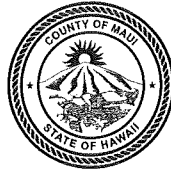


ALAN M. ARAKAWA  
Mayor

WILLIAM R. SPENCE  
Director

MICHELE CHOUTEAU McLEAN  
Deputy Director



COUNTY OF MAUI  
**DEPARTMENT OF PLANNING**

January 3, 2014

2014 JAN - 9 A 8:14  
LAND USE COMMISSION  
STATE OF HAWAII

Ms. Colleen Suyama, Senior Associate  
Munekiyo and Hiraga, Inc.  
305 High Street, Suite 104  
Wailuku, Hawaii 96793

Mr. Dan Orodener, Executive Director  
Land Use Commission  
P.O. Box 2359  
Honolulu, Hawaii 96813

Dear Ms. Suyama and Mr. Orodener:

**SUBJECT: COMMENTS ON AN ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN) PREPARED FOR A PETITION FOR A STATE LAND USE DISTRICT BOUNDARY AMENDMENT AND ANTICIPATED APPLICATIONS FOR A COMMUNITY PLAN AMENDMENT, CHANGE IN ZONING, AND PROJECT DISTRICT FOR THE PROPOSED PU'UNANI SUBDIVISION, LOCATED AT WAILUKU, ISLAND OF MAUI, HAWAII; TMK: (2) 3-5-002:002 AND 003 (POR) (RFC 2013/0180)**

The Department of Planning (Department) is in receipt of the above-referenced document for the proposed Pu'unani Subdivision (Project). The Department understands the Project proposes the development of a mixed-use community consisting of approximately 417 rural residential lots, a "village" mixed-use district consisting of 450 multi-family units and approximately 25,000 square feet of retail/office space, and an approximately 15-acre park and stormwater retention area on approximately 208 acres in Wailuku, Maui, Hawaii.

Based on the preliminary and general comments regarding the proposed Project described in the EISPN, the Department provides the following comments in preparation of the Draft Environmental Impact Statement (EIS):

1. Please provide photosimulations of the Project's potential impacts on scenic corridors and/or public views especially from the perspective of travel along the Honoapiilani Highway and to a lesser extent travel along the Mokulele Highway. This will allow an analysis of both near and far perspectives on view corridors from potential development, especially with full build-out of the commercial component. Travelers on Honoapiilani Highway in the vicinity of the Project site can now witness the effect on mauka views by recent construction of walls and residences in the Waiolani Subdivision. How will this Project minimize potential impacts on mauka views?

2. Address the sufficiency of the proposed 15-acre park/stormwater retention basin for the Project on approximately 208 acres. Delineate on the proposed site plan, areas intended for PARK and areas intended for a STORMWATER RETENTION BASIN. If these areas are proposed to be one-in-the-same, indicate this as such on site location maps. If the multi-family component of this project is targeting housing designated in-part for seniors, veterans, and families, how is a stormwater retention basin (if it is to be designated as PARK) to be considered a user friendly, accessible, and secure recreation area to be enjoyed throughout the year?
3. In reviewing the EISPN pages 62 to 64, there appears to be minimal reference as to how this Project complies with the Land Use Goals, Objectives, Policies, and Implementing Actions described on pages 26 to 29 of the Wailuku-Kahului Community Plan. Detailed responses as to how this Project complies with these Land Use Objectives are critical to reviewing this project both at the State Land Use Commission and at the County of Maui levels. Please provide a comprehensive analysis of the Project against the Wailuku-Kahului Community Plan.
4. Regarding applicability with the Wailuku-Kahului Community Plan, Land Use Objective #1 that states "Ensure that adequate lands are available to support the region's present and future agricultural activities," Objective #2 that states "Identify prime agricultural lands, and develop appropriate regulations for their protection," and Objective #3 that states "The direct and cumulative impacts of agricultural subdivisions and the impacts on the community shall be assessed and considered," describe how approximately 147 rural residential lots likely ranging from 0.5 to 1.0 acres can promote agricultural activities. What incentives shall be communicated to owners of these proposed "rural" lots to promote agricultural activities?
5. Regarding applicability with the Wailuku-Kahului Community Plan, Land Use Objective #14 that states "Maintain physical separation between traditional towns and villages in the region....Maintain open space around traditional rural areas such as Waikapu and Waihee to provide a sense of community and to prevent envelopment of these areas by urban expansion," describe how this proposed Project, especially with a proposed State Land Use Urban District with a multi-family, commercial component, provides a physical separation with the developments around this Project. Delineate on-site plans and describe in detail the proposed open space buffers along Honoapiilani Highway, Kuikahi Drive, and the adjacent Waiolani Subdivision spoken about on page 1 of the EISPN and on pages 8-21 of the Maui Island Plan.
6. Regarding these buffer areas, refer to **Map WC-1, Lahaina-Central Maui Island Plan Protected Area Diagram**. Clearly show on all maps and define BOTH the Preservation Protected Area along the Project's southern extent that provides separation between the Waiolani community and the Project AND the Greenway

Protected Area along the Project's eastern edge and adjacent to Honoapiilani Highway. Indicate if **ANY** activities and/or development are anticipated for either of these Protected Areas.

7. Elaborating on Item #6, discuss how this Project and proposed District Boundary Amendment, Change in Zoning, and Community Plan Amendment that may result in an adverse impact on a Protected Area, comport with Table 8-2 of the Maui Island Plan. Address how the proposed action will respect the intent of the Preservation Protected Area and Greenway Protected Area to provide visual relief. Demonstrate how this will be achieved by delineating on the proposed site plans those areas that follow the Protected Areas and their intended uses. The Maui Island Plan Protected Area Policy 8.3.a states that:

*"The Protected Area Diagrams E-1, NW-1, N-1, NE-1, S-1, SE-1, and WC-1 should be concurrently reviewed with Table 8-2 and with any proposed land uses that may result in an adverse impact on a Protected Area. The County Council and the Administration should be notified if a Protected Area may be compromised by a development proposal."*

In summary, please analyze this project in reference to Map WC-1 and Table 8-2 of the Maui Island Plan.

8. The Project should be reviewed in regards to the totality of the Maui Island Plan, in addition to the Directed Growth Plans & Projects section. Review this Project with the Goals, Objectives, Policies, and Actions of the Maui Island Plan paying particular attention to *Chapter 4 Economic Development* and *Chapter 7 Land Use*. For instance, on page 7-6 of the Maui Island Plan it states "The best strategy to protect agricultural lands is to prevent non-agricultural subdivisions and create an environment where agriculture can be profitable." Review the agricultural viability of this land area showing why this particular parcel falls short of meeting profitability standards for sustainable agricultural production.
9. Comprehensively address the Project and its compliance with the Maui Countywide Policy Plan.
10. Indicate if this Project may impact the historical resources of this traditional agricultural parcel as referenced in Wailuku-Kahului Community Plan, Land Use Objective #11?
11. Regarding applicability with the Wailuku-Kahului Community Plan, Land Use Objective #16 that states "Upon adoption of this plan, allow no further development unless infrastructure, public facilities, and services needed to service new development are available prior to or concurrent with the impacts of new

development," describe how proposed new development will be timed with the building of adequate infrastructure, including the provision of water, school capacity, and impacts to County services such as fire and police safety. Pay particular attention to the capacity and availability of educational facilities for children of residents in the Project and water availability.

12. Regarding applicability with the Maui Island Plan, the *Pu'unani Planned Growth Area* described on pages 8-21 of the Maui Island Plan is slated for a rural component with the Dwelling Unit Count and the Net Residential Density "TO BE DETERMINED," therefore, provide alternative scenarios showing a rural subdivision with 2 (two) acre lots and 5 (five) acre lots and a possible combination of such lot sizes that would possibly provide a greater sense of separation between the Wailuku and the Waiolani communities. Larger lot sizes would likely provide more visual relief with a lower-density residential pattern than exists in surrounding communities and a lower density than that proposed by 147 rural residential lots. These conceptual land lot subdivision plans with relative sizes, numbers, and locations of the rural residential lots and street networks will assist in understanding potential impacts of this Project and conformance of this Project with the goals and objectives of the Maui Island Plan. Pay particular attention to Maui Island Plan *Chapter 7 Land Use* and the Challenges and Opportunities Section in maintaining rural and agricultural lands. Note pages 7-19, paragraph 4 and pages 7-21, paragraph 1 relating to maintaining town edges and address how the proposed action limits the loss of valuable farmland, preserves open space, and maintains a distinctive separation between Waikapu and Wailuku. Discuss how the Project achieves Maui Island Plan Policy 7.3.1b.

*"7.3.1b - Maintain a distinct separation between communities, such as but not limited to, Wailuku and Waikapu; Wailuku and Waihee; Pukalani and Makawao; Pukalani and Kula; Makawao and Haliimaile; Lahaina and Kaanapali; Kihei and Maalaea; and Maalaea and Waikapu, to protect the character and identity of Maui's communities."*

13. Address how this Project addresses Maui Island Plan *Chapter 8 Wailuku-Kahului Challenges and Opportunities* section paying particular attention to pages 8-16 relating to the **Loss of Community Identity and Boundaries** which states:

*"The Wailuku-Kahului community plan region is one of the fastest growing regions on Maui. The majority of the region's growth is occurring on vacant agricultural land at the edges of the sub-regions, particularly south of Wailuku and Kahului, with isolated areas of redevelopment opportunities. As these lands become urbanized, the region's individual towns begin to blend together and lose their unique identities. To prevent the creation of one large, sprawling*

*urban mass, clear separation must be maintained between the area's four sub-regions through the use of regional parks, greenways, and protected areas."*

Also, please discuss how this Project meets the intent of the *Pu'unani Growth Area* and its described guidelines on pages 8-21 of the Maui Island Plan.

14. As the Project proposes a "village, mixed-use district," provide details of pedestrian and bicycle connections between the multi-family component with the commercial component. This is important if a target market is seniors, veterans and affordable family-housing.
15. Describe measures to facilitate connectivity between the project and other developments nearby especially considering the "mixed-use village" area may be targeted to seniors, veterans, and families in multi-family dwellings.
16. According to Figure 11 in the EISPN, the Project is located on PRIME Agricultural Lands of Importance to the State of Hawaii and according to Figure 12 the area proposed for Urban is located on A80i land and the area proposed for Rural is located on A80i and B8li land. Describe in additional detail how a boundary reclassification to Urban and Rural is consistent with the State of Hawaii Land Use Commission Rules and Objectives for district boundary amendment reclassification.
17. The proposed project site will require mass grading. Provide a conceptual grading plan and discuss potential building designs and techniques to be employed to reduce the need for mass grading. For example, a two (2) story dwelling can take advantage of the natural slope by designing "down the slope" as is being proposed for a new subdivision in Wailea.
18. What types of architectural and design guidelines will be instituted for the proposed rural and urban areas and how will these be enforced? Project and dwelling design is as important for rural residential subdivisions as for commercial/multi-family projects. Therefore, what provisions are being considered for adoption, especially in the rural residential area to ensure that high-quality design and landscaping are both used in the construction and long-term maintenance of the subdivision? The EISPN indicates on page 73 that consideration will be given to design techniques such as Conservation Subdivision Design (CSD). Provide various conceptual plans of such layouts and review the potential for superior agriculture activities and preservation of more continuous open space under such a CSD design.
19. Provide an analysis of water generation and usage by and within the project, including both calculations of how much potable and non-potable water will be used and generated.

Ms. Colleen Suyama, Senior Associate  
Mr. Dan Orodenker, Executive Director  
January 3, 2014  
Page 6

20. Provide an analysis of how many acres of PRIME agricultural lands there are on the Island of Maui, how many acres of PRIME agricultural lands have been removed from the inventory over approximately the last 15 years, and the impact of such reductions if such land is anticipated to be in demand for food or fuel crops in the future.
21. Describe proposed energy efficiency measures to be implemented throughout the project and provide potential measures for energy generation. Discuss the proposed Project's ability to achieve Leadership in Energy and Environmental Design (LEED) Silver or Gold Certification.
22. Provide cross sections and map locations of proposed roadways showing accompanying landscaping, bicycle/pedestrian paths, etc., and in particular proposed improvements to Old Waikapu Road.
23. Ensure that all impact studies regarding traffic, water, wastewater, public safety, etc., take into consideration the potential for additional dwelling units, especially on the proposed rural residential subdivision.
24. Evaluate the stormwater management system for its applicability to Low Impact Development (LID) as mentioned in Maui Island Plan *Chapter 7 Land Use* pages 7-13 and Implementing Action 7.2.2-Action 2.
25. Describe in detail any proposed affordable housing components of this project noting location, potential target market, pricing, and economic analysis and review potential affordable housing against the Goals, Objectives, Policies, and Implementing Actions of Maui Island Plan *Chapter 5 Housing*.

Thank you for the opportunity to comment on this Project of considerable magnitude and impact to the Maui Island community. The complexity of this Project is reflected in the decision to move forward on an Environmental Impact Statement. The Department appreciates your anticipated responsiveness to the above comments regarding this EISPN and will be reviewing the Draft EIS in detail along with submitting the Draft EIS for review and comment by the Maui Planning Commission prior to deliberations by the State Land Use Commission. Should you have any questions about the comments in this letter, please contact Staff Planner Kurt Wollenhaupt by email at [kurt.wollenhaupt@mauicounty.gov](mailto:kurt.wollenhaupt@mauicounty.gov) or by phone at (808) 270-1789.

Sincerely,



WILLIAM SPENCE  
Planning Director

Ms. Colleen Suyama, Senior Associate  
Mr. Dan Orodener, Executive Director  
January 3, 2014  
Page 7

xc: Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)  
John F. Summers, Planning Program Administrator (PDF)  
John S. Rapacz, Planning Program Administrator (PDF)  
Kurt F. Wollenhaupt, Staff Planner (PDF)  
Simone Bosco, Staff Planner (PDF)  
Maui Planning Commission  
Project File  
General File

WRS:KFW:cr  
K:\WP\_DOCS\PLANNING\RFC\2013\0180\_PUUNANI\_SUBDIVISION\PREPARATION \_NOTICE\_DEIS\_REVIEWCOMMENTS.DOC