.

Soils

Contamination: In response to your question about possible contamination of the soils the Pulelehua site, in Section 3.5 of the Final EIS (Identification of Chemicals and Fertilizers) will be revised to include the following:

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine the possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the

Genevieve Salomonson
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

assessment and/or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

Natural Hazard: In the Final EIS, Section 3.7 (Natural Hazards) will be revised to include a discussion of unstable soil as a natural hazard as shown in Attachment 1 of this letter.

Historical Perspective

As shown in Attachment 2 of this letter, a new section will be added to Chapter 2 of the Final EIS to provide a historical perspective of how Pulelehua came to be.

Terminology

In the Final EIS, Section 4.9.5 (Electrical Service) will be revised to include a definition of "radiant barrier" as follows:

A radiant barrier is a layer of metallic foil placed on the back of roof decking or attached to the beams just below the roof to reduce heat flow from the roof into the attic, thereby keeping the house cooler.

Alternatives

As discussed in Section 6.2 (Alternative Locations) of the Draft EIS, Maui Land & Pineapple Company owns approximately 23,000 acres of land in West Maui, however, much of this land is not developable for residential use for a variety of reasons, including 1) steep topography; 2) distance from Honoapi'iani Highway or other accessibility issues; and 3) access to utilities and infrastructure (potable water, sewer, electricity, telephone, and communication systems). Additionally, over 8,600 acres of Maui Land & Pineapple Company's land is in conservation areas.

The Pulelehua site was selected as the best location within Maui Land & Pineapple Company's West Maui lands because it met many objectives, including:

- o Access to nearby existing utility systems.
- o Central to major employment areas of Kaanapali and Kapalua, but outside of the AM and PM congested traffic area of Lahaina Town.
- o Ready access to Honoapi'iani Highway bordering the site.
- o An in-fill location between urban uses: Kahana Ridge Subdivision and the Kapalua West Maui Airport.

Permits and Approvals

In the Final EIS, the table in Section 1.9.4 (Required Permits and Approvals) and Section 5.3 (Approvals and Permits) will be revised to include the status and application dates of each permit and approval as shown in Attachment 3 of this letter.

Genevieve Salmonson
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 3

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Attachments

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Attachment 1

In the Final EIS, Section 3.7 (Natural Hazards) will be revised as shown:

3.7 NATURAL HAZARDS

Existing Conditions

Natural hazards impacting the Hawaiian Islands include volcanic eruptions, earthquakes, landslides, hurricanes, tsunamis, and flooding.

Volcanic hazards in the area of Pulelehua are considered minimal. No lava flows have impacted the West Maui region for at least 20,000 years (MacDonald et al. 1983).

In Hawai'i, most earthquakes are linked to volcanic activity, unlike other areas where a shift in tectonic plates is the cause of an earthquake. Each year, thousands of earthquakes occur in Hawai'i; the vast majority of them so small they are detectable only with highly sensitive instruments.

Landslide is a general term used to describe the down-slope movement of unstable soil, rock and organic materials under the influence of gravity. Unstable soil is a by-product of erosion. Erosion occurs naturally from water, wind, gravity, or other geological agents.

Devastating hurricanes have impacted Hawai'i twice in the past 23 years: Hurricane 'Iwa in 1982 and Hurricane 'Iniki in 1992. While it is difficult to predict these natural occurrences, it is reasonable to assume that future events could be likely given the recent record.

Tsunamis are large, rapidly moving ocean waves triggered by a major disturbance of the ocean floor, which is usually caused by an earthquake but sometimes can be produced by a submarine landslide or a volcanic eruption. About 50 tsunamis have been reported in the Hawaiian Islands since the early 1800's. Seven caused major damage, and two of these were locally generated. The Pulelehua community is outside of the Civil Defense Tsunami Evacuation Zone. In the Māhinahina region the Tsunami Evacuation Zone is makai of Honoapi'ilani Highway.

Flood hazards are primarily identified by the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA), National Flood Insurance Program. According to the FIRM, the Pulelehua site is located in Zone C. FEMA defines Zone C as areas determined to be outside of the 500-year floodplain (Figure 12).

Potential Impacts

Pulelehua will not exacerbate any hazard conditions. Volcanic impacts to the community are considered unlikely. Seismic hazards in the Pulelehua site are no greater than other locations on Maui; however buildings, as well as roadways, sewer, and water lines could be damaged by an earthquake of sufficient magnitude.

The topography of the Pulelehua site averages an eight percent slope, with little potential of landslides. There are no known landslides events in this area.

Pulelehua, as the rest of Maui or the State, is no more or less vulnerable to the destructive winds and torrential rains associated with hurricanes. Since Pulelehua is outside Tsunami Evacuation Zone, impacts from tsunamis are considered minimal.

Because the Pulelehua site is located in an area of minimal flooding, impacts from flooding are not expected. Section 4.9.2 contains more information on drainage of the site and discusses proposed impacts and improvements related to drainage infrastructure.

Mitigative Measures

While volcanic impacts to Pulelehua are considered unlikely, mitigation of lava flow hazards is limited to provision of adequate evacuation routes and a civil defense warning system designed to provide area residents with as much advance notice of a threatening lava flow as possible.

Mitigation of hazards associated with earthquakes include adherence to Maui County building codes and standards to minimize potential damage to structures. All buildings and structures will be designed and constructed in compliance with applicable building codes and standards. Likewise, the destructive winds and torrential rainfall of hurricanes will be mitigated by compliance with the Maui County Building Code.

Although landslides or unstable soils are unlikely to occur at Pulelehua, geotechnical studies of the soils will be completed prior to construction. Geotechnical studies investigate the soil and rock below the ground to determine its properties as a basis of design for foundations and to help mitigate hazards of unstable soil.

Because Pulelehua and is at a higher elevation than the coastal regions, the community could serve as a tsunami evacuation center for people along the coast.

Attachment 2

The following new section will be added to Chapter 2 of the Final EIS to provide a historical perspective of how Pulelehua came to be:

2.2.1 Historical Perspective

The idea for Pulelehua began in January of 2004 when Mayor Arakawa approached Maui Land & Pineapple Company, Inc., to help solve the affordable housing crisis in West Maui. Recognizing the critical need for affordable housing, Maui Land & Pineapple Company, Inc., then began considering sites for a new community on its West Maui property. The area makai of the Kapalua West Maui airport was chosen for its proximity between the major resort employment centers of Kapalua and Kā'anapali and access to infrastructure.

To ensure the community had input in the planning process, Maui Land & Pineapple Company, Inc., selected nationally recognized town planners Dover, Kohl & Partners to partner with West Maui citizens to design a community that would be both affordable and meet the same high standards for quality as established at their Kapalua Resort. The new community would be called Pulelehua, which means butterfly in Hawaiian, and is a reference to Kapalua's famous logo of a butterfly with a pineapple in the center. This logo is in itself a reference to Maui Land & Pineapple Company, Inc.'s heritage as a pineapple plantation.



STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE
54 HIGH STREET
WAILUKU, MAUI, HAWAII 96793-2102

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APR 27 2005

PULI HAWAII

April 25, 2005

Mr. Tom Schnell, AICP
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 1 96813-3484

Dear Mr. Schnell:

Subject: **Draft Environmental Impact Statement, Pulelehua
TMK: (2) 4-3-01:31 (portion), Mahinahina, Maui**

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Pulelehua project. The following comments are offered:

1. National Pollutant Discharge Elimination System (NPDES) permit coverage is required for this project. The Clean Water Branch should be contacted at 808 586-4309.
2. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control". A noise permit may be required and should be obtained before the commencement of work.
3. It is recommended that a dust control management plan be developed. Implementation of adequate dust control measures during all phases of the project is warranted. Construction activities must comply with the provisions of HAR, Chapter 11-60.
4. A new water source will be developed that will require the review and approval of the Safe Drinking Water Branch.

Attachment 3

In the Final EIS the table in Section 1.9.4 (Required Permits and Approvals) and Section 5.3 (Approvals and Permits), will be revised as follows:

Permit/Approval	Responsible Agency	Status
Chapter 343, HRS Compliance	State Land Use Commission	Submitted 6-28-05; action pending
State Land Use District Boundary Amendment	State Land Use Commission	Submitted 6-28-05; action pending
Community Plan Amendment	County of Maui Planning Department Maui Planning Commission Maui County Council	Submitted 3-18-05; action pending
Project District Phase I/ Change in Zoning	County of Maui Planning Department Maui Planning Commission Maui County Council	Submitted 3-18-05; action pending
Project District Phases II and III	County of Maui Planning Department Maui Planning Commission Maui County Council	Expected submittal 4-5-06
Project District Phase III	County of Maui Planning Department	Expected submittal 7-5-06
Chapter 6E, HRS Compliance	State Historic Preservation Division	Submitted 06/25/04; accepted 03/03/05
National Pollutant Discharge Elimination System (NPDES) Permit	State Department of Health	Expected submittal 8-5-06
Subdivision Approval	County of Maui Department of Public Works and Environmental Management	Expected submittal 8-5-06
Grading/Building Permits	County of Maui Department of Public Works and Environmental Management	Expected submittal 8-5-06
Well Construction Permit/ Pump Installation Permit	DLNRC Commission on Water Resource Management	Expected submittal 4-5-06

Mr. Tom Schnell
April 25, 2005
Page 2

5. The applicant is required by Hawaii Administrative Rules, Chapter 11-26, "Vector Control" to eradicate any rodents prior to site clearing activities and to notify the Department of Health by submitting Form VC-12 to the Maui Vector Control program when such action is taken.

Should you have any questions, please call me at 984-8230.

Sincerely,



Herbert S. Matsubayashi
District Environmental Health Program Chief

c: Karl Bossert
Anthony Ching
OEQC
Abe Mitsuda
Ann T. Cua



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June 27, 2005

Mr. Herbert S. Matsubayashi,
District Environmental Health Program Chief
State of Hawaii
Department of Health
Maui District Health Office
54 High Street
Wailuku, Hawaii 96793-2102

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Matsubayashi:

Thank you for your letter dated April 25, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we are responding to your comments.

1. In the Draft EIS the approvals and permits table contained in Sections 1.9.3 and 5.3 indicates that a NPDES permit is required.
2. In Section 4.5 (Noise) of the Draft EIS it is stated: 1) "All Pulelehua activities will comply with HAR 11-46, Community Noise Control;" and 2) "When construction noise exceeds, or is expected to exceed the DOH's allowable limits, a permit must be obtained from the DOH."
3. In Section 4.6 (Air Quality) of the Draft EIS it is stated: "All construction activities will comply with the provisions of HAR, Chapter 11-60.1 "Air Pollution Control", Section 11-60.1-33 Fugitive Dust. In compliance with these provisions a dust control plan will be implemented."
4. In response to your comment, in the Final EIS Section 4.9.3 (Water System) will be revised as follows:

Maui Land & Pineapple Company Inc., will work with the DWS for the development and construction of the new wells, which will be built in accordance with DWS standards and all requirements of the Commission on Water Resource Management. In addition, all new sources of potable water will be developed in compliance with Section 11-20-29, HAR and at the appropriate time Maui Land & Pineapple Company Inc., will submit a water engineering report for the approval of the Director of the State Department of Health.
5. We understand that the Pulelehua site may need to undergo rodent eradication prior to site clearing. In the Final EIS Section 3.9 (Wildlife Resources) will be revised to include the following:

Maui Land & Pineapple Company Inc., will eradicate any rodents prior to site clearing activities as required by HAR Chapter 11-26, "Vector Control" and will notify the Department of Health by submitting Form VC12 to the Maui Vector Control Program.

LINDA LINGLE
GOVERNOR OF HAWAII



CHIYOME LENAALA FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
File # M4 3 001 03
Date Recd. 4/1/05
W12 WD050170

April 4, 2005

Herbert S. Matsubayashi
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

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

Dear Mr. Schnell:

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Subject: Pulelehua - A New Traditional Community
Draft Environmental Impact Statement
Traditional Neighborhood Design, Mixed Use, Affordable Community
Mahinahina, West Maui, Maui
TMK: (2) 4-3-001: 031 approximately 312 acres

Thank you for allowing the opportunity to review the draft environmental impact statement for the subject project. The project proposes a traditional neighborhood design, mixed use, affordable community.

As the project is proposed to connect to the County wastewater system, we have no objections and concur with the project.

All wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules.

Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at telephone (808)586-4294.

Sincerely,

HAROLD K. YEE, P.E., CHIEF
Wastewater Branch

LNKM:mt

Enclosure: CD Rom



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May 31, 2005

Mr. Harold K. Yee, P.E., Chief
State of Hawai'i
Department of Health
Wastewater Branch
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Yee:

Thank you for your letter dated April 4, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge that you have no objections and concur with the project.

All wastewater plans for Pulelehua will conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems."

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

Sincerely,

TOM SCHNELL, AICP
Associate

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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United States Department of the Interior

U.S. GEOLOGICAL SURVEY
PACIFIC ISLANDS WATER SCIENCE CENTER
677 Ala Moana Blvd., Suite 415
Honolulu, HI 96813

Phone: (808) 587-2400/Fax: (808) 587-2401

May 6, 2005

Mr. Tom Schnell, AICP
PBR Hawaii
ASB Tower, Suite 650
1000 Bishop Street
Honolulu, HI 96813

Dear Mr. Schnell:

Subject: Draft Environmental Impact Statement (DEIS)
Pulelehua
Mauihahina, Lahaina, Maui
Tax Map Key Number: 4-3-01.31 (portion)

Thank you for forwarding the subject DEIS for review and comment by the staff of the U.S. Geological Survey, Pacific Islands Water Science Center. We regret however, that due to prior commitments and lack of available staff, we are unable to review this document.

We appreciate the opportunity to participate in the review process.

Sincerely,

Gordon Tribble
Director

cc: Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

Abe Mitsuda
State of Hawaii, Department of Business,
Economic Development and Tourism
Office of Planning
P.O. Box 2359
Honolulu, HI 96813

Office of Environmental Quality Control
235 S. Beretania St., Suite 702
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Ann T. Cua, Staff Planner
Planning Department
230 South High Street
Wailuku, HI 96793



LAND PLANNING
AND URBAN
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May 31, 2005

Mr. Gordon Tribble, Director
United States Department of the Interior
US Geological Survey
Pacific Islands Water Science Center
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Tribble:

Thank you for your letter dated May 6, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge that due to prior commitments and lack of staff you were unable to review the draft EIS.

Your letter will be included in the Final EIS.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
ALICE L. LEE
Director
HERMAN T. ANDAYA
Deputy Director

200 SOUTH HIGH STREET • WAILUKU, HAWAII 96793 • PHONE (808) 270-7805 • FAX (808) 270-7165

April 4, 2005

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

Dear Mr. Schnell:

Subject: Pulelehua Community

We have reviewed the Draft Environmental Impact Statement for the subject project and would like to offer the following comments:

1. Please specify in the Final EIS as to who will be responsible for monitoring and enforcing the owner-occupancy, buy-back restrictions and limited appreciation restrictions for the ownership units in the project.
2. What is the target date for preparing buy-back, limited appreciation and other provisions that will be used to prevent speculation in the resale of the affordable units.
3. It is our understanding that the project will be processed for approval under the County's Project District Ordinance. If that is the case, it should be stated in the final EIS.

Thank you for the opportunity to comment.

Very truly yours,

ALICE L. LEE
Director

ETO:hs

c: Mr. Karl Bossert
Mr. Anthony J. H. Ching
Ms. Genevieve Salmonson
Mr. Abe Mitsuda
Ms. Ann Cua
Mr. Edwin Okubo

TO SUPPORT AND ENHANCE THE SOCIAL WELL-BEING OF THE CITIZENS OF MAUI COUNTY



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LANDSCAPE ARCHITECTURE
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June 27, 2005

Ms. Alice L. Lee, Director
County of Maui
Department of Housing and Human Concerns
200 South High Street
Wailuku, Hawaii 96793

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Lee:

Thank you for your letter dated April 4, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, we are responding to your comments.

- Maui Land & Pineapple Company will establish a trust or other entity to ensure Pulelehua affordable homes are affordable in perpetuity, including monitoring and enforcing the owner-occupancy, buy-back restrictions, and limited appreciation restrictions for the affordable units.

Section 2.6.6 (Affordability) in Final EIS (previously Section 2.6.4 of the Draft EIS) will include this information and other details about Pulelehua's affordable housing program as shown in Attachment 1 of this letter.

- At the time of final subdivision, the affordable housing program documentation will be completed which will include the buy-back, limited appreciation, and other provisions to prevent speculation in the resale of the affordable units.

- As indicated in the Draft EIS, Section 1.1.1 (Project Profile) Section 1.9.4 (Required Permits and Approvals), Maui Land & Pineapple Company is seeking a Community Plan Amendment, a Change in Zoning, and Project District Phase I to III Approvals for Pulelehua.

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

Sincerely,

Tom Schnell, AICP
Associate

Attachment

- cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Attachment 1

In the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised as follows:

2.6.6 Affordable Housing

Pulelehua will emphasize ~~affordable housing with dignity~~ an integrated affordable housing approach by providing a range of ~~affordable homes integrated with market-priced homes into complete neighborhoods housing types throughout the community.~~ Affordable homes will not be segregated into fringe neighborhoods or placed in the least desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low-moderate and gap-group income Maui residents.

Pulelehua will provide housing to families earning between 50 and 140 percent of the median-family income on Maui. As of February 2004 2005, this figure is ~~\$60,700 \$62,350~~ based on the HUD guidelines for the County of Maui. Based on this February 2005 figure, a family of four earning between ~~\$30,350 \$33,950~~ and ~~\$84,980 \$87,290~~ would qualify for affordable housing.

Based on the ~~2004 2005~~ HUD guidelines and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than ~~\$187,400 \$193,500~~ if a family earned 50 to 80 percent of the median-family income. If a family earned 81 percent to 100 percent of the median-family income, the price would be set no higher than ~~\$238,000 \$245,600~~ and prices would top out at ~~\$349,200 \$359,800~~ if a family earned 100 percent to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 51 percent of Pulelehua's affordable housing is shown below:

Percentage of Units	Percentage of HUD Median-family Income
10	50 to 80
21	81 to 100
20	101 to 140

~~To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy-back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.~~

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

<u>Lottery Pool</u>	<u>Preference</u>
<u>A</u>	<u>MLP Employees and subsidiaries</u>
<u>B</u>	<u>Kapalua Nui Partners</u>
<u>C</u>	<u>West Maui residents who are police officers, public school teachers, and firefighters</u>
<u>D</u>	<u>Maui residents who work in West Maui, but do not live in West Maui</u>
<u>E</u>	<u>West Maui residents</u>

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold at affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Based on the size of Pulelehua and the services currently envisioned, it is estimated, the Home Owner Association (HOA) fees for Pulelehua will be similar to the average fees found in similar associations (plus future escalation). Maui Land & Pineapple Company Inc. will consider a graduated type of fee structure based on affordable and market rate homes or other criteria such as number of bedrooms, lot size or housing type.

Research regarding HOA fees on Maui found fees ranging from \$100 to \$400 per month depending on amenities such as pools, tennis courts, or outdoor gas barbecues, as well as the level of service provided for the fees. Isolated developments were found which have higher fees. Pulelehua HOA fees are currently estimated to be \$150 per unit. Maui Land & Pineapple Company Inc. will consider a graduated type of fee structure based on affordable and market rate homes or other criteria such as number of bedrooms, lot size, or housing type.

In addition to affordable homes, Pulelehua's marketing study (Hallstrom-2005) projects that during the next two decades approximately 25 percent of the housing demand in West Maui will be for homes ranging from \$380,000 to \$550,000 and 19 percent of the demand will be for homes above \$550,000. Pulelehua's moderate and market homes rate will help to satisfy the demand for homes in these ranges.

A. ARAKAWA
Mayor

J. MICHAEL W. FOLEY
Director

WAYNE A. BOTTEILHO
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

May 6, 2005

1. Section 1.9.4, Required Permits and Approvals

RECEIVED
MAY 19 2005
DEVELOPMENT OFFICE

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

Mr. Karl Bossert
Maur Land & Pineapple Company, Inc.
1000 Kapalua Drive
Lahaina, Hawaii 96761

Dear Mr. Schnell and Mr. Bossert:

RE: Draft Environmental Impact Statement (EIS) for Pulelehua Project
District located at TMK: 4-3-001: 031 (portion), Mahinahina, Lahaina,
Island of Maui, Hawaii

The Maui Planning Department (Department) is aware of a number of projects proposed for the West Maui Community Plan area, including Pulelehua. The Department supports the concept of a liveable community providing dwellings, apartments, neighborhood commercial, live/work units, school, parks, trails and civic uses as illustrated in Pulelehua. The Department's concern is that Pulelehua, as well as other projects, are proceeding through the land use permit process in advance of the General Plan (GP) Update. The General Plan Update will include technical data in the areas of infrastructure and socio-economics that will assist in defining the desirable amount, location and timing of new growth in the West Maui area.

The administration is currently evaluating the potential impacts associated with these projects in preceding the GP update. Once completed, the Department will be able to provide further direction on the continued processing of the relevant applications. With this in mind, the Department provides the following comments:

- a. Project District Phases II and III do not require approval by the County Council. Phase II approval is under the authority of the Maui Planning Commission, and Phase III approval is under the authority of the Planning Director.
- b. Please be advised that should the round-a-bout be constructed as indicated on the site plan, the proposed action would require compliance with Chapter 205A, HRS, Coastal Zone Management, and Chapter 12-202, Special Management Area Rules of the Maui Planning Commission.
2. Community gardens - who will be responsible for maintaining and paying the water fees for irrigation? The Department is concerned that this may increase the homeowners fees further burdening the owners of the affordable units.
3. Discuss potential impacts and mitigative measures regarding street lighting and preserving the night sky.
4. Section 2.6.2, Building Types
 - a. A true mixed use community is proposed and will be based on the maximum square feet that could be provided in specific transect zones and specific lot types. How is this proposed to be regulated?
 - b. Section 1.8 of the Draft EIS indicates a maximum of 318 ohana units are planned into the district and will be allowed on only designated lots. However, Table 1.0 indicates a total of 267 ohana units are proposed. Please clarify and revise the EIS as necessary. Further, provide a discussion of the need for up to 267 (or 318) ohana units within Pulelehua and the West Maui region. Provide a discussion as to what the ohana units will provide for the overall project.
 - c. Discuss the proposed mechanism by which the County will enforce the restriction of ohana units to designated lots.

Mr. Tom Schnell
Mr. Karl Bossert
May 6, 2005
Page 2

5. Section 2.7, Development Timetable and Preliminary Costs
Provide an anticipated construction schedule for all phases of the project. In particular, indicate the anticipated time frames of construction for public related facilities.
6. Section 3.5, Identification of Chemicals and Fertilizers
Arsenic-containing compounds were historically used as pesticides for pineapple cultivation. Discuss any potential impacts from residual levels.
7. Section 4.4, Transportation and Section 4.9.1, Roadway Facilities (see also Section 11.0, Comments on the EISPN)
 - a. As indicated in your response letter to State DOT dated October 6, 2004, Pulelehua is requesting four (4) additional access points on Honcapiliani Highway. Provide an update of the status with State DOT for obtaining approval of these additional accessways. Further, as part of the alternatives analysis in Chapter 6.0, include a discussion of an alternative plan with two (2) or three (3) new connections in lieu of the proposed four (4) accessways.
 - b. The Traffic Impact Analysis should revise the unit counts for Waivee Village to a total of 750 units.
 - c. The Department supports the proposed flexible street design, such as the narrow rights-of-way and slight bends in the roadways as a traffic calming measure. However, the Department is aware that the County Department of Public Works and Environmental Management (DPWEM) will support the alternative roadway design only if the roads are under private ownership. A relative discussion should be included in the EIS.
8. Section 4.9.2, Drainage
 - a. Identify the responsible party for maintaining the proposed desilting basins, bioswales, and drainageways proposed for the project district.

- b. Discuss the alternative of designing the drainage system to manage more than the net increase of storm water runoff from the proposed project.
9. As indicated in Section 4.9.3, Water System
MLP will work with the County Department of Water Supply (DWS) for the development and construction of the new wells proposed to provide the source of potable water for Pulelehua. Disclose the funding source for these improvements.
10. As indicated in Section 4.9.4, Wastewater System
MLP is working with the County Wastewater Reclamation Division to determine the capacity of the existing facility to confirm that Lahaina Wastewater Reclamation Plant can accommodate the wastewater generated from Pulelehua. Further, the Draft EIS indicates a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua is being prepared and will be submitted to the County for review as part of Pulelehua's engineering design. However, this study should be included within the EIS in order to determine the potential impacts to the Wastewater Reclamation Facility and whether the development of Pulelehua will require upgrades to the Wastewater Reclamation Facility.
11. Section 4.11.3, Schools
The EIS should disclose the anticipated construction schedule for the proposed school relative to the build out of the entire project. The State Department of Education (DOE) should be consulted with regards to the proposed construction schedule. The Department suggests establishing the development of the school with specific phases of overall development.
12. Section 4.11.4, Recreational Facilities
The West Maui Community Plan states (see Page 16, West Maui Community Plan):

"10. Provide and maintain parks and beach access for the present and future needs of residents and visitors. For the areas outside Lahaina town, establish or expand parks and public shoreline areas to include but not limited to the following....

- c. The proposed Mahinahina regional park on approximately 50 acres of land below the Kapalua/West Maui Airport."

The Draft EIS indicates approximately 50 acres of Pulelehua is designated as "Park" in the West Maui Community Plan. The proposed development will require a Community Plan Amendment which will remove this designation.

The Draft EIS indicates that Pulelehua will contain approximately 90 acres of useable parks, trails, and recreation areas. The Draft EIS also states that the County Department of Parks and Recreation (Parks Department) is willing to accept and maintain Pulelehua's neighborhood parks and ball fields. However, the Draft EIS does not include any comments from the Parks Department.

The Department's understanding is that the Parks Department does not support the proposed parks as stated in the Draft EIS. Further, it is the Department's understanding that the Parks Department is currently in the process of identifying potential locations for regional parks within the West Maui region. If Pulelehua is identified as a preferred location, then this should be disclosed in the EIS, and the site plans, unit counts, and discussions should be revised as necessary. As such, the Department recommends further consultation with the Parks Department.

13. Section 4.11.5, Health Care Services (see also Section 2.6.5)

Given the close proximity to the existing airport, Pulelehua would be a logical area to locate an urgent care clinic or hospital for the West Maui region. The Draft EIS indicates discussions are underway and a needs analysis is required prior to final decision making. However, as part of the alternatives analysis in Chapter 6.0 and assuming the 15 acres in Pulelehua's south Mahinahina neighborhood are set aside as proposed, provide a revised site plan indicating the location of the urgent care clinic. Include a discussion of the revised housing count.

Discuss benefits and/or potential impacts of helicopter or airplane transport between the proposed clinic or airport and the Maui Memorial Medical Center.

Please be advised that the Department will be requesting 18 copies of the Final EIS for permit processing. Although not part of the EIS, the Department is currently reviewing the proposed draft ordinance establishing the standards of development for Pulelehua. The Department will continue to work with MLP to formulate an ordinance that will achieve the goals of a liveable community, as well as, function as a mechanism for governmental review of each development within the Pulelehua Community.

Thank you for the opportunity to comment. Should you require further clarification, please contact Ms. Kivette Caigoy, Environmental Planner, at 270-7735.

Sincerely,



for
MICHAEL W. FOLEY
Planning Director

MWF:KAC:lar

c:

Wayne Boteilho, Deputy Planning Director
Clayton Yoshida, Planning Program Administrator
Jo Anne Johnson, Council Member
Kivette Caigoy, Environmental Planner
Ann Cua, Staff Planner
DPWEM
DWS
Parks Department
DOE
TMK File
General File
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June 27, 2005

Mr. Michael W. Foley
Planning Director
County of Maui
Department of Planning
250 South High Street
Wailuku, HI 96793

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Foley:

Thank you for your letter dated May 6, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to your comments.

We understand your concern regarding West Maui projects proceeding through the land use permit process in advance of the General Plan Update. However, our concern is that if the General Plan Update process is anything like the previous community plans update process, it could take several years while the need for affordable housing on Maui is immediate.

We are aware that the County has commissioned several technical studies in advance of the General Plan Update process and have used these studies in the preparation of the Pulelehua Draft Environmental Impact Statement (EIS). In particular, we have relied on the baseline population projections in the report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). We have also referred to two other studies commissioned by the County: 1) *County of Maui Infrastructure Assessment Update* (Wilson Okamoto Corp., 2003), and 2) *Public Facilities Assessment Update: County of Maui* (July 2002). Please note when we cited information in the Pulelehua EIS Preparation Notice from *Public Facilities Assessment Update: County of Maui* (July 2002) in regard to police services. The Police Department responded that the information was inaccurate; however, we have not received similar responses from other agencies or departments regarding the accuracy of other information in that report, or in the other reports.

The following are our responses to your comments:

1. a) We understand that the County Council does not approve Project District Phases II and III. The Project District Phase II is approved by the Maui Planning Commission, and Phase III is approved by the Planning Director. In the Final EIS, the permit table in Section 1.9.4 (Required Permits and Approvals) and 5.3 (Approvals and Permits) will be revised as shown in Attachment 1.
- b) Although a roundabout on Honoapiilani Highway had been included on previous plans, it has been eliminated from the current plan and was not included on the Illustrative Master Plan contained in the Draft EIS (Figure 1). There is no longer a roundabout proposed on Honoapiilani Highway as part of Pulelehua.

Mr. Michael W. Foley
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

2. Community gardens in Pulelehua will be maintained by the Pulelehua Home Owners' Association (or other entity as established to maintain Pulelehua's network of open space). MLP recognizes the impact of homeowner's fees on overall affordability, and, as stated in Section 2.6.4 (Affordability) of the Draft EIS, "will consider a graduated type of fee structure based on affordable and market rate homes or other criteria such as number of bedrooms, lot size, or housing type."

3. In response to your comment regarding lighting and preserving the night sky, Section 4.7 in the Final EIS will be revised to include the following:

All Pulelehua common area exterior lighting will be shielded from adjacent residential properties to the extent possible. Street lighting and common area lighting will be designed to minimize night sky light pollution to the extent possible. This will be accomplished through a combination of properly selected light fixture shades, bulb types and wattages, reflectors, and lens used within each fixture.

4. a) Uses within Pulelehua will be regulated by the Pulelehua Project District ordinance, which, when approved by the County Council, will become part of the Maui County Code, specifically incorporated in Chapter 19, Zoning. Design covenants for Pulelehua will also be created and be administered by the Pulelehua Homeowners' Association or a similar private organization or trust established to regulate uses within Pulelehua.

b) As clearly stated in Section 1.8 (Studies Contributing to this Environmental Impact Statement) of the Draft EIS: "The current plan for Pulelehua contains a total of 267 potential ohana units." As further explained in Section 1.8, at the time many of the technical studies were commissioned for the Draft EIS, 318 ohana units were projected. In the course of preparing the Draft EIS and revising the plan, the number of ohana units was reduced to a total of 267. Thus, many of the studies in the Draft EIS overstate the number of ohana units, which results in conservative estimates (i.e., overstated) of many demands such as water demands, wastewater produced, and traffic impacts.

In response to your request for a discussion as to what the ohana units will provide for Pulelehua, Section 2.6.4 (Building Types) of the Final EIS (Section 2.6.2 in the Draft EIS) will be revised to include the following:

- *Ohana (potential)*
An attached or detached dwelling unit that is accessory, incidental or subordinate in size and character to a principal building situated on the same lot or parcel, with a maximum of 625 to 800 square feet of living area, depending on lot type and district zone. Ohana units will be built at the discretion of individual owners.

The provision for potential ohana units will contribute to furthering affordability within Pulelehua. Ohana units will allow families to add living areas for family members or provide additional income if rented. In the true meaning of "ohana," it is envisioned that Pulelehua's ohana units will allow a family to provide living space for aging parents or allow children to live separately as they become adults and seek an affordable place of their own. If rented, ohana units can increase affordability by providing an owner with additional income to help pay the mortgage or other needs. In addition, if

rented, it is envisioned that small size of the ohana units will keep rent prices reasonable and affordable, thereby providing another source of affordable housing in West Maui.

- c) The Project District Ordinance will be the County mechanism for enforcing the restriction of ohana units to designated lots.
5. Pulelehua will be completed in one phase. As stated in the Draft EIS, Section 2.7 (Development Timetable & Preliminary Costs), development and sales of the Pulelehua community are projected to be completed within five to nine years. Within this total time and before construction, permitting and entitlement processing is expected to take approximately one year. Construction of the major backbone infrastructure is estimated to take an additional year, with the first homes being completed in 2007. Continued construction and full absorption should occur over the preceding five and a half years.
6. In response to your question regarding potential impacts from arsenic-containing compounds used as pesticides for pineapple cultivation, Section 3.5 in the Final EIS (Identification of Chemicals and Fertilizers) will be revised to include the following:

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine the possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and/or analyses, appropriate actions will be determined and implemented, including recontamination, if necessary.

7. a) MLP has met with the Department of Transportation (DOT) to discuss Pulelehua on four separate occasions: June 2, 2004; October 7, 2004; February 9, 2005; and June 23, 2005. In addition, over the last year, MLP has communicated its plans for Pulelehua to DOT through phone calls, e-mails, and letters. In response to DOT's comments on the Draft EIS, MLP has requested further meetings. In their comment letter on the Draft EIS, DOT specified that a request for changes to the present permitted access (Akahale Street) and the new accesses should be submitted to the Highways Division, Right-of-Way Branch for review and approval.

In response to your request for a discussion of an alternative plan with fewer connections to Honouliuli Highway, in the Final EIS, Section 6.3 will be revised as shown on Attachment 2 of this letter.

b) The Pulelehua Traffic Impact Analysis Report (TIAR) reflects the known status of projects at the time the study was conducted. Given that proposed projects change frequently, it is not practical to change the Pulelehua TIAR given the change in unit count for Waivee Village. It is our understanding that as the planning of Waivee Village progressed over the last nine months, the unit count has changed at least three times. In addition, it is conceivable that as the unit count for Waivee Village increases, the unit

count of other proposed projects may decrease or other proposed projects will not be built.

The Pulelehua TIAR provides for a conservative estimate of potential impacts as it: 1) does not assume the Lahaina Bypass or the "mini" bypass will be built; and 2) assumes that that all proposed projects will be built as planned at the time the report was prepared (which we believe to be highly unlikely); and 3) assumes all potential Pulelehua ohana units will be built.

Given the variability of these and other factors, at this time the conclusions of the Pulelehua TIAR should not be significantly different because of the change to the Waivee Village plan.

c) We appreciate the Planning Department's support of Pulelehua's flexible street design. As stated in Section 4.9.1 of the Draft EIS: "Maui Land & Pineapple Company, Inc., or its subsidiaries, will build all Pulelehua internal roadways and they are working with the County Planning Department and Department of Public Works to allow the Pulelehua streets to be dedicated to the County upon completion." In their comment letter on the Pulelehua Draft EIS, the Department of Public Works and Environmental Management acknowledges they are working with MLP by stating: "The Department of Public Works and Environmental Management and Kapalua Land Company [a subsidiary of MLP] are currently discussing the various roadway sections being proposed for the project."

8. a) MLP will be responsible for maintaining Pulelehua's new desilting basins, bioswales, and drainageways. The County will continue to be responsible for maintaining existing drainage facilities.

b) As stated in Section 4.9.2 (Drainage) of the Draft EIS, all drainage improvements will be developed in accordance with applicable Department of Health and County of Maui drainage requirements. As the planning of Pulelehua progresses and more detailed plans are available, additional drainage studies will be prepared.

9. MLP will fund the development and construction of the new wells proposed to provide potable water for Pulelehua.

10. As stated in Section 4.9.4 (Wastewater Systems) of the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design. As also stated in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete.

In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant and it is not possible to prepare a detailed

Mr. Michael W. Foley
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
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sewer impact study for Pulelehua at this time. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

We are aware that the County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued. In the Final EIS, Section 4.9.4 (Wastewater System) will include the following:

The County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued.

Maui Land & Pineapple Company Inc. will pay its fair share for any improvement fees assessed for Pulelehua. In the event the Lahaina Wastewater Reclamation cannot accommodate Pulelehua, Maui Land & Pineapple Company Inc. will evaluate the installation of a packaged sewer treatment plant to address Pulelehua's wastewater treatment demands.

11. In response to your comment regarding the school, in the Final EIS, Section 4.11.3 will be revised to include the following:

Plans for Pulelehua include a 13-acre site for a public elementary school. Maui Land & Pineapple Company Inc. will contribute the 13-acre school site as a portion of their standard fair-share school impact fee. Maui Land & Pineapple Company Inc. plans to develop Pulelehua in one phase and will keep the DOE informed regarding the progress of Pulelehua.

12. An application for a Community Plan Amendment was submitted on March 18, 2005 along with applications for Change in Zoning and Project District Development Approval.

MLP is currently working with the County Department of Parks and Recreation regarding the neighborhood parks and ball fields.

At this time, the Department of Parks and Recreation has not identified the Pulelehua site as a preferred location for a regional park.

13. The Final EIS will include discussion as part of Chapter 6.0 (Alternatives) regarding an urgent care clinic or hospital for the West Maui region, as shown in Attachment 2.

Emergency helicopters are allowed to land at the Kapalua West Maui Airport. In September 2004, an agreement was signed to allow an air ambulance to land at the airport. Since September, the air ambulance has only landed at the airport once.

We understand that the Department requests 18 copies of the Final EIS for permit processing. We also acknowledge that the Department is currently reviewing the proposed draft ordinance establishing the standards of development for Pulelehua.

Mr. Michael W. Foley
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 6

We appreciate the Department's continued work to formulate an ordinance that will achieve the goals of a livable community as well as function as a mechanism for government review of uses within Pulelehua.

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Attachments

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Attachment 2

In the Final EIS, Section 6.3 (Alternatives Related to Different Designs or Details Which Would Present Different Environmental Impacts) will be revised to include the following:

Reduced Access Points to Honoapiilani Highway. The Pulelehua plan proposes four new access points to Honoapiilani Highway in addition to the existing access provided by Akahahele Street. The Pulelehua intersections have been carefully considered and spaced more than 800 feet apart per access management guidelines to minimize the impact on travel flow of Honoapiilani Highway.

The alternative of providing fewer Pulelehua connections to Honoapiilani Highway was thoroughly studied during the planning Charrette and by Pulelehua traffic engineers and was rejected because fewer access points would result in long queuing times at the limited intersections, thus requiring more side street green time at Akahahele Street thereby interrupting smooth traffic flow on Honoapiilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapiilani Highway.

Finally, a more subtle environmental implication exists. With an optimal number of access points, more balanced traffic entering and leaving the site is very likely to encourage walking by town residents and guests. The more pedestrian trips within and to Pulelehua, the less the total vehicle miles of travel for this portion of West Maui.

Proposed Medical Center. Maui Memorial Medical Center in Wailuku, which is approximately an hour's drive from West Maui, is the only acute care for all of Maui. Given the close proximity to the Kapalua West Maui Airport, Pulelehua would be a logical area for an urgent care clinic or hospital. Emergency helicopters are already allowed to land at the Kapalua West Maui Airport and in September 2004 an agreement was signed to allow the air ambulance to land at the airport.

The proposed Pulelehua Project Ordinance provides for medical uses as a permitted use in Pulelehua's Māhinahina Neighborhood (the area south of Māhinahina Gulch). Maui Land & Pineapple Company Inc., is currently participating in discussions with Maui Memorial Medical Center officials to donate land for a medical facility in the neighborhood.

Should an urgent care clinic or other medical facility be developed, certain assumptions and conditions within the Pulelehua community would change. The

Attachment 1

In the Final EIS, the table in Section 1.9.4 (Required Permits and Approvals) and Section 5.3 (Approvals and Permits), will be revised as follows:

Permit/Approval	Responsible Agency	Status
Chapter 343, HRS Compliance	State Land Use Commission	Submitted 6-28-05; action pending
State Land Use District Boundary Amendment	State Land Use Commission	Submitted 6-28-05; action pending
Community Plan Amendment	County of Maui Planning Department Maui County Council	Submitted 3-18-05; action pending
Project District Phase I/ Change in Zoning	County of Maui Planning Department Maui Planning Commission Maui County Council	Submitted 3-18-05; action pending
Project District Phases II and III	County of Maui Planning Department Maui Planning Commission Maui County Council	Expected submittal 4-5-06
Project District Phase III Chapter 6E, HRS Compliance	County of Maui Planning Department Maui County Council State Historic Preservation Division	Expected submittal 7-5-06 Submitted 06/25/04; accepted 03/03/05
National Pollutant Discharge Elimination System (NPDES) Permit Subdivision Approval	State Department of Health County of Maui Department of Public Works and Environmental Management	Expected submittal 8-5-06
Grading/Building Permits	County of Maui Department of Public Works and Environmental Management	Expected submittal 8-5-06
Well Construction Permit/ Pump Installation Permit	DINR Commission on Water Resource Management	Expected submittal 4-5-06

ALAN M. ARAKAWA
Mayor
MILTON M. ARAKAWA, A.I.C.P.
Director
MICHAEL M. MIYAMOTO
Deputy Director
Telephone: (808) 270-7845
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RALPH NAGAMINE, L.S., P.E.
Development Services Administration
TRACY TAKAMINE, P.E.
Wastewater Reclamation Division
CARY YAMASHITA, P.E.
Engineering Division
BRIAN HASHIRO, P.E.
Highways Division
Solid Waste Division

COUNTY OF MAUI
**DEPARTMENT OF PUBLIC WORKS
AND ENVIRONMENTAL MANAGEMENT**
200 SOUTH HIGH STREET, ROOM 322
WAILUKU, MAUI, HAWAII 96793

May 18, 2005

number of home, for example, would be reduced. Figure 17 shows two medical facility alternatives, a seven-acre site and a 15-acre site. A seven-acre medical facility would reduce the total number of homes in the Māhinahina neighborhood by 50. A 15-acre facility would eliminate 90 homes.

With a medical facility neighborhood traffic patterns within the Māhinahina neighborhood may change slightly, but the intent would be to build the facilities within the fabric of Pulelehua's traditional town plan. Based on conceptual information, the medical facility would generate less demand for water, sewer, and electricity than the houses that would be replaced in the plan. Other potential impacts may also be reduced accordingly. It is anticipated that a medical facility could also provide significant positive economic impacts in the form of related medical businesses and professional job creation.

The close proximity to the airport would provide for air transport between the Pulelehua medical facility and the Maui Memorial Medical Center or medical facilities on Oahu, potentially saving lives. Potential impacts relating to air transport could include increased use of the airport, however since September, the air ambulance has only landed at the airport once.

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

Dear Mr. Schnell:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
PULELEHUA
TMK: (2) 4-3-001:031

We reviewed the subject application and have the following comments:

1. Although wastewater system capacity is currently available as of April 1, 2005, the developer should be informed that wastewater system capacity cannot be ensured until the issuance of the building permit.
2. Provide discussion and calculations (sewer impact study) to substantiate that the existing wastewater system is adequate to serve this project.
3. Wastewater contribution calculations are required before building permit is issued.
4. Developer is not required to pay assessment fees for this area at the current time.
5. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations.

6. Plans should show the installation of a single service lateral and an advance riser for each lot.
7. Commercial kitchen facilities within the proposed project shall comply with pre-treatment requirements (including grease interceptors, sample boxes, screens etc.).
8. Non-contact cooling water, condensate, etc. should not drain to the wastewater system.
9. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property.
10. Hold-Harmless Agreement should be executed. Signed agreement required before the Wastewater Reclamation Division (WWRD) will give recommendations for final subdivision approval.
11. Development shall include the use of recycled water for open space and commercial irrigation (if available).
12. The Department of Public Works and Environmental Management and Kapalua Land Company are currently discussing the various roadway sections being proposed for the subject project.
13. The architect and owner are advised that the project is subject to possible flood inundation. As such, said project must conform to Ordinance No. 1145 pertaining to flood hazard districts.
14. A verification shall be provided by a Registered Civil Engineer that the grading and runoff water generated by the project will not have an adverse effect on the adjacent and downstream properties.
15. A detailed and final drainage report and a Best Management Practices (BMP) Plan shall be submitted with the grading plans for review and approval prior to issuance of grading permits. The drainage report shall include hydrologic and hydraulic calculations and the schemes for disposal of runoff waters. It must comply with the provisions of the "Rules and Design of Storm Drainage Facilities in the County of Maui" and must provide verification that the grading and runoff water generated by the project will not have an adverse effect on adjacent and downstream properties. The

- BMP plan shall show the location and details of structural and non-structural measures to control erosion and sedimentation to the maximum extent practicable.
16. The applicant shall contribute his pro-rata share for traffic improvement to be determined by the County and traffic master plans. A detailed Traffic Master Plan for the entire subdivision shall be submitted for our review and approval. An agreement to the above prepared for filing with the State Bureau of Conveyances shall be submitted by the developer.
 17. All existing features such as structures, driveways, drainage ways, edge of the pavement, etc. shall be shown on the project plat plan.
 18. A site plan and a sight distance report to determine required sight distance and available sight distance at existing and proposed street intersections shall be provided for our review and approval.
 19. The 100-year flood inundation limits shall be shown on the project site plans. Lot geometrics cannot be approved until such data is submitted and reviewed.
 20. A detailed final Traffic Impact Assessment Report for the entire subdivision/development shall be submitted for our review and approval. The report shall also address regional traffic impacts and include assessments from the local community police officer.
 21. Preliminary construction plan submittal shall include a completed technical assistance review performed by the Disability and Communication Access Board (DCAB) for compliance with the Americans with Disabilities Act Accessibility Guidelines (ADAAG) for all facilities. All technical and structural infeasible assessments shall be the responsibility of the developer and an agreement waiving the County of Maui of any future liability, including redesign and reconstruction, for said facility shall be recorded with the State Bureau of Conveyances.

Mr. Tom Schnell, A.I.C.P.
May 18, 2005
Page 4

Please call Michael Miyamoto at (808) 270-7845 if you have any questions regarding this letter.

Sincerely,


MILTON M. ARAKAWA, A.I.C.P.
Director

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MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Mr. Milton Arakawa, AICP
Director
County of Maui
Department of Public Works & Environmental Management
200 South High Street, Room 322
Wailuku, HI 96793

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Arakawa:

Thank you for your letter dated May 18, 2005. Maui Land & Pineapple Company, Inc. (MLP) would like to take this opportunity to respond to your comments.

1. MLP understands that wastewater system capacity cannot be ensured until the issuance of the building permit. Further, it is our understanding the County has contracted an outside consultant to conduct tests on the existing treatment facilities to ascertain the current available capacity.
 2. As stated in Section 4.9.4 (Wastewater Systems) of the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design. Also stated in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete.
- In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

3. MLP understands wastewater contribution calculations are required before building permits are issued.
4. MLP understands that there is no requirement to pay assessment fees for this area at the current time.

1000 Kapalua Drive, Lahaina, Maui, Hawaii 96761
(808) 669-5625 • Fax (808) 669-5454 • www.mauland.com

5. We understand that MLP is required to fund any necessary off-site improvements to collection system and wastewater pump stations. MLP is pleased to find Public Works supports the approach to route a new sewer transmission system mauka of Honopi lani Highway. This new system will support Pulelehua and will be sized to handle inflow from other communities.
6. Plans will show the installation of a single service lateral and an advance riser for each lot.
7. Commercial kitchen facilities within Pulelehua will comply with all pre-treatment requirements.
8. Non-contact cooling water will not drain to the wastewater system.
9. Ownership of each easement will be indicated on subdivision plans. MLP understands the County will not accept sewer easements that traverse private property.
10. A Hold-Harmless Agreement will be executed before the Wastewater Reclamation Division will provide recommendations for final subdivision approval.
11. Community parks, neighborhood parks, open spaces, and common areas for multifamily units and the school will be irrigated using R-1 water, as discussed in Section 4.9.3 (Water System) of the Draft EIS.
12. MLP acknowledges that we are currently in discussions with the Department of Public Works and Environmental Management on various roadway sections being proposed for Pulelehua.
13. As detailed in Section 3.7 (Natural Hazards) in the Draft EIS, according to the Federal Emergency Management Agency (FEMA) Flood Rate Insurance Map (FIRM) (1997) (Panel Number 150003 0151C) the Pulelehua site is located in Zone C, with the exception of a small area mauka of Honoapi lani Highway in Mahinahina Gulch, which is Zone A5. FEMA defines Zone C as "areas of minimal flooding" and Zones A1 to A30 as "areas of 100-year flood, base flood elevations and flood hazard factors determined. All Pulelehua structures will be in the area designated Zone C. A proposed road may traverse Mahinahina Gulch in the area designated Zone A5. The roadway will be built to all standards and requirements for flood districts, including conformance to Ordinance No. 1145.
14. The preliminary drainage plan provided in the Final EIS specifies that all additional runoff due to Pulelehua will be retained on site with no increased flow to downstream properties. As the planning for Pulelehua progresses, more detailed grading and drainage civil engineering plans will be prepared and provided for your review. These plans will include verification by a Registered Civil Engineer that the grading and runoff

- water generated by Pulelehua will not have an adverse effect on the adjacent and downstream properties.
15. A detailed and final drainage report and a Best Management Practices Plan meeting all County of Maui requirements will be submitted with the grading plans for review and approval of grading permits.
 16. ML&P will contribute their pro-rata fair share for traffic improvements. A detailed Traffic Master Plan for the entire subdivision will be submitted to your department for review and approval.
 17. Pulelehua subdivision plat plans will show all existing features. Please note that at this stage, detailed subdivision plat plans have not been prepared. These plans will be prepared after Pulelehua receives approval for its State Land Use District Boundary Amendment, Community Plan Amendment, Change in Zoning, and Project District Phase I applications.
 18. When detailed plans are prepared, MLP will provide a site plan and a sight distance report for your review and approval.
 19. The 100-year flood inundation limits will be shown on subdivision plans. Please note that as per the response to item 13, the vast majority of the Pulelehua site is in the FIRM Zone C, an area of minimal flooding. The only proposed use that may be in an area subject to 100-year flood inundation is a roadway to cross Mahinahina Gulch. The roadway will be built to all standards and requirements for flood districts.
 20. A Traffic Impact Assessment Report (TIAR) was included in the Draft EIS. This TIAR included regional traffic impacts and a local community police officer was consulted in preparation of the report. Should the TIAR be revised, the revised report will be provided for your review and approval.
 21. The preliminary construction plan submittal will include a completed technical assistance review performed by the Disability and Communication Access Board for compliance with the Americans with Disabilities Act Accessibility Guidelines for all facilities.
- MLP will continue to work with the Department of Public Works and Environmental Management in the future. We feel confident that ongoing coordination with the County will make Pulelehua a better designed community. Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS.

ALAN M. ARAKAWA
MAYOR



CARL M. KAUFALOLO
CHIEF
NEAL A. BAL
DEPUTY CHIEF

M. Arakawa - Director, Public Works and Environmental Management, County of Maui
June 27, 2005
Page 4

COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY

200 DAIRY ROAD
KAHULUI, MAUI, HAWAII 96732
(808) 270-7561
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RECEIVED

APR 26 2005

PBR HAWAII

April 22, 2005

Sincerely,

Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company Inc.

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

Subject: CPA 2005/0005, CIZ 2005/0004, PHI 2005/0001 TMK (2)4-3-001:031
PULELEHUA

Dear Mr. Schnell,

cc: Anthony Ching, State Land Use Commission
Abe Mitsuada, State Office of Planning
Genevieve Salmonson, Office of Environmental Quality Control
Ann T. Cua, Department of Planning, County of Maui
Bob McNatt, Maui Land & Pineapple Company, Inc.
Tom Schnell, PBR Hawaii

I have had the opportunity to review the Community Plan Amendment application. I have also been able to attend several meetings over the past year concerning this project. There was much discussion about the roadway design and the different options.

The fire department is concerned with the emergency access road widths and routes. As we are aware, the Uniform Fire Code states that "*The unobstructed width of a fire apparatus access road shall be not less than 20 feet.*" The problems arise when residents park their vehicles on both sides of the roadway, mostly in the evening.

The following street examples do not appear to meet this requirement:

1. Drive DR 50 8/8 does not appear to meet this specification. We are able to utilize this design if the green swale area is structured with an all-terrain surface with a minimum distance of 4 feet from the edge of the roadway. This will assist emergency fire apparatus with the usage of the green swale area if needed. There are items on the market that provide grass as well as an all terrain surface, similar to a honeycomb design.
2. Drive DR 57 7/8/8 does not appear to meet this requirement. We are able to utilize this design if the green swale area is structured with an all-terrain surface with a minimum distance of 4 feet from the edge of the roadway. This will assist fire apparatus with the usage of the green swale area if needed. There are items on the market that provide grass as well as an all terrain surface, similar to a honeycomb design.

April 22, 2005

Subject: CPA 2005/0005, CIZ 2005/0004, PH1 2005/0001 TMK (2)4-3-001:031

PULELEHUA

3. Street ST 44 7/9/9/7 does not appear to meet this requirement however we will be able to utilize this design if this is not used on a cul-de-sac or similar dead end. This design will be required to be accessed from 2 or more directions (looped design).

4. The alley ways are not a concern at this time. It is believed that emergency vehicles will use the frontage of the residence(s). The alleyways are assumed to also be a looped system or will be able to be accessed from 2 or more directions.

Sincerely,

Valeriano F. Martin

Valeriano F. Martin
Valeriano F. Martin
Captain
Fire Prevention Bureau

cc: State Land Commission- Mr. Anthony Ching

Office of Environmental Quality Control

State of Hawaii, Dept of Business, Economic Development & Tourism- Abe Mitsuda

Maui County Department of Planning- Ms. Ann Cua



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

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June 27, 2005

Mr. Valeriano F. Martin, Captain
County of Maui
Department of Fire and Public Safety
200 Dairy Road
Kahului, Hawaii 96732

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Captain Martin:

Thank you for your letter dated April 22, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to your comments.

As you noted, MLP has been and will continue to meet with the Department of Fire and Public Safety regarding the roadway design. Your input has helped to create a safer community.

1. & 2. We understand your department's concern with the emergency access within Pulelehua Drive 50 8/8 and Drive 57 7/8/8. As you recommend, MLP will provide an all-terrain surface for both road sections at the recommended width of no less than 20 feet. This can be accomplished either by increasing the paved street section to 20 feet or providing the all terrain surface on the green swale area which combined with the paved section will provide needed 20 foot access corridor.

3. We would like to confirm that Street ST 44 7/9/9/7 will not end on a cul-de-sac or similar dead end. Furthermore, this street section will offer a loop design to areas that these streets serve.

4. We would also like to confirm that the alley ways (Rear Lanes 20-10) will be a loop design to areas that these alleys serve.

We hope that these assurances will meet your requirements and your approval of the above street sections.

To reflect the ongoing communication between MLP and the Fire Department, in the Final EIS Section 4.9.1 (Roadway Facilities) will be as follows:

~~The Fire Department has approved Pulelehua's street designs and stated they were very pleased with the design details and see no major hurdles with what has been proposed.~~

The Fire Department has attended several meetings over the past year regarding Pulelehua and has participated in discussions pertaining to roadway design and emergency access road widths and routes. Maui Land & Pineapple Company Inc., and the Fire Department continue to work together to ensure Pulelehua roadways meet Fire Department requirements.

ALAN M. ARAKAWA
Mayor



GEORGE Y. TENGAN
Director

Valeriano F. Martin
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNair, Maui Land & Pineapple Company, Inc.

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DEPARTMENT OF WATER SUPPLY

COUNTY OF MAUI

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

May 9, 2005

Mr. Michael W. Foley
Planning Department
250 South High Street
Wailuku, HI 96793
ATTN: Ms. Ann T. Cua

Dear Mr. Foley:

RE: Project Name: Pulelehua
TMK : (2) 4-3-001:031(por)
ID : CPA 2005/0005, CIZ 2005/0004, PH1 2005/0001

Thank you for the opportunity to comment on the subject proposal.

Source Availability and Consumption

The project site is served by our Lahaina System. As of March, 2005 anticipated demand for outstanding or pending projects is already 17 MGD, 8 MGD of which is anticipated to be served by the county system. DWS does not grant or imply any guarantee of water until an application for water meter has been received and reviewed. The applicant should be required to develop or participate in source development for the project.

Based on system standards, the estimated average daily demand for the proposed development is about 900,000 gallons. The applicant indicated that irrigation of landscaped areas will be supplied by reclaimed water from the Lahaina Wastewater Treatment Facility and surface water from the reclaimed water reservoir above the Kapalua West Maui Airport. This will alleviate demand on our Lahaina system. Actual consumption will depend on a number of factors, such as intensity of use, water features and other end uses.

The project site currently contains cultivated pineapple fields and fallow lands formerly used for pineapple cultivation. A study entitled "The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui" concluded that Maui's drinking-water wells are vulnerable in areas that have been used in the cultivation of pineapple. The vulnerability is attributable to the legal use of the now banned pesticides EDB and DBCP. Currently, there are 8 private irrigation wells in the subject property with chloride levels ranging from 200 to 1400 ppm. If a well is drilled, it should be upgraded or to the west of historical pineapple use. Expansion of the existing treatment plant is also an option.

"By Water All Things Find Life"

Page 2
Pulelehua
Mr. Michael W. Foley
May 9, 2005

System Infrastructure

Sixteen inch and twenty inch waterlines are situated approximately half a mile on the West and South sides of the project site. The applicant will be required to provide storage, transmission, distribution, and fire protection in accordance with standards. An offsite storage tank and transmission from this storage will be required. The applicant may also be required to enlarge raw water storage to accommodate updated drought demands of the project including land acquisition to accomplish this.

Conservation

We encourage the applicant to include the following conservation measures and techniques in the project design and construction as well as convey them to future homeowners, where applicable:

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. Refer to the attached handout, "The Costly Drip". The applicant should establish a regular maintenance program.

Use Climate-adapted Plants: The project is located in the Maui County Planting Plan - Plant Zones 4 & 5. We encourage the applicant to utilize appropriate native and non invasive species and avoid the use of potentially invasive plants. Native plants adapted to the area, conserve water and protect the watershed from degradation due to invasive alien species. Please refer to list of appropriate plants for the zones as well as potentially invasive plants to avoid.

Limit Irrigated Turf: Limit irrigated turf to 25% or less of total landscaped area. Low-water use shrubs and ground covers can be equally attractive and require substantially less water than turf.

Look for Opportunities to Conserve Water: A few examples of these are as follows: When clearing driveways, etc. of debris, use a broom instead of a hose. When washing cars, use a hand-operated spray nozzle instead of an open hose. Additionally, check for leaks in faucets and toilet tanks.

Groundwater Protection

The project site overlies the Honokowai aquifer which has an estimated sustainable yield on 8 MGD of potable water. In order to protect surface and groundwater resources, we encourage the applicant to adopt Best Management Practices (BMPs) designed to minimize infiltration and runoff from construction and vehicle operations. We have attached sample BMP for reference. Additional information can be obtained from the State Department of Health.

Page 3
Pulelehua
Mr. Michael W. Foley
May 9, 2005

Should you have any questions regarding system infrastructure and requirements, please call our Engineering Division at 270-7835, and any questions on source availability or conservation and resource matters, please contact our Water Resources and Planning Division at 270-7199.

Sincerely,



George Y. Terigan
Director

eam
c: engineering division
applicant, with attachments:

The Costly Drip
Maui County Planting Plan - Plant Zones 4 & 5 - Saving Water in the Yard - What and How to Plant in your Area
Jobs for an Ordinance Amending Chapter 16.20 of the Maui County Code, Pertaining to the Plumbing Code
Subsection 16.20A.680, "Water-Cooled Systems"
A Checklist of Water Conservation Ideas for the Home & Yard
A Checklist of Water Conservation Ideas for Commercial Buildings

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C: PBR Hawaii
State Land Use Commission
Office of Environmental Quality Control
State of Hawaii, DBEDT



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Mr. George Y. Tengan, Director
County of Maui
Department of Water Supply
200 South High Street, Room 322
Wailuku, HI 96793

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Tengan:

Thank you for your letter dated May 9, 2005. Maui Land & Pineapple Company (MLP) would like to take this opportunity to respond to your comments.

Source Availability and Consumption

We acknowledge that Pulelehua will be served by the Lahaina System and that 2005 anticipated demand for outstanding or pending projects is already 17 MGD, 8 MGD of which is anticipated to be served by the county system. We further acknowledge that DWS does not grant or imply any guarantee of water until an application for a water meter has been received and reviewed.

As discussed in Section 4.9.3 (Water System) of the Draft EIS, potable and non-potable water will be used to supply Pulelehua with the estimated average daily demand of approximately 900,000 GPD. While we continue to evaluate water supply alternatives, the most likely source for the additional potable water demand will be from new wells. These wells will likely be located mauka of the Pulelehua site in the Honolua or Honokowai aquifer. To reduce the average daily demand for potable water, landscaped areas will be irrigated with R-1 water from the Lahaina Wastewater Treatment Facility and surface water.

In response to your concern regarding possible ground water containments, Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Mr. George Tengan - Director, Department of Water Supply, County of Maui
Pulelehua Draft EIS
June 27, 2005
Page 2

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

System Infrastructure

MLP will provide all required water storage, transmission, distribution, and fire protection in accordance with standards. We acknowledge that an offsite storage tank and transmission from this storage tank will be required. Other water sourcing options are also being evaluated in case well development proves to be unfeasible or cost prohibitive.

Conservation

MLP is committed to conserving Maui's valuable water resources by utilizing non-potable water for irrigation, low-flow fixtures, climate appropriate landscaping, and BMPs where possible. Most of the suggested conservation measures in your letter have already been included in the Draft EIS (See Section 4.9.3). After completion, Pulelehua will institute a comprehensive program of water conservation, education and maintenance which will ensure water is used wisely.

Groundwater Protection

As outlined in Section 4.9.2 (Drainage) and 4.9.3 (Water System) of the Draft EIS, MLP will incorporate many environmentally friendly or "sustainable" design features into Pulelehua for storm water management. These include the best management practices for storm water drainage such as catch basins, bioswales, water retention/detention basins, porous pavement, as well as the best management practices designed to minimize infiltration and runoff from construction and vehicle operations.

In response to your comment regarding runoff from construction and vehicle operations, Section 4.9.2 of the Final EIS will include the following statement:

Best management practices (BMPs) will be adopted to minimize infiltration and runoff from construction and vehicle operations.

Mr. George Tengan - Director, Department of Water Supply, County of Maui
Pulelehua Draft EIS
June 27, 2005
Page 3

MLP will continue to work with the Department of Water Supply. We feel confident that ongoing coordination with the County will make Pulelehua a better designed community. Thank you for comments. Your letter will be included in the Final EIS.

Sincerely,



Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company, Inc.

cc: Anthony Ching, State Land Use Commission
Abe Mitsuda, State Office of Planning
Genevieve Salmonson, Office of Environmental Quality Control
Mayor Arakawa, Mayor's Office, County of Maui
Keith Regan, Mayor's Office, County of Maui
Ann T. Cua, Department of Planning, County of Maui
Bob McNeil, Maui Land & Pineapple Co., Inc.
Tom Schnell, PBR Hawaii



Maui Nui Housing Task Force
c/o Maui Economic Opportunity, Inc.
99 Mahalani Street
Wailuku, Maui, Hawaii 96793

April 28, 2005

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

Dear Mr. Schnell:

Re: Draft Environmental Impact Statement
Pulelehua Project - Maui Land & Pineapple Company
Maui, Hawaii (TMK 4-3-001:031)

Thank you for your request for comments on the Draft Environmental Impact Statement for the proposed Pulelehua project at Kapalua, Maui.

The Maui Nui Housing Task Force is a diverse group of concerned Maui residents who have gathered to further the cause of affordable housing. Comments from the Task Force come through its Coordinating Committee and are specific to the housing element only.

Pulelehua proposes a total of 882 residential units with at least 51% being made available for sale or rent to low, low-moderate and gap-group

Mr. Tom Schnell, AICP
April 27, 2005
Page 2

income groups. Although targeting West Maui residents, the project meets the basic parameters subscribed to by the Maui Nui Housing Task Force by providing units affordable to Maui's working families. Recognizing there are multiple elements contained within the DEIS that are beyond the scope of the Task Force, the Task Force has no adverse comments to the study at this time.

Should you wish any further information, please do not hesitate to contact me.

Sincerely,



Giovanni Rosati
Task Force Coordinator

cc: State Land Use Commission
PO Box 2359
Honolulu, Hawaii 96804

Office of Environmental Quality Control
235 S Beretania St. Suite 702
Honolulu, Hawaii 96813

Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, Maui, Hawaii 96761

GR/bm



LAND PLANNING
LANDSCAPE ARCHITECTURE
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GRANT MIRAKAMI, AICP
SENIOR ASSOCIATE

TOM SCHNELL, AICP
ASSOCIATE

RAYMOND T. HIGA, ASLA
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KEVIN NISHIKAWA, ASLA
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2105 Kalia Street
Wailea, Hawaii 96753-2204
Tel: (808) 242-2878
Fax: (808) 242-2902
E-Mail: perma@law.net

May 31, 2005

Mr. Giovanni Rosati, Task Force Coordinator
Maui Nui Housing Task Force
c/o Maui Economic Opportunity, Inc.
99 Mahalani Street
Wailuku, HI 96793

**SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT
STATEMENT**

Dear Mr. Rosati:

Thank you for your letter dated April 28, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we appreciate your statement that Pulelehua meets the basic parameters subscribed to by the Maui Nui Housing Task Force by providing units affordable to Maui's working families. We also acknowledge the Task Force has no adverse comments at this time.

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

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuada, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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ALAN M. ARAKAWA
Mayor
MICHAEL W. FOLEY
Director
WAYNE A. BOTEILHO
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

June 13, 2005

BBP 100-010
100-010-010

Mr Tom Schnell & Mr. Karl Bossert
June 13, 2005
Page 2

Should you require additional clarification, please contact Ms. Ann Cua, Staff Planner, at 270-77735.

Sincerely,

MICHAEL W. FOLEY
Planning Director

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

Mr. Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Lahaina, Hawaii 96761

Dear Mr. Schnell and Mr. Bossert:

RE: Maui County Cultural Resources Commission Comments on the Draft Environmental Impact Statement for Pulelehua, A New Traditional Community in Mahinahina at TMK: 4-3-001:031, Laheina, Island of Maui, Hawaii

At its regular meeting on June 2, 2005, the Maui County Cultural Resources Commission (MCCRC) discussed the Archaeological inventory Survey Report and Cultural Impact Study Assessment for the Pulelehua project.

The Commission also received comments from the Office of Hawaiian Affairs (OHA) dated May 4, 2005. The Commission concurred with OHA's letter and as such offers the following comments on the DEIS:

1. That landscape planting throughout the project shall include native species as often as possible.
2. That should Iwi or Native Hawaiian cultural or traditional deposits be encountered during ground disturbance, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

MWF:ATC:jmu
c: Wayne A. Boteilho, Deputy Planning Director
Kivette Caigoy, Environmental Planner
Ann Cua, Staff Planner
OEQC
EA Project File
General File
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APR 19 2005
P.L. 11-11-05



June 27, 2005

Mr. Mike Foley
Planning Director
County of Maui
Department of Planning
250 South High Street
Wailuku, HI 96793

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Foley:

Thank you for your letter dated June 13, 2005 reflecting the concerns of the Maui County Cultural Resources Commission regarding the Pulelehua Draft Environmental Impact Statement (EIS). As the consultant for the applicant, Maui Land & Pineapple Company, we are responding to these concerns.

1. As noted in Section 3.8 of the Draft EIS new landscaping will include native plants.
2. Should iwi or Native Hawaiian cultural or traditional deposits be found during excavation, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. This is noted in Section 4.1 of the Draft EIS.

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNat, Maui Land & Pineapple Company, Inc.



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April 15, 2005

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

Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive
Kapalua, HI 96761

Dear Mr. Schnell and Mr. Bossert:

Subject: Pulelehua – Draft Environmental Impact Statement

Thank you for allowing us to comment on the subject project.

We have no additional comments since our earlier letter dated August 23, 2004 to PBR Hawaii and Maui Land & Pineapple Company, Inc. Preliminary design concerns were addressed at meetings with Maui Land & Pineapple Company, Inc. We further encourage the developer's electrical consultant to meet with us as soon as practical to verify the project's electrical requirements so that service can be provided on a timely basis.

If you have any questions or concerns, please call Dan Takahata at 871-2385.

Sincerely,

Neal Shinyama
Manager, Engineering

NS/dt:ikh

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cc: Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Office of Environmental Quality Control
235 S. Beretania St., Suite 702
Honolulu, HI 96813

Abe Matsuda
State of Hawaii, Department of Business, Economic Development and Tourism
Office of Planning
P.O. Box 2359
Honolulu, HI 96813

Ann T. Cua
Staff Planner
County of Maui
Department of Planning
250 S. High St.
Wailuku, HI 96793



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TOM SCHNELL, AICP
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FAX: (808) 242-2977
E-MAIL: pbrwailu@pbrhawaii.com

May 31, 2005

Mr. Neal Shinyama, Engineering Manager
Maui Electric Company, Ltd.
P.O. Box 398
Kahului, Hawaii 96733-6898

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Shinyama:

Thank you for your letter dated April 15, 2005. As the consultant for the applicant, Maui Land & Pineapple Company, Inc., we acknowledge that you have no comments to offer in addition to those provided in your August 23, 2004 letter and that preliminary design concerns were addressed at meetings with Maui Land & Pineapple Company Inc.

Maui Land & Pineapple Company Inc. (MLP) staff will continue to work closely with your department to address details of the electrical system for Pulelehua. MLP's electrical consultant will meet with MECO as soon as practical to verify Pulelehua's electrical requirements so that service can be provided on a timely basis.

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

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Associate

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.



KAHANA RIDGE

May 5, 2005

RECEIVED

MAY 09 2005

Mr. Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapahua Drive
Kapahua, Maui, Hawaii 96761

DEVELOPMENT OFFICE

Subject: Pulelehua Draft EIS Comments

Dear Mr. Bossert:

As President of the Kahana Ridge Homeowners Association, an organization consisting of over 200 individual lot owners. Several owners have asked me to express their concerns about two situations in the Pulelehua design. The first is the proposed sewer pumping station located just mauka, and bordering the Kahana Ridge subdivision. This station will be very near the homes located on the most northern portion of Kahana Ridge Drive.

Some of these owners, that are aware of the proposed location, are very concerned about pump noise and potential spills, as is often observed with current county facilities.

The possibility of raw sewage draining into their back yard is a very real concern to them. Especially when the current design of the entire Pulelehua wastewater system gravity flows to a point just above their homes. Should the pump have a malfunction, there is a very likely possibility they will be receiving raw sewage in their backyards.

The owners want to know how sewage spills of various quantities will be addressed, and if raw sewage spills will be prevented from draining into the adjacent Kahanaiki Gulch.

Pump noise can easily be remedied by building the pump station underground, rather than above ground. This should be a consideration when designing the pump station.

Another concern for the entire subdivision is the fact that we are located directly downwind from the prevailing wind direction coming from the proposed sewage pump station. Perhaps the designers should evaluate this and look at locating the station, either further away, or in a different location.

There is also concern about the "Onsite Detention Basin" to be installed adjacent to these same Kahana Ridge lot owners on Pulelehua property. They are questioning whether this basin will collect raw sewage overflow from a pump station malfunction or only rainwater runoff from Pulelehua. They want this to be addressed.

C/o Nai'a Properties, Inc.
4260 L. Honoapiilani Rd., Lahaina, HI 96761
Phone: 808-669-0402 Fax: 808-669-0518

Page 2.
May 5, 2005
Pulelehua Draft EIS Comments

If this detention basin will collect only rainwater, then they are very concerned that mosquito breeding in the ponded water will not be addressed, and wish to know who will be responsible for controlling the mosquitoes. West Nile Virus, being a potential problem for Maui, concerns them, and they worry about their children being much more vulnerable than adults. Potential mosquito problems should be addressed in the EIS, after all, they are part of our environment, and may require the use of pesticides.

Sincerely,



Don R. Gerbig, President
Kahana Ridge Home Owners Association

C/o Nai'a Properties, Inc.
4260 L. Honoapiilani Rd., Lahaina, HI 96761
Phone: 808-669-0402 Fax: 808-669-0518



MAUI LAND & PINEAPPLE COMPANY, INC.

Don Gerbig, Kahana Ridge Homeowners Association
Pulelehua – Response Letter to Draft Environmental Impact Statement Comments
June 27, 2005
Page 2 of 3

pump station which services the Kahana Ridge subdivision and is located upwind of many homes in Kahana Ridge.

To incorporate your above concerns and our responses in the Final EIS, Section 4.9.4 will be revised as follows:

June 27, 2005

Mr. Don Gerbig
C/o Nati'a Properties Inc.
4260 L. Honoapiilani Road,
Lahaina, HI 96761

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Gerbig:

Thank you for your letter on the Pulelehua Draft Environmental Impact Statement (DEIS) dated May 5, 2005. As Maui Land & Pineapple Company's (MLP) Development Manager for Pulelehua, I would like to personally respond to your comments.

Pump Station

Although the Preliminary Engineering Report included in the DEIS states that a pump station will be located at the northerly edge of Pulelehua, MLP has not determined the final location of the pump station. We appreciate your concerns regarding this facility. MLP will do everything possible to ensure the residents of Kahana Ridge and Pulelehua are not negatively impacted by pump station.

The pump station will not serve all of Pulelehua. It will only handle waste water from a few dozen homes that can not gravity flow to the new sewer transmission line. The central and southern neighborhoods as well as a portion of the northern neighborhood will be able to gravity feed into the new line.

The pump station itself will be designed to be very reliable. The pump station will include instrumentation, alarm systems (e.g. equipment failure, high waste water levels) and redundant equipment such as pumps. These features will provide system monitoring and ensure reliability.

Sewer spills can be addressed using several methods. During the design and engineering phase of Pulelehua various options will be evaluated to keep any potential overflow of waste water from entering Kahana Gulch.

Sound attenuation features will be included in the pump station design, as needed, to ensure that all state and county noise requirements are met. Locating the equipment underground will be evaluated during the design and engineering phase of Pulelehua.

Sewer pump stations should not emit noxious odors if running properly. Notwithstanding this fact, based on prevailing wind patterns in the area, there is no location within Pulelehua which is predominately upwind of any homes at Kahana Ridge. In fact, there is an existing underground

Maui Land & Pineapple Company Inc., or its subsidiaries will build the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect to a new sewer line located along the east (mauka) side of Honoapiilani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet and will connect directly to the Lahaina Wastewater Reclamation Plant.

The onsite collection system will incorporate a sewer pump station at the northerly limit of the Pulelehua site. The pump station will not serve all of Pulelehua. It will only handle waste water from a few dozen homes that can not gravity flow to the new sewer transmission line. The central and southern neighborhoods as well as a portion of the northern neighborhood will be able to gravity feed into the new line to a gravity-flow system which will connect to the County's sewer pump station Napili No. 1, which will and transport wastewater into the Lahaina Wastewater Reclamation Plant. Pump The County's pump station No. 1 is located on the northerly side of the Lahaina Wastewater Reclamation Plant and pumps wastewater directly into the headworks at the plant.

The pump station at the northerly end of the Pulelehua site will include instrumentation, alarm systems (e.g. equipment failure, high waste water levels) and redundant equipment such as pumps. These features will provide system monitoring and ensure reliability. During the design and engineering phase of Pulelehua, various options will be evaluated to keep any potential overflow of waste water from entering Kahana Gulch. Sound attenuation features will be included in the pump station design, as needed, to ensure that all state and county noise requirements are met. Locating the equipment underground will be evaluated during the design and engineering phase of Pulelehua. Sewer pump stations should not emit noxious odors if running properly. Notwithstanding this fact, based on prevailing wind patterns in the area, there is no location within Pulelehua which is predominately upwind of any homes at Kahana Ridge.

The proposed sewage system will be designed to County of Maui standards. In addition, all wastewater plans will conform to applicable provisions of HAR, Chapter 11-62, "Wastewater Systems."

Detention Basins

The onsite detention basins will be designed to allow rainwater and run-off from Pulelehua to recharge into the soil. The pump station will be designed so that no overflow will enter the detention basin.

A properly designed detention basin will provide a recharge rate high enough so that under normal conditions the basins drain quickly, usually within one to two days. As stated in the Preliminary Drainage Report in the DEIS, the basins will be designed to handle additional run off from the site based on a 50 year event, 1 hour flow. This equates to 544.8 cubic feet per second (CFS).

Even after heavy rains, the basins should drain before mosquito eggs can hatch and mature into adult mosquitoes. The normal life cycle of a mosquito is eggs to larva to pupa to adult mosquitoes which can fly. It takes one to two days for eggs to hatch into larva and another 5 to 10 days for the larva to change into pupa. The pupa matures into adult mosquitoes over the next two to four days. In total, it takes from between 8 to 16 days on average for eggs to mature to adult mosquitoes that can fly.

To incorporate your above concerns and our responses in the Final EIS, Section 4.9.2 will be revised to include the following:

The detention basins will be designed to provide a recharge rate high enough so that under normal conditions the basins drain quickly, usually within one to two days. Even after heavy rains, the basins should drain before mosquito eggs can hatch and mature into adult mosquitoes. The normal life cycle of a mosquito is eggs to larva to pupa to adult mosquitoes which can fly. It takes one to two days for eggs to hatch into larva and another 5 to 10 days for the larva to change into pupa. The pupa matures into adult mosquitoes over the next two to four days. In total, it takes from between 8 to 16 days on average for eggs to mature to adult mosquitoes that can fly.

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. We hope these responses address your concerns. MLP will continue to work with you and your organization to find mutually agreeable solutions to any issues that may come up in the future.

Sincerely,



Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company, Inc.

Attachment

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Ms. Ann T. Cua, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.
Tom Schnell, PBR Hawaii

West Maui Community Association, LLC

72 Kahana Nui Road, Lahaina, HI 96761

Maui Land & Pineapple Company
1000 Kapahua Drive, Kapalua, HI 96761

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

May 5, 2005

Dear PBR Hawaii, ML&P, Land Use Commission, DEQC, DBEDT, and Maui County Planning Dept:

A consensus seems to be shaping up in West Maui. Pulelehua is too much, too fast.

We are facing an onslaught of 29 developments that will completely overwhelm our roads and infrastructure, more than doubling the population of West Maui, if you allow it. This was never part of the West Maui Community Plan. Our roads are already jammed today and our infrastructure lags behind.

There is need for a reasonable number of affordable homes in West Maui. Other developments like Waie'e and Ka'anapali 2020 plan to have many hundreds of affordable homes, a school, a medical center, good road access via the Lahaina bypass, and they are located closer to Lahaina amenities and population center. Unlike Pulelehua, a lot of public participation during several years of open planning has gone into each of these other projects, long before Pulelehua was conceived. Out of fairness to the time that Waie'e and Ka'anapali 2020 have taken for genuine community involvement in their planning, the State and County should give them the first opportunity for approval. Pulelehua should wait in line until its turn. This might also allow sufficient time for Pulelehua to go through a meaningful public planning process.

It would certainly lessen all impacts if Pulelehua was reduced to one-third the number of homes and area proposed. It would also help if the project were built over 10 years, so roads and infrastructure could grow along with it.

Please only approve Pulelehua if ML&P agrees in writing not to develop any future phases on surrounding lands. Without this guarantee, the door is open for ML&P to make Pulelehua into the urban core of a new city, as they have previously planned.

Sincerely,


Nell Woods

West Maui Community Association, LLC

Pulelehua Draft Environmental Impact Statement Comments

From the West Maui Community Association, LLC

Underlined items are new. New comments to the Draft EIS are added to the old comments submitted to the EIS Preparation Notice on 8/19/04.

We all live in West Maui, many have children living here, we know our community well, and will be severely impacted by Pulelehua if it proceeds as planned.

ML&P has offered to develop 125 affordable housing units to qualify for approval of their large luxury Kapalua Mauka development. But rather than incorporate those units at Kapalua Mauka they have responded with a proposal creating a new additional development "Pulelehua Town," which in Phase I alone encompasses 1,218 residences (895 units and 323 ohanas), including upscale "market-priced" units, plus commercial development and industrial development. Phase I of Pulelehua will triple the population of this rural neighborhood, changing it to an urban area, overwhelming infrastructure, and contradicting the West Maui Community Plan. Approval of Phase I would tend to encourage development of Phases II and beyond, which would create a new city in West Maui comparable to Lahaina, on land that is currently productive agricultural and open space.

Conclusions

We have come to the following conclusions based on our understanding of the Pulelehua proposal:

1. We support the need for construction of affordable housing in West Maui, both to provide for families, and to maintain the mixed economic blend of people which helps make our community wonderful.
2. Development of 895 units and 323 ohanas in Phase I of Pulelehua, plus the proposed industrial and commercial development, plus ML&P's proposed 690 unit Kapalua Mauka luxury development, together would completely overwhelm our already dangerous and overcrowded one-lane regional Highway 30. Highway 30 is the only road in and out of West Maui. We strongly oppose such a large plan for Pulelehua Phase I.
3. Pulelehua is just 1 of 29 developments planned for West Maui, with about 16,000 units, 45,000 new people, and 32,000 more cars. The impact of Pulelehua combined with these other developments would nearly triple the population of West Maui. Every square foot of Pulelehua violates the West Maui Community Plan, which is designed to make sure that all development is controlled in a way that allows West Maui infrastructure to adapt and support it, and preserves the landscape that makes West Maui a cornerstone of Hawaii's tourism industry.

5. If ML&P is seeking to satisfy their commitment to build affordable housing in exchange for permission to build the luxury 925-acre Kapalua Mauka development (gated homes in the \$1-to-\$10-million range), then consideration should first be given to integrating that affordable housing into Kapalua Mauka, not placed miles off site at Pulelehua. ML&P mentions repeatedly in their Pulelehua materials that they are committed to mixed neighborhoods, and that un-mixed neighborhoods don't work. Yet they don't support mixing at Kapalua Mauka?

6. Development of the Future Phases of Pulelehua would create a new city, totally altering the character and environment of West Maui. We oppose this adamantly.

7. By building Pulelehua and beginning the process of urbanizing the area, ML&P will set a precedent that will open the door to future development of large agricultural areas which are adjacent or near Pulelehua.

8. If no urban location in West Maui is deemed possible, then we believe our infrastructure could absorb the impact of a development such as Pulelehua if it contains one-third the residential units proposed, with no commercial or industrial development, and if access to Highway 30 is limited only to the existing Akahahele Road intersection where there is already a traffic light, and two new entrances south of Akahahele Road. And as a condition, the remaining area of Phase I and all areas marked "Future Phases" on ML&P's public announcement published in March 2004 should be placed permanently off limits to any future development.

9. A 100' buffer around existing residentially zoned neighborhoods is shown on the project map in the EIS (Figure 1, illustrative master plan) but it is not mentioned in the text of the DEIS. The final EIS must include a written commitment for: a) adjacent to residentially zoned areas, have a minimum buffer of 100' width from the project boundary line to the property line of lots in Pulelehua; and b) that the developer will maintain the buffer with trees or dense vegetation designed to make it an effective buffer, including irrigation if needed.

ISSUE NOT SOLVED IN DRAFT EIS:
Include All Phases of the Development in EIS

Applicant says it has no intention of building future phases "At this time." But Pulelehua will have facilities designed to ease expanding later (such as a school, many commercial buildings, main roads facing surrounding lands, and more highway entrances than it needs). Applicant must promise in writing that it will never build future phases at any time in future, or else it must examine all phases in the EIS.

See aerial photo map published by ML&P (page 17 of these comments). According to the applicant's public presentations in March 2004, Pulelehua Phase 1 is only the first segment of a final development several times as large as Phase 1. According to the Hawaii Administrative Rules, Chapter 200 - Environmental Impact Statement Rules, Subchapter 5 Applicability §11-200-7:

"Multiple or Phased Applicant or Agency Actions.

A group of actions proposed by an agency or an applicant shall be treated as a single action when:

- A. The component actions are phases or increments of a larger total undertaking;
- B. An individual project is a necessary precedent for a larger project..."

We understand this to mean that the EIS must consider the impact of the total plan for Pulelehua (all Phases, not just Phase 1), for every subject addressed in the EIS.

Approval of Phase I would open the gate to massive future development. On the ML&P Pulelehua map (page 17 of these comments), a large area east and north of Phase I is labeled "future phases," and extends off the map in 2 directions. If even a small portion of the Phase I plan is approved, the door will be open to additional phases, unless permanently placed off-limits to development.

Are Kapalua Mauka and Pulelehua segments of a single development?
The State Land Use Commission required ML&P to "develop no less than 125 affordable units as a part of its proposed Pulelehua project," as a condition of the District Boundary Amendment for ML&P's Kapalua Mauka, a 925-acre luxury development. So Pulelehua is a "necessary precedent" to Kapalua Mauka, as defined in B above.

If the State or County determine that Kapalua Mauka and Pulelehua are not segments of a single development, should the developer be required to place the 125 affordable units required for Kapalua Mauka within Kapalua Mauka, not at Pulelehua?

ISSUE NOT SOLVED IN DRAFT EIS:
Impact on the West Maui Community

Throughout the DEIS, it shows the number of people and houses in West Maui growing very quickly. This will only happen if there is poor planning. Without managed growth, developments like Pulelehua will cause fast growth. But this doesn't have to happen.

The DEIS says that Pulelehua won't raise Maui's population, promising to mostly take people from other parts of Maui, but it doesn't say how this will be done. Even if they're right, this will leave other Maui locations empty, to be filled by incoming people. New construction always brings more people to Maui.

1. Pulelehua will have a major impact on the density, changing it from a sparsely populated rural to a dense urban area. The existing developed area between Kaanapali and Napili is largely contained within a narrow corridor between the Honoapiilani Highway and the coast, about 2 blocks wide and 4 miles long. By contrast, the uphill side of the highway is mostly agricultural with currently only 230 homes in one compact area, and an affordable housing condo complex under construction with 117 units, and the small Kapalua/West Maui airport. Phase I of Pulelehua plans to add another 895 units and 323 ohanas, more than tripling the population of this area, plus commercial and industrial development. Future Phases of Pulelehua appear to include an area 4-times the size of Phase 1. As envisioned, Pulelehua will overwhelm our neighborhood.

2. It is unfair to place affordable homes directly next to the Kapalua airport, exposed to noise and safety issues, while the upscale Kapalua Mauka development is far from the airport.

3. Pulelehua will cause additional population to immigrate to the island of Maui, rather than alleviate the problem. The EIS should evaluate the increase in Maui's population that Pulelehua will cause.

ISSUE NOT SOLVED IN DRAFT EIS:
The Location and Size of the Pulelehua Development

Pulelehua is designed to fulfill the 125-unit affordable housing requirement agreed to by ML&P in exchange for approval of their "Kapalua Mauka" resort development of 690 luxury units on 925 acres. The EIS should ask why these affordable units are not contained within the 925 acre Kapalua Mauka?

The DEIS says that Pulelehua should be the location of Kapalua Mauka's affordable housing because of its "close proximity to the two major employment centers of Kapalua and Kaanapali," and because it's closer to water and wastewater plants. But Kapalua Mauka is closer to

Kapalua than Pulelehua. Pulelehua will have its own new water wells. And both developments are right next to wastewater mains. Is the real reason the affordable housing is not placed in Kapalua Mauka because they don't want it mixed in with the luxury homes?

However, if one accepts the concept that ML&P can satisfy their requirement for affordable housing at another site, it should not be in a rural/agricultural area, but in an area already zoned for urban growth, designated residential in the West Maui Community Plan, and with sufficient infrastructure already in place.

Wherever they are built, these 125 affordable homes serve ML&P by fulfilling their obligation undertaken in exchange for permission to build Kapalua Mauka. These affordable homes are supported by Kapalua Mauka. ML&P has no justification to build anything more than 125 units, which should be entirely affordable housing.

Any affordable housing should provide appropriate safeguards against speculation. It should be targeted to current residents of Maui to avoid encouraging a rise in the population. No commercial development or industrial development should be permitted, to avoid encouraging a rise in the population. Any development at Pulelehua Phase I should require a permanent agreement between ML&P and appropriate State and County entities dedicating the remainder of Pulelehua (including all "future phases" as identified in their original proposal flyer) as agricultural or open space in perpetuity, as a condition of project approval. And require covenants and a strong homeowner's association to ensure maintaining a quality neighborhood.

The DEIS promises to try to discourage speculators and make the housing affordable for "up to 25 years." How? We need specifics, not vague promises. Please keep affordable homes affordable forever. The buyers are trading their future appreciation for a reduced price today and the savings from reduced loan payments. If the homes creep up in price to meet the market, where will people find affordable housing?

There is certainly a need for affordable housing. How much should be built? We've heard that the Villas at Kahana affordable housing project (close by Pulelehua) has not had enough qualified affordable home buyers to fill their 117 condos. How many people will ultimately qualify for affordable housing income, be able to afford a down payment, qualify for a home loan, agree not to rent the home out, and really will move there?

ISSUE NOT SOLVED IN DRAFT EIS: Cumulative Impact

The DEIS only includes a small portion of the other developments in West Maui and their impacts. The DEIS counted only the next 6 years, about 4,000 homes, not the 16,000 in current plans. All the impacts on roads and infrastructure in the DEIS are too low. The impact will be 4 times higher.

The Environmental Impact Statement must consider Pulelehua Phase I in the context of the cumulative impacts of all planned developments in the West Side. There are currently twenty-nine major large-scale developments in various stages of planning for West Maui, many of these include affordable housing.

These combine are a rough total of approximately 16,000 residential units, approximately 44,000 people, 32,000 cars, and potential major impact on water, sewage, storm drainage, electric and telephone utilities, and the coastal marine environment. It is vital that each project needs to be evaluated based on the cumulative impact of the full build-out of all projects combined.

According to the Hawaii State Constitution and the West Maui Community Plan, none of these projects can be approved until infrastructure improvements such as roads are in place to support them. We absolutely agree, and advocate a slow-growth approach in West Maui to avoid creating worse problems than exist today. Please approve only one small increment of development at a time and only after new highways and other infrastructure is in place.

ISSUE NOT SOLVED IN DRAFT EIS: Traffic Impacts

(See traffic photos, pages 18-20 of these comments) Anyone who drives in West Maui knows that traffic is very bad today, with daily gridlock in Lahaina, and often jammed at rush hour between Lahaina and the rest of Maui. Pulelehua will only make it worse. It's common sense.

Combined with all the other planned developments, there is absolutely no way the current roads will have the capacity. We live here, we know.

Moreover, the DEIS doesn't examine traffic on Highway 30 from Lahaina to Kahului. This is the vital life-line for the whole west side, our **only road** to the outside world. It's one lane each direction, over high cliffs and through a tunnel, and expansion of this segment is not expected for 20 years at least. According to the State Department of Transportation 2001 traffic count, 26,828 vehicles per day used Highway 30 between West Maui and Central Maui. It may be over 30,000 cars per day today. Added traffic from Pulelehua could only make a bad situation worse.

Impact on Lahaina Traffic

Today traffic jams occur daily on Highway 30 through downtown Lahaina, and any additional traffic will cause gridlock. According to the State Dept. of Transportation, the Highway 30 traffic load at Lahainaluna Road in Lahaina averaged 31,776 per 24-hour period vehicles in 2001 (the most recent figures available). Since 2001 approximately 600 residential units have been built north of Honokowai, plus a large time-share hotel (the Westin) at Kaanapali, increasing the number of cars by about 2,500. Building Pulelehua Phase I and Kapalua Mauka would contribute another 2,500-to-3,500 vehicles to the area. This totals about 5,500-to-6,500 new vehicles in the area north of Lahaina. If each vehicle travels to Lahaina one round-trip per day, that creates an additional 11,000-to-13,000 trips, for a total in excess of 40,000 vehicle trips per day on Highway 30 in Lahaina (both directions of the round trip). The EIS should examine the effect of Pulelehua and Kapalua Mauka on: (a) the increased daily average number of trips on Highway 30 through Lahaina; (b) the increased traffic during peak hours and its effect on drive times. Additionally, drivers should be interviewed about their experiences in traffic on Highway 30 through Lahaina and their opinion about increasing it.

All school age children over 5th grade will have to commute to Lahaina for intermediate and high school and school sports. The EIS should examine the impact of these additional trips.

The "Lahaina Bypass" has been under discussion for over a decade. If eventually built, the reduced portion of the "Lahaina Bypass" that is currently being considered would lessen congestion from the schools at the top of Lahainaluna Road in early-morning and mid-afternoon, but will any other drivers choose to drive all the way up the long hill merely to go around a few blocks in Lahaina? The EIS should determine when the reduced portion of the "Lahaina Bypass" will be completed, and if it will have more than negligible effect on traffic through Lahaina.

Another issue to address is the availability of parking for the additional vehicles when in Lahaina, where there is already a severe shortage of spaces.

Impact on Local Traffic

See photo (page 17 of these comments). Highway 30 is only one lane in each direction adjacent to the Pulelehua site. According to the State Department of Transportation, the traffic count on Highway 30 in Honokowai was last measured in 2001, the traffic averaged 20,515 vehicles in both directions in a 24 hour period. When we include existing development added since 2001, plus adding Pulelehua and Kapalua Mauka, we will increase the average traffic load on Highway 30 at Akahahele Road and at Honokowai to near 30,000 vehicles per day. This is similar to the number of trips experienced in downtown Lahaina today where traffic jams occur daily -- where the highway is two lanes per direction. The EIS should examine the effect of Pulelehua and Kapalua Mauka on traffic between Kapalua and Lahaina, specifically: (a) the increased daily average number of trips on Highway 30; (b) the increased traffic during peak hours and its effect on drive times.

Digging into the hundreds of tables in the DEIS traffic report, a pattern of heavy traffic impacts emerges. Examining the tables for 2011 including Pulelehua (with a signal at Akahahele Road), one finds 136 Level of Service (LOS) estimates for various lanes and intersections along Highway 30 between Kapalua and Lahaina, for a.m. and p.m. combined. Out of these 136 LOS estimates, 40 are rated D, 19 rated E, and 6 rated F.

Another example: Table 19 gives traffic at Highway 30 and Dickenson street a poor LOS grade E in the year 2011. However the daily afternoon traffic experience of people in West Maui would already classify it today as a failing F.

Impact on Regional Traffic

Highway 30 is the only road connecting the towns of West Maui together and with urban Kahului and Wailuku. All traffic from West Maui to the rest of Maui must drive on this road, everyone uses it to go in for business, shopping, the hospital or airport. As a result the road is often jammed between Lahaina and Kahului/Wailuku, where highway 30 has only one-lane each direction. Residents know to plan for long delays. Daily traffic is already at or beyond capacity, Pulelehua will exacerbate this problem, interfering with tourism, commerce and public safety.

Because Highway 30 runs along the beach and along steep cliffs, it is subject to inundation, high winds and landslides and would be impassible in a hurricane or tsunami, isolating West Maui. The only hospital on Maui is in Wailuku. It would be irresponsible to encourage any further population growth in West Maui until this potential for disaster is corrected by providing an alternative inland route connecting Lahaina with the rest of Maui. The EIS should attempt to answer what would happen to the residents of Pulelehua in the event of a major hurricane or tsunami, and how the addition of Pulelehua would affect the safety of all residents of West Maui in such an event.

ML&P claims that by including small neighborhood stores and walkways in Pulelehua, they will decrease traffic, however everyone who lives on the West Side drives frequently to Kahului for Costco, Wal Mart, Home Depot, the mall, government business, school sports events, to see friends and relatives, etc. The EIS must quantify how adding 1,218 homes to West Maui will increase traffic between Lahaina and Kahului, and the effect on drive times at peak hours.

ML&P's plan to include industrial and commercial development in Pulelehua will also increase the regional traffic as people drive to Pulelehua businesses, and it will encourage population growth by drawing more people to live in the area. The EIS should include the effect of commercial and industrial development on regional traffic.

The EIS should consider the traffic impact of adding the proposed commercial development such as offices, stores, restaurants, coffee shops and tourism shops, which all draw customers, employees and deliveries, creating additional local traffic and parking problems.

Plus the proposed industrial development, which brings employees and large trucks slowing traffic, adding to problems of pollution, noise, and safety.

Plus the proposed elementary school, adding hundreds of trips twice daily.

For reasons stated in the following section on Public Safety below, we believe stop signs and the roundabout suggested for Pulelehua's entry points to Highway 30 will prove insufficient, so the EIS must also evaluate the effect of traffic lights at all intersections on traffic and drive times.

Construction trucks and construction workers' vans and cars will also add traffic to Highway 30, over a 5 year period or more. This means slow-moving, slow-turning vehicles, and inevitably a lot of mud on the road. This will certainly impact traffic levels and safety, especially toward the end of the construction when many residents will also be living at Pulelehua and using the road as well. We were unable to find any mention of construction traffic in the EIS traffic report.

ISSUE NOT SOLVED IN DRAFT EIS: Impact on Public Safety

According to the Maui Police Department, there were 4 traffic fatalities and 126 motor vehicle accidents on Highway 30 between Front Street (the north end of the Lahaina urban area) and Napili, in the 1-year period from August 1, 2003 to July 31, 2004. Two of the fatalities occurred on Highway 30 in Honokowai and at the intersection of Honoapiilani Road, both within about a mile of the proposed Pulelehua Town location.

This is a major impact on our community's families.

Pulelehua would have 5 intersections onto Highway 30. The Federal Highway Administration says that more accidents occur at intersections than on open roadway. So adding intersections to Highway 30 will make it more dangerous, not safer.

Highway 30 adjacent to Pulelehua is an undivided road with one lane in each direction, the posted speed limit is 45 mph, however drivers routinely travel at 55 mph and often faster. Many tourists use this road who are unfamiliar with it, often bringing their "speeding taigaing style" with them. The road is mostly unlit at night and subject to torrential "mauka" rainstorms many nights of the year. Driving across or entering Highway 30 at a signal requires great care as often people on Highway 30 fail to stop in time because of the high speed.

Pulelehua Phase I envisions adding 4 additional intersections to Highway 30, including stop sign intersections and a circular roundabout. Stop signs are totally inadequate to the speed and traffic volume at these intersections, and represent a serious danger. Inserting a roundabout (the only one on Highway 30) will surprise drivers such as tourists who are unfamiliar and not expecting such an unusual interruption. The EIS should address the public safety impact of all these. We believe stop signs and the roundabout if built will prove insufficient, so the EIS must also evaluate the effect of traffic lights at all intersections on public safety.

The EIS should address the effect of additional traffic on police, fire and ambulance response times, especially from Lahaina to the hospital in Kahului.

ISSUE NOT SOLVED IN DRAFT EIS: Contradicts Community Plan

The most recent (1996) West Maui Community Plan and Map #1 designate all of the proposed Pulelehua land "Open Space," "Park," "Airport," and "Agricultural" (a copy of the Community Plan map is attached). None of the land is designated residential, business or industrial. The West Maui Community Plan states that, "All zoning and land use approvals shall be consistent with the West Maui Community Plan..." (page 51)

The West Maui Community Plan specifically designates "Mahinahina regional park on approximately 50 acres of land below the Kapalua/West Maui Airport." (page 17) This is located right in the middle of the proposed Pulelehua Phase I. The green small strips and pocket parks envisioned in Pulelehua Phase I can't accommodate the uses of a 50 acre park, or replace its beauty.

"Infrastructure improvements need to be constructed prior to the issuance of building permits in order to prevent the lag time needed for infrastructure to catch up with development." (page 10)

"The Community Plan and its map shall define the urban growth limits for the region and all zoning requests and/or proposed land uses and developments shall be consistent with the West Maui Community Plan and its land use map." (page 16)

"Drainage channels and siltation basins should not be considered for building sites, but used, rather for public open space. The following streams and gulches as named on the USGS topographic maps (Lahaina and Honolua, Hawaii, 7.5 minute series, 1:24,000 scale), are to be kept as open space: ... Kahana Stream..." (page 23) Kahana Stream is the gulch forming the north boundary of Pulelehua Phase I, a new road is shown in this gulch on the Pulelehua proposal map.

Additionally, Pulelehua Phase I would adversely affect about 220 residential property owners who purchased their properties partly based on the West Maui

Community Plan map designation of "Agricultural" or "Open Space" for the property near their homes.

**[ISSUE NOT SOLVED IN DRAFT EIS:
Proposed Elementary School**

The EIS says the school will be needed by students living in Pulelehua. But would we need a school without Pulelehua?

1. Is there a need for this school? Currently there are 4 elementary schools in West Maui: Nahehaena and Kamehameha III public schools, Sacred Hearts and the Carden Academy. Neither of the public elementary schools are over capacity according to the State Department of Education, with the enrollment at Nahehaena projected to decline 6% by 2009, and the enrollment at Kamehameha III to hold steady.
2. Do the population age demographics justify the cost of creating, staffing and maintaining a new elementary school? It appears that the age demographic in the area from Kaanapali to Kapalua is growing older, with fewer families with children, and more childless families of middle-aged-to-older residents.
3. If we create another elementary school and encourage population to move in, where will these students go to intermediate and high school? There is only one intermediate school and one high school in West Maui. These do not appear to have the capacity to absorb the additional students from a new elementary school. The capacity of Lahaina Intermediate is 597 students, currently there are 625 enrolled. The capacity of Lahaina High School is 794, currently there are 987 students enrolled, 24% over capacity. Lahaina is a 1-hour drive from the other public intermediate and high schools on Maui.

4. Has funding been committed for the cost of staffing and maintaining a school? Lahaina's intermediate school and high school are severely under funded. Many classes cannot afford text books. The PTA had to purchase and install ceiling fans for class rooms last year because the school couldn't afford them. Will staffing a new elementary school drain funds from the other schools?

5. What is the traffic impact? An elementary school will draw hundreds of vehicles to the neighborhood twice daily, including busses, teachers and staff, food delivery, etc. Most of the traffic will funnel through the one main road, Highway 30, which is only 1-lane each direction along Pulelehua.

6. Who will teach in this school? Currently there is a teacher shortage in Maui and statewide.

7. Will adding an elementary school encourage further growth in population? Will it cause pressure to develop nearby agricultural lands surrounding Pulelehua Phase I?

Will ML&P pay for the school? We can't find any promise in the DEIS that it will.

**[ISSUE NOT SOLVED IN DRAFT EIS:
Impact of Proposed Road in Kahana Gulch at North End of Pulelehua**

There should be no road built in Kahana Gulch.

1. Such a road would damage the natural environment surrounding and below the existing Maui County dam and flood control basin, including mature trees and wetlands vital to the animal and bird life there. Currently the gulch is teeming with wildlife, fish, greenery, a year-round lake (siltation basin), fresh water wetlands and a stream. Kahana Stream is identified and protected in the West Maui Community Plan.
2. Since this area includes a Maui County dam and siltation basin for flood control, will construction cause erosion? As designed it places a major road next to existing residential properties unnecessarily.
3. Do not use the gulch areas for construction vehicles, workers' personal vehicles or construction deliveries.

**[ISSUE NOT SOLVED IN DRAFT EIS:
Architectural Design Problems**

The crowded streets and mixed commercial and residential uses will make it easy for non-residents to pass through the community unnoticed. The many unsupervised open spaces may tend to attract illegal activity such as drug use.

The drawings show very dense 2-and-3 story neighborhoods, denser than any other neighborhoods on Maui. Many buildings lack front yards and face on narrow streets. This will be a crowded urban cityscape.

The designs show corner grocery stores and small business fronts. These seem like a good idea except they will be economically unsustainable because they will be unable to compete with supermarkets and big box stores, and parking is inconvenient. There are currently a number of vacant store-fronts in Napili, Honokowai and Kaanapali. What will be the impact if the corner store concept fails?

On the designs sketches presented to the Maui community, there are no parking spaces indicated in the residential areas, or they are colored green on the sketches.

Commercial store-fronts will create noise and draw outside traffic into residential areas. Where will these additional cars park?

Walking and bicycling is suggested in the plan as an alternative to cars. This is commendable, however the project is located on steep hilly terrain in one of the most rainy areas of West Maui, unsuitable to bicycles and walking except for the most athletic. The proliferation of pathways will not discourage driving.

Please define exactly what kind of activities will be permitted in the Commercial and Industrial areas, and the impacts of these activities.

ISSUE NOT SOLVED IN DRAFT EIS:
Minimal public input to the ML&P planning process

The DEIS says that ML&P "has gone to extraordinary lengths" to include community. But the only public meetings were during 1 week in March 2004, NOTHING SINCE. Public participation in the planning process for Pulelehua has been very minimal.

The Pulelehua design has not evolved significantly since the first concept was presented over 1 year ago. This is because of the lack of public input.

ML&P first publicly announced Pulelehua and requested public input on March 3rd, 2004. Their only community input meetings were barely 2 weeks later, the "charrette," giving local residents insufficient time to digest the proposal, research it, discuss it and prepare meaningful input. No detailed information about the development was provided prior to the meetings.

This is contrary to the recommendation of the National Charrette Institute, which requires all participants to be thoroughly informed about the project details well in advance. Also according to the National Charrette Institute, a real charrette requires an independent impartial third party facilitator who leads and mediates the discussions. The Pulelehua Town meetings had no independent facilitator, they were conducted on ML&P property by Dover-Kohl, the Pulelehua Town design firm paid by ML&P.

We attended the March 20th meeting titled "Hands-on Design Session." Many attending may have been employees of ML&P. We were divided into groups of 2-5 people and seated at about a dozen separate tables, also seated at each table was a representative of ML&P and a representative of their project design firm. Each table was presented with a single map of the Pulelehua project boundaries, given crayons and asked to "draw in your idea of where to place the houses, parks, schools, stores, industrial areas, or whatever else you want."

The format of the meeting excluded the most important questions: Whether or not the public wants Pulelehua to be developed at all, or if the public wanted to

revise the boundaries or limit the overall size of Pulelehua. For example, when residents asked for an estimate of the proposed number of units, population or traffic impact, we were told, "that is unknown at this time."

As a result there was no meaningful discussion of the desirability of Pulelehua, its size or its impact on the community.

Administrators and legislators need to be aware of this as they weigh the value of these meetings. The "charrette" not part of any recognized public process with requirements for balance and notice. From our observation these meetings were staged by ML&P as a public relations effort solely to create the illusion of public participation and support for this controversial project. If the EIS refers in any way to these meetings, the EIS must clearly inform readers that the meetings are NOT evidence of endorsement by the West Maui community. The EIS must not use these staged meetings or any products from them as evidence of public support.

ISSUE NOT SOLVED IN DRAFT EIS:
Quantify the Need for Affordable Housing, and Define the Solution

Affordable housing is a real need and it is the main appeal of the project. But the DEIS hardly says anything about what kind of affordable homes are planned. How many rentals, condos, houses or ohamas? How big? In all the maps and charts in the EIS, not one shows where the affordable homes are located. Can the developer make the affordables smaller after approval? **Policy makers, before approving Pulelehua, please be sure you know exactly what affordable housing the community will get.**

How can our community be sure the people in need living today in Maui are the ones who get the affordable homes?

How many families would actually relocate to Pulelehua from Central Maui? Would they move their kids to a new school? Or do they have a spouse who works outside West Maui, preventing them from moving to West Maui, or who would have to commute also on Highway 30 to Central Maui? Will people who might otherwise be interested in an "affordable home" reject the high density of Pulelehua? Be put off by the airport noise? Rainy weather? Distance from Central Maui? The crowded urban design? Or do they simply prefer living in another area of Maui? Are the "affordable homes" large enough for the size of the families they are targeted to help, based on a demographic study of those families?

How will ML&P ensure that the "affordable homes" are purchased by people who have a real need and already live or work in West Maui? What is to prevent people from outside Maui moving here to live in these homes? Will outside buyers crowd out the local buyers, making this an ineffective solution to

the problem of affordable housing? If an "affordable home" is re-sold, will it only be available to people who have a real need and already work in West Maui? If outside buyers can purchase "affordable homes" on re-sale, they will eventually displace the local employees, defeating the purpose. What are the typical wages of West Maui employees, and will this "affordable housing" be within their means - exactly how many units and at what wage level? Will the price make "affordable homes" available to dual income households only? Can the above families qualify for home financing? What is their own estimate of the price of a home which they would be willing and able to purchase? Does this correspond to the proposed cost of "affordable homes" at Pulelehua? What guarantee is ML&P offering that the ultimate sales price will not go up if their costs change? Or will they reduce the size of units if their costs change? Are there sufficient competing financial institutions willing to finance homes on those terms? What portion of ownership is limited to ML&P employees?

Unless we clearly define the problem first, Pulelehua will fail to provide a solution. And before we contemplate such a large urban development with all the impacts on the West Maui community, we should clearly define the need. Have alternatives been fully explored? For example, other upcoming developments? Locating affordable housing in areas designated residential in the West Maui Community Plan? Or other solutions such as rent subsidies or controls.

The upcoming Waine'e project and Ka'anapali 2020 will offer many affordable homes.

How will public agencies make sure Pulelehua follows through on the affordable housing as promised, and that it ultimately reaches the Maui residents who need it?

NEW ISSUE IN DRAFT EIS:

Disaster Preparedness

In event of a hurricane or tsunami, the Highway 30 may be impassable, cutting West Maui off from Central Maui. The DEIS should describe how Pulelehua's residents will be sheltered during a major hurricane. A survey of the surrounding neighborhood should be done to assess the available hurricane shelter for residents and tourists, and if necessary additional shelter should be included in the Pulelehua plan.

NEW ISSUE IN DRAFT EIS:

Sewer pump station in bad location.

The DEIS proposes placing a sewer pump station next to homes on Kahana Ridge Drive, upwind of these homes. Sewer pumps are known to give off bad odors because the pump operates under pressure. A sewer pump should not be placed within one-quarter mile of homes or gulches.

NEW ISSUE IN DRAFT EIS:

Tax Cost Impacts

Will Pulelehua Town increase our taxes? It is a rule-of-thumb that as a community grows, so does its local tax rate. Residents of rural communities tend to pay lower taxes than big cities. Will Maui taxpayers pay for:

1. Construction of new or expanded roads, highways and public parking facilities to accommodate the additional traffic, adjacent to Pulelehua Town and regionally?
2. Road maintenance?
3. Additional police, fire and emergency services?
4. Construction of new water, sewer, trash dumps, electric facilities?
5. Staffing and maintenance of a school and recreational facilities in Pulelehua Town?
6. Increased use of our beaches and other West Side public facilities?
7. Unforeseen environmental, flood control or other consequences?

MAP of Pulelehua "FUTURE PHASES" Published by ML&P 3-04.
 The EIS must include the impact of full development of all phases of the project.



PHOTO: Highway 30 southbound traffic adjacent to the Pulelehua site:



PHOTO: Highway 30 northbound traffic at Olowalu (between Lahaina and Maʻaloa):

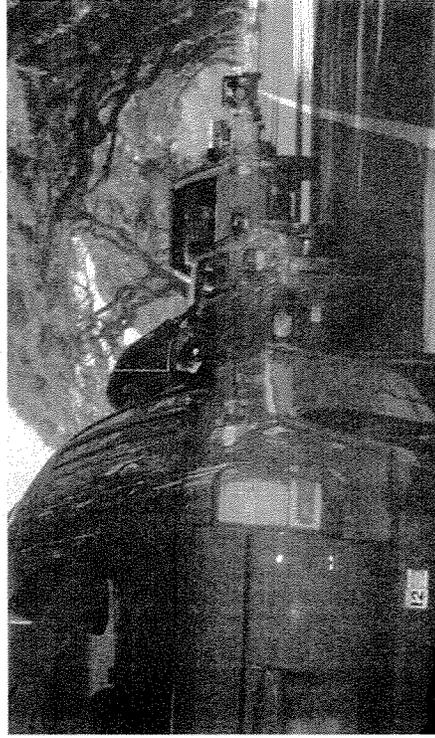


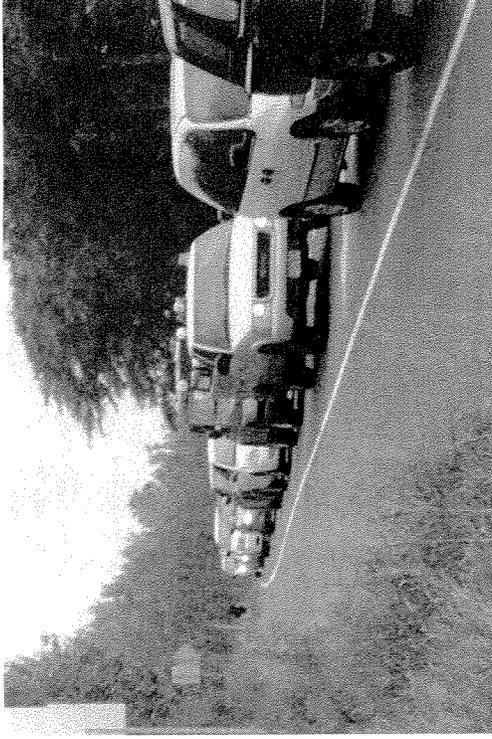
PHOTO: Highway 30 Southbound traffic at Lahainaluna Road:



PHOTO: Highway 30 northbound traffic entering Lahaina:



PHOTO: Highway 30 northbound traffic entering Lahaina:



All traffic photos taken during normal traffic conditions (traffic caused by too many cars, not by an accident).

Ms. Nell Woods
Pulelehua Draft EIS
June 27, 2005
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Before I provide a point by point response to your concerns there are a few overall issues I would like to clarify:

Pulelehua Phases: Throughout your letter you refer to "Pulelehua Phase 1" or "Phase 1." As discussed in Section 2.5 (No Future Phases) of the Draft EIS, at this time, MLP has no plans to engineer or construct any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

Kapalua Mauka and Affordable Homes: A condition of the State Land Use District Boundary Amendment for Kapalua Mauka (Land Use Commission (LUC) Docket No. A03-741) is for 125 affordable homes to be provided as part of Pulelehua. At the time of the LUC hearing on Kapalua Mauka in May 2004, this was far more affordable housing than was typically required by the LUC, and MLP voluntarily offered and agreed to this condition.

Kapalua Mauka is the long-planned expansion of the Kapalua Resort, and as such resort residential homes are an appropriate use as part of the Resort. Along with Kaanapali, the Kapalua Resort is one of two master-planned destination resorts recognized for the West Maui area. These resorts are important to the West Maui region and Maui in general as major employment centers and economic generators that impact all aspects of the County and State economies.

Number of Pulelehua Homes: Pulelehua is proposed to contain 882 homes. This is clearly stated throughout the Draft EIS. MLP will not construct any ohana units, however approximately 267 ohana units will be allowed on specific lots, to be built at the discretion and expense of individual owners. This is also clearly stated in many places in the Draft EIS.

Because ohana units may be built at the discretion and expense of individual owners it is not expected that all potential ohana units will be built. However, to provide a thorough evaluation, the Draft EIS examined the potential impacts of not only the 882 homes to be constructed by MLP, but also the potential ohana units that could be built by future owners. As stated in Section 1.8 (Studies Contributing to this Environmental Impact Statement) of the Draft EIS, at the time the studies were commissioned for the Draft EIS, 318 ohana units were projected. In the course of preparing the Draft EIS and revising the plan, the number of ohana units was reduced to a total of 267. Thus many of the studies in the draft EIS overstate the number of ohana units, which results in conservative estimates (i.e., overstated) of many demands such as water demands, wastewater produced, and traffic impacts.

Upscale Market Units: While at least 51 percent of the Pulelehua units will be affordable (i.e., priced to be affordable to families making between 50 to 140 percent of the County of Maui median income as defined by the US Department of Housing and Urban Development), Pulelehua will contain homes priced at market rates and homes targeted to "gap" buyers (meaning families that do not qualify for affordable homes but do not have the income to purchase homes at the prevailing market rates). Any "upscale" aspect to the market-priced homes is expected to be from the general design and desirability of Pulelehua itself, which will also be an amenity to the affordable homes. In addition, as stated in Section 2.6.2 (Building Types) of the Draft EIS, "Bed and breakfast uses, transient vacation rentals, and timeshare or other vacation rental or ownership plans will be prohibited within Pulelehua."



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Ms. Nell Woods
West Maui Community Association, LLC
72 Kahana Nui Road
Lahaina, HI 96761

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Woods:

Thank you for your letter on the Pulelehua Draft Environmental Impact Statement (EIS) dated May 5, 2005. As Maui Land & Pineapple Company's (MLP) Development Manager for Pulelehua, I would like to personally respond to your comments.

We acknowledge that that your organization feels Pulelehua is moving too quickly, but MLP respectfully disagrees. It has been over a year since the first Pulelehua planning meetings. The Draft EIS, which included various technical studies, was prepared during this time. MLP has also had extensive meetings with Federal, State, and County agencies over the last year to ensure the proper planning of Pulelehua. There will be at least another year of public hearings and other meetings to obtain basic land use permits. If approved, construction may begin in the third year. What this means is that it will take at least two more years before any portion of Pulelehua becomes a reality. Considering the current housing situation in West Maui, and Maui in general, three years seems like a substantial time for families seeking a home to wait. As evidenced by the number of people who are interested in becoming a resident in the Pulelehua community (over 2,700 individuals have registered with MLP), the need for housing in West Maui is immediate.

While other proposed West Maui projects such as Kaanapali 2020 also propose affordable housing, for various reasons, these projects are still several years away from providing any homes to meet the housing needs of West Maui. There is clearly more demand for affordable housing in West Maui than Pulelehua will provide. It seems unfair to make families wait for affordable housing because some plans move more slowly than others in the approval process.

According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. In addition, marketing studies commissioned by MLP, indicate that over 1,500 families are looking for affordable housing. Long-range forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. Based on these projections it is clear that reasonably priced homes in West Maui are in severe under supply.

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Retail and Industrial Uses. Pulelehua is designed to incorporate retail and other business uses to serve the Pulelehua community. As stated in Section 4.8.3 (Neighborhood Commercial Uses) of the Draft EIS, Pulelehua "will be a complete community with neighborhood shops, restaurants, offices, and other businesses serving residents." MLP views these neighborhood businesses as essential to create a vibrant community with many services and amenities within walking distance. This, in turn, will allow many residents to have a portion of their daily needs provided for within Pulelehua, thus reducing trips onto Honoapiʻilani Highway (Highway 30).

As stated in the Draft EIS, primary retail space is limited to 21,475 square feet. In comparison, a typical supermarket is approximately 50,000 square feet. What this means is that the primary Pulelehua retail space will be limited to a few small shops, restaurants, and other businesses. These establishments are not targeted toward the greater West Maui population. If they were, a far better location for these uses would have been in a "strip mall" type of configuration along Honoapiʻilani Highway, similar to the Kahana Gateway Shopping Center at the intersection of Honoapiʻilani Highway and Hooahu Road and other commercial centers in the area. The retail and commercial uses in Pulelehua are purposely integrated into the fabric of the community to specifically serve Pulelehua residents. The ideas of integrating the Pulelehua retail and commercial uses within the community are stated throughout the Draft EIS and specifically in Section 4.8.3 (Neighborhood Commercial Uses).

In addition to the primary retail space of Pulelehua, a maximum of 74,300 square feet could also be used for retail and commercial uses in specific areas and on specific lot types provided in the plan. The flexibility of the plan allows for varied uses over time, so that not all retail and other commercial uses may be built, or that uses may change over time to meet the needs of the community and specific building owners. With this flexibility a residential building could eventually provide formal office space for a home business or, for example, a first floor could be converted to retail or other commercial use, with the second floor continuing as residential. This concept is specifically stated in Sections 2.6.2 (Building Types) and 4.8.3 (Neighborhood Commercial Uses) of the Draft EIS.

Conformance with the West Maui Community Plan. We respectfully disagree that "Every square foot of Pulelehua violates the West Maui Community Plan." While the West Maui Community Plan Land Use Map provides for a park and agricultural uses on the Pulelehua site, the West Maui Community Plan consists of more than just a land use map. It also contains many pages of goals, objectives, and policies. Section 5.2.2 (West Maui Community Plan) of the Draft EIS includes discussion of how Pulelehua implements many of these goals, objectives, and policies. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua. MLP is not pursuing the "201G" fast track process to bypass this important step in the Pulelehua approval process.

While adopted by the County Council in 1996, the process of updating the West Maui Community Plan started in 1992. Changes in the West Maui region since then (such as the closure of the Pioneer Mill and the exponential increase in housing costs) necessitate a new revision to the plan. However, the County of Maui is just now starting on updating the General Plan, to be followed by updates of the nine community plan regions. The process will take years, meanwhile West Maui's population is increasing and housing prices continue to escalate.

Purpose of an EIS. Throughout your letter there are bold headings stating "ISSUE NOT SOLVED IN THE DRAFT EIS." However the purpose of an EIS is not to solve all potential issues of a proposed project, but rather to provide decision makers with information to fully consider environmental factors regarding an action and reach a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from a proposed project.

What follows is a point-by-point response to your concerns following the outline of your letter:

Conclusions

1. MLP is pleased the West Maui Community Association supports the need for construction of affordable housing in West Maui. MLP is taking action on this need and actually providing affordable homes in Pulelehua.
2. We acknowledge that the West Maui Community Association opposes Pulelehua, however we disagree that Pulelehua and Kapalua Mauka will "completely overwhelm" Honoapiʻilani Highway (Highway 30). The results of the Traffic Impact Assessment Report included in the Draft EIS conclude that Pulelehua will change area traffic flow, but peak hour traffic will continue to operate at acceptable levels of service as long as traffic improvements are made (see Section 4.4 (Transportation) of the Draft EIS). MLP will provide its fair-share contribution toward the provision of traffic improvements necessary as a result of Pulelehua and Kapalua Mauka.
3. MLP is aware that there are many proposed projects in West Maui. That is why we took great care to develop a list of 25 proposed West Maui projects (including Pulelehua) and considered the potential impacts of these projects when preparing the Pulelehua Draft EIS. The list was prepared in consultation with the County of Maui Department of Planning, as well as from compiling available information from published project environmental assessments, EISs, and traffic reports. This list is presented in Section 4.4 (Transportation) of the Draft EIS and represents the West Maui projects known at the time the Draft EIS was prepared.

While not cited in your letter, the 29 projects and the number of units you refer to appear to be the same as a list compiled by Maui Tomorrow. Careful comparison of Maui Tomorrow's list with the list in the Draft EIS indicates that the list in the Pulelehua Draft EIS is similar to Maui Tomorrow's list. The additional number of projects in Maui Tomorrow's list is the result of counting some projects (such as Pulelehua) in separate phases, the inclusion of some small projects (such as Sunstone and Hale Mahaolu, with five units each), and the inclusion of some projects (such as Kapua Village) that are already built and thus should not be included on a list of proposed projects. Also there are some projects on the Maui Tomorrow list that are also included in the list in the Draft EIS, which are the same project, but with different names. In addition, one source of information cited for the Maui Tomorrow list is a *Honolulu Advertiser* article dated February, 8, 2004, which contained many inaccuracies.

According to population projections commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm, the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

These population projections are stated throughout the Draft EIS and specifically in Section 4.8.1 (Population). Your statements regarding estimates of 45,000 new people in West Maui and 32,000 more cars, we assume, are based on the assumption that all 29 projects and units on the Maui Tomorrow list of projected projects actually will be built and will be built with the number of units indicated by Maui Tomorrow. We see this as very unlikely and instead have relied on the population projections commissioned by the County of Maui.

As stated above, we respectfully disagree that "Every square foot of Pulelehua violates the West Maui Community Plan." However, we do agree that new communities should take into consideration the impact to existing infrastructure and pay their fair share to increase infrastructure capacity relative to the needs and benefits of the proposed project. We also agree that the landscape, relative to population needs, should be preserved. This is exactly why MLP choose to locate Pulelehua next to existing urban areas (the area makai of Honoapiʻiani Highway as well as Kahana Ridge and the Kapalua West Maui Airport, are all in the State Urban district) and near existing infrastructure facilities. In terms of infrastructure, Pulelehua is located in a region with a usable aquifer, a nearby wastewater treatment plant (approximately 3,000 feet away), a surface water treatment plan (mauka of Pulelehua), an existing electrical substation, an airport, Honoapiʻilani Highway, and the end of the proposed Lahaina bypass highway. MLP has worked diligently for over a year, and continues to work, with various Federal, State, and County agencies to ensure Pulelehua is planned in context with existing and proposed infrastructure.

4. There was no item 4 in your letter.

5. As stated above, Kapalua Mauka is the long-planned expansion of the Kapalua Resort, and as such resort residential homes are an appropriate use as part of the Resort. Besides being near major infrastructure systems, the location of Pulelehua was also chosen because of its proximity mid-way between West Maui's major employment centers of Kaanapali and Kapalua. This location allows for easy access to jobs, but is outside of the congested traffic center of Lahaina. Thus the location of Pulelehua is a more desirable location for year-round residents. As stated in Section 6.2 (Alternative Locations) of the Draft EIS, alternative sites on MLP's lands would not provide similar attributes and could thus become more problematic in meeting Pulelehua's objective of providing affordable housing close to employment areas.

6. As discussed in Section 2.5 (No Future Phases) of the Draft EIS, at this time, MLP has no plans to, engineer or construct any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

7. Pulelehua is designed as a compact community with residential and other uses in a defined area. A stated objective of Pulelehua (see Section 2.2.1 (Statement of Objectives) of the Draft EIS) is to: "Build a community that preserves surrounding agricultural land and creates significant open space and trail systems." Also as cited in Section 6.2 (Alternative Locations) of the Draft EIS, the Pulelehua site is an infill location between urban uses: Kahana Ridge and, the Kapalua West Maui Airport and areas makai of Honoapiʻilani Highway. In addition it should be noted that the Department of Hawaiian Home Lands plans to develop its lands adjacent to, and south of, Pulelehua. As recommended by the State Land Use Commission Decision Making Criteria cited in Section 5.1.2 (State Land Use Law,

Chapter 205 HRS) of the Draft EIS (Standards for Determining Urban District Boundaries), "land contiguous with existing urban areas shall be given more consideration than non-contiguous land."

8. While we appreciate your suggestion that you believe "our infrastructure could absorb" the impact of a significantly different plan than what is proposed for Pulelehua, the Draft EIS and the technical studies contained in the Draft EIS examine how Pulelehua can be built as planned while minimizing impacts on area infrastructure. MLP has worked diligently for over a year, and continues to work, with various Federal, State, and County agencies to ensure Pulelehua is planned in context with existing and proposed infrastructure.

As stated above, MLP views Pulelehua's neighborhood businesses as essential to create a vibrant community with many services and amenities within walking distance. Section 6.4 (Actions of a Significantly Different Nature Which Would Provide Similar Benefits With Different Environmental Impacts) of the Draft EIS discusses the alternative of developing a conventional subdivision (which by your comment you seem to suggest) and provides reasons why this alternative was not pursued.

9. MLP will provide a buffer adjacent to the Kahana Ridge Subdivision. It is not certain at this time if a 100 foot wide buffer can be continuously provided. However, MLP will provide a wide buffer which will be maintained by the Pulelehua Home Owners' Association (or other entity as established to maintain Pulelehua's network of open space) and will include a trail system linking the communities.

To incorporate this additional information, in the Final EIS Section 2.6 (The Pulelehua Community) will be revised as follows:

Other new neighborhoods are to be located to the north (Kahanaiki) and south (Mahinahina), separated from the central neighborhood by preserved gulches; these are to have a different, predominantly residential character. Kahanaiki, the north neighborhood, will include park space that can be shared with the Kahana Ridge subdivision and a network of walkable streets and trails to connect residents to other areas of the Pulelehua community. The park space of the Kahanaiki neighborhood will include a wide buffer area adjacent to the Kahana Ridge subdivision. This buffer area will be maintained by the Pulelehua Home Owners' Association (or other entity as established to maintain Pulelehua's network of open space). Near the airport an additional green buffer area ~~is to~~ will be created.

Include All Phases of the Development in EIS

As discussed in Section 2.5 (No Future Phases) of the Draft EIS, at this time, MLP has no plans to, engineer or construct any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

As stated in our March 11, 2005 letter addressed to "West Maui Residents," in an effort to evaluate all options and gauge community support, MLP included the entire portion of land around the Kapalua West Maui Airport for discussion at the March 2004 Pulelehua Planning charrette. During the course of the charrette many individuals did voice support for a large multi-phase project that would address the overwhelming demand for affordable, gap and market priced homes in West Maui. However, as research was conducted and planning for

Pulelehua evolved, MLP decided to develop Pulelehua as a single-phase project on the 312 acre site below the airport. This is stated in Section 2.5 (No Future Phases) of the Draft EIS.

Kapalua Mauka is a separate project from Pulelehua. Planning for Kapalua Mauka started many years ago. The Kapalua Mauka Final Environmental Impact Statement (EIS) (PBR, Hawaii 2002) addressed impacts related to Kapalua Mauka and related cumulative impacts known at the time the EIS was prepared. All major issues including infrastructure demands, affordable housing requirements, and other requirements have been addressed through the environmental impact statement process, the Maui Planning Commission hearings and approval, and the Land Use Commission hearings and Decision and Order (Docket Number A03-741, June 29, 2004) reclassifying the land to the appropriate state land use districts. The Maui County Council will provide further review when it considers the County land use entitlement applications for Kapalua Mauka.

As stated above, a condition of the State Land Use District Boundary Amendment for Kapalua Mauka is for 125 affordable homes to be provided as part of Pulelehua. At the time of the LUC hearing on Kapalua Mauka in May 2004, this was far more affordable housing than was typically required by the LUC and MLP voluntarily offered and agreed to this condition.

Impact on the West Maui Community

As previously stated, population projections presented in the Draft EIS are from a County of Maui commissioned study conducted by SMS Research, a reputable social research firm. According to the SMS projections the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase. Overall the population of Maui County is projected to increase from 139,573 people in 2005 to 175,136 people in 2020, a 25.5 percent increase from the 2005 population.

Increased population without new housing creates high demand and escalating prices as evidenced by Maui's record high median home price on Maui of \$780,000. Increasingly, Maui residents are being priced out of home ownership. Pulelehua will provide homeownership opportunities for Maui's growing population, such as young first-time homebuyers, people living in multi-generational households seeking a place of their own, people currently renting, and others seeking homes at a reasonable price.

Section 2.6.4 (Affordability) of the Draft EIS will be revised in the Final EIS to include language that MLP will restrict affordable and gap home sales in Pulelehua to residents that are currently employed in Maui. Affordable home buyers in Pulelehua will also have to be first-time home buyers or not currently own a home and be employed on Maui. These safeguards favor residents who are currently renting or living in shared housing situations. With projected increased population in other parts of Maui, any migration of residents from other areas of the island will allow for additional housing opportunities for others.

Of the over 2,770 individuals that have registered with MLP as being interested in a home in Pulelehua, less than 11 percent are not from Maui.

1. The Draft EIS addresses concerns regarding density and changing uses on the site from agricultural to more urban uses. Specifically Section 4.7 (Visual Resources) of the Draft EIS

discusses visual resources and Section 4.8.4 (Community Character) discusses community character.

As stated in Section 4.8.4 (Community Character) of the Draft EIS, an important objective of Pulelehua is to preserve surrounding agricultural land and open space vistas by the creation of a compact community in an appropriate setting. The in-fill location of Pulelehua—between the existing urban uses makai of Honoapiʻilani Highway and the urban land of the Kapalua West Maui Airport and between the urban uses of Kahana Ridge and the airport—is an appropriate location for the new community and is in accord with widely accepted planning principles of placing new urban uses contiguous to existing urban uses.

2. As detailed in Section 4.10 (Kapalua West Maui Airport) of the Draft EIS, all uses within Pulelehua, including homes, the school, and businesses are located in accord with Federal Aviation Administration (FAA) and State Department of Transportation (DOT) airport noise compatibility guidelines. Even with projected maximum operations at the airport the vast majority of Pulelehua will be below the 55 DNL noise contours which is the area that is considered "unconditionally acceptable" under both FAA and State DOT airport noise compatibility guidelines.

3. As discussed above, Maui's population is projected to increase by over 25 percent in the next 15 years. This projection was made independently from Pulelehua. However, Pulelehua will provide housing for Maui's growing population.

The Location and Size of Pulelehua

While Pulelehua will contain 125 affordable homes as a condition of the State Land Use District Boundary Amendment for Kapalua Mauka, it is inaccurate to say that Pulelehua is designed to fulfill this condition. MLP will be providing 325 additional affordable homes in Pulelehua and has gone through the time, expense, and care to design a complete community.

Kapalua Mauka is the long-planned expansion of the Kapalua Resort, and as such resort residential homes are an appropriate use as part of the Resort.

As explained in Section 4.8.2 (Housing) of the Draft EIS, Pulelehua's inclusionary design, of affordable, moderate, and market rate homes provides "affordable housing with dignity," rather than an affordable housing "project."

As mentioned earlier, the Pulelehua location was carefully selected to take into consideration many factors including the employment centers of both Kapalua and Kaanapali, infrastructure, schools, traffic and proximity to adjacent urban neighborhoods. As stated in Section 6.2 (Alternative Locations) of the Draft EIS, alternative sites on MLP's lands would not provide similar attributes and could thus become more problematic in meeting Pulelehua's objective of providing affordable housing close to employment areas.

MLP intends to provide all affordable Pulelehua homes in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

In the Final EIS Section 2.6.6 (Affordability-section 2.6.4 in the draft EIS) will include information on Pulelehua's affordability provisions as shown in Attachment 1 of this letter.

As stated in Section 4.8.2 (Housing) of the Draft EIS, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income. MLP's list of 2,411 individuals and families who provided income information indicates that approximately 74 percent of these individuals and families would likely qualify for affordable housing.

In regard to the Villas at Kahana housing project, Betsill Brothers, the developer, informed us that they had more qualified affordable applicants than they could supply.

Cumulative Impact

The Draft EIS addresses cumulative impacts (see Section 7.2 (Cumulative and Secondary Impacts)), including a list of 25 proposed West Maui projects (including Pulelehua) (see Table 2 in Section 4.4 (Transportation)), and projects the cumulative number of units in West Maui that may be built by 2011, which is the year Pulelehua is projected to be complete. This methodology projects the impact of Pulelehua during build-out to completion. Thus in the Draft EIS, the cumulative impact of Pulelehua is considered in relation to other proposed projects. Projecting the impacts of other projects beyond the build out of Pulelehua would be highly theoretical and beyond the scope of the Pulelehua EIS. We chose a realistic timeframe to accurately project impacts of Pulelehua in context of other proposed projects. We find it highly unlikely that all proposed projects will be approved or, if approved, be built as currently conceived.

Without knowing final plans of other projects and without knowing if these projects will be approved, it is not possible to comprehensively detail all impacts from other projects. We agree that additional projects in West Maui will increase demands for resources and impact infrastructure, however, as we have done with Pulelehua, these other projects will have to plan accordingly to ensure impacts are minimized. As with Pulelehua, other proposed projects will be subject to regulatory review to ensure compliance with applicable land use policies. Projects must have the appropriate State land use designation, the appropriate County zoning, and comply with other applicable regulatory review and approval procedures to ensure the project will not have major adverse effects on infrastructure, public services, and the natural or socio-economic environment, or result in adverse cumulative and secondary impacts. Developers of other projects in the region will be required to satisfactorily mitigate impacts of their projects before proceeding with development.

In considering if an EIS is acceptable, the Hawaii Supreme Court has determined that the "rule of reason," shall apply; meaning that an EIS need not be exhaustive to the point of discussing all possible details bearing on a proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable a decision-maker to fully consider the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.

Traffic Impacts

(Note: For clarity in responding to your questions and concerns regarding traffic we have followed the general headings of your letter but have created subheadings specific to your questions below.)

In response to your relevant comments and the comments of others regarding traffic, the Transportation section in the Final EIS (Section 4.4) will be revised as shown in Attachment 2 to this letter.

Pulelehua Traffic Impacts. The results of the Traffic Impact Assessment Report (TIAR) included in the Draft EIS conclude that Pulelehua will change area traffic flow, but peak hour traffic will continue to operate at acceptable levels of service as long as traffic improvements are made (see Section 4.4 (Transportation) of the Draft EIS).

Traffic Impact South of Lahaina. The TIAR analyzed a 10 mile portion of Honoapiʻilani Highway, from Office Road in Kapatua to Shaw Street in Lahaina. After Shaw Street in Lahaina there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Lanipukoko. While the TIAR does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiʻilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiʻilani Highway through the Shaw Street intersection and beyond. Thus, if it is assumed that none of these cars turn off the highway between Shaw Street and Maʻalaea, 49 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapiʻilani Highway will cross the Shaw Street intersection during the AM peak. Thus, if it is assumed that these cars did not enter Honoapiʻilani Highway from some points between Shaw Street and Maʻalaea, 52 cars will travel on Honoapiʻilani Highway from Maʻalaea or other parts of Maui.

Using the same assumptions, in the PM peak, 42 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Maʻalaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali		
	AM Peak	PM Peak
From Pulelehua (southbound)	49	42
To Pulelehua (northbound)	52	113

Level of Service Concept. The Level of Service (LOS) traffic engineering concept is explained on page 2 of the TIAR included in the Draft EIS. As explained, there is a common misconception that LOS designations are like school grades, in which D is worse than C, C is

worse than B, and A is best of all. In urban areas a LOS of D is typically considered acceptable for peak conditions. This is because roads are very expensive to build, and once built, they must be heavily used to help justify the cost of construction. A road that operates at LOS A at all times is a road that has been over-built for local traffic conditions. Even during peak hours, a road at LOS A carries only a fraction of its vehicle capacity, which is a highly inefficient use of scarce transportation funding. Comparatively, a road that operates at LOS C or D, carries many trips for its size and represents a more efficient use of transportation funding. At LOS C or D, the road will be congested during peak travel times, but will also carry a measurable amount of traffic during off-peak times as well. Such roads represent a better fit between the desire to travel freely on the road and the expense of building new roads. For this reason, many communities adopt LOS D as their standard LOS for roads and streets.

Regarding your examination of the LOS levels for many West Maui intersections under the 2011 "with Pulelehua" scenario, careful comparison with the 2011 "without Pulelehua" scenario shows that the majority of intersections will operate at the same LOS with or without Pulelehua. In other words, considering all the other projected projects taken into account in the TIAR, Pulelehua will not substantially change the LOS at most intersections. Table 19 on page 52 in the TIAR is an example of this, showing the same LOS at intersections with or without Pulelehua.

Impact on Regional Traffic

Traffic Impact South of Lahaina. As explained above, the projected number of Pulelehua generated trips traversing the Pali would be as shown in the table below:

Estimated Trips To/From Pulelehua Traversing the Pali	AM Peak		PM Peak
	From Pulelehua (southbound)	To Pulelehua (northbound)	
	49	52	42
			113

Disaster Preparedness. The potential impact of natural disasters is discussed in Section 3.7 (Natural Hazards) of the Draft EIS. Mitigation of impacts associated with hurricanes and tsunamis is generally limited to compliance with building codes and adherence to appropriate civil defense warnings and recommendations. Note that Pulelehua is outside the Tsunami Evacuation Zone and impacts to Pulelehua from tsunamis are considered minimal. It is beyond the scope of the Pulelehua EIS to suggest mitigative measures related to hurricanes and tsunamis for the entire West Maui region. In the event of a hurricane or tsunamis, Pulelehua residents and all West Maui residents will hopefully comply with established civil defense procedures and recommendations.

Section 4.11.5 (Health Care Services) of the Draft EIS discusses health care facilities on Maui and in West Maui. As discussed in that section and in Section 2.6.5 (Proposed Medical Center), MLP is currently in discussions with the Hawaii Health System to provide a medical facility within Pulelehua. Plans are also underway for the West Maui Medical Facility to be located on a 15-acre site near the Lahaina Civic Center.

Big Box Shopping. Pulelehua's neighborhood businesses are not meant to compete with big box stores in Kahului. We acknowledge Pulelehua residents are likely to shop at a variety of

retailers. However, providing neighborhood serving businesses within Pulelehua will allow some immediate needs to be met within Pulelehua, thus decreasing a portion of trips onto Honoapiʻilani Highway. Unlike a conventional subdivision, Pulelehua residents will have the option of not driving for some basic services.

Traffic Impact South of Lahaina. As explained above, the projected number of Pulelehua generated trips traversing the Pali is quantified above and will be included in the Final EIS.

Commercial Traffic. Traffic projections included in the TIAR and summarized in Section 4.4 (Transportation) of the Draft EIS include projections of traffic generated from Pulelehua's neighborhood commercial uses.

Impact on Lahaina Traffic

Increased Traffic in Lahaina. The TIAR in the Draft EIS analyzed existing and projected traffic conditions on Honoapiʻilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. As part of the analysis, traffic counts were conducted in 2004 and the most recent data available from the State Department of Transportation was obtained. The traffic analysis was performed using established traffic engineering methodology to project not only impacts from Pulelehua, but also from 24 other projects proposed for West Maui (including Kapalua Mauka, see Table 2 in the Draft EIS). To our knowledge this is the most comprehensive traffic analysis conducted for the West Maui region. As noted in Section 4.4 (Transportation) of the Draft EIS, the traffic analysis provides a conservative estimate of potential impacts (i.e., actual trip generation may be much lower). Furthering the conservative nature of potential impacts, the analysis: 1) does not assume the Lahaina Bypass or the "mini" bypass will be built; 2) assumes that that all proposed projects will be built as planned (which we believe to be highly unlikely); and 3) assumes all potential Pulelehua ohana units will be built.

Daily Average Trips on Honoapiʻilani Highway. Routine daily volumes can vary dramatically, based on how trip patterns are spread throughout the full day. For this reason, traffic studies calculate capacity by hourly travel, not daily volumes, and daily volume is a poor indicator of a street's performance.

Effect on Drive Times. It is estimated that a trip through Lahaina during the peak PM hour will take approximately 14 seconds longer if Pulelehua is built.

Interviews with Drivers. TIARs typically do not include interviews with drivers to gain their opinion on traffic conditions. However, our traffic engineer did interview a West Maui police officer to obtain the Police Department's knowledge of traffic conditions in West Maui.

Trips to Schools. Trip generation rates used to project future conditions are ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Trips to and from schools are captured by these rates.

Lahaina Bypass. Because the time for the construction of the Lahaina Bypass is uncertain, the TIAR does not assume the Lahaina Bypass or the "mini" bypass will be built. This results in conservative estimates of traffic impacts.

Lahaina Parking. It is beyond the scope of the Pulelehua EIS to address the availability of parking in Lahaina. Businesses in Lahaina, like the rest of Maui, must comply with County parking requirements specific to the type of business.

Impact on Local Traffic

Increased Daily Average Trips Between Kapalua and Lahaina. Routine daily volumes can vary dramatically, based on how trip patterns are spread throughout the full day. For this reason, traffic studies calculate capacity by hourly travel, not daily volumes, and daily volume is a poor indicator of a street's performance.

Effect on Drive Times. It is estimated that a trip from Lahaina to Kapalua during the peak PM hour will take approximately 24 seconds longer if Pulelehua is built.

Commercial and School Traffic. Traffic projections included in the TIAR and summarized in Section 4.4 (Transportation) of the Draft EIS include projections of traffic generated from Pulelehua's school and neighborhood commercial uses.

Roundabout. The Illustrative Master Plan Contained in the Draft EIS (see Figure 1) does not include a roundabout on Honoapiʻilani Highway. Previous plans had included a roundabout, however this has been eliminated from the current plan and a roundabout is no longer proposed on Honoapiʻilani Highway as part of Pulelehua. The TIAR includes a discussion on roundabouts as a possible pedestrian safety measure if pedestrian volumes grow substantially over time at the intersection of Akakahele Street and Honoapiʻilani Highway.

Traffic Signals. Traffic volumes projected by the TIAR at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes reach levels specific established levels. The new intersections will require acceleration and deceleration lanes, which MLP will provide.

Construction Vehicle Traffic.

Construction traffic impacts during construction are assumed to be less than full build-out of Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the am or pm peaks. Although daily construction traffic is somewhat active, neither the daily or peak hour construction traffic exceeds the total build-out traffic forecast after Pulelehua completion.

Impact on Public Safety

Speed on Honoapiʻilani Highway. We share your concerns about public safety. Both Section 4.4 (Transportation) of the Draft EIS and the TIAR note that the posted speed limit on Honoapiʻilani Highway in the vicinity of Pulelehua is 45 miles per hour but most vehicles exceed this limit. This is partially due to the design of Honoapiʻilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peak hours, it is very likely people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

Accidents at Intersections. While you cite that the Federal Highway Administration says more accidents occur at intersections than on open highway, based on national traffic statistics signalized intersections experience a higher incidence of crashes than do non-signalized intersections. Note that the intersection of Honoapiʻilani Highway/Lower Honoapiʻilani Road is signalized and is the site of the two fatalities in Honokowai you mention.

The Pulelehua street intersections with Honoapiʻilani Highway will be engineered and designed according to all applicable Federal, State and County standards. As stated above, the new intersections will require acceleration and deceleration lanes, which MLP will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

While we recognize the primary concern expressed in your comment is in regard to public safety on Honoapiʻilani Highway, streets in Pulelehua are specifically designed to serve pedestrian mobility by achieving lower, safer, motor vehicle speeds within the community. This is one of the basic tenants of Traditional Neighborhood Design.

Emergency Response Times. In response to the additional traffic on emergency response times, during the peak PM hour the travel time impact of Pulelehua is estimated to be approximately 10 seconds through the Kaanapali/Kahana area and an additional 14 seconds through Lahaina, for a total of 24 seconds. This estimate is for "normal" vehicle traffic. Emergency vehicles require that motorist pull to the side to allow passage therefore, the response times should not be materially affected.

Contradicts Community Plan

Community Plan Amendment. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua. While the West Maui Community Plan Land Use Map provides for a park and agricultural uses on the Pulelehua site, the West Maui Community Plan consists of more than just a land use map. It also contains many pages of goals, objectives, and policies. Section 5.2.2 (West Maui Community Plan) of the Draft EIS includes discussion of how Pulelehua implements many of these goals, objectives, and policies.

Mahinahina Park. Regarding the proposed Mahinahina regional park, the Draft EIS addresses this issue in Section 5.2.2 (West Maui Community Plan).

Regarding the proposed Mahinahina regional park on approximately 50 acres within the Pulelehua site, as planned, Pulelehua will provide nearly twice as much park space in the form of neighborhood parks, ball fields, community gardens, and an extensive trail system. Pulelehua's parks will be open to all Maui residents. In addition, Maui Land & Pineapple Company, Inc., will build all Pulelehua parks. If the County were to develop the regional park as designated on the Community Plan, the County would have to acquire the land and build and maintain all facilities. It is unknown when the County would develop the regional park.

In addition, in the time since the park was designated on the community plan, the County has never approached MLP to acquire the land.

We acknowledge that you feel that Pulelehua's parks cannot accommodate the uses of a 50-acre park or replace its beauty.

We believe that neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. In total there will be 27 acres of parks and 77 acres of open space in Pulelehua all of which will be open to the public. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua. In the Final EIS Section 4.11.4 (Recreational Facilities) and Section 5.2.2 (West Maui Community Plan) will be revised to include these points as shown in Attachment 3 of this letter.

Infrastructure Improvements. We agree that new communities should take into consideration the impact to existing infrastructure and pay their fair share to increase infrastructure capacity relative to the needs and benefits of the proposed project. MLP has worked diligently for over a year, and continues to work, with various Federal, State, and County agencies to ensure Pulelehua is planned in context with existing and proposed infrastructure. The issuance of building permits for Pulelehua will be one of the final approvals necessary.

West Maui Community Plan Land Use Map. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua.

Kahanaiki Gulch. The north road shown on the south side of Kahanaiki Gulch will be an improvement of the existing dirt and gravel road. Drainage channels and siltation basins will not be used for Pulelehua building sites, as the gulches of the site will remain in open space. There is no development planned to take place in Kahanaiki gulch.

Affect on Neighboring Property Owners. MLP believes that Pulelehua will positively affect the surrounding residential property owners. Pulelehua will include many amenities, such as parks, a school, community centers, trails, and neighborhood stores that create a vibrant community. Many amenities will be open the surrounding neighborhood and to the broader West Maui community. Furthermore, the mix of income and range of housing types will diversify the social fabric of the community.

Proposed Elementary School

1. In their comment letter on the Draft EIS the Department of Education (DOE) stated: "The DOE acknowledges the need for additional school facilities within the West Maui area and finds the Pulelehua site acceptable for an elementary school."
2. Of the individuals that have registered with MLP as interested in living in Pulelehua and provided information regarding whether they have children, 67 percent (1,788) have children living at home. Fifty percent (894) of these individuals have children that are elementary age or younger. In addition, 10 percent (267) of the individuals and families registered are between the ages of 20 and 40 but do not currently have children.

3. The DOE concludes that an elementary school within Pulelehua could accommodate all elementary students living in Pulelehua. To mitigate the impact of Pulelehua on Lahaina Intermediate School and Lahainaluna High School, the DOE requests that the State and County impose a standard school fair-share condition.

4. The State has appropriated funds for the preliminary design of the elementary school. MLP will contribute 13 acres of land for the new school. It is expected that Pulelehua and other new developments will pay a fair share contribution in DOE fees. The increased tax base from Pulelehua homes will contribute to funding the ongoing operation of the elementary school.

5. Traffic projections included in the TIAR and summarized in Section 4.4 (Transportation) of the Draft EIS include projections of traffic generated from Pulelehua's school. However, as stated in Section 4.4 (Transportation) of the Draft EIS:

Trips generated by Pulelehua parents taking their children to school may be overstated due to the public DOE elementary school within Pulelehua. It is expected the school will have significant positive impact on travel on Honoapiʻilani Highway as elementary school children residing approximately north of Kaanapali, including Pulelehua children, will not have to travel to the Lahaina area for school.

In addition, as stated in Section 4.11.3 (Schools) of the Draft EIS, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahina) to walk to school, further reducing trips on to Honoapiʻilani Highway.

6. By providing affordable housing, it is expected that Pulelehua will attract teachers to West Maui. Teachers living in Pulelehua and teaching at the Pulelehua school will: 1) not have to drive to work; 2) have reasonable priced housing; and 3) live in a complete neighborhood with stores, shops, parks and open space

7. As stated above, the DOE acknowledges the need for additional school facilities within the West Maui area.

MLP will contribute the 13-acre school site as a portion of their standard fair-share school impact fee.

Impact of Proposed Road in Kahana Gulch

Previous Pulelehua plans included a road crossing Kahanaiki gulch near the desilting basin, however in current plan in the Draft EIS (see Figure 1) this crossing has been eliminated in favor of using an existing bridge adjacent and parallel to Honoapiʻilani Highway. In addition, the road alignment shown on the current plan is an existing dirt and gravel road.

1. Improving and paving the existing dirt and gravel road is not expected to result in significant impacts to this highly altered environment, which includes an engineered dam, a desilting basin, and an existing road. No threatened, endangered, or plant or animal species of

concern have been observed in the area (see Section 3.8 (Botanical Resources) and Section 3.9 (Wildlife Resources) of the Draft EIS).

2. The improvements to the dirt and gravel road will provide a fully engineered drainage system. This drainage system coupled with the paved road will reduce the amount of soils eroding into the stream.
3. Currently the dirt and gravel road is used for existing agricultural operations and will continue to be used for agricultural operations in the future. During construction, some equipment will operate in the area and some materials will have to be delivered. This portion of the construction will be completed in a short amount of time and with the least amount of disruption as possible to the residents of the area.

Architectural Design Problems

From your comments on the design of Pulelehua, it is clear that your understanding and review of the Pulelehua's Traditional Neighborhood Design (TND) concepts differs greatly from those of MLP. The Traditional Neighborhood (TND) design of Pulelehua is based on trends of new communities occurring across the mainland and in many parts of the world. TND communities are an alternative to conventional suburban sprawl and have been well received and enthusiastically embraced in many areas as a way to reduce congestion, preserve open space, restore a sense of place, and create vibrant communities.

During a trip to the East Coast earlier this year, MLP staff visited 22 TND communities in five states. MLP staff has also visited several TND communities on the West Coast. In every case, perceived concerns such as increased crime, urban cityscape, failed commercial properties, lack of parking, narrow streets, noise, and traffic proved to be unfounded and the towns MLP visited proved to be well received and very successful. The central district of Pulelehua will look like Paia or Makawao rather than a cityscape of Honolulu.

In an attempt to address your concerns regarding the design of Pulelehua, three principles of TND communities on which Pulelehua was based are explained below. These concepts were presented at the Pulelehua design charrette in March of 2004 and were well received by many of the participants. In fact, after the presentation of the charrette workshop results, Kihel resident and University of Hawaii Professor Lee Altenberg, was quoted in the *Maui News* ("A Holistic Town". March 30, 2004, Eagar) saying "This is the most concentrated collection of intelligent ideas I've heard since I came to Maui nine years ago."

The Region and Town

The region is the overall context for all planning. Towns within a region need a comprehensive strategy to prosper. Each town should have both homes—for people of all incomes—and nearby jobs, so residents aren't forced to travel far to work. Each town also needs a discrete sense of place. Towns and cities within a region should have clear boundaries, contributing to a sense of place. The land between towns should be preserved as open space.

Town centers, individual neighborhoods, and community edges each have their own building densities, street sizes, and appropriate mixtures of retail, residential, and other functions. The highest densities and most intense mix of uses are typically found in town centers; lower

densities are found at the edge. The compact development in the neighborhood center allows for more open space to be preserved along the edge, increasing quality of life for all residents.

The Neighborhood, the District, and the Corridor
Diverse, walkable neighborhoods are what distinguish TND communities from other development styles. Each neighborhood has a center and an edge. The center should be a public space, whether a square, a green, or an important intersection. The optimal size of a neighborhood is a quarter-mile from center to edge. Most people will walk a distance of approximately a quarter-mile before turning back or opting to drive or bicycle instead of walking. This dimension is consistent in the way people have created settlements for centuries. For a neighborhood to feel walkable, many daily needs should be supplied within this five-minute walk. That includes not only homes, but stores, workplaces, schools, houses of worship, and recreational areas.

Neighborhoods traditionally have a mix of uses and types of buildings. A variety of building types allows for diverse lifestyle options and incomes to live in the same neighborhood. For example, in a shopfront building, the business owner can live above his or her shop, or rent the upper floor as an office or apartment. Nearby, terrace homes and cottages can be intermingled with larger detached homes. The mix of uses also allows for more efficient use of parking spaces. Parking spaces in the town center can be used by business patrons or workers during the day, and residents of upper floor apartments at night; separate spaces for each use are not usually required.

The Block, the Street, and the Building

If there is one thing that reduces the livability of most conventional subdivisions, it is the fact that streets do not feel like pleasant, shared spaces. In TND communities, neighborhoods have a network of streets designed so that pedestrians, bicyclists, and motorists can move safely and comfortably through the neighborhood. Multiple options for travel through the street network allow traffic to disperse through the neighborhood, avoiding traffic problems on one particular street.

To make streets feel safe, buildings must be oriented to have doors, windows, and front porches facing the street, creating natural surveillance for pedestrian activity by the building occupants. Blocks that include alleys allow parking to be accessed along the rear of each lot, reducing the number of curb cuts along the sidewalk, which enhances the pedestrian experience. On-street parking and street trees, located between the sidewalks and moving vehicular lanes, provides another layer of comfort for pedestrians. The configurations of great streets consistently provide a high-caliber experience for pedestrians as a baseline obligation, and go on from there to accommodate all other required modes of travel.

To incorporate the above information into the Final EIS a new Section 2.1 will be included as shown on Attachment 4 of this letter.

Regarding your comment about the topography of the Pulelehua site in the context of walking and bicycling, elevation was carefully considered in the design of Pulelehua. While the Pulelehua site does contain slopes of approximately eight percent in some areas, an eight percent slope is walkable for most pedestrians. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative

attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Uses permitted and activities allowed in Pulelehua's neighborhood commercial areas are specified in Pulelehua's proposed Project District Ordinance, which was submitted to the County Planning Department as part of the Project District Phase I Application.

Minimal Public Input to the MLP Planning Process

Section 2.4 (The Community Planning Process) of the Draft EIS, "discusses the steps taken to include the community in the planning of Pulelehua. These steps include the community planning design charrette, the subsequent week of open public design, and mention of several meetings with various agencies and groups open to the public over the past year. Incidentally, the term you quote from the Draft EIS ("has gone to extraordinary lengths") is not used anywhere in the Draft EIS.

In addition, over the course of the last year, MLP has received a wealth of comments through our web page and registration database. Comments from individuals and public groups have also been received through the EIS public comment period.

At the time of the public charrette, many questions could not be answered; like how many units will be built or what is the population of Pulelehua. This is because the extent of what should be built was not determined until after the community charrette. An example of this fact is that mauka lands were included for discussion in the charrette process. After receiving feedback from the community, MLP has taken no steps to develop any of these mauka lands subsequent to the charrette.

After gathering public feedback through the charrette process and meeting with public groups, the draft plan was then developed. Then, this plan went through revisions after meeting with the State and County agencies and departments, such as the Hawaii Department of Transportation and evaluating input from our registered database. Studies like the traffic report, the airport noise study, and the preliminary engineering study also caused modifications to the plan.

Meetings with public groups such as Na Kupuna O Maui, the West Maui Taxpayers Association, the Kapalua Resort Association, and County commissions such as the Cultural Resources Commission and the Urban Design Review Board were held and are ongoing. MLP continues to welcome public feedback which will lead to a better plan for Pulelehua.

Quantity the Need for Affordable Housing and Define the Solution

Regarding the location and kind of affordable housing in Pulelehua, Section 2.6.4 (Affordability) of the Draft EIS states:

Pulelehua will emphasize "affordable housing with dignity" by providing a range of affordable homes integrated with market priced homes into complete neighborhoods. Affordable homes will not be segregated into fringe neighborhoods or placed in the least

desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low-moderate and gap-group income Maui residents.

In addition, Section 4.8.2 (Housing) of the Draft EIS states:

As a mixed income community, Pulelehua will contain a variety of housing options, in terms of type, size and price, integrated into complete neighborhoods. Affordable homes will be mixed with moderate and market rate homes, on the same block and on the same street. The affordable homes and lots may be smaller than the market homes, or may not have prime views, but they will not be of lesser quality or appearance than other homes. This inclusionary design provides "affordable housing with dignity," rather than an income segregated, affordable "project."

Regarding your paragraph of questions asking who and why people would move to Pulelehua, many of these questions can only be answered by individual buyers. Decisions such as choosing to relocate children to a new school, the desirability of the climate of the site, preferences to live in another area of Maui, and the attractiveness of the Pulelehua design, are individual preferences that each buyer will have to evaluate before choosing to buy a home in Pulelehua. What we do know is that Pulelehua will be a well designed community with amenities beyond affordable homes and that there is a tremendous demand for affordable homes in general on Maui and specifically in West Maui.

Forecast of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. Currently, MLP's database of people interested in a Pulelehua home has three times as many individuals registered than houses available. In the case of people who are interested in affordable housing, there are four times as many people registered.

Regarding your paragraph of questions pertaining to the affordability of Pulelehua homes and issues such as eligibility and restrictions on re-sales, Section 2.6.5 (Affordability) in Final EIS (previously Section 2.6.4 of the Draft EIS) will include additional information about Pulelehua's affordable housing program as shown in Attachment 1 of this letter.

A detailed set of qualifications and restrictions is being finalized now and will be discussed with the County as soon as possible.

As previously stated, all affordable housing units and 125 rentals will remain affordable in perpetuity. This will ensure that these units remain available to service the community for generations to come. The pricing of these units will be established in the future based on the HUD Affordable Housing Tables. This includes adjustments for financing interest rates, income level and family size. This pricing is independent of MLP's costs.

Disaster Preparedness

As stated above, the potential impact of natural disasters is discussed in Section 3.7 (Natural Hazards) of the Draft EIS. Mitigation of impacts associated with hurricanes and tsunamis is generally limited to compliance with building codes and adherence to appropriate civil defense warnings and recommendations. It is beyond the scope of the Pulelehua EIS to suggest

mitigative measures related to hurricanes and tsunamis for the entire West Maui region. In the event of a hurricane or tsunami, Pulelehua residents and all West Maui residents will hopefully comply with established civil defense procedures and recommendations. Note that Pulelehua is outside the Tsunami Evacuation Zone and impacts to Pulelehua from tsunamis are considered minimal.

Sewer Pump Station in Bad Location

The Preliminary Engineering Report included in the Draft EIS states that a pump station will be located at the northerly edge of Pulelehua. The exact location of the pump station has not been determined. Based on prevailing wind patterns in the area, there is no location within Pulelehua which is upwind of any homes at Kahana Ridge.

The unit will use the most current technology available. Pump stations like this are in place and operational throughout many developments. In fact, there is an existing pump station which services the Kahana Ridge community and is located upwind of many homes in Kahana Ridge.

Tax Cost Implications

Section 4.85 (Social-Economic Impacts) of the Draft EIS discusses economic impacts relative to Pulelehua (also see the market study and economic impact analysis in Appendix A of the Draft EIS).

1. Construction of all new roads within Pulelehua will be funded by MLP. Costs for highway upgrades, if required, will be borne by Pulelehua based on a fair share valuation. Public parking will be provided within Pulelehua. It is beyond the scope of the Pulelehua EIS to address the availability of parking outside of Pulelehua. Businesses and other establishments must comply with County parking requirements specific to the type of business.
2. Depending on how road ownership is established within Pulelehua road maintenance within Pulelehua will be provided by the County of Maui, the Pulelehua Home Owners' Association or a combination of both.
3. Additional police, fire and emergency services could be funded from the new taxes generated from Pulelehua. These services will further be subsidized by Pulelehua's affordable housing preferences for public service employees.
4. All water distribution systems within Pulelehua will be paid for by MLP. In addition, construction of new water sources will also be funded by MLP in the form of wells. Sewer transmission will be paid for by MLP through a new sewer main which will be constructed along the mauka side of the highway. If assessed, MLP will pay its fair share of the costs for increasing the capacity of the Lahaina Wastewater Treatment Plant. Solid waste access fees for each individual user. The infrastructure cost for electrical facilities are based on a fair-share contribution.
5. The ongoing cost of school operations are funded by the State through State taxes. The recreation facilities within Pulelehua dedicated to the County will be maintained with funds

from the additional tax base generated by Pulelehua. The balance of the parks and open space will be maintained by the Pulelehua Home Owners' Association (or other entity as established to maintain Pulelehua's network of open space).

6. Funding for beaches and other public facilities will be funded by the additional tax base from Pulelehua.
7. MLP is not able to respond to who will pay for unforeseen consequences.

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. We hope these responses help you see the merits of Pulelehua and recognize that MLP has put forth a well thought out community.

Sincerely,



Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company, Inc.

Attachments

- cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Ms. Ann T Cua, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

Attachment 1

In the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised to include the following:

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years Old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

Lottery Pool	Preference
A	MLP Employees and subsidiaries
B	Kapalua Mui Partners
C	West Maui residents who are police officers, public school teachers, and firefighters
D	Maui residents who work in West Maui, but do not live in West Maui
E	West Maui residents

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold at affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Attachment 2

In the Final EIS, Section 4.4 (Transportation) will be revised as follows:

In response to several comments on the Draft EIS, the following additional analysis regarding Pulelehua traffic impacts is provided:

Traffic Impact South of Lahaina. The transportation report analyzed a 10-mile portion of Honoapiʻilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina, there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launiopolo. While the transportation report does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiʻilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak hour, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiʻilani Highway through the Shaw Street intersection and beyond. Thus if it is assumed that none of these cars turn off the highway between Shaw Street and Māʻālaea, 49 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapiʻilani Highway will cross the Shaw Street intersection during the AM peak hour. Thus if it is assumed that these cars did not enter Honoapiʻilani Highway from some points between Shaw Street and Māʻālaea, 52 cars will travel on Honoapiʻilani Highway from Māʻālaea or other parts of Maui.

Using the same assumptions, in the PM peak hour, 42 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Māʻālaea or other parts of Maui.

This information is summarized below in table format:

	Estimated Trips To/From Pulelehua Traversing the Pali	
	AM Peak Hour	PM Peak Hour
From Pulelehua (southbound)	49	42
To Pulelehua (northbound)	52	113

Level of Service Concept. The Level of Service (LOS) traffic engineering concept is explained on page 2 of the transportation report included in the Draft EIS. As explained, there is a common misconception that LOS designations are like school grades, in which D is worse than C, C is worse than B, and A is best of all. In urban areas a LOS of D is typically considered acceptable for peak conditions. This is because roads are very expensive to build, and once built, they must be heavily used to help justify the cost of construction. A road that operates at LOS A at all times is a road that has been over-built.

for local traffic conditions. Even during peak traffic hours, a road at LOS A carries only a fraction of its vehicle capacity, which is a highly inefficient use of scarce transportation funding. Comparatively, a road that operates at LOS C or D carries many trips for its size and represents a more efficient use of transportation funding. At LOS C or D, the road will be congested during peak travel times, but will also carry a measurable amount of traffic during off-peak times. Such roads represent a better fit between the desire to travel freely on the road and the expense of building new roads. For this reason, many communities adopt LOS D as their standard LOS for roads and streets.

Comparison of the 2011 "with Pulelehua" scenario with the 2011 "without Pulelehua" scenario shows that the majority of intersections will operate at the same LOS with or without Pulelehua. In other words, considering all the other projected projects taken into account in the transportation report, Pulelehua will not substantially change the LOS at most intersections. Table 19 on page 52 in the transportation report is an example of this, showing the same LOS at intersections with or without Pulelehua.

Traffic Counts. Traffic counts taken for Pulelehua were compared with counts taken and traditional peak periods for other traffic impact studies in the area and with State Department of Transportation (DOT) data. The volumes were comparable. While it is possible that tourism was affected by the invasion of Iraq, this usual factor was not considered in the traffic counts. However, based on a comparison with other counts taken and traditional peak periods traffic impact studies and DOT data, the Pulelehua traffic volumes were comparable.

Trip Generation Rates. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Based on the professionally acceptable trip generation procedure, 986 vehicle trips are generated during the PM peak hour and 745 vehicle trips during the AM peak hour are reasonable trip generation estimates.

Given the walkable design of Pulelehua, the ITE rates probably overestimate the external automobile trip generation, so using these rates represents a very conservative trip generation estimate.

Commercial and School Traffic. Traffic projections of the transportation report include projections of traffic generated from Pulelehua's school and neighborhood commercial uses. ITE trip generation rates were used to project future conditions. These are standard rates used by traffic engineers throughout the country.

Trip Distribution. Trip distribution percentages were formulated from professional experience and judgment of the Pulelehua traffic engineers. To enhance this knowledge, multiple traffic impact reports for the area were studied to discern detailed distribution patterns.

Effect on Drive Times. It is estimated that a trip through Lahaina during the PM peak hour will take approximately 14 seconds longer if Pulelehua is built. It is estimated that a trip from Lahaina to Kapalua during the PM peak hour will take approximately 24 seconds longer if Pulelehua is built.

Intersections Most Impacted. Because the transportation report considers trip generation as originating and terminating from Pulelehua, the intersections closest to Pulelehua are the most impacted. As traffic is distributed further from Pulelehua, impacts lessen significantly, as not all Pulelehua vehicles travel the entire length of Honoapiʻilani Highway.

Traffic Signals. Traffic volumes projected in the transportation report at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes reach specific established levels. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide.

Less Pulelehua Intersections. Providing fewer Pulelehua connections to Honoapiʻilani Highway would result in long queuing times at the limited intersections, thus requiring more side street green time at Akahahe Street and interrupting smooth traffic flow on Honoapiʻilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapiʻilani Highway.

Public Safety. The posted speed limit on Honoapiʻilani Highway in the vicinity of Pulelehua is 45 miles per hour, but most vehicles exceed this limit. This is partially due to the design of Honoapiʻilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peak hours, it is very likely that people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

The Pulelehua street intersections with Honoapiʻilani Highway will be engineered and designed according to all applicable Federal, State and County standards. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

Construction Vehicle Traffic. During construction, construction vehicle traffic impacts are assumed to be less than full built out of Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the AM or PM peak hours. Although daily construction traffic is somewhat active, neither the

Attachment 3

daily or peak hour construction traffic exceeds the total build-out traffic forecast after Pulelehua completion.

Roundabout. A roundabout is not proposed on Honoapiʻilani Highway as part of Pulelehua. Previous plans had included a roundabout, however this has been eliminated from the current plan.

Lahaina Bypass. Because the time for the construction of the Lahaina Bypass is uncertain, the transportation report does not does not assume the Lahaina Bypass or the "mini" bypass will be built. This results in conservative estimates of traffic impacts.

Big Box Shopping. Pulelehua's neighborhood businesses are not meant to compete with big box stores in Kahului. While Pulelehua residents are likely to shop at a variety of retailers, providing neighborhood-serving businesses within Pulelehua will allow some immediate needs to be met within Pulelehua, thus decreasing a portion of trips onto Honoapiʻilani Highway. Unlike a conventional subdivision, Pulelehua residents will have the option of not driving to obtain some basic services.

Impact of Topography on Biking and Walking. Elevation was carefully considered in the design of Pulelehua. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Pulelehua streets are designed to run along the contour lines as much as possible, and streets that run up and down (mauka and makai of) the contour lines are relatively short. Within Pulelehua, trip lengths will be short and walking will not be adversely affected. While a few bicyclists/pedestrians might choose to zigzag up hill to their destination and would benefit from the street grid, most will choose the shortest route, cutting across a slope to reduce the effective grade of the path in a rural or recreational setting. However, when streets are designed to climb a slope, pedestrians generally follow the sidewalk and climb as required. Keeping the blocks short will minimize topographical constraints.

In the Final EIS Section 4.11.4 (Recreational Facilities) will be revised to include the following:

Pulelehua's neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

In the Final EIS Section 5.2.2 (West Maui Community Plan) will be revised to include the following statement:

Pulelehua's neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. In total, there will be 27 acres of parks and 77 acres of open space in Pulelehua all of which will be open to the public. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

Attachment 4

In the Final EIS a new sub-section 2.6.1 will be included under Section 2.6 (The Pulelehua Community):

2.6.1 Traditional Neighborhood Design Principles

The design of Pulelehua is based Traditional Neighborhood Design (TND) concepts, which are being incorporated into new communities across the mainland and in many parts of the world. TND communities are an alternative to conventional suburban sprawl, and have been well received and enthusiastically embraced in many areas as a way to reduce congestion, preserve open space, restore a sense of place, and create vibrant communities.

Three principles of TND communities on which Pulelehua was based are explained below. These concepts were presented at the Pulelehua design charrette in March of 2004 and were well received by many of the participants.

• The Region and Town

The region is the overall context for all planning. Towns within a region need a comprehensive strategy to prosper. Each town should have both homes-for people of all incomes-and nearby jobs, so residents aren't forced to travel far to work. Each town also needs a discrete sense of place. Towns and cities within a region should have clear boundaries, contributing to a sense of place. The land between towns should be preserved as open space.

Town centers, individual neighborhoods, and community edges each have their own building densities, street sizes, and appropriate mixtures of retail, residential, and other functions. The highest densities and most intense mix of uses are typically found in town centers; lower densities are found at the edge. The compact development in the neighborhood center allows for more open space to be preserved along the edge, increasing quality of life for all residents.

• The Neighborhood, the District, and the Corridor

Diverse, walkable neighborhoods are what distinguish TND communities from other development styles. Each neighborhood has a center and an edge. The center should be a public space, whether a square, a green, or an important intersection. The optimal size of a neighborhood is a quarter-mile from center to edge. Most people will walk a distance of approximately a quarter-mile before turning back or opting to drive or bicycle instead of walking. This dimension is consistent in the way people have created settlements for centuries. For a neighborhood to feel walkable, many daily needs should be supplied within this five-minute walk. That includes not only homes, but stores, workplaces, schools, houses of worship, and recreational areas.

Neighborhoods traditionally have a mix of uses and types of buildings. A variety of building types allows for diverse lifestyle options and incomes to live in the same neighborhood. For example, in a shopfront building, the business owner can live above his or her shop, or rent the upper floor as an office or apartment. Nearby, terrace homes and

cottages can be intermingled with larger detached homes. The mix of uses also allows for more efficient use of parking spaces. Parking spaces in the town center can be used by business patrons or workers during the day, and residents of upper floor apartments at night, separate spaces for each use are not usually required.

• The Block, the Street, and the Building

If there is one thing that reduces the livability of most conventional subdivisions, it is the fact that streets do not feel like pleasant shared spaces. In TND communities, neighborhoods have a network of streets designed so that pedestrians, bicyclists, and motorists can move safely and comfortably through the neighborhood. Multiple options for travel through the street network allow traffic to disperse through the neighborhood, avoiding traffic problems on one particular street.

To make streets feel safe, buildings must be oriented to have doors, windows, and front porches facing the street, creating natural surveillance for pedestrian activity by the building occupants. Blocks that include alleys allow parking to be accessed along the rear of each lot, reducing the number of curb cuts along the sidewalk, which enhances the pedestrian experience. On-street parking and street trees, located between the sidewalk and moving vehicular lanes, provides another layer of comfort for pedestrians. The configurations of great streets consistently provide a high-caliber experience for pedestrians as a baseline obligation, and go on from there to accommodate all other required modes of travel.



May 6, 2005

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

and

Maui Land & Pineapple Company, Inc.
 1000 Kapalua Drive
 Kapalua, Maui, Hawaii 96761
 ATTN: Karl Bossert

RE: Pulelehua Draft EIS

Dear Mr. Schnell and Mr. Bossert:

Upon carefully reviewing the Draft EIS, Maui Tomorrow questions construction of Pulelehua in its currently proposed configuration, due to the appearance of inadequate infrastructure existing to support such a massive development. Similarly, the project portends to have a substantial and undesirable impact upon the rural land use and character of West Maui.

Maui tomorrow recognizes the genuine need for affordable housing, and has authored a legislative proposal for Maui County to address this issue while protecting rural areas from over-development.

To partially remedy the shortcoming of the proposed project, Maui Tomorrow recommends a list of reasonable conditions that would make Pulelehua more acceptable in size and impact.

Thank you for carefully considering our comments.

MAUI TOMORROW FOUNDATION, INC.

Ron Sturtz, President
 For the Board of Directors

Ron Sturtz, President
 Lucienne de Nite, Inc/President
 Richard Michaels, Secretary
 Gill Newton, Treasurer
 Susan Bradford
 Sean Lester
 Ed Lindsey
 Maile Lu'wai
 Judith Michaels
 Mark Sheehan
 Renee Loux
 Lance Halter

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1. Current Proposal and Its Implications -- An Overview

BACKGROUND:

Maui Land & Pine is engaging in corporate restructuring that seeks to convert large tracts of West Maui's agricultural and open land for urban development. Pulelehua and Kapalu Mauka are major components of that strategy. This occurs within the context of 29 development proposals for West Maui including 15,956 new residential units, which would more than double the number of units in West Maui.

The "Future Phases" of Pulelehua mapped out on ML&P's 2004 publicity materials appear to rival the size of Lahaina. Phase 1 (the 300 acre project now called simply Pulelehua) is clearly designed to be the urban core of a much larger development; phase 1 contains a school, medical center and oversized road system including 5 entrances to Honoapilani Highway. Yet, ML&P currently denies any intention to build future phases. Will they change their mind again after Phase 1 is approved? Will ML&P grant the County a conservation easement that prevents development of future phases on surrounding land? Or should the EIS include all future phases as required by law? (HAR 200-5 §11-200-7)

DRAFT EIS ASSERTIONS THAT NEED SCRUTINY:

The Draft EIS assumes that rapid growth is inevitable. Everything in the EIS flows from that assumption. Pulelehua would triple the population of the Pulelehua neighborhood. It would dramatically increase traffic and overload utilities. Is rapid growth truly inevitable? Or is controlled gradual growth possible?

The Pulelehua proposal is in non-conformity with the current Community Plan, while there is already an abundance of other vacant land already designated residential in Maui's Community Plans. We have been told that a Maui County Land Use Forecast (2003) reports the presence of 2,740 acres of vacant land designated in the Maui Community Plans for residential use, not including project areas. There appears to be no pressing need to convert agricultural land to residential zoning. The first theme of the Maui County General Plan is: "Protect Maui County's Agricultural Land and Rural Identity. Amendments to the General Plan will preserve agricultural lands for the continuing pursuits of both land intensive and labor-intensive agricultural pursuits. This action will also achieve preservation of an open space resource."

As a justification for building Pulelehua, the EIS asserts "The needs of a growing population relating to traffic, infrastructure, public services and other issues will need to be addressed regardless of whether Pulelehua is built." To the contrary, as the largest development ever built in West Maui, Pulelehua phase 1 would directly cause much of that need, which was never envisioned in the West Maui Community Plan.

KEY QUESTIONS:

The central question is whether this conversion of West Maui from rural to urban is in the long-term interest of Maui residents, our vital tourism industry, and the environment.

Succinctly stated: Will policy makers manage growth for the benefit of the community, or allow uncontrolled growth, on a first-come first-serve basis?

What is the motivation for the Pulelehua proposal? Is it affordable housing? Quality of life? Or is Pulelehua economically driven by ML&P's restructuring?

Pulelehua forecasts to diminish tourist satisfaction, increase the population, traffic, infrastructure stress.

Is Pulelehua a real solution to affordable housing? Affordable housing is needed, but how will ML&P assure that it serves Maui's economically stressed residents and prevent the housing from being acquired by outsiders? How will they make it permanently affordable? Will owners be required to occupy the affordable units? What will the affordable units look like, how big and how many bedrooms, how many rentals vs. ownership units, and how many affordable units in actual numbers? None of these simple basic questions are answered in the 773 page EIS.

Will ML&P honor the representations made in the EIS? There is no mechanism for enforcing these promises. The EIS contains pages of generalized public relations language, but very few specific commitments. It doesn't even provide the number of affordable rentals and ownership units; Rather, it only has a percentage amount, which is open to various interpretations. Will County oversight and enforcement be required throughout construction and sales?

EXISTING ALTERNATIVES TO PULELEHUA:

The West Maui Community Plan envisions controlled reasonable growth. It provides a truly sustainable economy by protecting the long-term appeal to tourists - a renewable industry. And it places affordable housing as a top priority.

Kaanapali 2020, which is also in the EIS process, and Waïnee offer to provide sufficient affordable housing to satisfy the needs of West Maui for many years. Pulelehua will displace these other projects by using up scarce infrastructure capacity. Kaanapali 2020 and Waïnee have both gone through years of open public participation and planning to ensure they are pono. These projects took the time to do it right, and now they will be penalized if Pulelehua is allowed to leapfrog ahead of them.

2. Alternative to the Proposed Draft EIS Action

Based on a thorough review of the EIS, and the 29 other projects currently in planning or construction in West Maui, the West Maui Committee of the Board of Maui Tomorrow recommends the following compromise position be adopted:

1. **Limit the overall final size of Pulelehua to 50% of ML&P's proposal, 442 residential units and 159 ohanas,** and limit commercial development to 50% of ML&P's proposal, up to 10,737 square feet of retail space, 27,000 square feet of specialty retail/office space, and 10,150 square feet of workplace edge commercial space. Set a schedule for gradual build-out over 8 years of approximately 75 residential units maximum per year, and a total of 6,000 square feet of retail/specialty/office or commercial space maximum per year, to allow improvement of West Maui roads and infrastructure to keep pace. A minimum of 226 units and 81 ohanas should be permanently affordable. This would allow gradual development of Pulelehua without a large negative impact on West Maui, and at the same time allow some infrastructure capacity to remain available for other affordable housing projects such as Wainee and Kaanapali 2020.
2. **Limit Pulelehua access to Highway 30 to three intersections:** the existing intersection at Akahalele road, plus 1 new traffic light intersection, and one right-turn-only intersection, both south of Akahalele Road. This will reduce traffic delays on Highway 30, and limit expansion of future phases of Pulelehua.
3. **ML&P should relinquish all rights to development on surrounding agricultural lands for a substantial period (50 years?).** By asserting that Pulelehua is not the first phase of a larger development and ML&P now has "no intention" to build the future phases shown on their map of March 2004, the effect is to exclude the future phases of Pulelehua from scrutiny in this EIS. If this assertion is accurate, then ML&P should have no hesitancy in relinquishing all rights to development on those surrounding agricultural lands for, say, a period of 50 years. This includes all land mauka of Kapalua airport, and all land north of Kahana Gulch mauka of Highway 30 to the Maui Prep School site. Such a dedication would ensure that Pulelehua does not become the core of a new unplanned city in West Maui.
4. **Establish an official County watchdog mechanism** including periodic public reviews, to monitor Pulelehua throughout construction, and enforce the above conditions as well as all other conditions applicable to the project development. Condition final approvals upon compliance with all conditions, as is standard in every other project on Maui.

3. Shortfalls of the Draft EIS

A. Lahaina Wastewater Treatment Plant Is Over Capacity

The EIS incorrectly states the capacity of the Lahaina Wastewater Treatment Plant at 9 MGD (average) (page 91). The actual current operating capacity is 4.2 MGD. The current average daily flow is reportedly 5-to-5.5 MGD and higher with full hotel occupancy. Based upon these usage statistics, it appears that the plant is operating substantially above the design capacity and cannot support any additional development until the plant is expanded.

Of the two sewage plants at Mahinahina, only one is operational. The oldest was built in 1975, with an original average capacity of 3.2 MGD, upgraded to 4.8 MGD. This unit was closed in the 1980s because it exceeded EPA limits for nitrogen. The working plant was built in 1985, with an original average capacity of 3.5 MGD, upgraded to 4.2 MGD. So the actual capacity of the plant is 4.2 MGD currently.

Above and beyond the current daily flow, additional allocations of 3.48 MGD for future capacity have been reserved (including purchasable capacity). According to the Pulelehua Draft EIS, the allocations are:

Allocation	Developer	Project
1.80 MGD	AMFAC	Kaanapali 2020, with affordable housing
1.38 MGD	HFDC	Villages at Leali'i, with affordable housing
0.30 MGD	Kapalua Land Co.	Specifically for Kapalua Resort

The Maui County Public Works Dept. FY 2006 budget request says, "Current process operations of the facility cannot meet the reserve allocations for the HFDC and AMFAC properties."

In their FY 2006 budget request, the Public Works Dept. has asked for \$1-million to evaluate the non-functional plant and also the expansion of both plants. Before completion of this evaluation and plan it is not possible to determine if the expansion is feasible, what the cost will be, or when it will be completed. For one example, what is the capacity of injection wells needed to handle the additional flow?

The Public Works Dept. budget request reports, "By not completing this project, we expect continued problems with processing units especially during major maintenance activities and will not have the capacity to accommodate development in the region."

It is Maui Tomorrow's view that since the current plant is already over capacity, occupancy of new units at Pulelehua should not be permitted until the expanded wastewater treatment plant is operating and the required capacity is available.

Until the Public Works Dept. evaluation is completed, it cannot be determined if the treatment plant expansion is even possible, if it will be affordable, or what is the timetable for construction. One cannot know if the expansion will actually be built until the construction is approved by all controlling agencies (such as the EPA) and funding for the County Council passes full construction.

A district boundary amendment, community plan amendment, zoning change and/or subdivision for Pulelehua should not be approved until the wastewater treatment plant has received all required approvals by controlling agencies, passage of full funding and a building permit is issued for plant expansion construction.

The District Boundary Amendment for AMFAC and HFDC (LUC A92-686) contains a condition requiring the petitioner to "fund its proportionate share to expand or improve the existing Lahaina Wastewater Treatment Plant." Will Pulelehua and ML&P also be required to provide similar funding, assuming the expansion is possible and when the cost is known? A letter from the Department of Public Works in the draft EIS appears to say there are no plans to charge ML&P (Letter of 8/27/04, ¶15).

B. Traffic

The Draft EIS asserts that Pulelehua "will not create adverse traffic conditions," "will increase the overall mobility in West Maui," and that traffic "will continue to operate at acceptable levels" (pages 67-68). To the contrary, traffic in West Maui is already a major daily problem along many portions of the Honoapiilani Highway, the one road that connects West Maui's communities with each other and with Central Maui. According to Maui County Planning Director Michael Foley, in Lahaina "We have gridlock today." (4-26-05, Mayor's West Maui Advisory Committee meeting)

(1) How will ML&P's promise of "acceptable levels" of traffic be enforced? After Pulelehua is completed, if the traffic is worse than the EIS predicts, will ML&P agree to pay for wider roads, new roads, traffic lights or other mitigation? Or, will the cost be borne by Hawaii taxpayers?

The EIS Traffic Study appears to be based on questionable assumptions that may be easily overlooked amidst the hundreds of tables. For example:

(2) ML&P has only included only 28% of the total planned development (page 65, table 2). The report minimizes the traffic impact of massive development plans for West Maui, by arbitrarily ending projections in 2011. According to figures compiled from the County of Maui and the Honolulu Advertiser, 15,956 new units are planned for West Maui, but the traffic study only accounts for 4,469, or 28%. By arbitrarily ending the analysis at 2011, the report may very severely understate future traffic problems and costs of mitigation.

(3) ML&P's conclusions are based on traffic measurements taken during low tourism periods. ML&P's privately commissioned traffic measurements were taken May 14-17 and October 6-7, 2004 (appendix H, page 13). These are among the lowest months for tourism occupancy, according to the Maui County Data Book. With 9,640 vacation units in West Maui, compared 6,062 residences occupied by full time locals, tourists have a larger impact on traffic than locals. In 2002 tourists accounted for about 57% of the West Maui population on average, not including tourists who drive there from other parts of the island on day trips. The traffic measurements would better reflect true peak traffic loads if the measurements were taken at peak tourism season in July, August or December. They would have shown markedly higher numbers of vehicles, and substantially lower levels of service (LOS).

Other conclusions derive from DOT measurements made April 1-2, 2003, the week after the start of the invasion of Iraq, as footnoted in the DOT reports (unnumbered pages at the back of appendix H). So it is likely the DOT figures under-reported the usual traffic from tourism as well.

Trip distribution (upon what portion of Honoapiilani Highway each car travels) is an important factor in determining the traffic impact. Trip distribution percentages used throughout the traffic report appear to be based on anecdotal evidence. The data is not shown in the report - only the results. Trip distribution percentages are not (for example) based on tracking actual vehicle destinations (appendix H, page 39).

(4) Inadequate comparison of current and future traffic. Only one table in the 57-page traffic report compares current traffic counts with estimated future traffic (table 4, page 18). This table only covers three intersections on Honoapiilani Highway: Akahahe, Napilihau and Hoohui, all adjacent or north of Pulelehua. No comparison is given for intersections south of Pulelehua (toward Lahaina) where the vast majority of future development and traffic increase may occur, and where most of Pulelehua's traffic will drive. One can only speculate why is this not shown?

(5) Does the EIS underestimate the number of vehicle trips Pulelehua will cause? With 1,149 residences and an estimated 2,300 cars, plus cars and trucks for 634 employees of businesses in Pulelehua (page 83) and their customers and suppliers, plus the elementary school students and staff, medical center patients and staff, landscaping workers, and public facilities, Pulelehua may generate many more than the 986 p.m. peak hour trips predicted (page 66).

(6) The EIS underestimates the traffic impact. Even if we accept ML&P's estimate of 986 trips per hour peak (about one additional car per 3.6 seconds on average, but 2-3 times higher when the flow is uneven with stoplights), during high tourism months adding 1,000 or so cars at rush hour to the crowded 2-lane Honoapiilani Highway seems possible to cause major delays every day.

(7) ML&P's report did not study traffic from Lahaina to Maalaea, one of the most congested areas. The report only covers Honoapiilani Highway from Kapalua to Lahaina (page 63). Additional traffic on the Pali from Lahaina to central Maui was not studied and is only mentioned in passing. West Maui is geographically unlike most communities, since it is a long thin corridor connected by only one road, the Honoapi'ilani Highway. From Lahaina to Maalaea, Honoapi'ilani Highway is already at capacity. The DOT traffic count from 4/17/2001 (most recent available) lists 26,828 vehicles per day at that time. This stretch is today often plagued by delays of 30-minutes or longer, clearly because of too much traffic. This single 2-lane highway is the only access road to central Maui, a vital link to the hospital, Kahului airport, etc.

Rick Hall who is the Florida-based transportation engineer for Pulelehua, according to the Maui News 9-12-04:

Hall firmly believes that properly designed housing projects can actually cut down on traffic...."Long linear roads are OK in the country but when an area becomes urbanized you need a web of streets."

Since West Maui is only connected by one "long linear road," it is not a typical urban area with a web of streets and alternate routes for traffic. Placing a large population center like Pulelehua and Kapalua Mauka on that one road will definitely increase traffic. One can comprehend the amount of additional traffic by the fact that Pulelehua Phase 1 requires 5 entrances to Honoapiilani Highway. Will ML&P pay a fair share of the cost of widening this vital road to Central Maui?

Adjacent to Pulelehua Honoapiilani Highway is a 2-lane country road, where people routinely drive 50+mph. There have been 3 fatalities within 2 miles of Pulelehua in the 12 months ending in July 2004 on Honoapiilani Highway. Many tourists are unfamiliar with the road; it is subject to blinding rain. Five entrances from Pulelehua raise concerns about public safety.

(8) No alternative routes are presented to West Maui. The traffic models used in the EIS were developed by mainland organizations like the Florida DOT, where alternative roads exist for drivers to get around traffic problems (appendix H, page 3). West Maui has no alternate routes, only Honoapiilani Highway. The frustration of sitting in traffic with no alternative routes mandates a higher standard for West Maui traffic.

(9) Proposed mitigation may make problems worse. Adding new intersections or a roundabout to the Honoapiilani Highway may slow traffic flow, not improve it. Because of high speeds, stop signs may be unsafe. If traffic lights are required, delays will result.

(10) Claims that Pulelehua's New Urbanism design will reduce driving are questionable (page 63). Professors Peter Gordon and Harry W. Richardson of the University of Southern California write: "A major claim of the New Urbanists is that their proposals will lead to major changes in travel behavior: reduced automobile dependence, more transit use, increased cycling, and pedestrian-friendly development.

Unfortunately, there is little justification for these claims. A high proportion of trips is external to the community (for instance, almost all jobs are outside), and cars remain vitally necessary for mobility."

Randall Crane (Institute of Transportation Studies, University of California) and Richard Crepeau (Institute of Public Policy, George Mason University) conclude:

"Transportation benefits have been advertised as facts rather than hypotheses, and have been utilized or at least recommended as tools for decreasing the negative environmental impacts associated with car travel. From a research perspective the big question at hand is how urban form affects travel behavior. The most straightforward answer is that we know quite little."

(11) Placing businesses in Pulelehua will increase traffic. One justification ML&P has given for building Pulelehua is that there is a shortage of employees living in West Maui for its resort operations. New businesses in Pulelehua that will need another 634 employees (page 9). If there is a labor shortage in West Maui already, many of these 634 employees will have to commute at rush hour from outside of West Maui, further congesting Honoapiilani Highway.

(12) Bikes will not be a substitute for cars. The EIS claims Pulelehua will "encourage modes of travel other than cars" (pages 19, 68). Unfortunately, Pulelehua is built on a steep slope. It takes a person in excellent physical condition to bike up Akahele Road from Honoapiilani Highway to the Kapalua airport. The area experiences high trade winds daily, torrential morning rains, and very hot humid afternoons.

(13) "How much longer will it take me to drive from Napili to Lahaina, or from Maalaea to Honokowai?" In hundreds of pages, the traffic report never answers simple meaningful questions like these. Instead it concludes, "peak hour traffic will continue to operate at acceptable levels of service." What amount of sitting in traffic is acceptable to the residents of West Maui?

C. List Infrastructure Improvement Costs

The EIS should include specific costs for all required infrastructure improvements, so the County can evaluate the cost impact to taxpayers before approval of the project.

D. Population Impact

(1) ML&P claims Pulelehua is "not expected to cause a significant increase in the population" of Maui (page 74). However ML&P offers no specifics about how they will enforce this, and it is questionable whether legal means exists to require that buyers are already Maui residents. Studies of similar "Traditional Neighborhood Design" developments across the country show that they attract new population more than providing homes for area residents. What is to prevent people from outside Maui moving

here to live in these homes (both affordable and market-rate)? If a home is re-sold, will it still only be available to Maui residents? How will ML&P control this? Can ML&P provide a list of the names of 1,149 willing, eligible, mortgage-qualified buyers/renters who are current Maui residents and have paid a deposit fee to verify their commitment (not just people who have "shown interest")?

(2) Even if every unit in Pulelehua is filled by current Maui residents from other parts of the island, it will still increase Maui's population. Who will move into those places on Maui vacated by people moving to Pulelehua? Many non-residents. Either way Pulelehua increases the population of Maui.

(3) ML&P says Pulelehua will encourage people with jobs in West Maui who are living in other parts of Maui to move to West Maui (page 75). But the EIS offers no evidence to support this. How many families who currently commute from Central Maui to West Maui would actually relocate to Pulelehua from Central Maui? For affordable units, are they eligible and can they qualify for a mortgage? Would they move their kids to a new school? Or do they have a spouse who works outside West Maui, preventing them from moving?

(4) EIS population projections are based on assumed rapid growth. The projections used in the EIS assume rapid growth is inevitable (page 74). In contrast, the West Maui Community Plan seeks controlled growth. Unplanned, rapid growth will result only if the Community Plan is ignored by developments like Pulelehua. Without developments like Pulelehua, population growth will be much lower than the EIS projections. Yet the EIS uses that unplanned accelerated growth to imply that Pulelehua is just a small part of the total growth (page 74). If built as planned, Pulelehua would be the largest development ever built in West Maui, and the projected rapid population growth will be a self-fulfilling prophecy.

(5) EIS housing demand projections are based on assumed rapid growth. The same circular logic of uncontrolled rapid population growth is used to estimate housing needs (page 77). These projections assume developments like Pulelehua are built, giving the appearance that rapid population growth is inevitable. It is not inevitable, moderate growth is easily achievable by following the West Maui Community Plan.

(6) Placing businesses in Pulelehua will increase population and traffic. ML&P has said that there is a shortage of employees living in West Maui for its resort operations. If this is true, there is certainly no reason to create new businesses in Pulelehua that will need 634 more employees (page 9). Most of these 634 employees will have to come from outside of West Maui, if there are not enough employees in West Maui to staff existing businesses today. These will increase the population and traffic.

E. Development Size

With 1,149 residences and a projected 3,180 population, Pulelehua would be the largest development ever built in West Maui. (882 units x 3 people, + 267 ohana x 2 people = 3,180).

(1) Why are there 1,149 units, plus industrial and commercial? Is this large number appropriate to the community, especially when the 690 luxury homes at Kapalua Mauka are included? Today there are about 350 residences on the uphill side of Honoapiilani Highway between Ka'anapali and Kapalua, including 117 affordable units under construction. Adding 1,839 units (Pulelehua plus Kapalua Mauka) will increase the development in this area five-fold. Are there specific facts or reasons for this large size of development?

(2) Alternative proposal for an appropriately sized development. Cutting the size of Pulelehua in half and developing it gradually over an 8-year period will reduce its impact to an acceptable level because infrastructure construction will have a chance to keep pace.

Cutting the size of Pulelehua in half will reduce the cost of construction by half as well, so it will not affect the profit margin of ML&P. It will require half the land development costs, half the infrastructure, half the labor and materials, etc.

In addition it must be noted that Pulelehua contains the 125 unit affordable housing requirement for ML&P's Kapalua Mauka project, as required by LUC District Boundary Amendment conditions (docket A03-741). Kapalua Mauka is being built by ML&P near Pulelehua and at the same time, it is an exclusive luxury development of 690 homes and golf course condos selling in the millions of dollars each. The revenue from Kapalua Mauka is projected to be \$1-to-2-billion, and ML&P already owns the land, so the profits will be substantial. The LUC clearly intended some of these profits to pay for 125 affordable units at Pulelehua.

The 125 unit affordable housing requirement for Kapalua Mauka can still easily be met if Pulelehua is cut to half the proposed size. The effect of this will actually increase the profit margin for ML&P at Pulelehua, since the 125 units paid for by Kapalua Mauka will be a larger percentage of the whole Pulelehua development.

In fact, the EIS should not segment Pulelehua and Kapalua Mauka into separate developments, as noted elsewhere in these comments. Considered this way, there is plenty of profit for ML&P to cover any reduction in Pulelehua's size.

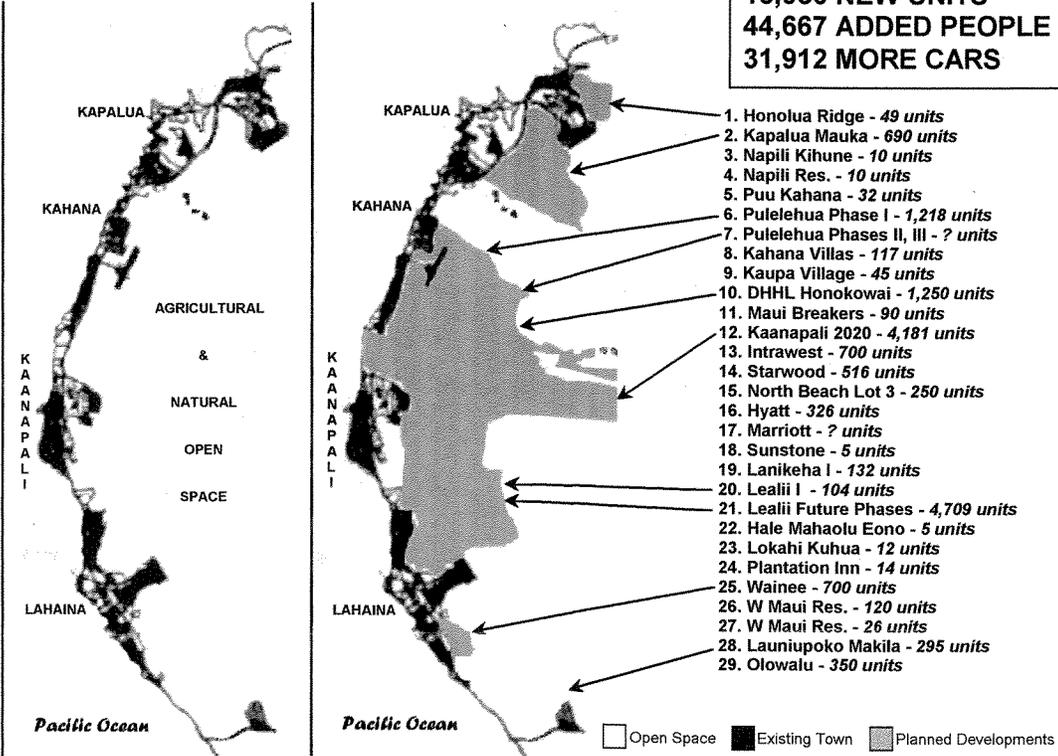
There is no cost justification for the large size of Pulelehua, and certainly no cost justification to prevent making it smaller.

WEST MAUI DEVELOPMENT MAP

EXISTING TODAY

PLANNED DEVELOPMENT

15,956 NEW UNITS
44,667 ADDED PEOPLE
31,912 MORE CARS



Sources: County of Maui, Honolulu Advertiser. Information is deemed reliable but not guaranteed accurate, and is subject to change.

It is interesting that in 773 pages, the EIS does not give specific numbers of unit types and square footage measurements for the residential buildings at Pulelehua, making it impossible for an independent analyst to confirm ML&P's cost estimates.

F. Over-Development of West Maui

The following map and chart of West Maui summarize 29 developments currently proposed. It must be emphasized that each of these projects is proposed by a serious developer with substantial ability to build each project. Within this context, it makes sense to limit the size of Pulelehua (and other developments as well) or rural West Maui will soon resemble Santa Monica.

West Maui Projects (Under Construction and Proposed) April 2005

Project Name	Developer	Units	Affordable	Type	201G	Zoning	Start	Comp	Status	Source
TOTAL		15,956	1,868							
1 Honolua Ridge	ML&P	49 ✓	0						Pending	2
2 Kapalua Mauka	ML&P	690 ✓	0	sgl/sale luxury					Pending	2
3 Napili Kihune		10 ✓	0						Pending	2
4 Napili Res.		10 ✓	0						Pending	2
5 Pu'u Kahana		32 ✓	0						Pending	2
6 Pulelehua Phase 1	ML&P	895 ✓	456	Mult/sgl/rent/sale/coml	201G	Ag	2005		EIS being drafted	1
Pulelehua ohanas	ML&P	323 ✓	?		201G	Ag	2005		EIS being drafted	1
7 Pulelehua Phases 2,3	ML&P					Ag				2
8 Villas at Kahana	Betsill	117 ✓	117	mult/sale		Apt-1	2004	2005	Under construction	1
9 Kapua Village		45 ✓	45	sgl/sale		R-1	2002	2004	Nearly complete	1
10 Honokowai Project	DHHL	1250 ✓	?			Ag			After Leali'i?	1,2
11 Maui Breakers #1	West Maui Condos	90 ✓	52	multi/sale		Apt-1	2004	2005	Awaiting SMA	1
12 Kaanapali 2020	Kaanapali Dev. Corp.	4181 ✓	562	Mult/sgl/rent/sale/coml		Ag	2007	2027		1,2
13 Intrawest		700 ✓	0	Hotel/timeshare?						2
14 Starwood		516 ✓	0	Timeshare, including lockoff units						2
15 North Beach Lot 3		250 ✓	0	Hotel/timeshare?						2,3
16 Hyatt		326 ✓	0	Hotel/timeshare?						2
17 Marriott		?	?	Hotel/timeshare?					Pending	2
18 Sunstone		5 ✓	0						Pending	2
19 Lanikeha Phase 1		132 ✓	0							2

Project Name	Developer	Units	Affordable	Type	201G	Zoning	Start	Comp	Status	Source
20 Leali'i Phases 1A/B	DHHL	104 ✓	104	sgl/sale	201E	Ag	2005	2006	Finalizing land sale	1
21 Leali'i future phases	DHHL	4,709 ✓	?							1,3
22 Hale Mahaolu Eono		5 ✓	0						Under construction	2
23 Lokahi Kuhua	Lokahi Pacific	12 ✓	12	sgl/sale		R-1	2004	2005	Under construction	1
24 Plantation Inn		14 ✓	0	Hotel						2
25 Wainee	Kaanapali Dev. Corp.	700 ✓	374	Mult/sgl/rent/sale	201G	Ag	2005	2010		1
26 W. Maui Resource	Maui Economic Conc.	120 ✓	120	Emergency/long-term	201G	Ag		2004	Complete	1
27 WM Resource Ctr	Maui Economic Conc.	26 ✓	26	Emergency/long-term	201G	Ag	2004	2005	Bid	1
28 Launiupoko Makila		295 ✓	0	sgl/sale		Ag				2
29 Olowalu		350 ✓	0							2

TOTAL ADDITIONAL UNITS PLANNED IN WEST MAUI

Planned Units	15,956
In addition to existing units.	
New Population (2.8 per unit)	44,677
In addition to existing population.	
Added Cars (2 per unit)	31,912
In addition to existing cars.	

According to the 2000 census there were 10,469 units in all of West Maui. 6,062 were full time occupied units.

Totals do not include the existing population which the 2000 Census counted as 17,967. Population figures do NOT include tourists.

According to DBEDT, there were 9,512 hotel rooms, condos, and other vacation units in West Maui in 2002.

Where sources differ, the estimated number of units is the average of figures from all sources.

Sources: (1) County DHHC; (2) County Long-Term Planning Office; (3) Honolulu Advertiser 2-8-04. Sources are deemed reliable, but not guaranteed accurate. Figures are estimates and subject to change.

G. Affordable Units Not Defined

(1) *The EIS does not tell us basic facts such as:*

- (a) **Exactly how many affordable units are planned?** Will the 51% affordable be based on 1,149 total units (units plus ohanas), for a total of 575 affordable units? Or based on 882 units (not including ohanas), for a total of 449 affordable units? Will ohanas count as affordable units? Even if they are left out of the affordable percentage calculation?
- (b) **How many of the affordable units will be rentals?** How many for sale? How many units at each level of affordability?
- (c) **Will the affordable units be of the same type as the market-rate units?** For example will there be the same number of 3-bedroom affordable units as 3-bedroom market-rate units? The same number of affordable rentals as market rate rentals?
- (d) **What will be the square footage of each affordable unit?** How does that compare with the size of the market-rate units?
- (e) **What will happen to affordable units if no qualified affordable buyer can be found?** Will they convert to market rate?
- (f) **Will affordable units be permanently affordable?** According to HUD, these is no limit on how long an affordable unit can remain affordable; it can be kept affordable forever. Are the affordable units at Pulelehu permanently affordable? Or will they revert to market price, rewarding speculation? If affordable units can convert to market rate, eventually the impacts will be: No affordable housing, more urban sprawl and less open land.

(2) **Quantify demand for affordable housing.** Next door to Pulelehu is the Villas at Kahana, a 117 unit affordable housing development, nearing completion. It has been reported that the developer has had difficulty finding enough buyers who are eligible for affordable housing and can qualify for a mortgage. Will there be enough qualified buyers for over 400 units of affordable housing at Pulelehu?

While there is certainly a need for affordable housing, the studies cited in the EIS are estimates based on population trends, not actual measurements of the need (appendix A, page 24). As noted above (Section 4E), these trends are based on rapid uncontrolled growth, which is the result of projects like Pulelehu reaching past the controlled growth envisioned in the West Maui Community Plan. The EIS estimate of demand for affordable housing is not based on an actual list of applicants who are 1) certified eligible within the income guidelines, 2) current residents of Maui, 3) pre-qualified for a mortgage, and 4) desire to live in Pulelehu.

If a specific number of housing units is being provided for ML&P employees, will they be forced to leave their home or apartment, or have their rent raised, if they if quit or have a disagreement with the company? Could living in company-owned housing exert unfair pressure on employees?

H. Wastewater Pump Station

Wastewater Pump Station improperly located next to existing homes. Appendix N of the EIS has correspondence with Otomo Engineering and a map showing a wastewater pump station in the extreme northwest corner of Pulelehu, adjacent to existing homes. The existing homes are downwind (trade winds) of the proposed pump station. Because of possible noxious odors and leakage, these facilities should not be positioned less than 1,000-feet from existing homes or gulch areas that drain to the ocean. A similar wastewater pump in Ka'anapali reportedly frequently leaks noxious odors.

I. Negative Impacts on Public Services

Police It is common knowledge that crime rates in urban areas are higher than in rural areas. The high-density "Traditional Neighborhood Design" proposed for Pulelehu has been shown to increase crime in other similar New Urbanism developments across the US. (See *Crime-Friendly Neighborhoods, How "New Urbanist" planners sacrifice safety in the name of "openness" and "accessibility"* by Stephen Town and Randal O'Toole, February 2005.)

The Lahaina Police is already severely understaffed at only 68% of the authorized level. ML&P should provide funds to pay for additional officers on an ongoing basis.

J. Development in Gulch Areas

(1) **Oversight on prohibition of building roads in Kahana Gulch.** The EIS declares "No structures will be built in the gulches" (page 36). However the designs show a new paved road positioned inside Kahana Gulch north of the project, running west down the gulch for approximately ¼ mile. This roadway will likely be raised to allow drainage; it may require excavations, foundations, drains, railings and lights. A natural spring occurs in the road path that may require construction of a diversion for the road to be built. The West Maui Community Plan requires preservation of gulch areas and specifically names the Kahana Stream (page 23, West Maui Community Plan). Construction of this road appears to violate enforceable portions of the Community Plan.

The gulch is home birds, fish, abundant greenery, a year-round lake (a County siltation basin) and stream. Since this area is subject to flash floods, there is the concern that any construction might cause erosion. A private dirt road in the area is occasionally used by plantation vehicles, and by County vehicles to service the siltation basin. The county

Department of Public Works has expressed concern in its comments that access be provided to clear the siltation basin periodically and disperse the silt nearby (Comments, Public Works letter dated 8/27/2004, paragraph 5).

(2) Road indicated in dam spillway: The dam creating the siltation basin in Kahana Gulch has an emergency spillway at its southern end. This is a lowered area of the dam to permit overflow in a major storm and protect the dam. The road indicated on the Pulelehua Plan traverses this spillway, potentially interfering with its operation, and subjecting the road to flood hazard and erosion.

K. School Issues Not Addressed

(1) Who will pay for the elementary school? It is unclear from the EIS who will build and pay for the proposed elementary school. Page 6 of the EIS says a school will be "provided." But page 106 only refers to providing a "site" and there is no reference to providing construction or funds. Is ML&P contributing construction of the school or has the DOE agreed to fund construction?

(2) How big will the school be? The EIS says there will be 623 school-aged children in Pulelehua, as proposed (page 107).

(3) Has funding been committed for the cost of staffing and maintaining a new elementary school? Will staffing a new elementary school deprive the other West Maui schools of funds? Lahana's existing schools are reportedly in poor shape. It has been reported that many classes cannot afford textbooks, and the PTA had to install ceiling fans for classrooms because the school couldn't afford them.

(4) Where will 623 students from Pulelehua go to intermediate and high school? There is only one intermediate school and one high school in West Maui, Lahaina Intermediate is designed for 597 students, there are 625 enrolled. The Lahainaluna High School's capacity is 794, there are 987 students enrolled, 24% over capacity. The other public intermediate and high schools on Maui are too distant for students to attend.

If it opens, the proposed private Maui Preparatory Academy in Napili may slowly absorb around 200 students grades 6-12 as it grows gradually to include all grades by 2013. However it will likely be expensive to attend, excluding many Pulelehua residents. It may attract students who today attend Seabury Hall and St. Anthony's in Central Maui, so the effect on attendance at the Lahaina public intermediate and high school may be minimal. This private school does not exist today and there is no guarantee it will open or survive.

ML&P should fund construction of facilities at both Lahaina Intermediate and Lahainaluna High schools to accommodate 600 additional students for grades 6-12.

(5) Alternative site available for an elementary school. The AMFAC development at Kaanapali is required to donate a site for an elementary school as a condition of their State district boundary amendment, about 2 miles south of Pulelehua (docket A03-741).

L. Building Height

The EIS does not describe the height of proposed structures. There are currently no structures higher than three stories mauka of the Honoapiilani Highway between Kaanapali and Napili, this restriction should be enforced at Pulelehua.

M. Well Water Quality

The EIS does not include analysis of water for DBCP and other nematode pesticides. DBCP has reportedly been found in other area wells. If such pollution is found, how will Pulelehua provide a safe water supply?

4. Maui Tomorrow's 38-Point Recommendation and Conditions for Approval of Pulelehua

Pulelehua Size And Structure

- (1) **Limit the overall final size of Pulelehua to 50% of ML&P's proposal.** This would allow development of Pulelehua without a large negative impact on West Maui, and at the same time allow some infrastructure capacity to remain available for affordable housing projects such as Waivee and Kaanapali 2020. The maximum size will be 442 residential units and 159 ohanas. The maximum allowed commercial development will be limited to 50% of ML&P's proposal, 10,737 square feet of retail space, 27,000 square feet of specialty retail/office space, and 10,150 square feet of workplace edge commercial space.
- (2) **Structures shall not exceed forty feet in height and shall not exceed three stories.** A basement, attic or loft, if present, shall also constitute a story.
- (3) **Businesses that create noise audible from the street shall incorporate acoustical measures** into the facility to mitigate potential noise impacts.
- (4) **All exterior lighting shall be shielded from adjacent residential properties and designed to minimize night sky light pollution.** No lights shall be permitted in gulch areas on or off the development boundary shown on the plan map in the EIS.
- (5) **Storage items:** Items that are not permanent structures or functional motor vehicles shall be stored within enclosed buildings or enclosed areas that are appropriately screened with fencing and landscape planting.
- (6) **Energy Conservation:** All energy systems for all residential, commercial, timeshare, and hotel 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, commercial, timeshare, and hotel units shall be equipped with a primary hot-water system comprised of a conventional solar-panel hot-water system or a common multi-unit 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 residential, commercial, timeshare, and hotel 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.

- (7) All utility lines will be underground within the project and connecting the project to pre-existing lines off-site for their entire length, including off-site portions.

Affordable Housing

- (8) **A minimum of 51% of the total units will be permanently affordable.** A minimum of 307 units will be permanently affordable $[(442+159) \times 0.51 = 307]$. Of these, not more than 82 may be ohanas $[159 \times .51 = 82]$. (These figures assume condition 1 above is adopted.)
- (9) **Enforce Completion of Affordable Units.** Affordable units shall be made available for occupancy prior to the date that an equivalent number of market rate units at Pulelehua are made available for occupancy. The market rate units may only be placed on the market after an equivalent number of affordable units are placed on the market. The affordable units must be of similar type to the corresponding market rate units, for example rentals, owner occupied or ohanas. This will be enforced by withholding issuance of certificates of occupancy and/or Builder Permit Final Inspection for the market rate units until an equivalent number of affordable units of the same type are available for occupancy.
- (10) **Affordable units kept permanently affordable upon resale.** To prevent speculation and ensure affordable units remain permanently affordable, the maximum resale price of the unit will be calculated by the County agency that regulates affordable housing, taking into consideration the cost-of-living index and any improvements made by the owner to the unit. The owner may sell only to a qualified average or below average household for a price mutually agreed upon by the buyer and seller provided that this price is not in excess of the maximum sales price set by the County.
- (11) **An affordable unit may not be rented or sold at market rates, even if no qualified affordable buyers or renters are available.** If insufficient qualified buyers or renters can be found after a unit is certified for occupancy, and has been on the market for at least 6 months thereafter, then the County agency in charge of affordable housing may adjust the income qualifications upward to attract more buyers/renters, or may adjust the selling price/rent downward (only) to attract more buyers. This condition is to prevent the developer from purposely over-building affordable units and then converting them to market-rate when no qualified affordable housing buyers are immediately available.
- (12) **Affordable units for purchase must be owner occupied at all times to prevent speculation.** The developer or community association will annually submit a survey to the County agency that regulates affordable housing to verify compliance.

(13) Comply with all future County affordable housing laws, guidelines and instructions.

(14) Affordable units may not be used as credits for future development. ML&P may not claim, use, trade or sell any state or county affordable housing credits that may become available resulting from construction of affordable units in Pulelehua for the purpose of developing market rate housing. This condition is designed to discourage further urbanization of West Maui.

(15) Specify exact prices and terms for affordable units in the final EIS, before approval of a District Boundary Amendment, Community Plan Amendment, zoning change or subdivision. This shall include:

- (a) The actual number of affordable units.
- (b) Whether rental, owner occupied or ohana, for each unit.
- (c) The number of bedrooms and square footage for each unit.
- (d) The location of each unit.
- (e) The sales price of each unit, or formula for calculating it.
- (f) Terms under which the units may be resold and remain affordable.

The above terms will become part of the Final EIS and may not be changed during construction or sales. This is to prevent the developer from raising the price or reducing the size or quality of the units.

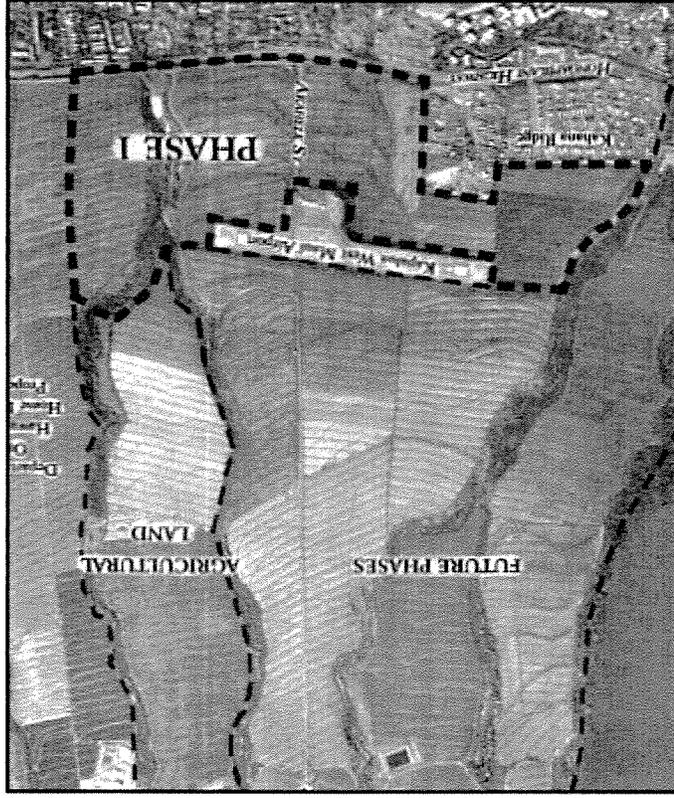
Growth And Over-Development

(16) Set a schedule for gradual build-out of 75 residential units maximum per year, and a total of 6,000 square feet of retail/specialty/office or commercial space maximum per year, over 8 years, to allow improvement of West Maui roads and infrastructure to keep pace.

(17) Limit Pulelehua access to Honoapiilani Highway to three intersections: the existing intersection at Akahahele road, plus 1 new intersection, and one right-turn-only intersection, both south of Akahahele Road. This will reduce traffic delays on Honoapiilani Highway, and limit expansion of future phases of Pulelehua.

(18) Pay a fair road construction impact assessment based on a per capita share of the cost of expanding the Honoapiilani Highway to 4 lanes from Akahahele Road to Maalaea, to be calculated by dividing the estimated cost of the road improvements by the current population of West Maui, then multiplied by the estimated population of Pulelehua.

(19) Limit surrounding development. On page 23 of the EIS, ML&P is claiming Pulelehua is not the first phase of a larger development and they now have "no intention" to build the future phases shown on ML&P's map of March 2004 (below). To honor their commitment, ML&P will grant the County of Maui an irrevocable conservation easement on the area of the "future phases" for a period of 50 years. These "future phases" on ML&P's map include all land mauka of Kapalua airport, and all land north of Kahana Gulch mauka of Honoapiilani Highway to the Maui Prep School site (see ML&P's map of March 2004, below, the areas marked "Future Phases" enclosed by a dashed line). This is vital to ensure that Pulelehua does not grow into a new unplanned city in West Maui.



(20) Require that the Final EIS include the combined impact of Pulelehua and Kapalua Mauka, for these reasons: a) Pulelehua is inextricably connected to Kapalua Mauka because it is the mandated affordable housing component of Kapalua Mauka; b) Pulelehua and Kapalua Mauka are both part of a single larger

contiguous land area owned by ML&P; c) ML&P has stated that Pulelehua is intended to house workers from their Kapalua resort operations; d) Pulelehua and Kapalua Mauka are being planned and/or built concurrently by ML&P; f) Pulelehua and Kapalua Mauka rely on the same sole access road – two lane Highway 30, the same infrastructure, aquifer and water system, sewer, emergency services, etc., and g) Pulelehua and Kapalua Mauka affect the same neighborhood

Enforcement And Compliance

(21) **Enforce conditions and establish fair, effective penalties.** Establish an official County watchdog mechanism including periodic public reviews, to monitor Pulelehua throughout construction, and enforce these conditions. Enforcement will also extend to all the specific commitments made in the EIS, and written promises made to the County. The watchdog agency will hold public hearings at least every 4 months in the Pulelehua neighborhood, from groundbreaking until the final unit is occupied. The watchdog agency will have the power to deny permits and final approvals to enforce compliance. It may be possible to make this part of the Project District approval process.

(22) **Reports and Compliance:** The developer shall provide timely annual compliance reports to the Planning Director and the Council. The compliance reports shall include: (a) the status of the developer's compliance with each of these conditions; and (b) a reasonable estimate of the time needed for full compliance. Failure to fulfill any condition may result in a reversion to former or more appropriate zoning or community plan designations or other remedies.

(23) **ML&P will not use the 201G fast track for this development.**

(24) **The developer shall participate in the *pro rata* funding and construction of adequate civil defense measures as determined by the State and County civil defense agencies.**

(25) **Public Safety:** The developer shall fund a minimum of six additional FTE police officers for West Maui for 30 years

(26) **Transfer.** ML&P shall give notice to the Department of Planning and the Council of any intent to sell, lease, assign, place in trust, or otherwise voluntarily alter the ownership interests in Pulelehua. All terms and conditions established between the County and ML&P shall be binding on all additional or subsequent owners.

(27) **Waianee and Kaanapali 2020 must be considered first by the State Land Use Commission and by the Maui County Council and Planning Department, before Pulelehua can be considered.** Both Waianee and Kaanapali 2020 have

gone through years of very public planning meetings involving West Maui residents. Pulelehua has rushed through with little public involvement in order to skip to the head of the line for consideration and to lock-up scarce infrastructure. If Pulelehua is approved first, there may be insufficient infrastructure capacity to allow Waianee and Kaanapali 2020. Should these two affordable housing projects be penalized for taking time and doing it right?

Environmental Impact

(28) **Green space will be permanent.** Because the Pulelehua community plan amendment urbanizes a 50-acre regional park, all green space, parks, recreation areas, buffer areas, gulches etc. shown on the Illustrative Master Plan (Draft EIS figure 1) are to be permanent open space, with no future "in-filling" construction, enforced by an irrevocable contract with the County.

(29) **Construction traffic shall be prohibited in gulches.** To avoid disturbing the habitat, all construction vehicles and employees vehicles are prohibited in or through Kahana Gulch, Mahinahina Gulch and Pohaku Kaanapali Gulch for the purpose of accessing Pulelehua from off the site, or for parking.

(30) **Prevent coqui frog infestation.** Upon notice from any party, ML&P will act within 5 days to eradicate any coqui frogs appearing in the project area and in Kahana Gulch, during construction and afterward.

(31) **Construction is not allowed in Kahana Gulch.** No road or other structures may be built in Kahana Gulch.

Water

(32) **Locate wastewater pump station away from existing homes.** These facilities may not be positioned less than 1,000-feet from existing homes or gulch areas, because of possible noxious odors, and to prevent leakage down gulches to the ocean.

(33) **Complete the Lahaina wastewater treatment facility upgrade before Pulelehua occupancy is allowed.** Currently the Lahaina wastewater treatment facility is operating 30-to-45% above it's maximum design capacity. No funding has been authorized for construction to expand the capacity. Funding to study the problem has been requested by the Department of Public Works, but not yet approved. That funding request states, "By not completing this project, we expect continued problems with processing units especially during major maintenance activities and will not have the capacity to accommodate development in the region." Therefore occupancy of new units cannot be permitted until the expanded treatment plant capacity is available.

Schools

- (34) Require approval and full funding for the Lahaina wastewater treatment facility upgrade construction,** before approval of a District Boundary Amendment, Community Plan Amendment, zoning change or subdivision for Pulelehua. We will not know if the treatment plant expansion is even possible, the environmental impact, if it will be affordable, or the timetable, until the plan and an EIS is completed. We will not know if it will actually be built until the construction is approved by all controlling agencies (such as the EPA) and funding for full construction is passed by the County Council. Therefore a community plan amendment, zoning change and/or subdivision for Pulelehua cannot be approved until after all approvals by controlling agencies, passage of full funding, and a building permit is issued for the wastewater treatment plant expansion construction.
- (35) ML&P is required to pay a fair wastewater assessment** for a pro-rata share of the cost of improving the Lahaina Wastewater Treatment Plant, based on the cost of improvements multiplied by the percentage of increased capacity used by Pulelehua.
- (36) Water Quality Monitoring.** Because development of Pulelehua will trigger expansion of the Lahaina Wastewater Treatment Plant, the developer will fund a near shore water quality monitoring program in the waters within 2 miles north and south of the treatment plant. The frequency of the water quality monitoring program shall be at least twice annually, with additional testing upon the occurrence of two one-year, 24-hour storm events within the preceding 12 months. At a minimum, the following water quality parameters shall be monitored: temperature, salinity, total suspended solids, total nitrogen, ammonia nitrogen, nitrate and nitrite, total phosphorus, chlorophyll A, and silicate. Storm samples shall include analyses for pesticides used on the landscaping or turf. In addition, the developer shall initiate and fund a marine biological monitoring program covering live and dead corals, algae, fish, and macroalgal species twice annually at the same sampling sites used for the near shore water quality monitoring program. The monitoring programs shall be approved by the State Department of Health (DOH) in consultation with the United States Fish and Wildlife Service, the National Marine Fisheries Service, and the Division of Aquatic Resources, State Department of Land and Natural Resources. The developer shall implement mitigation measures if the results of the monitoring programs warrant them. The monitoring programs shall commence at least one year prior to development and continue in perpetuity. Mitigation measures shall be approved by DOH in consultation with the above mentioned agencies. The developer shall annually set aside a minimum of \$8,000 to hire an outside-peer reviewer to provide a yearly objective critique of (a) the near shore water quality and marine biological monitoring programs; (b) the quality assurance plans; and (c) the monitoring results. The peer reviewer shall be approved by DOH after consultation with the Department of Planning.

- (37) Require ML&P to build an elementary school with a capacity for 623 students.** The school construction cost must be paid by ML&P. No more than 50% of the market-rate residential units may be approved for occupancy at Pulelehua before the school is completed and operating. (This condition may be waived if condition 1 above is adopted, and instead the site for a school must be contributed.)
- (38) Provide funding to support expansion of Lahaina Intermediate and Lahainaluna High School.** ML&P must fund construction of facilities at both schools to accommodate 600 additional students for grades 7-12. (This condition may be reduced by 50% if condition 1 above is adopted.)

5. Conclusion

Maui Tomorrow recognizes the genuine need for affordable housing on this island. We also maintain that affordable housing developments should also meet the criteria of protecting rural areas from over-development. In light of this mission, we have provided **PBR Hawaii and Maui Land & Pineapple Company** with critical analysis and detailed recommendations for an improved Environmental Impact Statement for the Pulelehua development.

Maui Tomorrow's analysis, recommendations, and conditions all seek to:

- ensure that policy makers manage growth for the benefit of the community
- identify mechanisms to enforce the plans that ML&P claims it will implement
- clarify incorrect findings in the Draft EIS and provide accurate details
- set forth strategic affordable housing policies that create positive impact in the lives of Maui residents.

We look forward to a revised Environmental Impact Study that will address our concerns and re-examine the viability of Pulelehua.

Maui Tomorrow Foundation, Inc.
Board of Directors



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Mr. Ron Sturtz
Maui Tomorrow
P.O. Box 429
Makawao Hi 99768

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Sturtz:

Thank you for your letter on the Pulelehua Draft Environmental Impact Statement (EIS) dated May 6, 2005. As Maui Land & Pineapple Company's (MLP) Development Manager for Pulelehua, I would like to personally respond to your comments.

1. Current Proposal and Its Implications

West Maui Projects: Regarding Maui Tomorrow's list of 29 proposed projects, careful comparison of Maui Tomorrow's list with the list in the Draft EIS (see Table 2, Section 4.4 (Transportation)), indicates that the lists are very similar. The additional number of projects in Maui Tomorrow's list is the result of counting some projects (such as Pulelehua) in separate phases, the inclusion of some small projects (such as Sunstone and Hale Mahaolu, with five units each), and the inclusion of some projects (such as Kapua Village) that are already built and thus should not be included on a list of proposed projects. Also there are some projects on the Maui Tomorrow list that are included in the list in the Draft EIS, which are the same project, but with different names. In addition, one source of information cited for the Maui Tomorrow list is a *Honolulu Advertiser* article dated February, 8, 2004, which contained many inaccuracies.

We took great care to develop our list of 25 proposed West Maui projects (including Pulelehua) and considered the potential impacts of these projects when preparing the Pulelehua Draft EIS. The list was prepared in consultation with the County of Maui Department of Planning, as well as from compiling available information from published project environmental assessments, EISs, and traffic reports. This list represents the West Maui projects known at the time the Draft EIS was prepared.

Pulelehua Phases: Throughout your letter you refer to "Pulelehua Phase 1" or "Phase 1." As discussed in Section 2.5 (No Future Phases) of the Draft EIS, at this time, MLP has no plans to engineer or construct any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

Population Growth: The population projections cited in the Draft EIS are from a report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase 1 Report*

(SMS, 2002). This report was commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm. The report projects that the population of West Maui will increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

Conformance with the West Maui Community Plan. While the West Maui Community Plan Land Use Map provides for a park and agricultural uses on the Pulelehua site, the West Maui Community Plan consists of more than just a land use map. It also contains many pages of goals, objectives, and policies. Section 5.2.2 (West Maui Community Plan) of the Draft EIS includes discussion of how Pulelehua implements many of these goals, objectives, and policies. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua. As stated in the Draft EIS, MLP is not pursuing the "201G" fast track process to bypass this important step in the Pulelehua approval process.

While adopted by the County Council in 1996, the process of updating the West Maui Community Plan started in 1992. Changes in the West Maui region since then (such as the closure of the Pioneer Mill and the exponential increase in housing costs) necessitate a new revision to the plan. However, the County of Maui is just now starting on updating the General Plan, to be followed by updates of the nine community plan regions. The process will take years, meanwhile West Maui's population is increasing and housing prices continue to escalate.

Need for Residential Zoning: We respectfully disagree that there is no need for additional residential zoned land on Maui. As discussed in Section 4.8.2 of the Draft EIS:

Historically, vast potentially habitable areas of Maui and significant water resources have been devoted to agriculture. Until the past decade, the long term viability of the sugar industry was unquestioned and the business remained a major employer and tax payer. As a result, cane land was reclassified for urban uses only after lengthy public agency reviews and negotiation with labor unions.

The long-term impact of this policy, in the face of unmet resident housing needs and off-island capital driven visitor-oriented land use demands, has been high appreciation in real estate prices on Maui since the early 1970s, primarily due to the high demand versus low supply of available residential land.

Key Questions

Pulelehua provides a balance of housing opportunities to a cross section of the population. A well-planned community which supports employees of the vital tourism industry is in the long-term best interest of Maui residents.

Pulelehua does not represent uncontrolled growth. Pulelehua is designed as a compact community with residential and other uses in a defined area. A stated objective of Pulelehua (see Section 2.2.1 Statement of Objectives of the Draft EIS) is to: "Build a community that preserves surrounding agricultural land and creates significant open space and trail systems." Also as cited in Section 6.2 Alternative Locations of the Draft EIS, the Pulelehua site is an infill location between urban uses: Kahana Ridge and, the Kapalua West Maui Airport and areas

makai of Honoapiʻilani Highway. As recommended by the State Land Use Commission Decision Making Criteria cited in Section 5.1.2 State Land Use Law, Chapter 205 HRS of the Draft EIS (Standards for Determining Urban District Boundaries), "land contiguous with existing urban areas shall be given more consideration than non-contiguous land."

Pulelehua is not an economically driven project. MLP is looking to provide affordable housing for the employees of West Maui. Clearly, other project options exist which could have been proposed by MLP with less time and expense and with much greater returns.

Pulelehua is designed to increase tourism satisfaction by improving the quality of life for those who work in the tourism industry. A detailed response to population impacts and traffic will be provided later in this response.

In answer to your comments questioning the affordable housing provisions of Pulelehua, in the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised as shown in Attachment 1 of this letter.

Existing Alternatives to Pulelehua

MLP acknowledges that many projects started their planning prior to Pulelehua. MLP has worked hard over the last year to bring affordable and moderately priced homes to the public. MLP hired consultants and started studies at the beginning of the planning process to gain knowledge and avoid delays.

While MLP has made great progress over the last year, we recognize that time is needed to work with the state, county, and community in the planning of Pulelehua. This is why MLP made the choice to go through the normal entitlement process instead of using the 201G process.

There will be at least another year of public hearings and other meetings to obtain basic land use permits. If approved, construction may begin in the third year. What this means is that it will take at least two more years before any portion of Pulelehua becomes a reality. Considering the current housing situation in West Maui, and Maui in general, three years seems like a substantial time to wait for families seeking a home.

2. Alternative to the Proposed Draft EIS Action

1. Limiting the overall size of Pulelehua to 50 percent of the current plan is an arbitrary limit not based on any documented need to limit Pulelehua. It will delay affordable homes to hundreds of people and make the community less attractive as a real community including neighborhood retail, neighborhood parks, the elementary school, and community facilities, as well as a mix of residential types and price ranges.
2. Limiting the number of intersections to three is arbitrary and would create intersections and roads that may be less safe and would create longer delays at the lighted intersection of Akahahele Street. Street sections would be wider, posted speeds would also be higher to handle the higher volume of cars each intersection would handle. Professional traffic

engineers have determined the best circulation system base on engineering standards and this is represented in the plan put forth in the EIS.

3. As discussed in Section 2.5 of the Draft EIS, "No Future Phases"; at this time, MLP has no plans to engineer or construct any future phases of Pulelehua, mauka of West Maui Airport.
4. The State Land Use District Boundary Amendment and the County Change in Zoning processes provide for government oversight and are expected to impose legally binding conditions on Pulelehua. In addition, Pulelehua's project district ordinance will be incorporated into the Maui County Code. Other State, Federal and County agency and department requirements will also provide regulation of the design and operation of Pulelehua.

3. Shortfalls of the Draft EIS

A. Lahaina Wastewater Treatment Plant

Regarding your comments regarding wastewater, as stated in Section 4.9.4 (Wastewater Systems) in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete. As also stated in the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design.

In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant and it is not possible to prepare a detailed sewer impact study for Pulelehua at this time. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

We are aware that the County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued. In the Final EIS, Section 4.9.4 (Wastewater System) will include the following:

The County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued.

Maui Land & Pineapple Company Inc., will pay its fair share for any improvement fees assessed for Pulelehua. In the event the Lahaina Wastewater Reclamation cannot accommodate Pulelehua, Maui Land & Pineapple Company Inc., will evaluate the installation of a packaged sewer treatment plant to address Pulelehua's wastewater treatment demands.

B. Traffic

1. MLP anticipates conditions of approval for Pulelehua will require mitigation measures based on the calculated Pulelehua-generated traffic.

2. Your statements regarding estimates of 15,956 new homes being built in West Maui, we assume, are based on the assumption that all 29 projects and units on the Maui Tomorrow list of proposed projects actually will be built with the number of units indicated by Maui Tomorrow.

Forecasting the impacts of other projects beyond the build out of Pulelehua would be highly theoretical and beyond the scope of the Pulelehua EIS. We chose a realistic timeframe to accurately project impacts of Pulelehua in context of other proposed projects. We find it highly unlikely that all proposed projects will be approved or, if approved, be built as currently conceived.

3. Traffic counts taken for Pulelehua were compared with counts taken and traditional peak periods for other traffic impact studies in the area and with State Department of Transportation data. The volumes were comparable. While it is possible that tourism was affected by the invasion of Iraq, this unusual factor was not considered in the traffic counts. However based on comparison with other counts taken and traditional peak periods traffic impact studies, the Pulelehua traffic volumes were comparable.

Trip distribution percentages were formulated from professional experience of our traffic engineers and judgment. To enhance this knowledge, multiple traffic impact reports for the area were studied to discern detailed distribution patterns.

4. Because the traffic study considers trip generation as originating and terminating from Pulelehua, the intersections closest to Pulelehua are the most impacted. As traffic is distributed further from Pulelehua, impacts lessen significantly, as not all Pulelehua vehicles travel the entire length of Honoapiʻilani Highway.

5. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Given the walkable design of Pulelehua, the ITE rates probably overestimate the external automobile trip generation, so using these rates represents a very conservative trip generation estimate.

6. Based on the professionally acceptable trip generation procedure (see above) 986 vehicle trips are generated during the PM peak hour and 745 vehicle trips during the AM peak hour are reasonable trip generation estimates.

7. The TIAR analyzed a 10 mile portion of Honoapiʻilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Luniopoko. While the TIAR does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiʻilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiʻilani Highway through the Shaw Street intersection and beyond. Thus if it is

assumed that none of these cars turn off the highway between Shaw Street and Ma'alaea, 49 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapi'ilani Highway will cross the Shaw Street intersection during the AM peak. Thus if it is assumed that these cars did not enter Honoapi'ilani Highway from some points between Shaw Street and Maalea, 52 cars will travel on Honoapi'ilani Highway from Ma'alaea or other parts of Maui.

Using the same assumptions, in the PM peak, 42 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Ma'alaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali		PM Peak
	AM Peak	
From Pulelehua (southbound)	49	42
To Pulelehua (northbound)	52	113

We share your concerns about public safety. Both Section 4.4 (Transportation) of the Draft EIS and the traffic report note that the posted speed limit on Honoapi'ilani Highway in the vicinity of Pulelehua is 45 miles per hour, but most vehicles exceed this limit. This is partially due to the design of Honoapi'ilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peak hours, it is very likely people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

The Pulelehua street intersections with Honoapi'ilani Highway will be engineered and designed according to all applicable Federal, State and County standards. The new intersections will require acceleration and deceleration lanes, which MLP will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

8. As stated above in response to number 7, in the AM peak, 49 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Ma'alaea or other parts of Maui. In the PM peak, 42 cars from Pulelehua will travel on Honoapi'ilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Ma'alaea or other parts of Maui.

9. The illustrative Master Plan Contained in the Draft EIS (see Figure 1) does not include a roundabout on Honoapi'ilani Highway. Previous plans had included a roundabout, however this has been eliminated from the current plan and a roundabout is no longer proposed on Honoapi'ilani Highway as part of Pulelehua.

Providing fewer Pulelehua connections to Honoapi'ilani Highway would result in long queuing times at the limited intersections, thus requiring more side street green time at Akahele Street thereby interrupting smooth traffic flow on Honoapi'ilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapala West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapi'ilani Highway.

Traffic volumes projected by the traffic study at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes reach specific established levels. The new intersections will require acceleration and deceleration lanes, which MLP will provide.

10. We disagree with the position of Professors Gordon and Richardson who advocate the consumption of large areas of agricultural land and have authored an article titled "Why Sprawl is Good." Pulelehua's compact design with a mix of uses will reduce some localized trips, especially to parks, convenience retail, and the elementary school. The compact design of Pulelehua will further contribute to the feasibility of public transportation by providing a concentrated population within a walkable community, thus enabling many people to walk a short distance to get to a transit stop.

11. Traffic projections included in the traffic report and summarized in Section 4.4 (Transportation) of the Draft EIS include projections of traffic generated from Pulelehua's neighborhood commercial uses. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country.

12. Elevation was carefully considered in the design of Pulelehua. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Pulelehua streets are designed to run along the contour lines as much as possible, and streets that run up and down (mauka and makai of) the contour lines are relatively short. Trip lengths will be short and walking will not be adversely affected. While a few bicyclists/pedestrians might choose to zigzag up hill to their destination and would benefit from the street grid, most will choose the shortest route, cutting across a slope to reduce the effective grade of the path in a rural or recreational setting. However, when streets are designed to climb a slope, pedestrians generally follow the sidewalk and climb as required. Keeping the blocks short will minimize topographical constraints.

13. It is estimated that a trip through Lahaina during the peak PM hour will take approximately 14 seconds longer if Pulelehua is built. It is estimated that a trip from Lahaina to Kapala during the peak PM hour will take approximately 24 seconds longer if Pulelehua is built.

In response to your relevant comments and the comments of others regarding traffic, the Transportation section in the Final EIS (Section 4.4) will be revised as shown in Attachment 2 to this letter.

C. Cost of Infrastructure

At this stage in the Pulelehua design, it is not possible to provide detailed infrastructure improvement costs, however much of Pulelehua's infrastructure would be installed at MLP's expense. This includes drilling and testing new wells, installing a wastewater pump station within Pulelehua, installing a wastewater transmission line to the wastewater treatment plant and installing storage and transmission lines for non-potable water. Other infrastructure costs will be covered by fees or specific fair-share contributions paid by MLP.

D. Population impacts.

1. The population projections cited in the Draft EIS are from a report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). This report was commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm. The report projects that the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

As stated in Section 4.8.2 (Housing) of the Draft EIS, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income. According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. MLP's list of over 2,700 individuals and families who are interested in owning a home in Pulelehua and provided income information indicates that approximately 74 percent of these individuals and families would likely qualify for affordable housing. Of the 2,700 individuals less than 11 percent are not from Maui.

Fifty-one percent of Pulelehua will be affordable. MLP is looking into various restrictions and qualifications to maximize the sales to current residents of Maui. This may include a requirement to be employed on Maui. For additional information on Pulelehua's affordability provisions refer to Attachment 1 of this letter.

While you have referenced studies of Traditional Neighborhood Design that attract new population, none were cited in your letter so we can not respond specifically to these studies.

2. With safeguards in place favoring local residents, many Pulelehua residents are likely to be current renters, first-time homebuyers, or persons living in shared housing situations. With projected increased population in other parts of Maui, any migration of residents from other areas of the island will allow for additional housing opportunities for others.

3. Regarding who and why people would move to Pulelehua, many of these questions can only be answered by individual buyers. Decisions such as choosing to relocate children to a new

school, proximity to employment, or spouse employment, are individual preferences that each buyer will have to evaluate before choosing to buy a home in Pulelehua. What we do know is that Pulelehua will be a well designed community with amenities beyond affordable homes and that there is a tremendous demand for affordable homes in general on Maui and specifically in West Maui.

4. As stated above, population projections cited in the Draft EIS are from a report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). This report was commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm. The report projects that the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

5. The housing demand projection cited in the Draft EIS of 3,447 additional homes needed in West Maui by 2020 is also from *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). The report was commissioned by the County of Maui to provide various projections in advance of the General Plan Update. The housing demand projection cited in the Draft EIS of 5,440 additional homes needed was estimated by the Hallstrom Group, a respected Hawaii real estate consulting firm.

6. As stated above, traffic projections included in the traffic report and summarized in Section 4.4 (Transportation) of the Draft EIS include projections of traffic generated from Pulelehua's neighborhood commercial uses. It is envisioned that many businesses within Pulelehua will employ Pulelehua residents or be owned and operated by Pulelehua residents, for example, a sole-proprietor accounting business, with an office nearby or the owner's mixed-use residence.

E. Development Size

1. Why are there 1,149 units, plus industrial and commercial?
Pulelehua is proposed to contain 882 homes. This is clearly stated throughout the Draft EIS. MLP will not construct any ohana units, however 267 ohana units will be allowed on specific lots, to be built at the discretion and expense of individual owners. Because ohana units may be built at the discretion and expense of individual owners it is not expected that all potential ohana units will be built. This is also clearly stated in many places in the Draft EIS.

Pulelehua is designed to incorporate retail and other business uses to serve the Pulelehua community. As stated in Section 4.8.3 (Neighborhood Commercial Uses) of the Draft EIS, Pulelehua "will be a complete community with neighborhood shops, restaurants, offices, and other businesses serving residents." MLP views these neighborhood businesses as essential to create a vibrant community with many services and amenities within walking distance. This, in turn, will allow many residents to have a portion of their daily needs provided for within Pulelehua, thus reducing trips onto Honoapiʻiani Highway.

Kapalua Mauka is a separate project from Pulelehua. Planning for Kapalua Mauka started many years ago. *The Kapalua Mauka Final Environmental Impact Statement* (PBR Hawaii 2002) addressed impacts related to Kapalua Mauka and related cumulative impacts known at the time the EIS was prepared.

units will be built. However, the ohana are expected to add affordability to Pulelehua. This will be explained by revising Section 2.6.4 (Building Types) of the Final EIS (Section 2.6.2 in the Draft EIS) to include the following

- *Ohana (potential)*
An attached or detached dwelling unit that is accessory, incidental or subordinate in size and character to a principal building situated on the same lot or parcel, with a maximum of 625 to 800 square feet of living area, depending on lot type and district zone. Ohana units will be built at the discretion of individual owners.

The provision for potential ohana units will contribute to furthering affordability within Pulelehua. Ohana units will allow families to add living areas for family members or provide additional income if rented. In the true meaning of "ohana," it is envisioned that Pulelehua's ohana units will allow a family to provide living space for aging parents or allow children to live separately as they become adults and seek an affordable place of their own. If rented, ohana units can increase affordability by providing an owner with additional income to help pay the mortgage or other needs. In addition, if rented, it is envisioned that small size of the ohana units will keep rent prices reasonable and affordable, thereby providing another source of affordable housing in West Maui.

- 125 residential units will be permanent affordable rentals.
- Affordable homes will be offered in the same housing types as most of the home in the market rate group (condominiums, townhouses, and single family homes). They will range in size from one bedroom apartments to medium-sized single family homes with three or four bedrooms.
- See c above. Detailed floor plans have not been prepared.
- With the median home price on Maui at \$780,000 and affordable homes in Pulelehua selling for between approximately \$193,000 and \$360,000 MLP strongly doubts there will be a lack of buyers or qualified applicants. In fact, over 2,700 Maui residents have registered on the Pulelehua interest list to purchase or rent a home.
- In regard to the Villas at Kahana housing project, Betsill Brothers, the developer, informed us that they had more qualified affordable applicants than they could supply.

According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. In addition, marketing studies commissioned by MLP, indicate that over 1,500 families are looking for affordable housing. Long-range forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. Based on these projections it is clear that reasonably priced homes in West Maui are in severe under supply.

Historically, MLP has provided over 500 employee housing lots or homes over the past 30 years. MLP intends to continue this commitment of providing housing opportunities for their employees. It has been MLP's experience that employee/employer relationships and employee/employer housing relationships are kept as separate issues. Furthermore, a trust

2. Alternate proposal for an appropriate sized development.
The size of Pulelehua was not determined based on profit margins, constructed costs or meeting requirements for Kapalua Mauka. Rather, the community sizing was based on feedback from the public, what would be an appropriate number and mix of residential units, retail space, community facilities and other uses to create a real community, and forecasts for population growth and affordable housing demand.

Kapalua Mauka is the long-planned expansion of the Kapalua Resort, and as such resort residential homes are an appropriate use as part of the Resort. Along with Kaanapali, the Kapalua Resort is one of two master-planned destination resorts recognized for the West Maui area. These resorts are important to the West Maui region and Maui in general as major employment centers and economic generators that positively impact all aspects of the County and State economies.

A condition of the State Land Use District Boundary Amendment for Kapalua Mauka is for 125 affordable homes to be provided as part of Pulelehua. At the time of the LUC hearing on Kapalua Mauka in May 2004, this was far more affordable housing than was typically required by the LUC, and MLP voluntarily offered and agreed to this condition.

The Draft EIS specifies the number of homes proposed in Pulelehua (882) states that 51 percent of these will be affordable. Pulelehua will also provide 'gap' and market priced home. General information on proposed building types is also stated in the Draft EIS (see Section 2.6.2, Building Types). Detailed floor plans have not been prepared since it is premature to do detailed design of homes prior to zoning approval. Additional information regarding Pulelehua's affordability provisions will be provided the Final EIS, as shown on Attachment 1 of this letter.

F. Over-Development of West Maui

As stated previously, regarding Maui Tomorrow's list of 29 proposed projects, careful comparison of Maui Tomorrow's list with the list in the Draft EIS (see Table 2, Section 4.4 (Transportation)), indicates that the lists are very similar. However, we find it unlikely that all projects on the list will be built or built as planned. For example, the Villages of Lelalii (projected a 4,709 units on the Maui Tomorrow list) has been tied up in a legal dispute for over 10 years, although an agreement was recently reached to allow DHHL to provide 104 homes on a portion of the site.

G. Affordable Housing

Information relating to many of your affordable housing questions will be provided the Final EIS, as shown on Attachment 1 of this letter.

- 1a. The 51 percent of Pulelehua's affordable homes will be based on the 882 homes MLP will build. MLP will not build the 267 ohana units which will be allowed on specific lots, to be built at the discretion and expense of individual owners. Because ohana units may be built at the discretion and expense of individual owners it is not expected that all potential ohana

and home owners association will manage the Pulelehua community once constructed, thus removing MLP from daily Pulelehua management.

H. Wastewater Pump Station

In response to your concerns, and the concerns of the Kahana Ridge Association, in the Final EIS, Section 4.9.4 will be revised as follows:

Maui Land & Pineapple Company Inc., or its subsidiaries will build the onsite sewer collection system within Pulelehua. The system will be designed to accommodate the anticipated flow and will consist of a gravity sewer system and sewer pump stations that will connect to a new sewer line located along the east (mauka) side of Honoapiʻiani Highway. The sewer line will continue south, mauka of the highway, approximately 3,500 feet and will connect directly to the Lahaina Wastewater Reclamation Plant.

The onsite collection system will incorporate a sewer pump station at the northerly limit of the Pulelehua site. The pump station will not serve all of Pulelehua. It will only handle waste water from a few dozen homes that can not gravity flow to the new sewer transmission line. The central and southern neighborhoods as well as a portion of the northern neighborhood will be able to gravity feed into the new line to a gravity-flow system which will connect to the County's sewer pump station Napili No. 1, which will and transport wastewater into the Lahaina Wastewater Reclamation Plant. Pump The County's pump station No. 1 is located on the northerly side of the Lahaina Wastewater Reclamation Plant and pumps wastewater directly into the headworks at the plant.

The pump station at the northerly end of the Pulelehua site will include instrumentation, alarm systems (e.g. equipment failure, high waste water levels) and redundant equipment such as pumps. These features will provide system monitoring and ensure reliability. During the design and engineering phase various options will be evaluated to keep any potential overflow of waste water from entering Kahana Gulch. Sound attenuation features will be included in the pump station design, as needed, to ensure that all site and county noise requirements are met. Locating the equipment underground will be evaluated during the design and engineering phase of Pulelehua. Sewer pump stations should not emit noxious odors if running properly. Notwithstanding this fact, based on prevailing wind patterns in the area, there is no location within Pulelehua which is predominately upwind of any homes at Kahana Ridge.

The proposed sewage system will be designed to County of Maui standards. In addition, all wastewater plans will conform to applicable provisions of HAR, Chapter 11-62, "Wastewater Systems."

I. Negative Impact on Social Services

The article reference was written about British neighborhoods and cites a book from the 1970's and a study from the 1980's. The 1980's study only compared urban neighborhoods with suburban neighborhoods and found high crime rates in the cities. The study did not look at Traditional Neighborhood Design (TND) communities. Many recent studies done in the United States that show TND communities reduce overall crime rates.

MLP is aware there are unfilled authorized police positions. In their comment letter on the EISPN, the Maui Police Department stated that the Lahaina Patrol District consists of five beats that cover the area from the Pali Tunnel to Nakalele Point. The district has an

authorized strength of 53 uniformed officers and six investigative officers. However, with only 36 of 53 authorized positions filled, the district is at 68 percent staffing.

It is expected that Pulelehua will provide homes for police officers and other public employees. The Pulelehua affordable housing provisions (see Attachment 1) provide for a preference for West Maui residents who are police officers, public school teachers, and firefighters.

J. Development in gulch areas.

Previous Pulelehua plans included a road crossing Kahanaiki gulch near the desilting basin, however in current plan in the Draft EIS (see Figure 1) this crossing has been eliminated in favor of using an existing bridge adjacent and parallel to Honoapiʻiani Highway. In addition, the road alignment shown on the current plan is an existing dirt and gravel road.

Improving and paving the existing dirt and gravel road is not expected to result in significant impacts to this highly altered environment, which includes an engineered dam, a desilting basin, and an existing road. No threatened, endangered, or plant or animal species of concern have been observed in the area (see Sections 3.8 Botanical and 3.9 Wildlife Resources of the Draft EIS).

The improvements to the dirt and gravel road will provide a fully engineered drainage system. This drainage system coupled with the paved road will reduce the amount of soils eroding into the stream.

Currently, the dirt and gravel road is used for existing agricultural operations and will continue to be used for agricultural operations in the future.

K. School Issues

Information relating to many of your school issues will be provided the Final EIS, as shown on Attachment 3 of this letter.

1. Maui Land & Pineapple Company Inc., will contribute the 13-acre school site as a portion of their standard fair-share school impact fee. To mitigate the impact on Lahaina Intermediate and Lahainaluna High the Department of Education requests the State and Maui County to impose a standard school fair-share condition to offset the impact of Pulelehua on the Lahainaluna schools.
2. In their comment letter on the Draft EIS the Department of Education (DOE) 1) stated "The DOE acknowledges the need for additional school facilities within the West Maui area and finds the Pulelehua site acceptable for an elementary school," and 2) estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students.
3. The State has appropriated funds for the preliminary design of the elementary school. It is expected that Pulelehua and other new developments will pay a fair share contribution in DOE fees.

4. Pulelehua middle and high school students are expected to attend Lahaina Intermediate and Lahainaluna High, although some may attend Maui Preparatory Academy.

Maui Preparatory Academy will provide scholarship funding to 20 percent of their planned enrollment. This will provide some relief to the intermediate school and high school demands.

To mitigate the impact of Pulelehua on Lahaina Intermediate School and Lahainaluna High School, the DOE requests that the State and County impose a standard school fair-share condition.

5. As stated in Section 4.4 (Transportation) of the Draft EIS, it is expected a school within Pulelehua will have significant positive impact on travel on Honoapiʻilani Highway as elementary school children residing approximately north of Kaanapali, including Pulelehua children, will not have to travel to the Lahaina area for school.

In addition, as stated in Section 4.11.3 (Schools) of the Draft EIS, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Mahinahina) to walk to school, further reducing trips on to Honoapiʻilani Highway.

L. Building Height

The current plan is to limit height to 48 feet within core district to create mixed use opportunities and designs that create a sense of place by defining the public space. Other districts will have lower maximum height limits. Uses within Pulelehua will be regulated by the Pulelehua Project District ordinance, which, when approved by the County Council, will become part of the Maui County Code, specifically incorporated in Chapter 19, Zoning.

M. Well Water Quality

In response to your concern about the potential impacts of DBCP, Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well

site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

4. Recommendation and Conditions

1. Limit the overall final size of Pulelehua to 50% of MLP's proposal.
 - o This is an arbitrary limit which is not supported by any evidence that demonstrates that the size needs to be limited.
2. Structures shall not exceed forty feet in height and shall not exceed three stories.
 - o Our current plan is to limit height to 48 feet within core areas to create mixed use opportunities and designs that create a sense of place by defining the public space. Other districts will have lower maximum height limits.
3. Businesses that create noise audible from the street shall incorporate acoustical measures.
 - o All County and State noise requirements will be met.
4. All exterior lighting shall be shielded from adjacent residential properties and designed to minimize night sky light pollution.

In response to your concern exterior lighting and preserving the night sky, Section 4.7 in the Final EIS will be revised to include the following:

All Pulelehua common area exterior lighting will be shielded from adjacent residential properties to the extent possible. Street lighting and common area lighting will be designed to minimize night sky light pollution to the extent possible. This will be accomplished through a combination property selected light fixture shades, bulb types and wattages, reflectors, and lens used within each fixture.

5. Storage items.
 - o Design covenants for Pulelehua will be created and be administered by the Pulelehua Homeowners' Association or a similar private organization or trust established to regulate uses within Pulelehua, including appropriate storage requirements.
6. Energy conservation.
 - o MLP plans to implement a full set of energy conservation measures.
7. All utility lines will be underground within the project and connecting the project to preexisting lines off-site for their entire length, including off-site portions.
 - o MLP plans to underground all utilities within Pulelehua.

8. A minimum of 51% of the total units will be permanently affordable.
 - o See Attachment 1.
9. Enforce completion of affordable units.
 - o ML&P has the best track record of any landowner/developer on Maui, of providing affordable home, having provided approximately 500 employee housing lots or units over the past 30 years.
10. Affordable units kept permanently affordable upon resale.
 - o See Attachment 1.
11. An affordable unit may not be rented or sold at market rates.
 - o See Attachment 1.
12. Affordable units for purchase must be owner-occupied at all times.
 - o See Attachment 1.
13. Comply with all future County affordable housing laws guidelines and instructions.
 - o MLP will comply with all County affordable guidelines and requirements and will execute an affordable housing agreement with the County.
14. Affordable units may not be used as credits for future developments.
 - o There is no for basis for restricting MLP from getting credit for the affordable housing it makes available to the public.
15. Specify exact prices and terms for affordable units in the final EIS.
 - o See Attachment 1.
 - o Some aspects may be changed based on the final affordable housing agreement entered into with the County.
 - o The housing prices will vary from year-to-year based on the median income for that year.
16. Set a schedule for gradual build-out of 75 residential units maximum per year.
 - o This is an arbitrary limit which is not supported by any evidence to show the units built per year needs to be limited, and would dramatically increase the costs of the project and jeopardize its viability as an affordable housing project.
 - o This will greatly delay the availability of the much needed affordable housing for West Maui.
 - o This will expose residents of the area and Pulelehua to ongoing construction for years.
17. Limit Pulelehua access to Honoapi'iiani Highway to three intersections.
 - o This will lead to overloading the three intersections causing delays and may cause less safe conditions.
 - o The proposed connections are based on an engineering analysis and limiting them to three is arbitrary. Better traffic circulation occurs when a

- grid of streets exist. Multiple two-lane roads in a grid function geometrically better than fewer large highways.
18. Pay a fair road construction impact assessment.
 - o MLP will pay its fair share of DOT assessments attributable to Pulelehua generated traffic.
 19. Limit surrounding development.
 - o MLP has no plans to develop the area mauka of Pulelehua.
 20. Require that the Final EIS include the combined impact of Pulelehua and Kapalua Mauka.
 - o Kapalua Mauka is a separate project.
 - o The Kapalua Mauka Final EIS was accepted by the Maui Planning Department in 2002 over two years ago. Both the LUC and the Maui Planning Commission have approved Kapalua Mauka.
 21. Enforce conditions and establish fair, effective penalties.
 - o The County and State agencies and departments are in place to monitor Pulelehua.
 22. Reports and compliance.
 - o The County and State possess the authority to enforce all requirements.
 23. MLP will not use the 201G fast track for this development.
 - o The Draft EIS states that MLP is not using the 201G process for Pulelehua.
 24. The developer shall participate in the pro rata funding and construction of adequate civil defense measures as determined by the State and the County civil defense agencies.
 - o MLP will participate in the fair share cost of any civil defense measures stipulated by the State or County as required of other developers.
 25. Public Safety.
 - o MLP has offered to provide a satellite police substation within Pulelehua.
 - o MLP further plans to make affordable housing available to public service employees, including police officers.
 - o Taxes generated within Pulelehua will contribute to fund the police department.
 26. Transfer.
 - o No transfer of the property is contemplated, except that a trust will be formed for the ongoing community management upon completion.
 27. Wahee and Ka'anapali 2020 must be considered first by the State Land Use Commission and by the Maui County Council and Planning Department before Pulelehua can be considered.

- o This will only serve to delay affordable housing getting to the people who need it.
- o There are no first-come, first-serve requirements at the State or County level.
- 28. Green space will be permanent.
 - o MLP agrees not to develop designated green space within Pulelehua.
- 29. Construction traffic shall be prohibited in gulches.
 - o Construction traffic will be limited in gulches to the extent possible to support the road and any required drainage upgrades and construction of infrastructure.
- 30. Prevent coqui frog infestation.
 - o MLP will, to the extent possible prevent, coqui frog infestation.
 - o MLP is not responsible for coqui frogs and is actively managing the Pu'u'kui preserve and our other lands with a full time staff to protect against all invasive species.
- 31. Construction is not allowed in Kahana Gulch.
 - o The existing agricultural road along the side of in Kahana Gulch may be paved as part of Pulelehua.
 - o Other improvements to the drainage system of the area may be undertaken.
- 32. Locate wastewater pump station away from existing homes.
 - o The wastewater pump station will be located so as to limit the possibility of odors reaching existing homes.
- 33. Complete the Lahaina wastewater treatment facilities upgrade before Pulelehua occupancy is allowed.
 - o There is no reason to delay Pulelehua until after the wastewater treatment plant is expanded.
 - o Pulelehua can be pursued concurrently as the County is aware of Pulelehua expected wastewater treatment demands.
- 34. Require approval and full funding for the Lahaina wastewater treatment facility upgrade construction.
 - o See response to 33 above.
- 35. MLP is required to pay fair wastewater assessment.
 - o MLP will pay its fair share assessment for wastewater treatment.
- 36. Water quality monitoring.
 - o Pulelehua waste water will not be injected into injection wells or flow to the ocean.

- o Pulelehua will use R-1 water from the Wastewater Treatment plan for irrigation of community parks, neighborhood parks, open spaces, common area, multifamily units, and the school.
- o Any water quality testing required by the operation of the Lahaina Wastewater Treatment Plant should be performed by the County.
- 37. Require MLP to build an elementary school with a capacity of 623 students.
 - o Maui Land & Pineapple Company Inc., will contribute the 13-acre school site as a portion of their standard fair-share school impact fee.
 - o The current DOE standard elementary school campus is sized for 600 students. MLP has no control of the DOE standard for elementary schools.
- 38. Provide funding to support expansion of Lahaina Intermediate and Lahaina High School.
 - o To mitigate the impact of Pulelehua on Lahaina Intermediate School and Lahainaluna High School, the DOE requests that the State and County impose a standard school fair-share condition.

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. We hope these responses help you see the merits of Pulelehua and recognize that MLP with the assistance of over 600 residents of the West Maui community over the past fifteen months has put forth a well thought out community.

Sincerely,



Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company, Inc.

Attachment

- cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Genevieve Salimonson, Office of Environmental Quality Control
Ms. Ann T Cua, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.
Mr. Tom Schnell, PBR Hawaii

Attachment 1

In the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised to include the following:

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

Lottery Pool	Preference
A	MLP Employees and subsidiaries
B	Kapalua Nui Partners
C	West Maui residents who are police officers, public school teachers, and firefighters
D	Maui residents who work in West Maui, but do not live in West Maui
E	West Maui residents

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold as affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Attachment 2

In the Final EIS, Section 4.4 (Transportation) will be revised as follows:

In response to several comments on the Draft EIS, the following additional analysis regarding Pulelehua traffic impacts is provided:

Traffic Impact South of Lahaina. The transportation report analyzed a 10-mile portion of Honoapiʻilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina, there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launiopolo. While the transportation report does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiʻilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak hour, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiʻilani Highway through the Shaw Street intersection and beyond. Thus if it is assumed that none of these cars turn off the highway between Shaw Street and Māʻālaea, 49 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapiʻilani Highway will cross the Shaw Street intersection during the AM peak hour. Thus if it is assumed that these cars did not enter Honoapiʻilani Highway from some points between Shaw Street and Māʻālaea, 52 cars will travel on Honoapiʻilani Highway from Māʻālaea or other parts of Maui.

Using the same assumptions, in the PM peak hour, 42 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Māʻālaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali	AM Peak Hour	PM Peak Hour
	From Pulelehua (southbound)	49
To Pulelehua (northbound)	52	113

Level of Service Concept. The Level of Service (LOS) traffic engineering concept is explained on page 2 of the transportation report included in the Draft EIS. As explained, there is a common misconception that LOS designations are like school grades, in which D is worse than C, C is worse than B, and A is best of all. In urban areas a LOS of D is typically considered acceptable for peak conditions. This is because roads are very expensive to build, and once built, they must be heavily used to help justify the cost of construction. A road that operates at LOS A at all times is a road that has been over-built

for local traffic conditions. Even during peak traffic hours, a road at LOS A carries only a fraction of its vehicle capacity, which is a highly inefficient use of scarce transportation funding. Comparatively, a road that operates at LOS C or D carries many trips for its size and represents a more efficient use of transportation funding. At LOS C or D, the road will be congested during peak travel times, but will also carry a measurable amount of traffic during off-peak times. Such roads represent a better fit between the desire to travel freely on the road and the expense of building new roads. For this reason, many communities adopt LOS D as their standard LOS for roads and streets.

Comparison of the 2011 "with Pulelehua" scenario with the 2011 "without Pulelehua" scenario shows that the majority of intersections will operate at the same LOS with or without Pulelehua. In other words, considering all the other projected projects taken into account in the transportation report, Pulelehua will not substantially change the LOS at most intersections. Table 19 on page 52 in the transportation report is an example of this, showing the same LOS at intersections with or without Pulelehua.

Traffic Counts. Traffic counts taken for Pulelehua were compared with counts taken and traditional peak periods for other traffic impact studies in the area and with State Department of Transportation (DOT) data. The volumes were comparable. While it is possible that tourism was affected by the invasion of Iraq, this usual factor was not considered in the traffic counts. However, based on a comparison with other counts taken and traditional peak periods traffic impact studies and DOT data, the Pulelehua traffic volumes were comparable.

Trip Generation Rates. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Based on the professionally acceptable trip generation procedure, 986 vehicle trips are generated during the PM peak hour and 745 vehicle trips during the AM peak hour are reasonable trip generation estimates.

Given the walkable design of Pulelehua, the ITE rates probably overestimate the external automobile trip generation, so using these rates represents a very conservative trip generation estimate.

Commercial and School Traffic. Traffic projections of the transportation report include projections of traffic generated from Pulelehua's school and neighborhood commercial uses. ITE trip generation rates were used to project future conditions. These are standard rates used by traffic engineers throughout the country.

Trip Distribution. Trip distribution percentages were formulated from professional experience and judgment of the Pulelehua traffic engineers. To enhance this knowledge, multiple traffic impact reports for the area were studied to discern detailed distribution patterns.

Effect on Drive Times. It is estimated that a trip through Lahaina during the PM peak hour will take approximately 14 seconds longer if Pulelehua is built. It is estimated that a trip from Lahaina to Kapalua during the PM peak hour will take approximately 24 seconds longer if Pulelehua is built.

Intersections Most Impacted. Because the transportation report considers trip generation as originating and terminating from Pulelehua, the intersections closest to Pulelehua are the most impacted. As traffic is distributed further from Pulelehua, impacts lessen significantly, as not all Pulelehua vehicles travel the entire length of Honoapiʻilani Highway.

Traffic Signals. Traffic volumes projected in the transportation report at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes reach specific established levels. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide.

Less Pulelehua Intersections. Providing fewer Pulelehua connections to Honoapiʻilani Highway would result in long cueing times at the limited intersections, thus requiring more side street green time at Akahahele Street and interrupting smooth traffic flow on Honoapiʻilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapiʻilani Highway.

Public Safety. The posted speed limit on Honoapiʻilani Highway in the vicinity of Pulelehua is 45 miles per hour, but most vehicles exceed this limit. This is partially due to the design of Honoapiʻilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peak hours, it is very likely that people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

The Pulelehua street intersections with Honoapiʻilani Highway will be engineered and designed according to all applicable Federal, State and County standards. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

Construction Vehicle Traffic. During construction, construction vehicle traffic impacts are assumed to be less than full built out of Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the AM or PM peak hours. Although daily construction traffic is somewhat active, neither the

ATTACHMENT 3

In the Final EIS, Section 4.11.3 (Schools) will be revised as shown:

4.11.3 Schools

Existing Conditions

Educational facilities in West Maui include four public schools and two private schools. The public schools are: King Kamehameha III Elementary (grades K-5), Princess Nahienaena Elementary (grades K-5), Lahaina Intermediate (grades 6-8), and Lahainaluna High (grades 9-12). The private schools are: Sacred Hearts School (grades K-8) and West Maui Carden Academy.

~~As of October 2004, the current enrollment at West Maui's public schools was as follows:~~ In their comment letter on the Pulelehua Draft EIS, dated May 17, 2005 (see Section 12) the Department of Education (DOE) provided the following information on the enrollments (for school year 2004-2005) and capacities (for school year 2003-2004) of West Maui public schools:

	Current Enrollment Capacity (2004-2005)	Capacity Over (2003-2004)
Kamehameha III Elementary:	698 702	704
-2		
Princess Nahienaena Elementary:	664 664	681
-17		
Lahaina Intermediate:	637	577 597
Lahainaluna High School:	1,038	656 794
244		

Kamehameha III Elementary School is the designated public elementary school for students from the area extending from Honokōhau Valley to Kāyanapali (which includes the Pulelehua area). All Kamehameha III Elementary School students must be transported to and from school, either by school buses, or by other means such as their parents or car pools. The DOE operates six school buses to transport 254 students to Kamehameha III Elementary School from the Honokōhau Valley to Kāyanapali area. Many of these students reside in the area near Pulelehua.

Potential Impacts and Mitigative Measures

Plans for Pulelehua include a 13-acre site for a public elementary school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapiʻilani Highway as elementary school children residing north of Kāyanapali, will not have

daily or peak hour construction traffic exceeds the total build-out traffic forecast after Pulelehua completion.

Roundabout. A roundabout is not proposed on Honoapiʻilani Highway as part of Pulelehua. Previous plans had included a roundabout, however this has been eliminated from the current plan.

Lahaina Bypass. Because the time for the construction of the Lahaina Bypass is uncertain, the transportation report does not do not assume the Lahaina Bypass or the "mini" bypass will be built. This results in conservative estimates of traffic impacts.

Big Box Shopping. Pulelehua's neighborhood businesses are not meant to compete with big box stores in Kahului. While Pulelehua residents are likely to shop at a variety of retailers, providing neighborhood-serving businesses within Pulelehua will allow some immediate needs to be met within Pulelehua, thus decreasing a portion of trips onto Honoapiʻilani Highway. Unlike a conventional subdivision, Pulelehua residents will have the option of not driving to obtain some basic services.

Impact of Topography on Biking and Walking. Elevation was carefully considered in the design of Pulelehua. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Pulelehua streets are designed to run along the contour lines as much as possible, and streets that run up and down (mauka and makai) of the contour lines are relatively short. Within Pulelehua, trip lengths will be short and walking will not be adversely affected. While a few bicyclists/pedestrians might choose to zigzag up hill to their destination and would benefit from the street grid, most will choose the shortest route, cutting across a slope to reduce the effective grade of the path in a rural or recreational setting. However, when streets are designed to climb a slope, pedestrians generally follow the sidewalk and climb as required. Keeping the blocks short will minimize topographical constraints.

to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honopiʻilani Highway.

Planning Director Mike Foley has noted that the Pulelehua school will be a good traffic mitigation measure since West Maui Schools have the highest number of parents driving kids to school within the State. In their comment letter on the EISPN, the Police Department stated that having a school in the vicinity is a must," in reference to the fact that there is currently no school in the Pulelehua area and all students must be driven to Lahaina area schools, including schools serviced by Lahainaluna Road.

The DOE has indicated that the Pulelehua school site is appropriate and acceptable for an elementary school.

~~The Market Study and Economic Impact Analysis prepared for the Pulelehua community (Hailstrom 2005) estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions, based on DOE figures, with about 75 percent (308 children) attending grades kindergarten to 8th and 25 percent (102) attending high school.~~

In their comment letter on the Draft EIS, the Department of Education estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students. The number of students is dependent on the total number of residential units and the breakdown between single-family and multi-family homes.

The Department of Education also provided the following information regarding the projected enrollments and capacities for the 2009-2010 school year:

	Projected Enrollment (2009-2010)	Over Capacity (2009-2010)
Students		
Kamehameha III Elementary:	683	-21
Princess Nahienaena Elementary:	615	-66
Elementary Subtotal:	1,298	
239		
Lahaina Intermediate:	664	67
115		
Lahainaluna High School:	996	172
136		

The Department of Education concludes that an elementary school within Pulelehua could accommodate all elementary students residing in Pulelehua and that Pulelehua will impact Lahaina Intermediate and

Lahainaluna High by doubling the number of students currently over facility capacity. To mitigate this impact the Department of Education requests the state and Maui County to impose a standard school fair-share condition to offset the impact of Pulelehua on the Lahainaluna schools.

A new private school, Maui Preparatory Academy, will be located in Māpili and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. In 2007, four classes of pre-kindergarten will be added. The anticipated enrollment of pre-kindergarten children is 18 students per classroom. In 2008, an additional primary grade level will be added. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-kindergarten through 12.

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MAY 09 2005

DEVELOPMENT OFFICE

Applicant: Maui Land & Pineapple Company, Inc.
1000 Kapalua Drive, Kapalua, HI 96761
Contact: Mr. Karl Bossert (669-5625)

Prof. (Emeritus) Dick Mayer
1111 Lower Kimo Drive
Kula, Maui HI 96790



May 6, 2005

Subject: ML&P's PULELEHUA SUBDIVISION (HRS 343 DEIS)

I wish to place on the official DEIS record the following comments and recommendations. I expect that the Final EIS will address these issues. Furthermore, I ask that the Land Use Commission, Office of Environmental Quality Control, and the Maui County Planning Department and Maui County Planning Commission seriously consider the issues which I raise.

1. The most significant weakness of the Pulelehua DEIS relates to the **segmentation** that is taking place. The EIS law requires that a large project should not be segmented into a number of smaller projects, so as to avoid the cumulative and interactive effects of the many smaller projects. In this case, the segmentation problem exists at several levels.

A) The Pulelehua project itself has been segmented into **multiple phases**. The DEIS states that there is "no present intention" to construct further phases above the airport, and discusses only the area below the Kapalua airport. As of today (May 6, 2005), ML&P's web site (http://www.pulelehua.com/newsletters/newsletter_3_3_04.pdf) contains a map which shows that the lower area is merely phase #1. Consequently, the FINAL EIS should contain an explicit statement that ML&P will never (or at least for 50 years) develop the lands above the airport. Otherwise a non-segmented EIS should be completed for all phases of Pulelehua.

B) A second level of segmentation is the separation of Pulelehua from ML&P's **huge, luxury housing project, Kapalua Mauka, and the many other Kapalua projects (including the 159 super-luxury residential units now under separate EIS review at the site of the existing Kapalua Hotel**. Not only will there be considerable interaction among the projects: traffic, schoolchildren, medical needs, employee commuting, etc., but the affordable housing components of Pulelehua is apparently being constructed to meet certain requirements of the Kapalua Mauka project.

As a **minimum**, the interaction among the projects should be explicitly made in the Pulelehua FEIS. Even better, would be an integration of the projects into a non-segmented EIS.

C) A third level of segmentation is the avoidance by the Pulelehua DEIS to consider the full range of **impacts between Pulelehua and all the other very large and small developments** taking place in West Maui. Only traffic concerns are given the full environmental impact treatment. Where is the much-needed discussion on the cumulative and interactive effects of the many projects on such significant elements of the infrastructure as: education, sewage, solid waste, police, fire, electricity, water supply, etc.? Pulelehua is not being developed in isolation; the FEIS should clearly point out the cumulative infrastructure impacts in West Maui that need to be mitigated.

ML&P's PULELEHUA SUBDIVISION (HRS 343 DEIS) - Dick Mayer Page 2

D) A fourth level of segmentation is the avoidance in the DEIS of considerations as to the effects of the Pulelehua project upon the whole island of Maui. Maui is presently undergoing a massive level of development, a virtual tsunami of development. The Pulelehua project will add its impact to an already overheated economy. One of the reasons that prices of homes are so high is due to the high level of construction activity. If the Maui economy were allowed to slow down a bit, prices of homes would surely level off and perhaps even fall. The DEIS glowingly touts the high level of construction costs that will be taking place at Pulelehua. Rather than benefiting Maui, Pulelehua will be another, and major, contributor to the County's over-heated, inflationary housing spiral.

2. I request that the Final EIS reflect and respect the thought that went into developing the West Maui Community Plan ordinance.

The Citizen Advisory Committee, Maui Planning Department, Maui Planning Commission, and the County Council confirmed the community's wish to leave most of this area in agriculture and part of it in a 50 acre "regional park". Now, only a few years since the Community Plan was adopted, ML&P is proposing to re-designate this area into entirely different uses. The Final EIS should explain what is significantly different now from when the comprehensive Community Plan was adopted as a planning ordinance.

3. Will this Pulelehua project jump ahead of all those developments which were carefully placed in the West Maui Community Plan? If not, is it appropriate to reclassify and re-zone the land-use prior to the other projects getting underway? What if there is not enough water, etc.?

4. With regard to the affordable housing provisions, the statement at the top of page 29 is too weak. There should be a specific statement as to: a) who will administer and enforce the buyback provisions; and b) that the affordable housing, both for owners and renters, will be "in perpetuity."

5. It is stated over and over again that Pulelehua will not increase the overall **population of Maui** because this project will merely permit people from Central Maui to move closer to their jobs in West Maui. Consequently, I suggest a more substantive analysis of the effect on **all of Maui's businesses** if Pulelehua were to be built? What will be the impact on existing business/retail/commercial space in other parts of Maui if approximately 2,000 residents of those areas move to Pulelehua? Please address the potential loss of business from existing establishments, instead of merely reporting bloated income and retail figures for West Maui. Will the claimed increase in employment merely reflect displacement of customers from existing businesses, with no significant NET impact to the Maui economy? Will the migration of existing Maui residents to West Maui mean that new people will move to Maui to fill the vacated units?

6. Levels of soil contamination are especially worrisome. The DEIS (P. 43-44) cites a large number of chemicals that have been used on the pineapple fields. Although these may all be chemicals approved by the federal government for use in agriculture, there is no assurance that these same chemicals, individually or cumulatively, will be safe for a residential area, especially for young kids.

There will be many children on the property playing on the playgrounds and in their own yards. Prior to any land-use change discussions, a neutral body, such as the State Department of Health, should survey the entire parcel for pesticide/herbicide contamination residues. Both the quantitative results and their implications should be included in the Final EIS.

The mitigative measures on the bottom of page 44 are much too weak.

7. Since West Maui has only one single-lane (in each direction) road connecting it to central Maui, it is absolutely essential that the EIS discuss the effects of Pulelehua on the traffic between Lahaina, the Pali, and Maalaea. Assuming that there will probably be no significant improvement to this highway during the next 10 years (long after the proposed 2011 completion of Pulelehua), special attention has to be paid to emergency vehicles, solid waste shipments to the central Maui dump, deliveries of construction materials to Pulelehua, etc. It may even be useful for the Final DEIS to discuss the potential of a public bus service to/from Central Maui.

8. The DEIS constantly mentions that residents will be able to easily walk and bike about the community to do their shopping, and perhaps go to work. Although the distances may be relatively short, there is a considerable 8% slope to the land. Consequently, although the urban planners would like to have a pedestrian community, it seems likely that many trips will be made in vehicles. Hopefully, the FEIS will clarify this matter.

9. Because the capacity of the proposed Pulelehua Elementary School will be larger than needed to serve the immediate community, has provision been properly made for student drop-offs and pick-ups by off-site parents, and the large number of buses that will be bringing children from outside the immediate community? Will school going vehicles be using the same Pulelehua "Main Street" that leads up to the airport?

10. The DEIS (middle of page 75) states that efforts will be made to restrict housing to local residents. Since this may become a controversial legal issue, it is necessary to indicate the exact mechanism by which local residents will be given preference. If there is no legal mechanism, then stating the desire to help local residents becomes a very misleading statement. Without the ability to help local residents, Pulelehua may become merely another development to allow more people to move to Maui.

11. The overall scale of Pulelehua can be noted on pages 74-75. The West Maui population is expected to increase in the next 15 years by 6,688; and Pulelehua is expected to house the first 2,492 of the new residents already by 2011. That does not seem realistic.

12. The DEIS inadequately discusses the potential growth of the Kapalua Airport. The de facto population of West Maui is expected to grow very rapidly during the next 15 years. Because it will reach a level comparable to the present population of the whole island of Kauai, and because West Maui has a very poor connection to the main central Maui airport, there will be a great pressure to expand the Kapalua Airport operations. Unfortunately, the road to the airport is also the Pulelehua "Main Street" with "parallel parking". How will the needs of West Maui to utilize the airport and the desire of Pulelehua to remain "slower and kinder" community be reconciled?

13. The economic data on page 83 are not only exaggerations, but wrong. This is not surprising, since Appendix A, the source of that data, was prepared by two real estate appraisers, rather than economists. They even state that they never visited the site.

They have included a major flaw in their assumptions: they have assumed that the Pulelehua project will be a net addition to Maui's economy. This assumption clearly contradicts the major premise of the whole DEIS, that the people who will occupy Pulelehua will primarily be moving from other parts of Maui. Therefore, the huge additions to Maui's income will NOT take place. Rather, the population and incomes will merely be transferred from one side of the island to West Maui.

Furthermore, there are serious concerns resulting from their exaggerated estimates of the available tax-base which is much needed to support all the additional services that will be required by the residents of the more isolated Pulelehua community: schools, public hospital, state parks, etc. However, there will be only a modest net change in State taxable incomes; primarily it will be only a shift in location. The same is true for the excise taxes.

14. Potentially, the biggest infrastructure limitation may be the inadequate West Maui sewer system, rumored to be operating at only half its rated capacity. I would like to ask that the Final EIS include either a statement by the Maui County Public Works Department declaring unequivocally that there is adequate capacity for both Pulelehua and the other potential users of the West Maui sewerage treatment facility, or that Pulelehua promises to construct its own facility prior to any home occupancy in Pulelehua.

15. The discussion on electricity (P.92) is inadequate. Total KWH consumption is not a critical issue. Rather, the FEIS should contain several components:
- i) a detailed analysis of the ability of Maui Electric Company to have adequate production capability to serve this project, i.e. will additional megawatts have to be installed?
 - ii) analysis of the capability of the overhead power lines to deliver adequate electricity to Pulelehua and other West Maui projects, i.e. will new or bigger lines need to be constructed?
 - iii) the financial effect on Maui's existing electricity ratepayers, i.e. how much will rates rise due to the construction of a new generator, power plant, or overhead power lines?
16. During the past year the Maui County Council passed Bill 84. One of the most significant elements in the bill was the establishment of **urban growth boundaries** within the upcoming General Plan. The rationale for including urban growth boundaries was that developments in isolated and rural areas are more costly for Maui County government and all of the taxpayers.
- Consequently, the final EIS should include the actual costs for Maui County to deliver its services to Pulelehua. For example, by constructing Pulelehua in a more isolated area there will be considerable costs to transport solid waste to the County's single landfill operation. Police service and fire protection also will be stretched to serve this more isolated region.
- Similarly, the additional costs to the State (schools, hospitals) should be included.
17. The construction of **adequate schools** is an extremely important issue. The table on page 106 clearly indicates that the highest need for a new West Maui school facility is not at the elementary level, but at the high school level. Therefore, it is quite surprising to note that Pulelehua's DEIS describes ML&P plan to establish only an elementary school within its community.
- The DEIS points out that there will soon be a private intermediate and high school built in the vicinity of Pulelehua. This new school, Maui Preparatory Academy, will be very expensive for the residents of the area. The initial tuition charge in the fall of 2005 will be \$8,500. It is highly unlikely that any of the residents in the affordable housing will be able to go to Maui Prep Academy; they will have to travel to the VERY over-crowded Lahainaluna High School.
- The FEIS has to address the public high school situation. Who will pay? What is the time frame for available facilities? In fact, Pulelehua should not be able to sell a single house until there are adequate public facilities for elementary, intermediate, and high school age students.

18. Considering the tragic lack of **adequate medical facilities** in West Maui, the DEIS section on medical facilities is a case of "planning mal-practice!" There is no question that emergency and urgent-care facilities are needed in West Maui. Mention of on-going negotiations with Maui Memorial Medical Center is not enough.
- The Final EIS needs to present a complete plan for the establishment of the needed facilities for Pulelehua and the whole West-side. There is no justification to move an additional 2500 people with over 600 children into a region that is over an hour from the hospital.
19. This project is being proposed for prime agricultural land, 253 acres (81% of the total) are **prime agricultural land**. (DEIS, Page 39). The State Constitution is concerned and the State Land Use Commission should be concerned that this valuable resource will be lost forever from the State's prime agricultural lands inventory.
- The DEIS states in numerous places that the acreage taken out of pineapple production is merely 2.5% of ML&P's lands. However, this statistic is very misleading because ML&P is presently involved in actively converting many other extensive acres out of agricultural production. ML&P is now in the process of selling approximately 2,000 acres of agricultural land in the lower part of Kula; they are converting a very large parcel at Kapatua Mauka for luxury homes; in addition, they are in the process of converting potentially hundreds of acres into a new residential community in Haliimaile, Maui. The DEIS should report the total acreage being converted out of agriculture by ML&P. 2.5% is clearly wrong and MOST deceptive. This is a segmentation issue.
- On Page 114, it is stated that other acreage will be better suited for production. Which lands? The lands being sold? If they are better, why aren't they being used now?
20. ML&P is proposing to build houses on the area which was planned as a **50 acre regional park** in the existing West Maui Community Plan. In lieu of the park which was intended to serve the whole region, Pulelehua proposes 90 acres all walking trails and parks throughout the community. The final EIS should calculate the difference in cost between the single large regional Park and Pulelehua's proposal. Specifically, there should be an estimate of the cost to the County of maintaining the many dispersed neighborhood parks.
- Furthermore, there should be a description of the impact on the surrounding region of not having the community planned regional park. What will be lost?
21. The economic data on page 163 is supposed to demonstrate that "the no-action alternative" would be of great loss to Maui. The numbers at the top of that page are wild exaggerations and do not reflect the **NET** effect on Maui.

As stated in # 13 above, this is not surprising, since Appendix A, the source of that data, was prepared by two real estate appraisers, rather than economists. They have included a major flaw in their assumptions: they have assumed that the Pulelehua project will be a net addition to Maui's overall economy. This assumption clearly contradicts the major premise of the whole DEIS, that the people who will occupy Pulelehua will primarily be moving from other parts of Maui. Therefore, the huge additions to Maui's income will NOT take place. Rather, the population and incomes will merely be transferred from one side of the island to West Maui.

Eliminate the errors, and the "no-action alternative" seems appealing!

22. On Page 5 of Kobayashi's DBEDT letter, there are references made to pollutants in the water wells of the region. Clearly explain the nature of these pollutants and their potential effects on the water for Pulelehua and on the neighboring properties. Clarify the reasons why the Pulelehua project believes that its well water is not affected by water from the contaminated wells.

23. With so many working families, ensure facilities for child day-care and for a preschool center. At the other end of the age spectrum, perhaps the County would establish a senior center similar to the Spreckelsville senior center for senior day-care. Both pre-school and senior facilities could be placed in adjacent buildings on one or two of the "community-designated" lots.

24. The DEIS document is full of mitigative measures to solve a variety of problems and concerns. The Final EIS should have a separate distinct section devoted to an explicit list of all the mitigative actions. Thereafter, they will be assumed to be the conditions for the various kinds of approvals that will be needed from the LUC, Planning Commission, etc.

25. In 2002, in response to the original Preliminary EIS Notice, many residents raised concerns about the Pulelehua proposal. Unfortunately, the replies in the DEIS were often inadequate and vague; they occasionally even avoided the issues raised. I expect that the FINAL EIS will contain meaningful responses. Please answer the concerns of the government agencies and private citizens with complete and helpful responses.

Thank you for your attention to my comments, questions, and suggestions. I look forward to your response and the incorporation of my comments into the Final EIS.
 CC: **Approving Agency:** State Land Use Commission PO Box 2359, Honolulu, HI 96804
Consultant: Anthony J.H. Ching (587-3822)
Contact: Tom Schnell (521-5631)
OEQC: Office of Environmental Quality Control: Genevieve Salmonson, Director,
Maui County Planning Department: Michael Foley, Director,
West Maui County Councilmember: Joanne Johnson

West Maui Projects (Under Construction and Proposed) – April, 2005

Project Name	Developer	Units	Afford-able	Percent Affordable	Type	201G Zoning	Start	Comp	Status	Source
TOTAL		15,956	1,868							
1 Honolua Ridge	ML&P	49	0		sg/sale luxury				Pending	2
2 Kapaha Maui	ML&P	69	0		sg/sale luxury				Pending	2
3 Napili Kihune		10	0						Pending	2
4 Napili Res.		10	0						Pending	2
5 Poa Kahana		32	0						Pending	2
6 Phase 1	ML&P	896	456		Multi-apartment sale/cond	201G Ag	2005		EIS being drafted	1
Pulelehua ohana	ML&P	323 ?	?			201G Ag	2005		EIS being drafted	1
7 Pulelehua 2,3	ML&P					Ag				2
8 Villas at Kahana	Besilli	117	117		multirate	Ag	2004		Under construction	1
9 Kapua Village		45	45		sg/sale	R-1	2002		Nearly complete	1
10 Project	DHHL	1,100-1,400	?			Ag			After Lealit?	1,2
11 Maui Breakers #1	West Maui Condos	90	52		multirate	Ag	2004		2005 Awaiting SMA	1
12 Kaunapali 2020	Kaunapali Dmv Corp.	2,810-5,552	4181		Multi-apartment sale/cond	Ag	2007			1,2
13 Innwest		700	0		Hotelmeshare? lookfor units					2
14 Starwood		516	0		Hotelmeshare? lookfor units					2
15 North Beach Lot 3		0-500	0		Hotelmeshare?					2,3
16 Byatt		326	0		Hotelmeshare?					2
17 Marriott		?	?		Hotelmeshare?				Pending	2
18 Sunstone		5	0						Pending	2
19 Lanitaha Phase 1		132	0						Finalizing land	2
20 MAIB	DHHL	104	104		sg/sale	201E Ag	2005		2006	1
21 Lealit Maui		4,700 ?	?							1,3
22 Hala Mahalo	DHHL	5	0						construction	2
23 Lohani Kihua	Lohani Pacific	12	12		sg/sale	R-1	2004		2005 construction	1
28 W. Maui Resource	Conc.	120	120		Multi-ssl rent/sale					
27 WMA Resource Ctr	Conc.	26	26		Emergency long-term	201G Ag	2004		2004 Complete	1
28 Lanitapoko Makia		295	0		Emergency long-term	201G Ag	2004		2004 Bld	1
TOTAL			1,868							
WEST MAUI			1,868							
Planned Units		15,956								
existing units.										
(2.1 unit) Population.		44,677								
units) existing cars.		31,912								
in 2002.										

Source: <http://www.maui-land.com/newsroom/05/05/05/05.html>



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June 27, 2005

Professor (Emeritus) Dick Mayer
1111 Lower Kimo Drive
Kula, Hawaii 96790

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Professor Mayer:

Thank you for your letter on the Pulelehua Draft Environmental Impact Statement (EIS) dated May 6, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to these concerns.

1. a) As discussed in Section 2.5 (No Future Phases) of the Draft EIS, at this time, MLP has no plans to engineer or construct any future phases of Pulelehua, mauka of the Kapalua West Maui Airport.

As explained in the same section, in an effort to evaluate all options and gauge community support, MLP included the entire portion of land around the Kapalua West Maui Airport for discussion at the March 2004 Pulelehua Planning charrette. During the course of the charrette, many individuals did voice support for a large multi-phase project that would address the demand for affordable, gap, and market priced homes on the west side of Maui. However, as research was conducted and planning for Pulelehua evolved, MLP decided to develop Pulelehua as a single-phase project on the 312-acre site below the airport.

b) Kapalua Mauka is a separate project from Pulelehua. Planning for Kapalua Mauka started many years ago. The Kapalua Mauka Final Environmental Impact Statement (EIS) (PBR Hawaii, 2002) addressed impacts related to Kapalua Mauka and related cumulative impacts known at the time the EIS was prepared. All major issues including infrastructure demands, affordable housing requirements, and other requirements, have been addressed through the environmental impact statement process, the Maui Planning Commission hearings and approval, and the Land Use Commission hearings and Decision and Order (Docket Number A03-741, June 29, 2004) reclassifying the land to the appropriate state land use districts. The Maui County Council will provide further review when it considers the County land use entitlement applications for Kapalua Mauka.

A condition of the State Land Use District Boundary Amendment for Kapalua Mauka is for 125 affordable homes to be provided as part of Pulelehua. At the time of the LUC hearing on Kapalua Mauka in May 2004, this was far more affordable housing than was typically required by the LUC, and MLP voluntarily offered and agreed to this condition.

The Residences at Kapalua Bay is also a separate project from Pulelehua. The EIS for the Residences addresses project-related impacts and relative cumulative impacts. The Maui County Council will provide further review when it considers the SMA application for the Residences at Kapalua Bay.

Professor (Emeritus) Dick Mayer
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 2

c) The Draft EIS addresses cumulative impacts (see Section 7.2 (Cumulative and Secondary Impacts)), including a list of 25 proposed West Maui projects (including Pulelehua) (see Table 2 in Section 4.4 (Transportation)), and projects the cumulative number of units in West Maui that may be built by 2011, which is the year Pulelehua is projected to be complete. This methodology projects the impact of Pulelehua during build-out to completion. Thus, in the Draft EIS, the cumulative impact of Pulelehua is considered in relation to other proposed projects. Projecting the impacts of other projects beyond the build out of Pulelehua would be highly theoretical and beyond the scope of the Pulelehua EIS. We chose a realistic timeframe to accurately project impacts of Pulelehua in context of other proposed projects. We find it highly unlikely that all proposed projects will be approved or, if approved, be built as currently conceived.

Without knowing final plans of other projects and without knowing if these projects will be approved, it is not possible to comprehensively detail all impacts from other projects. We agree that additional projects in West Maui will increase demands for resources and impact infrastructure; however, as we have done with Pulelehua, these other projects will have to plan accordingly to ensure impacts are minimized. As with Pulelehua, other proposed projects will be subject to regulatory review to ensure compliance with applicable land use policies. Projects must have the appropriate State land use designation, the appropriate County zoning, and comply with other applicable regulatory review and approval procedures to ensure the project will not have major adverse effects on infrastructure, public services, and the natural or socio-economic environment, or result in adverse cumulative and secondary impacts. Developers of other projects in the region will be required to satisfactorily mitigate impacts of their projects before proceeding with development.

In considering if an EIS is acceptable, the Hawaii Supreme Court has determined that the "rule of reason" shall apply; meaning that an EIS need not be exhaustive to the point of discussing all possible details bearing on a proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable a decision-maker to fully consider the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.

d) See above response. The EIS is not required to consider the effects of Pulelehua upon the entire island of Maui. This is not realistic and is not consistent with the "rule of reason."

2. West Maui Community Plan

The 1996 West Maui Community Plan Land Use Map provides for a park and agricultural uses on the Pulelehua site; however the West Maui Community Plan consists of more than just a land use map. It also contains many pages of goals, objectives, and policies. Section 5.2.2 (West Maui Community Plan) of the Draft EIS includes discussion of how Pulelehua implements many of these goals, objectives, and policies. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua.

The West Maui Community Plan did not anticipate the shortage of housing opportunities in this region. While adopted by the County Council in 1996, the process of updating the West Maui Community Plan started in 1992. Changes in the West Maui region since then, such as the closure of the Pioneer Mill and the exponential increase in housing costs, necessitate a new revision to the plan. However, the County of Maui is just now starting on updating the

General Plan, to be followed by updates of the nine community plan regions. The process will take years, meanwhile, West Maui's population is increasing and housing prices continue to escalate.

Regarding the proposed Mahinahina regional park, the Draft EIS addresses this issue in Section 5.2.2 (West Maui Community Plan):

Regarding the proposed Mahinahina regional park on approximately 50 acres within the Pulelehua site, as planned, Pulelehua will provide nearly twice as much park space in the form of neighborhood parks, ball fields, community gardens, and an extensive trail system. Pulelehua's parks will be open to all Maui residents. In addition, Maui Land & Pineapple Company, Inc., will build all Pulelehua parks. If the County were to develop the regional park as designated on the Community Plan, the County would have to acquire the land and build and maintain all facilities. It is unknown when the County would develop the regional park.

In addition, in the time since the park was designated on the community plan, the County has never approached MLP to acquire the land.

Neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing a neighborhood park in a residential area allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ballfield within three blocks of any home. In total there will be 30 acres of parks and 77 acres of open space in Pulelehua all of which will be open to the public. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

Section 4.11.4 (Recreational Facilities) and Section 5.2.25 (West Maui Community Plan) will be revised to include these points as attached in Appendix 1.

3. As evidenced by the number of people who are interested in becoming a resident in the Pulelehua community, over 2,700 individuals have registered with MLP. The need for housing in West Maui is immediate.

While other proposed West Maui projects such as Kaanapali 2020 also propose affordable housing, for various reasons, these projects are still several years away from providing any homes to meet the housing needs of West Maui. There is clearly more demand for affordable housing in West Maui than Pulelehua will provide. It seems unfair to make families wait for affordable housing because some plans move more slowly than others in the approval process.

According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. In addition, marketing studies commissioned by MLP indicate that over 1,500 families are looking for affordable housing. Long-range forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. Based on these projections, it is clear that reasonably priced homes in West Maui are in severe under supply.

We agree that additional projects in West Maui will increase demands for resources and impact infrastructure; however, as we have done with Pulelehua, these other projects will have to plan accordingly to ensure impacts are minimized. As with Pulelehua, other proposed projects will be subject to regulatory review to ensure compliance with applicable land use policies. Projects must have the appropriate State land use designation, the appropriate County zoning, and comply with other applicable regulatory review and approval procedures to ensure the project will not have major adverse effects on infrastructure, public services, and the natural or socio-economic environment, or result in adverse cumulative and secondary impacts. Developers of other projects in the region will be required to satisfactorily mitigate impacts of their projects before proceeding with development.

4. To clarify Pulelehua's affordable housing provisions, Section 2.6.6 (Affordability) in the Final EIS (Section 2.6.4 in the Draft EIS), will be revised as shown on Attachment 2.

5. The population projections cited in the Draft EIS are from a report titled: *Maui Community Plan Update Program: Socio-Economic Forecast, Phase I Report* (SMS, 2002). This report was commissioned by the County of Maui and calculated by SMS Research, a reputable social research firm. The report stated that the population of West Maui is projected to increase from 19,779 people in 2005 to 25,431 people in 2020, a 28.5 percent increase.

Pulelehua is designed to incorporate retail and other business uses to serve the Pulelehua community. As stated in Section 4.8.3 (Neighborhood Commercial Uses) of the Draft EIS, Pulelehua "will be a complete community with neighborhood shops, restaurants, offices, and other businesses serving residents." MLP views these neighborhood businesses as essential to create a vibrant community with many services and amenities within walking distance. This, in turn, will allow many residents to have a portion of their daily needs provided for within Pulelehua, thus reducing trips onto Honoapiʻilani Highway (Highway 30).

With safeguards in place favoring local residents, many Pulelehua residents are likely to be current renters, first-time homebuyers, or persons living in shared housing situations. Many Pulelehua buyers will be relocating and moving their household income and spending from one area to another. However, their movement, typically a step up in the home market, creates an opening for a new household to be formed and stabilized, with their new income and spending. Therefore, a household relocation spurs economic growth on the island even if it is not fully directed to West Maui. With projected increased population in other parts of Maui, any migration of residents from other areas of the island will allow for additional housing opportunities for others.

Projecting the impacts on "all of Maui's businesses" is beyond the scope of the Pulelehua EIS and is not consistent with the "rule of reason."

6. In response to your concern about the potential impacts of chemicals used on the former pineapple fields of the Pulelehua site, Section 3.5 (Identification of Chemicals and Fertilizers) of the Final EIS will be revised to include the following:

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine possible impact to human habitation of the property due to potential

low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and/or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

7. The TIAR analyzed a 10-mile portion of Honoapiilani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launipolo. While the TIAR does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiilani Highway through the Shaw Street intersection and beyond. Thus, if it is assumed that none of these cars turn off the highway between Shaw Street and Ma'alaea, 49 cars from Pulelehua will travel on Honoapiilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapiilani Highway will cross the Shaw Street intersection during the AM peak. Thus, if it is assumed that these cars did not enter Honoapiilani Highway from some points between Shaw Street and Maalea, 52 cars will travel on Honoapiilani Highway from Ma'alaea or other parts of Maui.

Using the same assumptions, in the PM peak, 42 cars from Pulelehua will travel on Honoapiilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Ma'alaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali		
	AM Peak	PM Peak
From Pulelehua (southbound) To Pulelehua (northbound)	49 52	42 113

Construction traffic impacts during construction are assumed to be less than full built-out at Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the AM or PM peaks. Although daily construction traffic is somewhat active, neither the daily or peak hour construction traffic exceeds the total built-out traffic forecast after Pulelehua completion.

In response to the additional traffic on emergency response times, during the peak PM hour, the travel time impact of Pulelehua is estimated to be approximately 10 seconds through the Kaanapali/Kahana area and an additional 14 seconds through Lahaina, for a total of 24 seconds. This estimate is for "normal" vehicle traffic. Emergency vehicles require that motorist pull to the side to allow passage; therefore, the response times should not be materially affected.

Solid waste shipments and construction deliveries typically are not made during peak AM and PM periods. It is very unlikely that the small numbers of trips Pulelehua will contribute to the Pali during non-peak periods would impact traffic.

In response to your relevant comments, and the comments of others, regarding traffic, the Transportation section in the Final EIS (Section 4.4) will be revised as shown in Attachment 3 to this letter.

8. Regarding the topography of the Pulelehua site for walking and bicycling, elevation was carefully considered in the design of Pulelehua. While the Pulelehua site does contain slopes of approximately eight percent in some areas, an eight percent slope is walkable for most pedestrians. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

In response to your comments regarding biking and walking, and the comments of others, the Transportation section in the Final EIS (Section 4.4) will be revised as shown in Attachment 3 to this letter.

9. The current layout for Pulelehua provides many options for reaching the elementary school. Provisions have been included in the master plan to allow for a loop road around the elementary school. This will allow for drop offs and pickups to be accomplished in one direction.

There are alternate entrances to Pulelehua other than Akahahele Street. In addition, there is a secondary road that runs just mauka and parallel to Honoapiilani Highway. This road would allow entrance to Pulelehua by way of Akahahele Street but provide for an alternate route to the elementary school.

10. Maui Land & Pineapple Company, Inc., will restrict affordable home sales in Pulelehua to Hawai'i residents to the extent legally permissible. As previously stated in response 4, to clarify Pulelehua's affordable housing provisions, Section 2.6.6 (Affordability) in the Final EIS (Section 2.6.4 in the Draft EIS), will be revised as shown on Attachment 2.

11. According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. Furthermore, approximately 2,700 individuals and families have registered with MLP as being interested in a home in Pulelehua. Pulelehua will provide 450 affordable homes.

MLP has no concerns about the absorption of the affordable, gap or market rate homes once offered to the public. Furthermore, the Market Assessment Report attached to the Draft EIS substantiates Pulelehua's market share.

12. As discussed in Section 4.10 of the Draft EIS, there are significant restrictions on the expansion of the Kapalua West Maui Airport, such as conditions imposed by the County Council and gulches on each end of the runway. In addition the Department of

Transportation does not forecast a large increase in operations at the airport. In fact, the operations are estimated to increase approximately nine percent over the next 15 years. With current operations at 12.5 flights per day, the estimated increase amounts to 14 flights over the next 15 years. This does not represent a significant traffic issue. Moreover, Pulelehua's internal roads offer many alternatives to using Akahahele Street ("Main Street").

13. MLP respectfully disagrees that our economic data is "wrong." The consultants are reputable experts in their field specializing in applications for proposed developments, a limited area that is well outside the scope of expertise for the vast majority standard economists. To further clarify, an appraiser is by definition a real estate economist. Also, the consultant did visit the site (see Appendix A of the Draft EIS).

Many Pulelehua buyers will be relocating from elsewhere on the island and moving their household income and spending from one area to another. However, their movement, typically a step up in the home market, creates an opening for a new household to be formed and stabilized, with their new income and spending. Therefore, a household relocation spurs economic growth on the island even if it is not fully directed to West Maui.

Further, a large number of Pulelehua buyers will be "new" households such as first time buyers and dispersion of multi-generational households. These households represent base economic expansion with "new" income and spending. Also, upwards of three-quarters of the businesses in the mixed-use areas of Pulelehua will be new or expansions, with only limited numbers of relocations.

Section 4.85 (Social-Economic Impacts) of the Draft EIS discusses economic impacts relative to Pulelehua (also see the market study and economic impact analysis in Appendix A of the Draft EIS).

14. As stated in Section 4.9.4 (Wastewater Systems) in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete. As also stated in the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design.

In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant and it is not possible to prepare a detailed sewer impact study for Pulelehua at this time. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

We are aware that the County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued. In the Final EIS, Section 4.9.4 (Wastewater System) will include the following:

The County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued.

15. MLP is in receipt of two letters from MECO concerning the Pulelehua EIS. A letter dated August 23, 2004 and a letter dated April 15, 2005, both fail to raise power generation as a concern. In discussions with MECO, MLP has been informed that adequate power generation capacity exists to support Pulelehua. Further, existing power transmission lines are also in place to handle the load.

As stated in the Draft EIS, Section 4.9.5 (Electrical Service), the substation which is mauka of Pulelehua will most likely provide electricity for Pulelehua. This facility may need to be upgraded with additional or larger equipment and new circuits to feed the site. MLP agrees to pay its fair share contribution to upgrading the existing facilities and/or installing new facilities required to serve Pulelehua.

16. We agree that developments in isolated and rural areas are more costly for Maui County, this is why MLP chose to locate Pulelehua next to existing urban areas (the area mauka of Honoapiilani Highway, as well as Kahana Ridge and the Kapalua West Maui Airport, are all within the State Urban district) and near existing infrastructure facilities. In terms of infrastructure, Pulelehua is located in a region with a usable aquifer, a nearby wastewater treatment plant (approximately 3,000 feet away), a surface water treatment plan (mauka of Pulelehua), an existing electrical substation, an airport, Honoapiilani Highway, and the end of the proposed Lahaina bypass highway.

In response to your request an analysis of the projected revenues that would be generated and expenditures that would be incurred by the State and County governments relative to Pulelehua, MLP commissioned an economic analysis and cost/benefit study. The complete study will be included as an appendix to the Final EIS. In addition, the Final EIS will include a new section summarizing the study as shown in Attachment 4 of this letter.

17. In response to your comment regarding the school construction, in the Final EIS, Section 4.11.3 will be revised to include the following:

Plans for Pulelehua include a 13-acre site for a public elementary school. Maui Land & Pineapple Company, Inc., will contribute the 13-acre school site as a portion of their standard fair-share school impact fee. Maui Land & Pineapple Company Inc. plans to develop Pulelehua in one phase and will keep the DOE informed regarding the progress of Pulelehua.

It should be noted that the State has appropriated funds for the preliminary design of the elementary school. In their comment letter on the Draft EIS the Department of Education (DOE) stated: "The DOE acknowledges the need for additional school facilities within the West Maui area and finds the Pulelehua site acceptable for an elementary school."

Of the individuals that have registered with MLP as interested in living in Pulelehua and provided information regarding whether they have children, 67 percent (1,788) have children living at home. Fifty percent (894) of these individuals have children that are elementary age or younger. In addition, 10 percent (267) of the individuals and families registered are between the ages of 20 and 40, but do not currently have children.

The DOE concludes that an elementary school within Pulelehua could accommodate all elementary students living in Pulelehua. To mitigate the impact of Pulelehua on Lahaina

As previously stated in response 2, we believe that neighborhood parks offer a viable alternative to one large regional park. The Final EIS Section 4.11.4 (Recreational Facilities) and Section 5.2.2 (West Maui Community Plan) will be revised to include these points as shown in Attachment 1 of this letter.

21. See response to 13 above.

22. In response to your concern about the potential impacts of pollutants in the water wells, Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

23. We agree with your comment on day care and adult care facilities. Day care and senior's facilities will be encouraged in Pulelehua. MLP has had and will continue to have discussions with organizations that provide such facilities.

24. The EIS Rules (Chapter 200, Hawaii Administrative Rules) specify an EIS must contain mitigative measures, but do not mandate the format for including these measures. For ease of reading we prefer to include mitigative measures directly after the existing conditions, to provide a direct comparison.

25. MLP received several comment letters to the EIS Preparation Notice. Each letter received a reply. While not all of the questions posed could be completely answered at the time because all technical studies and other information was not complete, MLP provided information available at the time.

During the time between the EIS Preparation Notice and the Draft EIS, MLP diligently worked with State, Federal and County agencies to examine open issues.

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. We hope these responses help you see the merits of Pulelehua and recognize that MLP has put forth a well thought out community.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Intermediate School and Lahainaluna High School, the DOE requests that the State and County impose a standard school fair-share condition.

Regarding your comments on Lahaina area school enrollments, capacities, and enrollment projections, Section 4.11.3 (Schools) of the Final EIS will be revised as shown in Attachment 5 of this letter.

18. As stated in Section 4.11.5 (Health Care Services) of the Draft EIS, MLP recognizes the need for adequate medical facilities. This is exactly why MLP offered to provide lands within Pulelehua for a medical facility.

There is an ongoing needs analysis that is being conducted by Maui Memorial Hospital to identify the medical services needed in West Maui. MLP will continue to support the concept of a west side medical facility regardless of its final location or make up of services.

19. As indicated in Section 3.3 (Soils) of the Draft EIS, "prime" agricultural land is a term from the State of Hawaii Department of Agriculture's *Agricultural Lands of Importance to the State of Hawaii* (ALISH) system, which classifies nearly all land in the state into categories of "Prime," "Unique," and "Other." Under the ALISH system, the definition of "Prime" agricultural land takes into consideration "modern farming methods ... including water management" (i.e., irrigation) in determining the classification. U.S. Department of Agriculture's *Soil Conservation Service Soil Survey* also considers irrigation and other factors in rating the agricultural suitability of land. Without irrigation and other agricultural management techniques (such as the application of fertilizers) many soils have severe limitations in regard to crops and productively and would not be classified "Prime." Historical use of the lands (i.e., plantation agriculture) at the time of the surveys (1970s) was also a factor in the classifications.

Section 3.4 (Agricultural Impacts) of the Draft EIS states that: "creation of Pulelehua will require that approximately 150 acres of land currently in pineapple cultivation be withdrawn from agriculture use. This amounts to 2.5 percent of the approximately 5,800 acres currently in pineapple cultivation." The Kapalua Mauka parcel that your letter cites as "being converted out of agriculture" is not in pineapple cultivation, thus, not included in the 5,800 acres cited above.

The Haliimaile area is in pineapple cultivation. The Kula parcel for sale, at this time, is approximately 1,800 acres, with approximately 200 acres in active pineapple cultivation. Section 3.4 (Agricultural Impacts) of the Draft EIS details MLP's long term commitment to agriculture. Maui Pineapple Company is reviewing current agricultural fields and identifying the fields that are most productive to farm pineapple. The Kula parcel has been identified as less productive pineapple field relative to current fields.

20. Pulelehua will provide numerous parks, trails, gulches, and open spaces within Pulelehua. All these areas will be open to the public. With the exception of approximately 10 acres of parks which will be donated to the County, the balance of these areas will remain privately owned and maintained. This represents a significant savings to the County. Additionally, during the time since the park was designated on the community plan, the County has never approached MLP to acquire the land.

Professor (Emeritus) Dick Mayer
Subject: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT
June 27, 2005
Page 11

Attachment 1

In the Final EIS, Section 4.11.4 (Recreational Facilities) will be revised to include the following:

Pulelehua's neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

In the Final EIS, Section 5.2.2 (West Maui Community Plan) will be revised to include the following statement:

Pulelehua's neighborhood parks offer a viable alternative to one large regional park. Providing one large regional park would require a majority of park users to drive to the park. On the other hand, providing neighborhood parks in residential areas allows users to walk or bike to the park. Pulelehua will have a neighborhood park or ball field within three blocks of any home. In total, there will be 27 acres of parks and 77 acres of open space in Pulelehua all of which will be open to the public. Because of the close proximity of Pulelehua's parks to homes, both the young and the elderly will have better access to the neighborhood parks as they will not need to depend on someone else to drive them to a park in Pulelehua.

cc: Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Ms. Ann T Cua, County of Maui Planning Department
Mr. Bob McNair, Maui Land & Pineapple Company, Inc.

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Attachment 2

In the Final EIS Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised as follows:

2.6.6 ~~2.6.4~~ Affordability

~~Pulelehua will emphasize "affordable housing with dignity" an integrated affordable housing approach by providing a range of affordable homes integrated with market priced homes into complete neighborhoods housing types throughout the community. Affordable homes will not be segregated into fringe neighborhoods or placed in the least desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low-moderate and gap-group income Maui residents.~~

~~Pulelehua will provide housing to families earning between 50 and 140 percent of the median-family income on Maui. As of February 2004 2005, this figure is \$60,700 \$62,350 based on the HUD guidelines for the County of Maui. Based on this February 2005 figure, a family of four earning between \$30,350 \$33,950 and \$84,980 \$87,290 would qualify for affordable housing.~~

~~Based on the 2004 2005 HUD guidelines and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than \$187,400 \$193,500 if a family earned 50 to 80 percent of the median-family income. If a family earned 81 percent to 100 percent of the median-family income, the price would be set no higher than \$238,000 \$245,600 and prices would top out at \$349,200 \$359,800 if a family earned 100 percent to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.~~

~~Current breakdown for the 51 percent of Pulelehua's affordable housing is shown below:~~

Percentage of Units	Percentage of HUD Median-family Income
10	50 to 80
21	81 to 100
20	101 to 140

~~To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy-back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.~~

~~There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000. (Realtors Association of Maui, 2005).~~

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

<u>Lottery Pool</u>	<u>Preference</u>
<u>A</u>	<u>MLP Employees and subsidiaries</u>
<u>B</u>	<u>Kapalua Nui Partners</u>
<u>C</u>	<u>West Maui residents who are police officers, public school teachers, and firefighters</u>
<u>D</u>	<u>Maui residents who work in West Maui, but do not live in West Maui</u>
<u>E</u>	<u>West Maui residents</u>

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold a affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.

Attachment 3

In response relevant comments regarding traffic, the Transportation section in the Final EIS (Section 4.4) will be revised to include the following:

Traffic Impact South of Lahaina. The transportation report analyzed a 10 mile portion of Honoapiʻilani Highway from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launiopolo. While the transportation report does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapiʻilani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak, approximately 49 cars from Pulelehua (southbound) will travel on Honoapiʻilani Highway through the Shaw Street intersection and beyond. Thus if it is assumed that none of these cars turn off the highway between Shaw Street and Maʻalaea, 49 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapiʻilani Highway will cross the Shaw Street intersection during the AM peak. Thus if it is assumed that these cars did not enter Honoapiʻilani Highway from some points between Shaw Street and Maalea, 52 cars will travel on Honoapiʻilani Highway from Maʻalaea or other parts of Maui.

Using the same assumptions, in the PM peak, 42 cars from Pulelehua will travel on Honoapiʻilani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Maʻalaea or other parts of Maui.

This information is summarized below in table format:

Estimated Trips To/From Pulelehua Traversing the Pali		
	AM Peak	PM Peak
From Pulelehua (southbound)	49	42
To Pulelehua (northbound)	52	113

Level of Service Concept. The Level of Service (LOS) traffic engineering concept is explained on page 2 of the transportation report included in the Draft EIS. As explained, there is a common misconception that LOS designations are like school grades, in which D is worse than C, C is worse than B, and A is best of all. In urban areas a LOS of D is typically considered acceptable for peak conditions. This is because roads are very expensive to build, and once built, they must be heavily used to help justify the cost of construction. A road that operates at LOS A at all times is a road that has been over-built for local traffic conditions. Even during peak traffic hours, a road at LOS A carries only a fraction of its vehicle capacity, which is a highly inefficient use of scarce transportation funding. Comparatively, a road that operates at LOS C or D, carries many trips for its size and represents a more efficient use of transportation funding. At LOS C or D, the road will be congested during peak travel times, but will also carry a measurable amount of traffic during off-peak times as well. Such roads represent a better fit between the desire to travel freely on the

road and the expense of building new roads. For this reason, many communities adopt LOS D as their standard LOS for roads and streets.

Comparison of the 2011 "with Pulelehua" scenario with the 2011 "without Pulelehua" scenario shows that the majority of intersections will operate at the same LOS with or without Pulelehua. In other words, considering all the other projected projects taken into account in the TRANSPORTATION REPORT, Pulelehua will not substantially change the LOS at most intersections. Table 19 on page 52 in the transportation report is an example of this, showing the same LOS at intersections with or without Pulelehua.

Traffic Counts. Traffic counts taken for Pulelehua were compared with counts taken and traditional peak periods for other traffic impact studies in the area and with State Department of Transportation (DOT) data. The volumes were comparable. While it is possible that tourism was affected by the invasion of Iraq, this usual factor was not considered in the traffic counts. However based on comparison with other counts taken and traditional peak periods traffic impact studies and DOT data, the Pulelehua traffic volumes were comparable.

Trip Generation Rates. Trip generation was performed using ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country. Based on the professionally acceptable trip generation procedure, 986 vehicle trips are generated during the PM peak hour and 745 vehicle trips during the AM peak hour are reasonable trip generation estimates.

Given the walkable design of Pulelehua, the ITE rates probably overestimate the external automobile trip generation, so using these rates represents a very conservative trip generation estimate.

Commercial and School Traffic. Traffic projections of the transportation report include projections of traffic generated from Pulelehua's school and neighborhood commercial uses. Trip generation rates used to project future conditions are ITE (Institute of Transportation Engineers) trip generation rates. These are standard rates used by traffic engineers throughout the country.

Trip Distribution. Trip distribution percentages were formulated from professional experience and judgment of the Pulelehua traffic engineers. To enhance this knowledge, multiple traffic impact reports for the area were studied to discern detailed distribution patterns.

Effect on Drive Times. It is estimated that a trip through Lahaina during the peak PM hour will take approximately 14 seconds longer if Pulelehua is built. It is estimated that a trip from Lahaina to Kapalua during the peak PM hour will take approximately 24 seconds longer if Pulelehua is built.

Intersections Most Impacted. Because the transportation report considers trip generation as originating and terminating from Pulelehua, the intersections closest to Pulelehua are the most impacted. As traffic is distributed further from Pulelehua, impacts lessen significantly, as not all Pulelehua vehicles travel the entire length of Honoapiʻilani Highway.

Traffic Signals. Traffic volumes projected in the transportation report at the new Pulelehua intersections do not warrant signals. Traffic signals are usually warranted when traffic volumes

reach levels specific established levels. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide.

Less Pulelehua Intersections. The providing fewer Pulelehua connections to Honoapiilani Highway would result in long queuing times at the limited intersections, thus requiring more side street green time at Akahahele Street thereby interrupting smooth traffic flow on Honoapiilani Highway. Multiple access points distribute site-oriented traffic more evenly, resulting in smoother flowing traffic conditions. In addition, multiple connections provide for multiple routes for reaching destinations within Pulelehua and the Kapalua West Maui Airport, thereby reducing unnecessary traffic circulation on Honoapiilani Highway.

Public Safety. The posted speed limit on Honoapiilani Highway in the vicinity of Pulelehua is 45 miles per hour, but most vehicles exceed this limit. This is partially due to the design of Honoapiilani Highway with wide travel lanes and shoulders. If a road is designed to provide a high level LOS during peak hours, it is very likely people will speed during off-peak hours because the road is too wide based on the non-peak hour traffic loading.

The Pulelehua street intersections with Honoapiilani Highway will be engineered and designed according to all applicable Federal, State and County standards. The new intersections will require acceleration and deceleration lanes, which Maui Land & Pineapple Company Inc., will provide. The new intersections will require proper engineering, which will be conducted at the appropriate time prior to construction.

Construction Vehicle Traffic. Construction traffic vehicle impacts during construction are assumed to be less than full built out at of Pulelehua. Construction traffic, while active during the building phases, usually enters and leaves a project site earlier than either the am or pm peaks. Although daily construction traffic is somewhat active, neither the daily or peak hour construction traffic exceeds the total build-out traffic forecast after Pulelehua completion.

Roundabout. A roundabout is not proposed on Honoapiilani Highway as part of Pulelehua. Previous plans had included a roundabout, however this has been eliminated from the current plan.

Lahaina Bypass. Because the time for the construction of the Lahaina Bypass is uncertain, the TIAR does not does not assume the Lahaina Bypass or the "mini" bypass will be built. This results in conservative estimates of traffic impacts.

Big Box Shopping. Pulelehua's neighborhood businesses are not meant to compete with big box stores in Kahului. While Pulelehua residents are likely to shop at a variety of retailers, providing neighborhood serving businesses within Pulelehua will allow some immediate needs to be met within Pulelehua, thus decreasing a portion of trips onto Honoapiilani Highway. Unlike a conventional subdivision, Pulelehua residents will have the option of not driving for some basic services.

Impact of Topography on Biking and Walking. Elevation was carefully considered in the design of Pulelehua. For transportation purposes, topography is less of a factor in walkability than for bikeability. The distance between locations and the relative attractiveness of the locations, as well as traffic speeds, are more important factors for walkability and can overcome topography. For

bicycling, however, the steepness and length of trip can affect the desirability of making the trip. Pulelehua mitigates this condition by providing short blocks to prevent cyclists from having to make prolonged climbs.

Pulelehua streets are designed to run along the contour lines as much as possible, and streets that run up and down (mauka and makai of) the contour lines are relatively short. Within trip lengths will be short and walking will not be adversely affected. While a few bicyclists/pedestrians might choose to zigzag up hill to their destination and would benefit from the street grid, most will choose the shortest route, cutting across a slope to reduce the effective grade of the path in a rural or recreational setting. However, when streets are designed to climb a slope, pedestrians generally follow the sidewalk and climb as required. Keeping the blocks short will minimize topographical constraints.

Attachment 4

In the Final EIS, Section 4.8.5 (Economic Impacts) will be revised to include the following:

An economic cost/benefit analysis for the Pulelehua community (Appendix O) provides the following conclusions:

- The County of Maui will receive some \$8 million in real property tax revenues during the first decade of development and use of Pulelehua, and stabilized receipts of \$1.5 million annually thereafter. The revenues would be substantially higher (upwards of 30 percent) were the community entirely market-priced; however, the inclusion of a significant affordable-price housing component will limit the assessment base.
- The State of Hawai'i will receive circa \$64.4 million in income gross excise tax revenues during the first ten years of the community's existence, stabilizing at \$12.7 million per year thereafter. Again, these revenues would be much higher were the community designed as a typical subdivision, exploiting highway frontages for intense commercial uses, maximizing housing densities and minimizing open space allowances.
- If analyzed on an "actual cost" basis, the additional government operations associated with the Pulelehua will total some \$992,000 to the County and \$3.5 million to the State annually at build-out.
- From a "per capita" public costs perspective, the additional government operations associated with Pulelehua after completion will total circa \$5.8 million per year for the County of Maui and \$14.7 million for the State.
- Overall during its first decade of development and existence, the estimated net returns to the State and County governments will be positive from an "actual cost" perspective. On a "per capita cost" basis, the State will have receipts greater than expenses during the first ten years, and the County will have higher expenses than income.
- At stabilized use levels, both the County and State should experience some net "actual" cash flow benefits; the State more so. However, both will have operating losses from a "per capita" viewpoint, which is typical for a local resident-oriented development having significant affordable-priced components.
- Additional direct benefits include the proposed donation of a 13-acre serviced school site, 10 acres of improved parks, and provisions for seven civic/community lots. Community amenities, including parks, pathways and open/nature spaces will be available for the general public.
- The commitment by Maui Land & Pineapple Company Inc., to price 51 percent of the proposed homes to affordable and gap group housing needs, as opposed to market-priced homes, is inferring some \$35.4 million in equity-based benefits directly into the West Maui community via Pulelehua. Additionally, Maui Land & Pineapple Company Inc., will be making a long-term capital commitment to regional housing needs of \$40.6 million through the construction of 125 rental apartments.
- Supplemental regional public benefits from a real estate perspective include protection of highway frontage from large-scale commercial or residential uses; a lower overall housing unit density (2.8 per acre) than typical for a residential development with significant affordable components; and, actualization of a quality, modern, holistic, lifestyle community which will become a standard for future regional urbanization.

ATTACHMENT 5

In the Final EIS, Section 4.11.3 (Schools) will be revised as shown:

4.11.3 Schools

Existing Conditions

Educational facilities in West Maui include four public schools and two private schools. The public schools are: King Kamehameha III Elementary (grades K-5), Princess Nahienaena Elementary (grades K-5), Lahaina Intermediate (grades 6-8), and Lahainaluna High (grades 9-12). The private schools are: Sacred Hearts School (grades K-8) and West Maui Garden Academy.

As of October 2004, the current enrollment at West Maui's public schools was as follows: In their comment letter on the Pulelehua Draft EIS, dated May 17, 2005 (see Section 12) the Department of Education (DOE) provided the following information on the enrollments (for school year 2004-2005) and capacities (for school year 2003-2004) of West Maui public schools:

	Current Enrollment (2004-2005)	Capacity (2003-2004)	Over Capacity (2004-2005)
Kamehameha III Elementary:	698 702	704	-2
Princess Nahienaena Elementary:	664 664	681	-17
Lahaina Intermediate:	637	577 597	40
Lahainaluna High School:	1,038	850 794	244

Kamehameha III Elementary School is the designated public elementary school for students from the area extending from Honokohau Valley to Kā'anapali (which includes the Pulelehua area). All Kamehameha III Elementary School students must be transported to and from school, either by school buses, or by other means such as their parents or car pools. The DOE operates six school buses to transport 254 students to Kamehameha III Elementary School from the Honokohau Valley to Kā'anapali area. Many of these students reside in the area near Pulelehua.

Potential Impacts and Mitigative Measures

Plans for Pulelehua include a 13-acre site for a public elementary school. It is expected that the Pulelehua school will have a significant positive impact on travel on Honoapiʻilani Highway as elementary school children residing north of Kā'anapali, will not have to be transported to the Lahaina area for school. In addition, the public school within Pulelehua will allow Pulelehua school-age children and many of the students in the surrounding area (such as Kahana Ridge and in Māhinahina) to walk to school, further reducing trips on to Honoapiʻilani Highway.

Planning Director Mike Foley has noted that the Pulelehua school will be a good traffic mitigation measure since West Maui Schools have the highest number of parents driving kids to school within the State. In their comment letter on the EISPN, the Police Department stated that "having a school in the vicinity is a must," in reference to the fact that there is currently no school in the Pulelehua area and all students must be driven to Lahaina area schools, including schools serviced by Lahainaluna Road.



Hawaii Chapter
Maui Group
P.O. Box 791180
Paia, HI 96779

SIERRA CLUB
MAUI GROUP



May 6, 2005

RECEIVED

MAY 09 2005

PBR HAWAII

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Maui Land & Pineapple Company, Inc.
1000 Kapulua Drive
Kapalua, Maui, Hawaii 96761

To Whom It May Concern:

On behalf of our more than 800 members on Maui, I want to thank you very much for offering us the opportunity to review the Draft Environmental Impact Statement (DEIS) prepared to accompany the request to the State Land Use Commission for a boundary amendment for the Pulelehua Subdivision by Maui Land & Pineapple Company. In its 30 year history on Maui the Sierra Club has reviewed many projects, and we hope it is fair to say that we have contributed to the improvement of some of those. We also hope that our suggestions for this project will be given serious consideration. Our recommendation is that the project be reduced in size so that its impacts fit the actual needs of the community it is designed to accommodate as well as the resources it draws upon and impacts.

The Pulelehua project, as conceived and presented in the presentations we have reviewed, offers a broad vision of community that addresses more of the needs of Maui's residents than simply the urgent requirement for affordable housing. The proposed plan for Pulelehua is based on an appreciation of community values and accounts for many of the complexities that a well-functioning community must address in accommodating the daily lives and activities of all its residents. We applaud the effort that has gone into much of the plan including the beautiful, affordable, well-designed homes that are energy efficient and set in a "town" able to provide the daily services required by its residents: schools, pedestrian and bicycle access ways, community space, open space, commercial space etc.

This plan is also highly appealing in the context of the desperate need for affordable housing in Maui. However, the project must be considered in light of the larger community in which it is situated - a portion of West Maui with an extensive supply of multi-million dollar homes and resorts that cater to a similar clientele. We are concerned that the primary goal of the project is to meet the quotas for "affordable" housing in this area that have been imposed upon developers

The DOE has indicated that the Pulelehua school site is appropriate and acceptable for an elementary school.

The Market Study and Economic Impact Analysis prepared for the Pulelehua community (Hallstrom 2005) estimates that there will be approximately 623 school-age children residing in Pulelehua. Approximately 411 of these school-age children are likely to attend public institutions based on DOE figures, with about 75 percent (308 children) attending grades Kindergarten to 8th and 25 percent (103) attending high school.

In their comment letter on the Draft EIS, the Department of Education estimated that the total number of students from Pulelehua could be 490: 239 elementary students, 115 middle school students, and 136 high school students. The number of students is dependent on the total number of residential units and the breakdown between single-family and multi-family homes.

The Department of Education also provided the following information regarding the projected enrollments and capacities for the 2009-2010 school year:

	Projected Enrollment (2009-2010)	Over Capacity (2009-2010)	Students
Kamehameha III Elementary:	683	-21	
Princess Nahienaena Elementary:	615	-66	239
Elementary Subtotal:	1,298		115
Lahaina Intermediate:	664	67	172
Lahainaluna High School:	996	172	136

The Department of Education concludes that an elementary school within Pulelehua could accommodate all elementary students residing in Pulelehua and that Pulelehua will impact Lahaina Intermediate and Lahainaluna High by doubling the number of students currently over facility capacity. To mitigate this impact the Department of Education requests the state and Maui County to impose a standard school fair-share condition to offset the impact of Pulelehua on the Lahainaluna schools.

A new private school, Maui Preparatory Academy, will be located in Nāpili and is scheduled to open in the Fall of 2005. Maui Preparatory Academy is anticipated to open with an enrollment of 52 students in grades 6, 7, and 8. In 2007, four classes of pre-Kindergarten will be added. The anticipated enrollment of pre-Kindergarten children is 18 students per classroom. In 2008, an additional primary grade level will be added. By the year 2013, Maui Preparatory Academy will reach its anticipated full enrollment of 540 students in grades pre-Kindergarten through 12.

of a high-end subdivision (Kapalua Mauka) in West Maui rather than truly addressing the needs of average West Maui families.

The conception of this community must also be considered in light of the large number of unaddressed questions underlying this DEIS. With that view, we conclude that the project only superficially addresses community needs rather than being truly "holistic" as it is represented. In fact, if some of our concerns about infrastructure and prior land use are not fully addressed in the completed EIS, this subdivision could well subject residents to unhealthy and unsatisfying living conditions.

In addition to the speed with which this project was planned, we have two general points of concern that are detailed in this letter below. 1) Important information related to water and land resources and impacts remain undisclosed or undisclosed, for example the DEIS overstates sewage capacity and does not list the pesticides that were used when these fields were in production or what it will do to remediate the lands on which they were used. 2) There are underlying studies regarding the adequacy of water and roadway infrastructure and impacts of runoff, all of which are either preliminary, incomplete or misinterpreted. These deficiencies suggest that caution is warranted in embracing the vision projected in this DEIS for this proposed community development, and that the primary goal of the DEIS is to obtain rapid approval for this multi-million dollar project rather than undertaking sincere studies that will improve the project so that, "The residents of Pulelehua will enjoy an increased quality of life."

To determine whether this project is in its primary aim is a sincere effort on behalf of the community or an effort to fast track a profitable venture, the following questions must be asked.

- Is it a good idea to build 822 units immediately adjacent to an airport in an area with very inadequate infrastructure to satisfy a need for 125 affordable units to meet the requirements for building another highly profitable development that has some infrastructure already available and a more desirable setting (free of airport noise)?
- Will Pulelehua really be employee housing? How many ML&P employees actually need housing in this area and what are the specific needs of THOSE EMPLOYEES with respect to housing space and cost?
- Does the inherent conflict of interest associated with an employer providing a community for its employees hinder the opportunity for community members to offer their ideas and concerns freely without worry about the influence it may have on promotion or job security for themselves or family members?
- Is Pulelehua being created through a developer driven process, making good use of to the desperate need for affordable housing, or a community based process focused on serving local residents?
- Is this project being created to offer a real livable community with an authentic sense of place?

- Is the information provided by the applicant and their consultants about infrastructure availability (water, sewers, roads) thorough and complete?
- Is it valid to claim that there will be no impacts to nearshore waters from 500 MGD of storm run off and other urban products?
- Are the potential impacts of toxic chemicals once used on the pineapple fields clearly explained?

For the benefit of all concerned complete and honest answers to these questions are essential to complete the missing, incomplete or unsupported information in this DEIS.

Consistency with Community Plan

The West Maui Community Plan (1996) did not anticipate additional urban growth in this region. In fact all of the land encompassed by this project is designated in the Community Plan as open space including a park, the airport and agricultural lands. As late as mid-2000 ML&P representatives participating in water planning discussions indicated that the proposed project area was to remain in pineapple cultivation and the only development they anticipated was in the area now known as Kapalua Mauka.

One of this project's stated objectives was to propose development in an area that had existing infrastructure. A realistic view of the Pulelehua site certainly does not support that conclusion.

- There is no public water capacity available for the project area.
- The sewage treatment capacity for the project is unallocated in area that is at or near capacity.
- Any capacity demands from this development will compete with other worthwhile projects for the same infrastructure.
- The road capacity in the area is at maximum load and vague assertions in the DEIS that a large number of future residents will work nearby and not need to drive is entirely unsupported.
- The proposal offers bike and walking paths and no other viable alternative longer range transportation options for future residents.

In the West Maui Community Plan the area for this proposed 312 acre project was designated by the community and confirmed by Council vote as Agricultural, Open Space and Park. The community Plan's intent was to protect prime ag land and buffer airport impacts. The DEIS dismisses this characteristic of this prime ag land with inconsistent logic stating that the land is not really "prime" because it is without sufficient water. In truth, this land is like most ag land on Maui. Very little of Maui's prime ag land receives sufficient water from natural rainfall, but it is still productive farming land.

The other rationale offered by the applicant is that these ag lands can be developed, because there are plenty of other ag lands available. This conclusion fails to account for the fact that the

owners of many of these other lands are making exactly the same argument in a rush to urbanize their own holdings. The public is left holding the buck, hoping someone will care enough to actually respect the community planning process.

Planning Process

Pulehaha's stated mission is to create a community with a sense of place. Their 7-day community planning process involved several hundred people for a day or two. This is a very good start, but many of those who participated felt herded towards the developer's objectives rather than a sense of taking part in a truly open and ongoing process. There was little opportunity or forum provided for community members who wanted to ask the hard questions. We wonder whether that will be provided in the future and if community resident concerns will be dismissed or taken to heart. The answers to these questions are the benchmarks of whether a true community planning process has occurred and should be considered seriously by policy makers.

Agricultural Land Use

The section discussing agricultural chemical and fertilizers used in the project area was incomplete. Two chemicals known to be carcinogens, DBCP and EDB, were not discussed at all, even though three Ka'anapali Water Co. wells directly mauka of the project area (Ka'anapali Pumps 4, 5 & 6) all have reported DBCP & EDB contamination according to the state Dept of Health records.

The DEIS does not examine how potentially contaminated soil or water would affect future parks, community playgrounds or community vegetable gardens. Plans for buffer areas between lands continuing to be farmed and the development area are indicated on conceptual maps, but are not discussed. The DEIS informs prospective residents about the "right to farm act" but does not address nuisances like pineapple bugs, pesticide drift, pesticide contaminated dust and agricultural run off.

No plan for soil remediation is discussed in the "cradle to cradle" vision of this new "sustainable traditional community" and is inconsistent with the sustainable image portrayed for this project. The toxic substances that the DEIS lists as being used on the fields in the project area includes:

- **1,3-Dichloropropene**, which is used to kill nematodes. It dissolves in water and can enter groundwater, or be inhaled from spray or dust. Ingestion can cause coughing, nausea, headaches and organ damage. It is also listed as a possible carcinogen.
- **Endosulfan**, which is sprayed on soil, can travel long distances and takes years to break down. Skin exposure to contaminated soils can affect the central nervous system. Severe poisoning results in death.

- **Hydramethlon**, a bait to control fire ants, is noted by the EPA as toxic to fresh water fish.
- **Diazinon**, an organophosphate used for cockroach and ant control (used in small doses to treat pets for fleas), was cancelled for use on golf courses and sod farms by the EPA due to bird die offs nationwide. Humans can process this chemical rapidly but the EPA regards it as a "widespread and continuous hazard" to birds, fresh and salt water fish and bees.
- **Hexazinone**, a herbicide for weed control, is relatively non toxic to humans but stays in soil for up to 6 months and can migrate to ground water.

Marine Environment

The marine studies contracted by the applicant were extremely limited. All the information in the report is based upon marine water quality testing on a single day, April 20, 2004. A benthic community survey was also conducted on a single day (May 5, 2005). It would be beneficial for the applicant to contract for studies that spanned a seasonal range in order to more fully understand the nearshore water environment and the impacts it could face from the proposed development.

The DEIS did not mention if the consultants sought out individuals who regularly practice traditional or customary gathering along the shoreline. Such informants are very knowledgeable and can provide important observations about specific life forms and resources that may not become apparent in a one day survey.

The applicant's Marine Environment survey indicated that considerable degradation of nearshore water quality has occurred in the area mauka of the proposed project due to a variety of factors including muddy runoff from improperly maintained or functioning siltation basins. The DEIS implies that muddy runoff from this area will improve if the present landowner (who has caused persistent non-point source pollution with its past management practices) is permitted to urbanize its agricultural lands.

The original study cited in the marine consultant's report (Solcher & Peterson) attributes 60% of nutrient load in nearshore waters to agricultural activities. The applicant's summary of the consultant's study implied that the remaining 40% of nutrient load is unrelated to golf courses, residential or resort development. This is inconsistent with current thinking about the impacts of developments and golf courses. It is unlikely that converting the project area from agricultural lands to urban use will eliminate the 60% contribution to nearshore water quality degradation made by agricultural activities in the project area. It is more likely that this project will further degrade nearshore waters with organic nutrients from upslope fields, and manmade pollutants from hardened surfaces, unless the siltation and water retention basins planned for the project function flawlessly.

Ironically, the applicant (under previous management) claimed that the gradual degradation of nearshore water quality and coral reefs in the Honolua Bay area could not possibly be linked to poor management practices in the company's extensive pineapple fields upslope.

Before accepting the theory propounded in the DEIS that 'improvements' to ocean water quality will result from replacing farming with a housing development, we urge the reviewers of this application to require the landowner to substantiate this claim by conducting independent peer-reviewed studies of Hawaiian waters.

Archaeological & Cultural Features

Whether or not a large or small population lived in this area during precontact times, it is likely that the area was used for agriculture (mauka) and fishing/gathering (makai). The applicant expresses the desire to create a development with a "sense of place." It would seem that an important first step would be to acknowledge the culture activities that are likely to have preceded agricultural uses for this land by investing in a more complete archaeological reconnaissance and review of the gulches above and below the project area.

West Maui gulches, even though they may not boast perennial streams in our own time, hold the most important remains of Hawaiian culture. If Pulelehua is to establish a sense of place in Hawaii, the applicant should consider a much larger commitment of time and effort to uncovering the area's Hawaiian cultural history rather than assuming that the region's history holds little significance since little information is currently available.

The Ka'anapali 2020 community-based planning process engaged scores of community members and several Amfac staff in exploring the various gulches surrounding the proposed Ka'anapali 2020 project. This exploration unfolded over a year-long period and involved Hawaiians and non-Hawaiians, lineal descendants and new comers, keiki and kupuna. The process has created a vital sense of place in that project area, that can now be directly shared by hundreds. There are also no provisions in this plan for maintaining the viability of the most common cultural activities in the proposed project area - shoreline fishing and gathering.

Drainage

The applicant's consultant estimates that the proposed project will result in an increase of onsite runoff during storms from 333.2 CFS (215 million gallons of water a day) to 878 CFS (567 MGD.) This is a significant flow of water to be handling on site. It isn't clear what impacts site preparation activities (estimated earlier to be spread out over at least one year) will have on runoff.

The applicant is asking the County to rezone this parcel as a "Project District", which gives a great deal of flexibility in site design. The applicant describes laudable intentions to use minimum grading methods, to create natural swales and water detention basins that will capture the substantial runoff the project will create. We urge the regulatory agencies ask hard questions

about drainage issues to ensure that the methods described by the applicant prove practicable and are actually implemented.

It appears that a road is planned to cross at least one gulch that has a reputation for flooding. This is not discussed in detail in the proposal. There is also no mention of who will be responsible for the maintenance required for future drainage "improvements". The DEIS also does not mention existing drainage features in the gulches, which are currently subject to overflow during heavy storms, and how those features will be impacted or addressed by this project.

Water Supply

It is apparent that existing municipal water systems in the project area are unlikely to provide a reliable source of potable water for an additional 2,500 residents. The applicant's consultant refers to a plan to drill wells to supply up to 0.7 MGD of potable water for the future project. This is based upon the assumption, which is not verified with supporting data, that the Honokowai and Honolua aquifer each have a sustainable yield of up to 8 MGD of good quality water. A comprehensive view of both aquifers, their potential water quality and the demands of competing users should be made before either is viewed as a reliable water source for this project.

The Honokowai Aquifer is estimated in the DEIS to have a sustainable yield of 8 MGD. If this were accurate, 7.2 MGD would be the maximum amount available to avoid over pumping. However, it is very unlikely that this is an accurate estimate.

- This figure was based upon **plantation era conditions** when nearly 40 MGD of water from streams in Honolua and Honokohau aquifer were brought into the Honokowai aquifer and used to irrigate crops. That activity stopped when the Pioneer mill was shut down in 1999, but sustainable yield estimates have not been revised.
- Ka'anapali Water Company (KWC) currently has 9 wells in this aquifer (6 for domestic use and 3 for irrigation). These wells generated an average of approximately 3 MGD in 2003 and all have experienced rising chloride levels in recent years. This could be a sign that sustainable yield for Honokowai aquifer is realistically around 4 MGD without the irrigation recharge that existed prior to 1999.
- Three of the 6 KWC wells are contaminated with DBCP & EDB and the water must be treated. All three contaminated wells are located directly upslope of the Pulelehua project area (at 900 ft elevation). Future wells in the project area could also have agricultural contaminants.
- Three additional production wells were drilled by the state in the Honokowai aquifer to serve the Lei'ai'i affordable housing project. Each of these has a projected capacity of

0.7 MGD. The total anticipated use for these three wells is 2.1 MGD, but none are currently being pumped, so their effect on the aquifer is unknown and unaccounted for.

- Ka'anapali 2020 anticipates providing a portion of their project's potable water (5,000 unit build out) from new wells in the Honokowai aquifer. Their needs have been estimated at nearly 4 MGD.

In summary, it is very unlikely that there is sufficient reliable capacity in the Honokowai aquifer to supply the needs of all three proposed projects (Pulelehua, Leialii and Ka'anapali 2020).

The Honolua Aquifer is estimated in the DEIS to have a sustainable yield of 8 MGD. If this estimate is accurate, maximum use would be 7.2 MGD (90%). Honolua's sustainable yield is as yet unproven since the aquifer has no well that has ever been pumped at a rate of more than 0.7 mgd.

- Two of the 5 county wells in the Honolua aquifer (Napili A & Honokua A) are contaminated with DBCP and have been rarely used over the past decade. The other 3 county wells have been pumped at an average rate about 1.5 MGD, but as pumping has increased, chloride levels have risen as high as 200 ppm.
- Although the Honolua aquifer has significant rainfall, there is not a well developed "coastal capstone" formation to prevent underground water from rushing into the sea.
- KWC has 3 private wells in the aquifer that have a combined potential capacity of 3 MGD but a current use of around 0.5 MGD. The company estimates Kapalua Mauka will use another 0.7 to 0.9 MGD of the system's capacity
- The County well in Honolua aquifer nearest to the Pulelehua site (Napili A) is contaminated.

Due to the lack of reliable information regarding ground water characteristics in both the Honokowai and Honolua aquifers, County decision makers and the applicant should research any future well sites thoroughly to insure a reliable supply of good quality water in advance of any project approvals.

Waste Water

The Draft EIS states that the Lahaina wastewater treatment facility has a design capacity of 9 MGD. However, it fails to disclose that the facility consists of two plants, one of which accounts for approximately half the design capacity. This portion of the facility has 30-year old technology that failed to meet EPA standards for nitrogen discharge levels in the 1980s. It was shut down over 10 years ago after a second, newer plant was brought on line.

As stated in the DEIS, wastewater capacity has been allocated to AMFAC (1.38 MGD), HFDC (1.8 MGD) and Kapalua Land Co (0.3 MGD). In its budget request, the Public Works Department has stated that it cannot meet the larger two of these allocations if they are claimed. Public Works is in the process of determining the costs of reactivating the non-functional plant and expanding both plants.

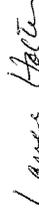
The Public Works Department does not determine if there is actual wastewater capacity sufficient to support a project until the building permits are requested and will not permit occupancy of the units at Pulelehua without sufficient sewer capacity. The final EIS should include this information.

Recommendations

In addition to requiring the applicants to address the shortcomings of this DEIS listed above, the Maui Group of the Sierra Club believes that this project would be much more effective for the community and its impacts more manageable if it were reduced to approximately half the size of what is currently proposed. Furthermore, we recommend a gradual build out of the homes over a 5 year period rather than all at once. This would provide an opportunity for infrastructure to keep pace with growth and to leave infrastructure capacity for other worthy affordable housing projects proposed for West Maui.

We hope these suggestions will be taken to heart by the applicant and reviewing agencies, and that by fully addressing the issues listed above, the resulting Pulelehua project will become a truly holistic model for future projects on Maui.

Sincerely,



Lance Holter
President, Maui Group
Hawaii Chapter of the Sierra Club



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

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June 27, 2005

Mr. Lance Holter, President
Maui Group
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PO Box 791180
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SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Holter:

Thank you for your letter on the Pulelehua Draft Environmental Impact Statement (DEIS) dated May 6, 2005. As the consultant for the applicant, Maui Land & Pineapple Company (MLP), we are responding to your concerns.

We appreciate your commendation on Pulelehua's broad vision of community. We agree that Pulelehua will address the broader needs of Maui's residents rather than simply providing for affordable housing.

The Sierra Club's website on building better communities at <http://www.sierraclub.org/vision/communities.asp> is in harmony with the vision of Pulelehua. The Sierra Club web page on "Livable Communities" provides lists contrasting "cities that work for people" and "development patterns to avoid," as seen here:

Cities that work for people	Development patterns to avoid
People-friendly streets	Segregated uses
A mix of uses in an area	Strip commercial
Provide the benefits of town-like density	Buildings surrounded by parking lots
Build on a human scale	Office parks
Provide public places, civic amenities	Ribbons of development into rural areas

A Sierra Club sponsored article titled "Smart Growth and Affordable Housing: A Partnership for Success" (found also on the Sierra Club website) highlights the principles of Traditional Neighborhood Design (TND) which are the same principles that formed the design of Pulelehua; for example, "mixed use zoning that locates housing near jobs and compact growth to reduce the cost of infrastructure." In addition, the Sierra Club, in a venture with Urban Land Institute and National Multihousing Council, created a PowerPoint presentation (www.smartgrowth.com) to advocate "A Plan for Tomorrow: Creating Stronger and Healthier Communities Today". This powerful presentation ends with the following talking points:

*The future is our choice and it can be a great one if we understand three things:
First, we have tremendous opportunity ahead of us. Second, we don't need to be afraid of, or oppose, higher-density development. Done well, it can provide great economic and environmental benefits. Third, if we want this new vision of an even better community to happen, we have to work together.*

MLP strongly agrees with Sierra Club's mission of building better communities which Pulelehua community represents. In that context, we can truly become partners in creating holistic communities.

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Responses to the concerns in your letter are provided below:

Recommendation to Reduce Pulelehua

As stated in Section 4.8.2 (Housing) of the Draft EIS, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The majority of this demand is for homes affordable to families making between 80 to 140 percent of the County of Maui median income. According to Mayor Arakawa and Ms. Alice Lee, the Director of Housing and Human Concerns, there will be a demand for over 1,800 affordable homes in West Maui by the time construction starts on Pulelehua. MLP's list of over 2,770 individuals and families who are interested in owning a home in Pulelehua and provided income information indicates that approximately 74 percent of these individuals and families would likely qualify for affordable housing. Based on these facts, it is clear that reasonably priced homes in West Maui are in severe under supply.

Kapalua Mauka

Kapalua Mauka is the long-planned expansion of the Kapalua Resort, and as such, resort residential homes are an appropriate use as part of the Resort. Along with Kaanapali, the Kapalua Resort is one of two master-planned destination resorts recognized for the West Maui area. These resorts are important to the West Maui region and Maui in general as major employment centers and economic generators that impact all aspects of the County and State economies.

Kapalua Mauka is a separate project from Pulelehua. Planning for Kapalua Mauka started many years ago. *The Kapalua Mauka Final Environmental Impact Statement (PBR Hawaii, 2002)* addressed impacts related to Kapalua Mauka and related cumulative impacts known at the time the EIS was prepared. All major issues, including infrastructure demands, affordable housing requirements, and other requirements, have been addressed through the environmental impact statement process, the Maui Planning Commission hearings and approval, and the Land Use Commission hearings and Decision and Order (Docket Number A03-741, June 29, 2004) reclassifying the land to the appropriate state land use districts. The Maui County Council will provide further review when it considers the County land use entitlement applications for Kapalua Mauka.

As stated above, a condition of the State Land Use District Boundary Amendment for Kapalua Mauka is for 125 affordable homes to be provided as part of Pulelehua. At the time of the LUC hearing on Kapalua Mauka in May 2004, this was far more affordable housing than was typically required by the LUC, and MLP voluntarily offered and agreed to this condition.

While Pulelehua will contain 125 affordable homes as a condition of the State Land Use District Boundary Amendment for Kapalua Mauka, it is inaccurate to say that Pulelehua is designed to fulfill this condition. MLP will be providing 325 additional affordable homes in Pulelehua and has gone through the time, expense, and care to design a complete community.

Your position that Pulelehua must be considered in light of the larger community in which it is situated—a portion of West Maui with an extensive supply of multi-million homes—is exactly why MLP is proceeding with Pulelehua: in an area where the median home price is near one million dollars, there is a critical need for housing the average family can afford.

It is not unreasonable to believe that MLP wants to fulfill its obligation to provide affordable housing. What is wrong with a major landowner wanting to meet and significantly exceed its obligations for affordable housing? As it seems you understand, Pulelehua will be much more than just an affordable

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housing "project." It will be a real community incorporating many of the principles that the Sierra Club espouses.

Question 1 Various Topics

BUILD 882 HOMES: There is a severe shortage of reasonably priced homes in West Maui. As stated in Section 4.8.2 (Housing) of the Draft EIS, forecasts of housing demand project a need for approximately 3,447 (SMS 2002) to 5,440 (Hallstrom 2005) additional homes in West Maui by 2020. The Mayor and the Director of Housing, Alice Lee, both acknowledge the lack of affordable housing.

INFRASTRUCTURE: Your comments about infrastructure are addressed below under individual headings as outlined in your letter.

"ANOTHER HIGHLY PROFITABLE DEVELOPMENT": See above regarding Kapalua Mauka.

AIRPORT: As detailed in Section 4.10 (Kapalua West Maui Airport) of the Draft EIS, all uses within Pulelehua, including homes, school, and businesses are located in accordance with Federal Aviation Administration (FAA) and State Department of Transportation (DOT) airport noise compatibility guidelines. Even with projected maximum operations at the airport the vast majority of Pulelehua will be below the 55 DNL noise contours, which is the area that is considered "unconditionally acceptable" under both FAA and State DOT airport noise compatibility guidelines.

Question 2 Employee Housing

Because of the large demand for affordable housing, a selection preference will be established, giving priority to MLP employees and others (such as police officers, public school teachers, and firefighters) who work in West Maui. Since a large majority of MLP employees work in West Maui, Pulelehua will provide homes near their jobs. It should be noted that MLP employees are Maui residents, many of whom are seeking an affordable home, just like employees of other businesses on Maui.

SECTION 2.6.6 (AFFORDABILITY) IN THE FINAL EIS (PREVIOUSLY SECTION 2.6.4 OF THE DRAFT EIS) WILL INCLUDE INFORMATION ABOUT PULELEHUA'S AFFORDABLE HOUSING PROGRAM AS SHOWN IN ATTACHMENT 1 OF THIS LETTER.

At this time, MLP has not quantified the amount of MLP employees that want housing or the specific housing needs and cost of interested employees; however, MLP currently employs over 1,400 people, many of whom work at the Honolua Plantation and the Kapalua Resort. Historically, MLP has provided over 500 employee housing lots or homes over the past 30 years. MLP intends to continue this commitment of providing housing opportunities for its employees.

Question 3 Employees / Employer Conflict

As mentioned above, MLP has provided and will continue to provide homes for its employees. It has been our experience that employee/employer relationships and employee/employer housing relationships are kept as separate issues. Furthermore, a trust and home owners' association will manage the Pulelehua community once constructed, thus removing MLP from daily Pulelehua management.

In regard to MLP's policy on "speaking freely," employees have multiple avenues to freely express concerns regarding their employment or other concerns regarding any MLP initiative.

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Question 4 Community Based Process

Both MLP and the Sierra Club have similar goals to build better communities. Both organizations realize it is better to proactively decide where and how to concentrate development rather than allow continued sprawl—the unintended consequence of "doing nothing." To build better communities, MLP decided to open the design process to include all interested parties, as explained in Section 2.4 (The Community Planning Process) of the Draft EIS. Over 600 fellow residents accepted the public invitation to work with MLP on Pulelehua.

Question 5 Livable Community

As described in Section 2.3 (Vision) of the Draft EIS, during the planning workshops for Pulelehua, several planning ideas emerged from the community that match the Sierra Club's Livable Community web page cited above. These became the "First Principles" that guided the work of the design team:

- **A Compact, Sustainable Community**

Create genuine neighborhoods, not just subdivisions. Genuine neighborhoods contain a mix of uses and housing types, accommodating a wide variety of people and activities. A compact community respects the land on which it is placed, protecting and restoring natural amenities within and around the town.

- **Affordable Housing with Dignity**

Provide a variety of affordable housing options, integrated into complete neighborhoods. Include a wide variety of street-oriented, privacy-protecting buildings. Integrate density into the neighborhoods with careful urban design.

- **Mixed Uses for Livability**

Include neighborhood-serving commerce and live/work units, but without any of the typical "strip shopping centers."

- **True Hawaii**

Value traditional Hawaiian architecture, the landscape, the climate, important views, outdoor life, and the principal of *mālama 'āina* - and design with these issues in mind.

- **Connectedness**

Incorporate networks of green space, streets and trails into the neighborhood, allowing multiple types of circulation. Encourage people-to-people contact through the architecture and urban design by creating high quality public buildings and spaces, houses with porches, parks, streets and sidewalks for all to enjoy.

- **Make it Walkable & Bike-able**

The design of the streets and destinations located along them determine how they will be used; make great streets, not just ordinary ones, and people will use them for more than just driving.

Question 6 Infrastructure

Your comments about infrastructure are addressed below under individual headings outlined in your letter.

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Question 7 Nearshore Water

See response below under the Marine Environment heading.

Question 8 Chemicals

In response to your question about the potential impacts of chemicals used on the former pineapple fields of the Pulelehua site, Section 3.5 (Identification of Chemicals and Fertilizers) of the Final EIS will be revised to include the following:

Maui Land & Pineapple Company's application of agricultural chemicals on the Pulelehua site has been in strict compliance with all laws, regulations, and manufacturer's specifications. However, Maui Land & Pineapple Company will conduct appropriate assessment and soils analyses as may be necessary to determine possible impact to human habitation of the property due to potential low level residues of fertilizers, pesticides, fungicides, or herbicides that may be present in the soils of former pineapple fields of the Pulelehua site. Based on the results of the assessment and/or analyses, appropriate actions will be determined and implemented, including remediation, if necessary.

Consistency with Community Plan

We agree that the West Maui Community Plan did not anticipate additional urban growth nor could it anticipate the shortage of housing opportunities in this region. While adopted by the County Council in 1996, the process of updating the West Maui Community Plan started in 1992. Changes in the West Maui region since then, such as the closure of the Pioneer Mill and the exponential increase in housing costs, necessitate a new revision to the plan. However, the County of Maui is just now starting on updating the General Plan, to be followed by updates of the nine community plan regions. The process will take years, meanwhile, West Maui's population is increasing and housing prices continue to escalate.

The 1996 West Maui Community Plan Land Use Map provides for a park and agricultural uses on the Pulelehua site; however, the West Maui Community Plan consists of more than just a land use map. It also contains many pages of goals, objectives, and policies. Section 5.2.2 (West Maui Community Plan) of the Draft EIS includes discussion of how Pulelehua implements many of these goals, objectives, and policies. MLP is seeking a community plan amendment to amend the West Maui Community Plan Land Use Map to include Pulelehua.

MLP acknowledges that communities should take into consideration the impact to existing infrastructure and pay their fair share to increase infrastructure capacity relative to the needs and benefits of the proposed project.

Pulelehua is next to existing urban areas (the area makai of Honoapiilani Highway, as well as Kahana Ridge and the Kapalua West Maui Airport, are all in the State Urban district) and near existing infrastructure facilities. In terms of infrastructure, Pulelehua is located in a region with a usable aquifer, a nearby wastewater treatment plant (approximately 3,000 feet away), a surface water treatment plan (mauka of Pulelehua), an existing electrical substation, an airport, Honoapiilani Highway, and the end of the proposed Lahaina bypass highway.

A detailed discussion on water, sewer, drainage, and roadways will be addressed below. MLP has worked diligently for over a year, and continues to work, with various Federal, State, and County agencies to ensure Pulelehua is planned in context with existing and proposed infrastructure.

Section 3.4 (Agricultural Impacts) of the Draft EIS details MLP's long term commitment to agriculture. Maui Pineapple Company is reviewing current agricultural fields and identifying the fields that are most productive to farm pineapple. Maui Pineapple Company is keeping its best land in pineapple cultivation and exploring new farming techniques that will increase the yields of pineapple.

The "inconsistent logic" you refer to regarding the definition of "prime" agricultural land is from the State of Hawaii Department of Agriculture's *Agricultural Lands of Importance to the State of Hawaii* (ALISH) system, which classifies nearly all land in the state into categories of "Prime," "Unique," and "Other." Under the ALISH system, the definition of "Prime" agricultural land takes into consideration "modern farming methods ... including water management" [i.e., irrigation] in determining the classification. U.S. Department of Agriculture's *Soil Conservation Service Soil Survey* also considers irrigation and other factors in rating the agricultural suitability of land. Without irrigation and other agricultural management techniques (such as the application of fertilizers) many soils have severe limitations in regard to crops and productively and would not be classified "Prime." Historical use of the lands (i.e., plantation agriculture) at the time of the surveys (1970s) was also a factor in the classifications.

Planning Process

Section 2.4 (The Community Planning Process) of the Draft EIS, discusses the steps taken to include the community in the planning of Pulelehua. These steps include the community planning design charrette, the subsequent open public design studio, and mention of several meetings with various agencies and groups open to the public over the past year.

In addition, over the course of the last year, MLP has received a wealth of comments through its web page and registration database. Comments from individuals and public groups have also been received through the EIS public comment period.

After gathering public feedback through the charrette process and meeting with public groups, a draft plan was developed. This plan then went through revisions after meetings with the State and County agencies and departments, such as the Hawaii Department of Transportation, and evaluating input from the MLP registered database. Studies, such as the airport noise and the preliminary engineering report, also caused modifications to the plan.

Meetings with public groups such as Na Kupuna O Maui, MEO Affordable Housing Task Force, West Maui Taxpayers Association, Kapalua Resort Association, and County commissions such as the Cultural Resources Commission and the Urban Design Review Board, have been held and are ongoing. MLP continues to welcome public feedback which will lead to a better plan for Pulelehua.

Agricultural Land Use

In response to your concern about the potential impacts of DBCP and EDB, Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water System) of the Final EIS will be revised to include the following:

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in

Mr. Lance Holter

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June 27, 2005

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Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Maui Land & Pineapple Company Inc., has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

To clarify, the open space areas in Pulelehua will not be cultivated in pineapple. Please see Figure 7 Land Use Map in the Draft EIS, Section 2.6 (Pulelehua Community), Section 4.7 (Visual Resources), and Section 4.9.2 (Drainage) of the Draft EIS discuss Pulelehua's gateway buffer areas.

In Section 3.4 (Agricultural Impact) of the Draft EIS, it is stated that all prospective buyers will be notified of the Hawaii Right to Farm Act (Chapter 165, HRS). The notification will include language regarding information on potential nuisances as outlined in your letter.

Marine Environment

The present scenario off Pulelehua is somewhat unique in that the area is subjected to high rates of terrigenous sedimentation and resuspension of these sediments in the nearshore zone. Our marine consultant agrees that more data from multiple days of sampling could be of some additional value; however, since the purpose of the Marine Assessment was to characterize the present condition of the marine environment, the most important information to be gained was from evaluating the "optimal" end of the environmental range, rather than the most impacted. Evaluating the optimal end provides a better basis to evaluate the extent of a project's impact. Sampling done during severe conditions (even if it can be accomplished without undue risk) is of limited value as the potential impacts from the project would be overwhelmed by natural processes. It is stated on page 5 of the Marine Environment Assessment Report in the Draft EIS that "conditions on the day when fieldwork was carried out (April 20, 2004) consisted of slack winds, virtually no surf and no significant turbidity. Hence, results of surveys depict what can be considered the best, rather than worst environmental conditions that occur in the subject area."

With respect to biotic community structure, field studies are limited to periods of favorable sea conditions in terms of both safety and visibility. In addition, benthos, such as coral, adapt to environmental conditions over long time periods of time making multiple surveys unlikely to produce changes unless a significant destructive event (e.g., hurricane) occurs between sampling. Hence, it is not likely that any of the results and conclusions of the Marine Assessment Report would be different if seasonal surveys had been conducted.

Individuals that practice traditional or customary gathering along the shoreline were sought out and interviewed (see Section 4.2, (Cultural Resources) of the Draft EIS); however, this was done as part of the cultural assessment report (see Appendix G of the Draft EIS). The purpose of the Marine Assessment was not to evaluate or describe cultural practices of the area. Such information was included in the Cultural Impact Assessment in the Draft EIS, which noted "the most significant cultural practice in the vicinity of the Pulelehua community project area is the fishing and sea-gathering practices. While these resources are outside of the project lands, the cultural interviewees feel that any construction activity that occurs on project lands could adversely affect or impact these resources."

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To address this concern, MLP commissioned the Marine Assessment Report. As indicated in 3.6 (Marine Environment and Nearshore Water Quality) of the Draft EIS, "the marine environment assessment concludes that Pulelehua has the potential to improve conditions in the marine environment."

Regarding the original study cited in the marine consultant's report (Solcher & Peterson), to clarify, the remaining 40 percent of nutrient load delivered to the ocean consists of the natural nutrient loading from groundwater discharge. This is indeed inconsistent with current thinking about the impacts of golf courses and residential development. Scientific data from peer-reviewed publications has not corroborated this common misconception. In fact, the data has shown that nutrient subsidies from golf courses and residential areas have resulted in positive changes to nearshore marine communities (ex. Dollar and Grigg 2004, Dollar et al. 1999, Dollar and Atkinson 1992, Dollar and Andrews 1997).

Hence, there is reason to expect in sufficient time, the conversion of agricultural lands to other land uses that do not entail regular periodic tilling of the soil followed by fertilizer usage-will result in elimination of all or a large fraction of the 60 percent of the nutrient subsidies to nearshore waters.

Therefore, based on specific scientific studies we disagree that "this project will further degrade nearshore waters with organic nutrients from upslope fields and manmade pollutants from hardened surfaces, unless the siltation basins planned for the project function flawlessly." First, upslope fields will be replaced so they will no longer be capable of providing erosional materials to the ocean. Second, the major "pollutant" that is presently affecting the marine environment is suspended sediment, and not dissolved nutrients. Hence, hardened surfaces and landscaped surfaces, which eliminate the exposure of erodible soils, will effectively lessen erosion. Similarly, while the retention basins are designed to contain all erodible materials on land, during the most extreme range of natural conditions, it is not beyond doubt that the basins capacity will be exceeded which could result in some flow to the ocean. However, such conditions will be rare, if they occur at all, and clearly will not "further" degrade nearshore waters. Rather, the change in land use, and augmentation of retention capacity will clearly result in a reversal of the past trend, with an improvement over the current degraded conditions.

Archaeological & Cultural Features

MLP respectfully disagrees that both our archeological and cultural studies are inadequate. The consultants are reputable experts in their respective fields and spent considerable amount of time and effort in their studies. In fact, the Pulelehua cultural expert is the same consultant for Kaanapali 2020. The archeological and cultural studies are included in the Draft EIS.

Office of Hawaiian Affairs (OHA) has commended our plans for Pulelehua (OHA's comments will be included in Final EIS) and the Maui County Cultural Resource Commission also reviewed plans for Pulelehua. Both had similar recommendations to: 1) incorporate native plants into Pulelehua landscaping, and 2) cease work and contact appropriate agencies should iwi or Native Hawaiian cultural or traditional deposits be encountered during ground disturbance.

There are no plans in the Draft EIS to protect shoreline fishing and gathering because Pulelehua: 1) is not on the shoreline; 2) will not impact shoreline access; 3) will improve nearshore water quality relative to existing conditions.

MLP intends to create a trust to plan, develop, and administer a community enrichment center focused on cultural and wellness programs for Pulelehua residents. To incorporate this idea in the Final EIS, Section 2.6.6 (Affordability) (section 2.4.4 in the Draft EIS) will be revised as shown in Attachment 1 of this letter.

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Drainage

Stormwater management will be designed and approved during the engineering phase of the subdivision process by various agencies, including the Department of Public Works and Environmental Management. As detailed in Section 4.9.2 (Drainage), "the net result of the drainage improvements will be no increase in runoff from Pulelehua onto downstream properties or in the existing drainage ways, desilting basins, and the ocean."

The storage volume is calculated using a storm hydrograph for a specified intensity and duration, i.e. 100-year, 24-hour storm. The hydrograph is usually a bell-shaped type of curve and the area under the curve is the storage volume required. The calculation in your letter is based on a constant intensity. This is not the basis for runoff calculations.

The north road shown on the south side of Kahanaiki Gulch will be an improvement of the existing dirt and gravel road. Drainage channels and siltation basins will not be used for Pulelehua building sites, as the gulches will remain in open space. There is no development planned to take place in Kahanaiki gulch.

The south road shown in the Mahinahina Gulch will be designed to meet any flood requirements.

Currently, the County of Maui maintains two of the large desilting basins at the Kahanaiki and Mahinahina gulches. Maui Pineapple Company maintains Pohaku-Kaanapali gulch. This situation will continue in the future. In terms of the internal stormwater management, features such as bio-swales will be maintained by the Pulelehua home owners' association.

Water Supply

As previously mentioned, MLP has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honouliua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options.

Honokowai Aquifer & Honouliua Aquifer

The information contained in Section 4.9.3 (Water System) of the Draft EIS regarding the sustainable yield of the Honokowai and Honouliua Aquifers is from the records of the Commission on Water Resource Management (CWRM). In their comments on the Draft EIS, CWRM did not note that the information was incorrect.

However, thank you for providing information on existing conditions that MLP will forward to their water resource consultant to ensure that the sustainable yield and average pumpage is accurately described in the water well source evaluation.

As suggested, MLP will research future well sites thoroughly to ensure a reliable supply of good quality water. As a matter of clarification, the Department of Water Supply does not grant or imply any guarantee of water until an application for water meter has been received and reviewed.

Waste Water

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Regarding your comments regarding wastewater, as stated in Section 4.9.4 (Wastewater Systems) in the Draft EIS, the County of Maui has retained the services of a consultant to do a dynamic study of the capacity of the existing wastewater facilities and the study is not yet complete. As also stated in the Draft EIS, a detailed sewer impact study evaluating the wastewater system requirements for Pulelehua will be prepared and submitted to the County for review as part of Pulelehua's engineering design.

In the absence of the County's study, MLP cannot accurately estimate the existing condition at the wastewater treatment plant and it is not possible to prepare a detailed sewer impact study for Pulelehua at this time. Once the County's study is available, MLP will work with the Wastewater Reclamation Division to determine the available capacity for Pulelehua. MLP has been informed by Public Works that capital projects in 2007 and 2008 will improve capacity in the treatment facility.

We are aware that the County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued. In the Final EIS, Section 4.9.4 (Wastewater System) will include the following:

The County of Maui Department of Public Works requires wastewater contribution calculations before building permits are issued.

Maui Land & Pineapple Company Inc. will pay its fair share for any improvement fees assessed for Pulelehua. In the event the Lahaina Wastewater Reclamation cannot accommodate Pulelehua, Maui Land & Pineapple Company Inc. will evaluate the installation of a packaged sewer treatment plant to address Pulelehua's wastewater treatment demands.

Roadways

The TIAR analyzed a 10-mile portion of Honoapi'iiani Highway, from Office Road in Kapalua to Shaw Street in Lahaina. After Shaw Street in Lahaina there are two un-signalized intersections (Aholo Road and Front Street) and one signalized intersection at Launiopolo. While the TIAR does not specifically analyze the intersections south of Shaw Street, it does provide projections of Pulelehua-generated traffic that will be traveling north or south bound on Honoapi'iiani Highway and through the Shaw Street intersection in the AM and PM peak hours.

In the AM peak, approximately 49 cars from Pulelehua (southbound) will travel on Honoapi'iiani Highway through the Shaw Street intersection and beyond. Thus, if it is assumed that none of these cars turn off the highway between Shaw Street and Ma'alaea, 49 cars from Pulelehua will travel on Honoapi'iiani Highway around the Pali to other parts of Maui.

In the northbound direction (traveling to Pulelehua), approximately 52 Pulelehua-bound cars on Honoapi'iiani Highway will cross the Shaw Street intersection during the AM peak. Thus, if it assumed that these cars did not enter Honoapi'iiani Highway from some points between Shaw Street and Ma'alaea, 52 cars will travel on Honoapi'iiani Highway from Ma'alaea or other parts of Maui.

Using the same assumptions, in the PM peak, 42 cars from Pulelehua will travel on Honoapi'iiani Highway around the Pali to other parts of Maui and 113 cars from other parts of Maui will travel to Pulelehua from Ma'alaea or other parts of Maui.

This information is summarized below in table format:

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Estimated Trips To/From Pulelehua Traversing the Pali

	AM Peak	PM Peak
From Pulelehua (southbound)	49	42
To Pulelehua (northbound)	52	113

Thank you for reviewing the Draft EIS. Your letter will be included in the Final EIS. We hope these responses help you see the merits of Pulelehua and recognize that MLP has put forth a well-designed community.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Associate

Attachment

cc: Mr. Anthony Chung, State Land Use Commission
Mr. Abe Mitsuda, Office of Planning
Ms. Ann T. Cua, County of Maui Planning Department
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.

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Attachment 1

In the Final EIS, Section 2.6.6 (Section 2.6.4 in the Draft EIS) will be revised as follows:

2.6.6 2-6-4 Affordability

Pulelehua will emphasize "affordable housing with dignity" an integrated affordable housing approach by providing a range of affordable homes integrated with market-priced homes into complete neighborhoods housing types throughout the community. Affordable homes will not be segregated into fringe neighborhoods or placed in the least desirable locations of the site. Rather, affordable homes will be integrated with market priced homes throughout the community. At least 51 percent of the homes will be made available for sale or rent to low, low-moderate and gap-group income Maui residents.

Pulelehua will provide housing to families earning between 50 and 140 percent of the median-family income on Maui. As of February 2004 2005, this figure is \$60,700 \$62,350 based on the HUD guidelines for the County of Maui. Based on this February 2005 figure, a family of four earning between \$30,350 \$33,950 and \$84,980 \$87,290 would qualify for affordable housing.

Based on the 2004 2005 HUD guidelines and assuming a 6.5 percent interest rate with a 5 percent down payment, a single-family home would be priced no higher than \$197,400 \$193,500 if a family earned 50 to 80 percent of the median-family income. If a family earned 81 percent to 100 percent of the median-family income, the price would be set no higher than \$238,000 \$245,600 and prices would top out at \$349,200 \$359,800 if a family earned 100 percent to 140 percent of the median-family income. Actual pricing for Pulelehua will be set based on HUD figures at the time units become available.

Current breakdown for the 51 percent of Pulelehua's affordable housing is shown below:

Percentage of Units	Percentage of HUD Median-family Income
10	50 to 80
21	81 to 100
20	101 to 140

To keep Pulelehua affordable for years to come, speculation in the resale of affordable homes will be discouraged with strong buy-back and limited appreciation provisions. In addition, at least 125 homes will be maintained as affordable rentals in perpetuity.

There will be a total of 450 affordable homes: 325 permanent affordable homes for sale and 125 permanent affordable rentals. There will also be approximately 100 moderate-rate residential (i.e. "gap") homes available for sale. This "gap" housing group comprises those families that earn over \$87,290 annually, disqualifying them from the affordable housing group, yet they also are unable to afford a home at Maui's median home price of \$780,000 (Realtors Association of Maui, 2005).

6 Tulip Place
Lahaina, HI 96761-8322

May 5, 2005

Mr. Karl Bossert
Maui Land & Pineapple Company, Inc.
1000 Kapatua Drive
Kapalua, Maui, Hawaii 96761

RECEIVED

MAY 09 2005
DEVELOPMENT OFFICE

Dear Mr. Bossert:

Subject: Pulelehua Draft EIS Comments

May I suggest that you correct your terminology in the EIS, when discussing pesticides. Pesticides are defined, in the industry and in state law as being insecticides, herbicides, fungicides, nematocides, rodenticides etc. Insecticides are pesticides. The term "pesticide" is not interchangeable with only "insecticide".

I have two concerns in regards to the proposed drinking water and wastewater sources in the EIS.

Under pesticides used or named, there is absolutely no mention of ML&P's use of the nematocide DBCP. It is well known that this compound has been found in drinking water in West Maui. You might check with the Department of Health, Safe Drinking Water Branch.

Should ML&P drill and install water wells for Pulelehua within their pineapple lands they are almost certain to find this compound in the water. Not only is DBCP not mentioned, as it should be, but if and when it is mentioned, ML&P should also mention that they will install a treatment plant to remove DBCP found in drinking water wells they provide.

Second, the EIS mentions that Pulelehua will utilize R-1 recycled wastewater from a reservoir above the subdivision. My concern here is that there is no mention of who is going to pay or pump the R-1 water from the STP to the reservoir.

Back in history Pioneer Mill was taking STP treated water pumped to a reservoir, but the county stopped pumping it up to their reservoir. It was a combination of problems, two of which were pump problems and the high electrical cost of running the pumps.

This concerns me in that there may not be any of this R-1 water reaching the Pulelehua reservoir and thus an unplanned increase in the use of groundwater will result. There needs to be some sort of guarantee.

Thank you for your concern.

Sincerely,


Don R. Gerbig

Qualifications for buying an affordable home at Pulelehua will include:

1. Currently employed in Maui;
2. Minimum age of 18 years old;
3. Evidence of sufficient income;
4. Must agree to physically reside in the home;
5. Cannot already own a home or real property; and
6. Further qualifications may apply.

To encourage homeownership among local families, a selection preference will be incorporated, giving priority to Maui Land & Pineapple Company, Inc.'s employees and others who work in West Maui. The selection for homeownership will be based on the lottery system outlined below:

<u>Lottery Pool</u>	<u>Preference</u>
<u>A</u>	<u>MLP Employees and subsidiaries</u>
<u>B</u>	<u>Kapalua Nui Partners</u>
<u>C</u>	<u>West Maui residents who are police officers, public school teachers, and firefighters</u>
<u>D</u>	<u>Maui residents who work in West Maui, but do not live in West Maui</u>
<u>E</u>	<u>West Maui residents</u>

All affordable Pulelehua homes will be affordable in perpetuity. A trust or other entity will be established to administer this program. When the owner of an affordable home sells the unit back to the trust, they will be able to recover the depreciated value of previously approved improvements plus a reasonable amount of appreciation based on an index to be determined.

The following restrictions will be placed on transfers:

1. Home must be owner-occupied;
2. Buyback restriction with first right of refusal to trust;
3. Buyback price is based on a repurchase formula and the home will be resold at a affordable;
4. Sharing of equity if trust does not buyback; and
5. Further restrictions may apply.



MAUI LAND & PINEAPPLE COMPANY, INC.

June 27, 2005

Mr. Don Gerbig
6 Tulip Place
Lahaina, HI 96761-8322

SUBJECT: PULELEHUA DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Gerbig:

Thank you for your letter dated May 5, 2005. Maui Land & Pineapple Company, Inc. (MLP) would like to take this opportunity to respond to your comments.

In the Final EIS the heading shown in Section 3.5 (Identification of Chemicals and Fertilizers) of the Draft EIS will be changed from "Pesticides" to "Pesticides, Insecticides, and Nematocides."

Regarding your concerns, and the concerns of others, regarding groundwater quality, in the Final EIS Section 3.5 (Identification of Chemicals and Fertilizers) and Section 4.9.3 (Water system) will be revised to include the following:

In comment letters received on the Draft EIS, some writers expressed concerns regarding the possible contamination of the Honokowai and Honolua Aquifers from historical agricultural use in the region. Specifically, concerns were expressed regarding the possible historical use of the agricultural chemicals DBCP and EDB. The use of DBCP was banned by the Environmental Protection Agency in 1979 except for use as a soil fumigant against nematodes on pineapples in Hawaii; this use was cancelled in 1985 (EPA website). EDB was banned in 1983 from use as a fumigant (Cornell Cooperative Extension office website).

Maui Land & Pineapple Company Inc. has contracted a water resource consultant to conduct a water well source evaluation. This evaluation will include confirming the sustainable capacity of the Honokowai and Honolua aquifer, preparing a well site analysis, and providing recommendations for storage and transmission options. The well site analysis will take into consideration historical agricultural uses and will focus on finding a location that provides the best quality water possible. If a well produces water containing contaminants at levels above State or Federal guidelines, treatment would be required.

In response to your concern about the cost of pumping R-1 water to supply Pulelehua, in the Final EIS, Section 4.9.3 (Water System) will be revised to include the following:

Mr. Don Gerbig
Pulelehua Response Letter to Draft EIS Comments (05/05/05)
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Maui Pineapple Company Ltd., currently has agreements in place with the County of Maui to receive R-1 water from the Lahaina Wastewater Reclamation Plant as part of its agricultural operations. As with other R-1 users, Maui Pineapple Company Ltd., pays a fee to the County of Maui based on use. The fee helps offset the cost, including pumping, of providing R-1 water.

Maui Land & Pineapple Company, Inc., intends to continue or increase its current agreements with the County to supply R-1 water to Pulelehua.

Thank you for your comments. Your letter and the additions as stated above will be included in the Final EIS.

Sincerely,

Karl Bossert
Development Manager
Community Development
Maui Land & Pineapple Company Inc.

cc:

Mr. Anthony Ching, State Land Use Commission
Mr. Abe Mitsuda, State Office of Planning
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Ms. Genevieve Salmonson, Office of Environmental Quality Control
Ms. Ann T Cua, County of Maui Planning Department
Mr. Bob McNatt, Maui Land & Pineapple Company, Inc.
Mr. Tom Schnell, PBR Hawaii

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