

~~Draft~~Final Environmental Impact Statement

Volume III of HIV Chapter XI. Parties Consulted During the 45-Day Comment Period on the Draft Environmental Impact Statement; Letters Received and Responses to Substantive Comments (Part II)

PROPOSED OLOWALU TOWN MASTER PLAN (TMK Nos. (2)4-8-003:84, 98 through 118, and 124)

Prepared for:

Olowalu Town, LLC and
Olowalu Ekolu, LLC

February 2012October 2015

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XI. PARTIES CONSULTED DURING THE REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT, LETTERS RECEIVED AND RESPONSES TO SUBSTANTIVE COMMENT LETTERS

The following agencies, organizations and individuals were consulted during review of the Draft Environmental Impact Statement (EIS); agencies, organizations and individuals comments and responses to substantive comments are included hereto:

Consulted Party	Date of Comment Letter	Date of Response Letter
Federal Agencies		
US Army Engineer Division	---	---
US Geological Survey	---	---
US Fish and Wildlife Service	---	---
National Oceanic and Atmospheric Administration, National Marine Fisheries Service	3/27/12	10/26/15
State Agencies		
Department of Agriculture	---	---
Department of Accounting and General Services	3/21/12	10/26/15
Department of Business Economic Development and Tourism (DBEDT)	---	---
DBEDT – Energy Division	---	---
DBEDT - Land Use Commission	4/16/12	10/26/15
DBEDT – Office of Planning	4/20/12	10/26/15
Department of Defense	4/10/12	10/26/15
Department of Education	4/27/12	10/26/15
Department of Hawaiian Home Lands	---	---
Department of Health (DOH), Clean Water Branch	5/31/12	10/26/15
DOH, Environmental Planning Office	3/8/12	10/26/15

Consulted Party	Date of Comment Letter	Date of Response Letter
DOH, Indoor and Radiological Health Branch	3/13/12	10/26/15
DOH, Wastewater Branch	3/14/12	10/26/15
Department of Human Services	3/27/12	10/26/15
Department of Labor and Industrial Relations	3/15/12	10/26/15
Department of Land and Natural Resources (DLNR) - Land Division	4/20/12	10/26/15
DLNR – Historic Preservation Division	---	---
DLNR - Office of Conservation and Coastal Lands	4/23/12	10/26/15
Department of Transportation	4/26/12	10/26/15
Hawaii Housing Finance and Development Corp.	---	---
Office of Hawaiian Affairs	---	---
UH Environmental Center	---	---
County Agencies		
Department of Environmental Management	4/25/12	10/26/15
Department of Fire and Public Safety	4/25/12	10/26/15
Department of Housing and Human Concerns	4/16/12	10/26/15
Department of Parks and Recreation	---	---
Department of Planning	4/17/12	10/26/15
Police Department	4/5/12	10/26/15
Department of Public Works	---	---
Department of Transportation	---	---
Department of Water Supply	4/9/12	10/26/15
Mayor	---	---
Elected Officials		
Council Chair Danny Mateo	---	---
Council Vice-Chair Joe Pontanilla	---	---
Councilmember Gladys Baisa	---	---
Councilmember Robert Carroll	---	---
Councilmember Elle Cochran	---	---

Consulted Party	Date of Comment Letter	Date of Response Letter
Councilmember Don Couch	---	---
Councilmember G. Riki Hokama	---	---
Councilmember Michael Victorino	---	---
Councilmember Michael White	---	---
Libraries		
Kahului Library	---	---
Lāhainā Library	---	---
Legislative Reference Bureau	---	---
Maui Community College Library	---	---
State Main Library	---	---
UH Hamilton	---	---
News Media		
Honolulu Star Advertiser	---	---
Maui News	---	---
Utility Companies		
Maui Electric Company	4/25/12	10/26/15
Hawaiian Telcom	---	---
Citizen Groups, Individuals, and Consulted Parties		
Margaret Schlachter	---	---
Anna C. Potts and Jason A. Potts 4606 Fowler Avenue, Apt. 9 Everett, WA 98203	4/10/12	10/26/15
Jan Ehrenkrook 49935 Gallatin Road Gallatin Gateway, MT 59730	4/13/12	10/26/15
Victoria and Walton Huffman 9909 Lemon Avenue La Mesa, CA 91941	4/15/12	10/26/15
Wallace H. Fujii Fujii Family Limited Partnership P.O. Box 511 Kahului, Hawai'i 96733	4/18/12	10/26/15

Consulted Party	Date of Comment Letter	Date of Response Letter
Michael W. Foley 3625 Pi ikeā Place Makawao, Hawai'i 96768	4/19/12	10/26/15
Randy Ragon 713 Front Street A Lahaina, Hawai'i 96761	1/24/12 and 4/19/12	10/26/15
Dick Mayer 1111 Lower Kimo Drive Kula, Hawai'i 96790	4/21/12	10/26/15
Pauline Feine P.O. Box 627 Kihei, Hawai'i 96753	4/21/12	10/26/15
Robin Newbold, Chair Maui Nui Marine Resource Council P.O. Box 532533 Kihei, Hawai'i 96753	4/22/12	10/26/15
Maui Tomorrow 55 N. Church Street, Suite A5 Wailuku, Hawai'i 96793	4/23/12	10/26/15
West Maui Taxpayers Association P.O. Box 10338 Lahaina, Hawai'i 96761	4/24/12	10/26/15
Surfrider Foundation Maui Chapter P.O. Box 790549 Paia, Hawai'i 96779	5/7/12	10/26/15
Citizens for Truth and Justice Maui County P.O. Box 791071 Paia, Hawai'i 96779	10/15/12	10/26/15

INDIVIDUAL LETTERS

APR 23 2012

A=C Potts
4606 Fowler Ave. Apt 9
Everett, WA 98203

Date: 4/10/2012

To: Olowalu Town LLC, Olowalu Ekolu, State Land Use Commission, Munekiyo & Hiragi Inc.

From: Anna C. Potts, Jason A. Potts

Subject: Olowalu Master plan/Environmental Impact

Dear Olowalu Town LLC, Olowalu Ekolu, State Land Use Commission and Munekiyo & Hiragi Inc,

I'm writing in regards to the recent environmental impact statement posted on the State Office of Environmental Quality Control web site. Our family has many concerns about the future development plans in Olowalu and after reviewing the impact statement online we feel it is time to respond.

First I would like to share some of our family history so you can understand why this is so important to us. My ohana is originally from Olowalu but moved away many years ago. My second great grandparents James and Julia Palakiko are buried on top of pu'u kilea. They are buried the traditional way with no marking but with the future development plans we feel it is time to change this. My great grandmother Elizabeth Piilani Palakiko used to live behind the general store next to the old water tower. All that remains there now is the foundation located in the bushes. My father told me that her house was burned down many years ago and never rebuilt due to money/resources and then the land was taken after she passed away. The foundation and property is very important to our ohana because of our history in this area and also because we have family buried there. After looking over the plans listed on the Environmental impact there are no plans to preserve this area and when construction moves forward you will be erasing a huge part of our history and at the same time disturbing our kupuna.

Here are some of our concerns:

- **House foundation and burials located behind the old water tower.**

My great grandmother's foundation is older than the sugar mill ruins and there are no plans to protect one of the only historical foundations left in this area. The burials should be enough to protect this area. The foundation is located to the left of the water tower in the bushes.



- **Pu'u Kilea Burials sihp #4715**

My second great grandparents James and Julia Palakiko are buried on top of kilea. The land is now controlled by the OCR and no steps have been taken to protect these Native Hawaiian burials. The only plans listed on the environmental impact statement are to improve the gate at the old access road. This gate will only stop people from driving to the top. There are many other ways up to the burials. The Japanese cemetery sihp #4758 is listed as a historical cemetery but these Native Hawaiian burials are listed as just a cemetery with less protection. We would like to have the burials gated off and signs put up letting everyone know that it is crime to damage the area. This area has been vandalized in the past and offerings have been taken.



- **Olowalu Petroglyphs sihp #1200.**

The plans listed on the environmental impact statement are undetermined and it states that the site extent makes permanent buffer markers difficult. This area has also been vandalized numerous times in the past and petroglyphs have actually been stolen. Most of the petroglyphs seen there today are from vandalism and if there is no future protection this will continue to happen with the rising population. This area should be gated off keeping the public out of hands reac. Signs should be posted stating the history of the petroglyphs and that it is a crime to damage this historical area.



- **Kaiwaloa heiau sihp #4.**

Kaiwaloa Heiau has been under the control of the OCR for over ten years and not one thing has been done to preserve this area (see picture). There are no dates listed for the preservation plans for this heiau and because of the significance of Kaiwaloa it should be preserved before the master plan starts.



- **9 Rock mounds created by sugar company**

I have been told by many family members that the nine rock mounds contain Native Hawaiian bones from when the sugar company bulldozed the land. If this is true they should be labeled as burial grounds and should be protected.



- Archaeological site plans for sihp #3180,4695,4696,4702,4703,4719,4720,4721,4821

There are no descriptions or plans listed for these sites on the environmental impact statement. We would like to have these available so we can also look over them.

After reviewing this I really hope that you can understand our concerns and determine that these areas do require more protection/planning before the master plan continues. Our family would also like to be included in future discussion and plans and we look forward to hearing from you. Mahalo

Anna C. Potts

acpotts1@gmail.com

(206)412-6825

2-107

COUNTY Maui
 ISLAND Maui
 DISTRICT Lahaina

DEPARTMENT OF COMMERCE AND LABOR—BUREAU OF THE CENSUS
 THIRTEENTH CENSUS OF THE UNITED STATES: 1910—PO
 HAWAII

NAME OF CITY, TOWN, OR VILLAGE Honolulu (Plantation)
 ENUMERATED BY ME ON THE 23 DAY OF April 1910

NAME OF INSTITUTION X

SEX	AGE	NAME	RELATION	PERSONAL DESCRIPTION	NATIVITY			MOTHER TONGUE
					Place of birth of this person	Place of birth of father of this person	Place of birth of mother of this person	
		1. <u>Lika, Louise M.</u>	<u>head</u>	<u>4/12/85 S</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		2. <u>Samoa, Lela</u>	<u>daughter</u>	<u>7/10/88 F</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u> Hawaiian</u>
		3. <u>Shabiko, James</u>	<u>head</u>	<u>11/22/81 M</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		4. <u>Julia</u>	<u>wife of</u>	<u>2/10/81 S</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		5. <u>James</u>	<u>son</u>	<u>11/21/85 S</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	
		6. <u>Calicadett</u>	<u>daughter</u>	<u>2/10/88 S</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	
		7. <u>Charles H.</u>	<u>son</u>	<u>11/21/88 S</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	

2-107

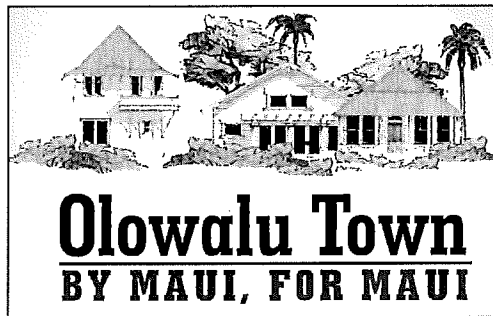
COUNTY Maui
 ISLAND Maui
 DISTRICT Lahaina

DEPARTMENT OF COMMERCE—BUREAU OF THE CENSUS
 FOURTEENTH CENSUS OF THE UNITED STATES: 1920
 POPULATION—HAWAII

NAME OF CITY, TOWN, OR VILLAGE Honolulu Village
 ENUMERATED BY ME ON THE 7 DAY OF January 1920

NAME OF INSTITUTION X

SEX	AGE	NAME	RELATION	RACE	MARRIAGE	CITIZENSHIP	EDUCATION	NATIVITY AND MOTHER TONGUE			
								Place of birth of this person	Place of birth of father of this person	Place of birth of mother of this person	
		12. <u>Malakio, James</u>	<u>head</u>	<u>M</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		13. <u>Julia</u>	<u>wife</u>	<u>F</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		14. <u>Charles</u>	<u>son</u>	<u>M</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		15. <u>John</u>	<u>son</u>	<u>M</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		16. <u>John</u>	<u>son</u>	<u>M</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>
		17. <u>John</u>	<u>son</u>	<u>M</u>	<u>Mar</u>	<u>U.S.</u>	<u>High Sch</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>Hawaii</u>	<u>English</u>



2035 MAIN STREET WAILUKU HAWAII 96793

OFFICE: 808-249-2224 / FAX: 249-2333

October 26, 2015

Anna C. and Jason A. Potts
4606 Fowler Avenue, Apt. 9
Everett, Washington 98203

SUBJECT: *Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan at Olowalu, Hawaii*

Dear Mr. and Mrs. Potts:

We thank you for your letter of April 19, 2012 responding to our request for comments on the Draft Environmental Impact Statement (EIS) for the proposed Olowalu Town Master Plan. We offer the following information in response to the comments noted in your letter.

Comment:

First I would like to share some of our family history so you can understand why this is so important to us. My ohana is originally from Olowalu but moved away many years ago. My second great grandparents James and Julia Palakiko are buried on top of pu'u kilea. They are buried the traditional way with no marking but with the future development plans we feel it is time to change this. My great grandmother Elizabeth Piilani Palakiko used to live behind the general store next to the old water tower. All that remains there now is the foundation located in the bushes. My father told me that her house was burned down many years ago and

never rebuilt due to money/resources and then the land was taken after she passed away. The foundation and property is very important to our ohana because of our history in this area and also because we have family buried there. After looking over the plans listed on the Environmental impact there are no plans to preserve this area and when construction moves forward you will be erasing a huge part of our history and at the same time disturbing our kupuna.

Response: *On behalf of Olowalu Town, LLC and Olowalu Ekolu, LLC, we would like to extend our appreciation to you for sharing with us your family history, as well as the importance of the area to you and your ohana.*

We thank you also for sharing with us the particular significance of Pu'u Kilea as it is the resting place of your second great grandparents, James and Julia Palakiko and the significance of the foundation of the house in which your great grandmother, Elizabeth Piilani Palakiko, resided and which still remains near the old water tower.

We recognize the importance of your concerns to both you and your family as your ties to the land run for generations. In this context, as the Applicants we recognize the significance and meaning of the property to you.

In reading your letter, you have outlined and separated each of your concerns by specific issues. In consideration of this, we would like to provide responses to each of your issues, as follows.

Comment:

- ***House foundation and burials located behind the old water tower.***

My great grandmother's foundation is older than the sugar mill ruins and there are no plans to protect one of the only historical foundations left in this area. The burials should be enough to protect his area. The foundation is located to the left of the water tower in the bushes.

Response: *As the Applicants, the cultural and archaeological significance of the area are also of importance to us. From 1998 to 2002, a total of seven (7) archaeological inventory studies and historic preservation mitigation plans were carried out for the project area and subsequently accepted by the State Historic Preservation Division (SHPD). More recently in February*

2012, Cultural Surveys Hawaii prepared the Archaeological Literature Review for the Olowalu Master Plan. The purpose of this report, which is provided as an appendix in the EIS, was to create a comprehensive reference document of the previously mentioned archaeological work as a way to evaluate the current status and condition of previously identified significant historic properties.

As the project moves forward with the submittal of various land entitlement requests including Special Management Area Use Permits and more detailed project plans are developed, additional archaeological work, including the preparation of additional studies and reports, will likely need to be prepared by the project's archaeologist. Additionally, during construction, archaeological monitoring will be undertaken during all ground disturbance activities within the project area. Notwithstanding, however, as the Applicants we feel it is important to share your knowledge and information with the project's archaeologist to ensure the proper assessment and mitigation of the potentially historic feature of your grandmother's house foundation, as well as the possible burials located behind the old water tower near Olowalu General Store. As the project moves forward, the project archaeologist will be in touch with you for further consultation and additional information you may have on the house foundation and burials. As always, coordination with the SHPD will be undertaken throughout this process.

Comment:

- ***Pu'u Kilea Burials sihp #4715***

My second great grandparents James and Julia Palakiko are buried on top of kilea. The land is now controlled by the OCR and no steps have been taken to protect these Native Hawaiian burials. The only plans listed on the environmental impact statement are to improve the gate at the old access road. This gate will only stop people from driving to the top. There are many other ways up to the burials. The Japanese cemetery sihp #4758 is listed as a historical cemetery but these Native Hawaiian burials are listed as just a cemetery with less protection. We would like to have the burials gated off and signs put up letting everyone know that it is crime to damage the area. This area has been vandalized in the past and offerings have been taken.

Response: *As you have shared with us your family ties to this area, in particular the burial of your great grandparents atop Pu'u Kilea, we understand your*

concern and interest in the treatment of the burials. As you know, the burials have been assigned the State Inventory of Historic Property (SIHP) number 50-20-08-4715. Currently, long-term preservation plans, which have been reviewed and accepted by SHPD, call for conservation of Pu'u Kilea. In addition to an improved gate at the base of the access road, which you have pointed out in your letter, the preservation plans recommend a 30-foot buffer with landscaping surrounding the burials. Signage indicating the presence of the historic property is also proposed. In the February 2012 Archaeological Literature Review for the Olowalu Master Plan, Cultural Surveys Hawaii recommended community consultation concerning the placement of the signage. In this regard, during the community consultation process, which will likely be undertaken by the project's archaeologist, as the Applicants we encourage your involvement should there be a continued interest.

It should also be noted, as you have pointed out, Pu'u Kilea is located within the Olowalu Cultural Reserve (OCR) which is under a long-term lease agreement with and completely managed by the OCR, a community-based, non-profit organization. The OCR is tasked with the purpose to support and promote the revitalization of traditional Hawaiian culture. The OCR is its own governing body, independent from the Applicants, with little to no input from the Applicants in decision-making processes including management of Pu'u Kilea. The OCR does, however, rely heavily on community support. Understanding your personal connection to Pu'u Kilea and the importance of your great grandparent's burials atop Pu'u Kilea to you and your family, we feel it important for you to have a voice in the process and would be happy to work with the OCR in scheduling a meeting with you to discuss the matter further should you be interested.

Comment:

- **Olowalu Petroglyphs sihp #1200.**

The plans listed on the environmental impact statement are undetermined and it states that the site extent makes permanent buffer markers difficult. This area has also been vandalized numerous times in the past and petroglyphs have actually been stolen. Most of the petroglyphs seen there today are from vandalism and if there is no future protection this will continue to happen with the rising population. This area should be gated off keeping the public out of hands reach. Signs should be posted stating

the history of the petroglyphs and that it is a crime to damage this historical area.

Response: *As with Pu'u Kilea, the Olowalu Petroglyphs (SIHP No. 50-50-08-1200) are located within the OCR. While the Applicants cannot speak directly for the OCR, we do recognize that culturally significant artifacts such as the petroglyphs are of utmost importance to the OCR as well as the Applicants. As you have pointed out, unfortunately, some of the petroglyphs have been vandalized. This condition has been reported in past archaeological studies completed for the property. It is our understanding that the OCR has removed the stairs and limited access to ensure the protection of the petroglyphs from vandalism. The intent is to allow the petroglyphs to still be viewed by the public, albeit at a safe distance (approximately 30 feet) to ensure the protection of the cultural artifact. Currently, signage is proposed for this area. We will, however, share your concerns with the OCR and will make a copy of your letter available.*

Comment:

- ***Kaiwaloa heiau sihp #4.***

Kaiwaloa Heiau has been under the control of the OCR for over ten years and not one thing has been done to preserve this area (see picture). There are no dates listed for the preservation plans for this heiau and because of the significance of Kaiwaloa it should be preserved before the master plan starts.

Response: *Thank you for sharing with us your concerns regarding the Kaiwaloa Heiau (SIHP No. 50-50-08-0004). As you are aware, the heiau is also located within the OCR. Currently, long term preservation measures for the heiau, as outlined in the SHPD accepted preservation plan and noted in the February 2012 Archaeological Literature Review for the Olowalu Master Plan prepared by Cultural Surveys Hawaii, call for a 100-foot buffer (buffer markers to consist of native hedge and boulders), pathway or foot trail, viewing platform overlooking the heiau for the general public. Pedestrian access to the heiau will, however, be restricted to Native Hawaiian traditional cultural practices. It should also be noted that the 2012 Archaeological Literature Review for the Olowalu Master Plan, which is included as an appendix in the EIS, recommends additional community consultation with the lineal and cultural descendants of the Olowalu Ahupua'a, as well as the designated caretakers of the heiau and the OCR*

regarding the layout of the design of both the pathway and viewing platform, and the plant type for the native hedge to serve as the buffer boundary. The intent of the community consultation is to ensure that proper care is given to the heiau.

Comment:

- **9 Rock mounds created by sugar company**

I have been told by many family members that the nine rock mounds contain Native Hawaiian bones from when the sugar company bulldozed the land. If this is true they should be labeled as burial grounds and should be protected.

Response: *As previously shared, the cultural and archaeological significance of the area are of utmost importance to us as the Applicants. As the project moves forward, the project archaeologist will be in touch with you for further consultation and additional information you may have on the nine (9) rock mounds which you believe to contain Native Hawaiian bones. As always, coordination with the SHPD will be undertaken throughout this process to ensure the proper care is bestowed upon these potential burials.*

Comment:

- **Archaeological site plans for sihp #3180, 4695, 4696, 4702, 4703, 4719, 4720, 4721, 4821**

There are no descriptions or plans listed for these sites on the environmental impact statement. We would like to have these available so we can also look over them.

Response: *In working with SHPD, several historic properties documented within the current project area were determined to be "no longer significant" and therefore carried a recommendation of "no further work", while a couple historic properties were relocated from their recorded location to Awalua Cemetery (SIHP No. 50-50-08-04758). Below, please find a description of those historic properties noted in your letter and presented in the 2012 Archaeological Literature Review for the Olowalu Master Plan, which is included as an appendix in the EIS. Should you be interested in obtaining a copy of the 2012 Archaeological Literature Review for the Olowalu*

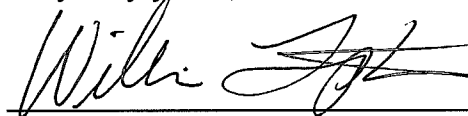
Master Plan, please feel free to contact us and a copy will be provided to you.

Summary of Historic Properties that are No Longer Significant (SIHP Prefix 50-50-80)

SIHP No.	Format Type	Probable Function	Treatment
3180	Historic Cattle Wall	Ranching	No Longer Significant – No Further Work
4695	Wall/terrace	Erosion Control	No Longer Significant – No Further Work
4696	Old Government Road	Road	No Longer Significant – No Further Work
4702	L-Shape	Boundary	No Longer Significant – No Further Work
4703	Complex	Boundary	No Longer Significant – No Further Work
4719	Rock Wall	Boundary	No Longer Significant – No Further Work
4720	Retaining Wall	Transportation	No Longer Significant – No Further Work
4721	Rectangular Platform	Habitation	No Longer Significant – No Further Work
4821	Surface Scatter Human Skeletal Remains	Burial	Moved to Awalua Cemetery – continued archaeological monitoring in the area

Thank you again for sharing with us your family history and the importance of the area to you and your ohana. As well, we appreciate your participation in the Chapter 343, Hawaii Revised Statutes review process. A copy of your letter and this response letter will be included in the Final EIS. Should you have any questions regarding this letter, or would like to set up a meeting with the OCR, please call us at (808) 249-2224. Also, should you wish to receive a copy of the Final EIS document, or portion thereof, please submit your request in writing to Munekiyo Hiraga, 305 High Street, Suite 104, Wailuku, Hawaii 96793 (Attention: Colleen Suyama).

Very truly yours,



William Frampton
Olowalu Town, LLC



David Ward
Olowalu Town, LLC

Anna C. and Jason A. Potts
October 26, 2015
Page 8

CS:tn

cc: Peter Martin, Olowalu Ekolu LLC
Tanya Lee-Greig, Cultural Surveys Hawaii
Jennifer Lim, Carlsmith Ball, LLP
Colleen Suyama, Munekiyo Hiraga

K:\DATA\OlowaluTown\MasterP\Draft EIS\Response Letters\Potts.doc

April 13, 2012

LAND USE COMMISSION
STATE OF HAWAII

2012 APR 17 A 7:58

Mr. Don Davidson
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Dear Mr. Don Davidson,

My name is Jan Ehrenkrook, I reside in Olowalu. When I purchased my property in Olowalu Mauka, a quote in the sales and marketing brochure by the developer at the inception of Olowalu Mauka over 10 years ago read;

"With the recent demise of sugar cane cultivation in West Maui, this new community will foster the growth of entrepreneurs looking to add to the range of Maui's agricultural products"

Now, this same developer wants to change 460 acres of agriculturally zoned land to urban and rural. Sounds to me like the ONLY entrepreneur here is the developer, who wants to GROW 1500 new units....

As a homeowner in Olowalu Mauka on Maui I am very concerned to say the least, about a possible approval of the proposed Olowalu Town LLC. There are many very important facts you need to consider. The developer of this project, William Frampton/West Maui Land, are the same that developed Olowalu Mauka. Even though they have denied being affiliated at the time of development, his signatures appear all over documents from the beginning well over 10 years ago...

These people have been very deceitful as well as negligent in completing the promised and permitted infrastructure of Olowalu Mauka, which in the big picture seems tiny as compared to a proposed massive 1500 unit development. This being said, they are not capable of completing this task. For example, being granted a SMA Permit over 10

years ago to complete a turn lane in to the development before the development could be completed. We are still waiting for this to happen... The county, as well as DOT have continually turned their back on us., no enforcement or it would be done. The developers are dragging their feet until they get an approval for this proposed project. Also, The Cultural Reserve in Olowalu that they were to maintain went neglected as well until we brought that to the County's attention. The impact of this project will no doubt all but destroy the one of the last beautiful reefs on Maui. Already, there can be up to 8 commercial boats on that reef daily and the damage is already evident. You can only imagine the harmful impact of THOUSANDS of people living here, not to mention the impact of others using the proposed new facilities would have on this treasured spot.

The traffic created by this proposed development would create a massive gridlock that West Maui cannot handle. Tourism would greatly be affected by this gridlock because it will take hours to get from the airport in Kahalui to points North. Tourists will not want to be stuck in that gridlock. West Maui does not have the proper infrastructure to support such an increase in traffic and population such as this.

I have heard that a resort/ hotel company has already placed a bid for the land where the current highway is located... Contrary to the developer of this proposed development stating their interest is respectful of the community. This means even MORE harmful use to the reef. Where is this going to end?

Another prime example of this developers deceit is in the enclosed excerpt from the sales and marketing brochure presented to prospective buyers of Olowalu Mauka at the inception. If you look at the rendering enclosed, you will see absolutely no resemblance to what exists today... Our HOA had to fight with them just to remove the cattle gate that was there... Another example, quoted in their brochure "Canopies of mature trees." We were to receive over 200 trees planted and that never happened. Total misrepresentations.....

The residents here in Olowalu Mauka have been victims for much too long of these developers empty promises and deceitful ways, it just

goes on and on. The same will happen if they are allowed to proceed with this proposed development. A precious commodity ,treasured by so many, will be inevitably destroyed. PLEASE don't let them get away with this any longer, Enough is Enough.

Respectfully,

A handwritten signature in black ink that reads "Jan Ehrenkrook". The signature is written in a cursive, slightly slanted style.

Jan Ehrenkrook
Olowalu Mauka Resident

P.S. Where is their proposed sewage treatment plant to be located? I certainly hope that issue is brought to the forefront before we end up with another situation such as Kaanapali with the stench....

com·mu·ni·ty

(ke myōō'he tē) *n.*,

common possession

or enjoyment

— *Websters*



A new community is being formed at Olowalu. We invite you to be the first in this new landscape; to

be a participant in this new Olowalu community. This community will be as inclusive today as in the past, as it's one that respects varied cultures and economic diversity.

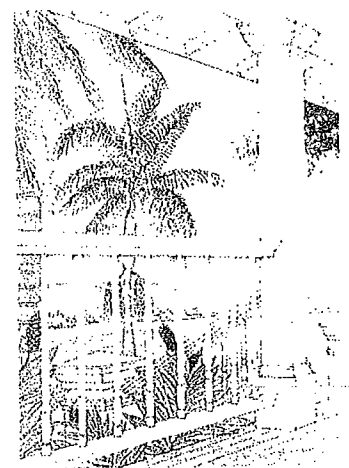
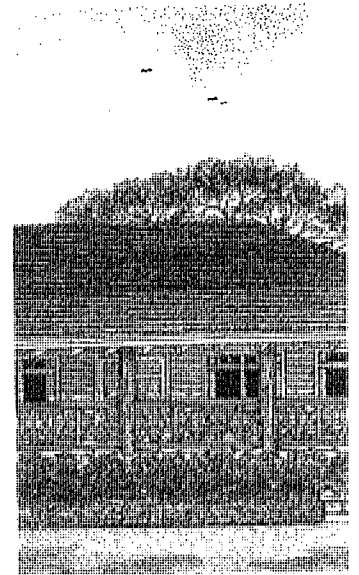
Included in this new community is a "Cultural Reserve" of approximately 74 acres being administered by a private non-profit corporation, whose mission statement is as follows:

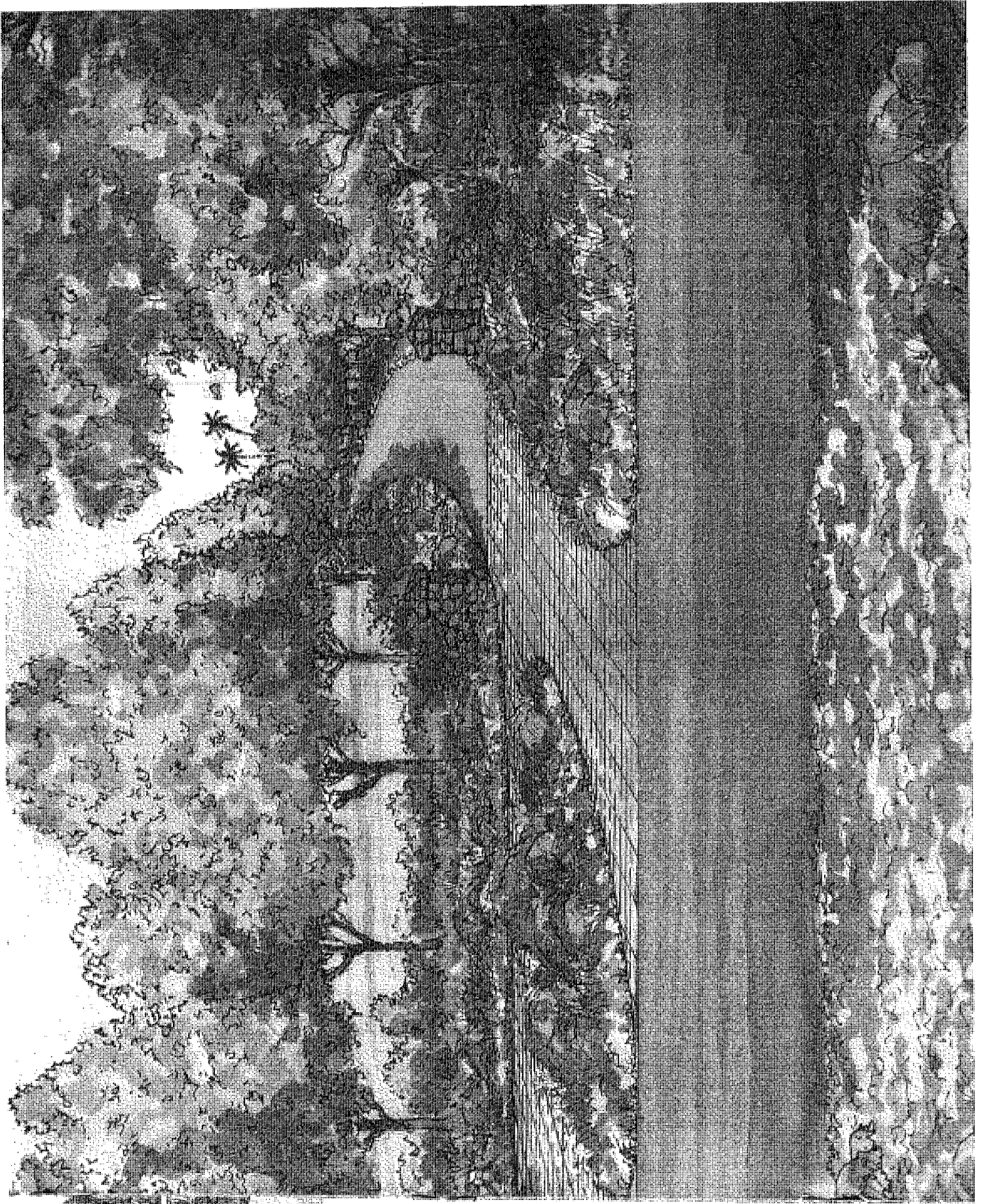
To perpetuate the traditional and customary practices of "kanaka maoli" of these Hawaiian Islands and promote opportunities to regain the spiritual connection of "malama aina" of our ancestors by insuring these beliefs and customs are passed down to future generations.

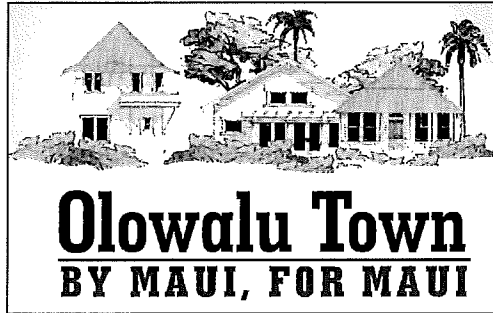
With the recent demise of sugar cane cultivation in West Maui, this new community will foster the growth of entrepreneurs looking to add to the range of Maui's agricultural products.

This new community will also have a unified architectural theme that blends indigenous architectural elements, such as the generous use of natural materials, with elements from the Plantation Era managers' homes, such as grand verandas and large eaves. Expansive lawns and a canopy of mature trees are also important elements of the Plantation Era.

This new community will be what we all make it.







2035 MAIN STREET WAILUKU HAWAII 96793
OFFICE: 808-249-2224 / FAX: 249-2333

October 26, 2015

Jan Ehrenkrook
49935 Gallatin Road
Gallatin Gateway, MT 59730

SUBJECT: Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan at Olowalu, Hawaii

Dear Ms. Ehrenkrook:

We thank you for your letter of April 13, 2012 to the Land Use Commission providing comments on the Draft Environmental Impact Statement (EIS) for the proposed Olowalu Town Master Plan. We offer the following information in response to the comments noted in your letter.

Comment:

My name is Jan Ehrenkrook, I reside in Olowalu. When I purchased my property in Olowalu Mauka, a quote in the sales and marketing brochure by the developer at the inception of Olowalu Mauka over 10 years ago read; "With the recent demise of sugar cane cultivation in West Maui, this new community will foster the growth of entrepreneurs looking to add to the range of Maui's agricultural products"

Now, this same developer wants to change 460 acres of agriculturally zoned land to urban and rural. Sounds to me like the ONLY entrepreneur here is the developer, who wants to GROW 1500 new units....

Response:

We understand the developer of the 14-lot Olowalu Mauka Subdivision, Olowalu Elua Associates, LLC, envisioned the opportunity for enhancing agricultural product development with the offering of lots at the subdivision. As developers of the proposed Olowalu Town Master Plan (OTMP), we note that Olowalu Town, LLC and Olowalu

Ekolu, LLC are entities distinct from Olowalu Elua Associates, LLC which developed the 14-lot Olowalu Mauka Subdivision.

As referenced in your comment, the OTMP contains development objectives which are different from that proposed for the 14-lot Olowalu Mauka Subdivision. Nonetheless, it is the goal of the OTMP to reflect a land use plan and spatial allocation framework which will be compatible with surrounding agricultural uses.

Comment:

As a homeowner in Olowalu Mauka on Maui I am very concerned to say the least, about a possible approval of the proposed Olowalu Town LLC. There are many very important facts you need to consider. The developer of this project, William Frampton/West Maui Land, are the same that developed Olowalu Mauka. Even though they have denied being affiliated at the time of development, his signatures appear all over documents from the beginning well over 10 years ago ... These people have been very deceitful as well as negligent in completing the promised and permitted infrastructure of Olowalu Mauka, which in the big picture seems tiny as compared to a proposed massive 1500 unit development. This being said, they are not capable of completing this task. For example, being granted a SMA Permit over 10 years ago to complete a turn lane in to the development before the development could be completed. We are still waiting for this to happen ... The county, as well as DOT have continually turned their back on us., no enforcement or it would be done. The developers are dragging their feet until they get an approval for this proposed project.

Response:

With regards to your comment that William Frampton is the developer of the 14-lot Olowalu Mauka Subdivision, we take this opportunity to clarify that Mr. Frampton was previously hired as a project consultant for Olowalu Elua Associates, LLC and has no financial interest in the corporation. Since development of the 14-lot Olowalu Mauka Subdivision, Mr. Frampton and Mr. David Ward formed Olowalu Town LLC in 2005 as a separate entity responsible for the planning, design, and implementation of the OTMP.

As a project consultant for Olowalu Elua Associates, LLC, Mr. Frampton assisted Olowalu Elua with a few of the conditions of approval for the Special Management Area (SMA) Use Permit issued in 2000 for the Olowalu Makai and Olowalu Mauka Subdivisions, both of which is not included in the OTMP. As you have pointed out, one (1) of the conditions required certain roadway improvements to Honoapiilani Highway, including left-turn storage lanes, be constructed as part of the SMA approval. In coordination with the State of Hawaii, Department of Transportation (HDOT), Olowalu Elua Associates, LLC completed the intersection improvements at Honoapiilani Highway in December 2012.

Comment:

Also, The Cultural Reserve in Olowalu that they were to maintain went neglected as well until we brought that to the County's attention.

Response:

Although Olowalu Elua Associates own the 74 acre Olowalu Cultural Reserve (OCR), the OCR is under a long-term lease agreement and completely managed by the community-based, non-profit organization also called the OCR. The OCR is tasked to support and promote the revitalization of traditional Hawaiian culture at Olowalu. The OCR is its own governing body, independent from the applicant, with little to no input from the applicant in decision-making processes including management of the 74 acres. Since the OCR was established in 1999, the OCR has remained steadfast in its efforts by restoring the former irrigation system and lo'i for taro cultivation as well as planting other traditional crop, restoring native habitat, working with the landowners to protect historic and cultural sites, and providing educational experiences to students, residents, and visitors.

Comment:

The impact of this project will no doubt all but destroy the one of the last beautiful reefs on Maui. Already, there can be up to 8 commercial boats on that reef daily and the damage is already evident. You can only imagine the harmful impact of THOUSANDS of people living here, not to mention the impact of others using the proposed new facilities would have on this treasured spot.

Response:

We recognize that the Olowalu nearshore area encompasses an important reef complex. We share similar concerns regarding the declining coral reefs near areas of shoreline development. Traditional approaches to development have affected the environment of the islands. Impervious surfaces such as pavement and structures reduce rainfall infiltration and, therefore, increase stormwater runoff. Stormwater runoff carries sediments and pollutants that impact the near-shore coastal waters. Olowalu Town's location adjacent to a significant, accessible coral reef system dictates that stormwater quality best management practices (BMPs) be implemented.

Towards this end, during the planning phase of the project, the applicants investigated innovative stormwater solutions as well as resources such as the State of Hawaii Department of Land and Natural Resources, Commission on Water Resource Management's (CWRM) "A Handbook for Stormwater Reclamation and Reuse Best

Management Practices in Hawaii” with the expressed intention of “encouraging the management of stormwater as a resource rather than as a nuisance to be discharged to our streams and coastal waters”. The publication outlines alternative stormwater measures that have been used to mitigate stormwater impacts in environmentally-sensitive communities in the United States, such as the Puget Sound area of Washington State. The State of Hawaii’s handbook was used to identify a menu of BMPs that are appropriate for implementation in the OTMP. The Olowalu Town Stormwater Quality Enhancements Study (Appendix “B-1” in the Draft EIS), prepared by Brown and Caldwell, proposes BMPs that meet the County of Maui stormwater drainage rules that were adopted in 1995 and 2012. By implementing the BMPs in conjunction with the County’s standards, the applicant will be providing a level of environmental protection that goes beyond what has been provided at existing Maui developments.

The *Olowalu Town Stormwater Quality Enhancements* aim to reduce the amount of stormwater from development and to improve the quality of the runoff that does occur. The goals of the plan are to:

1. Increase the volume of stormwater that infiltrates into the soil
2. Reuse stormwater where feasible
3. Improve the quality of stormwater that does run off

The BMPs outlined in the study support the aforementioned goals. The OTMP will develop stormwater BMP guidance documents for use by the designers of the residential, commercial, and green space/recreational facilities within the community to ensure that proper BMPs are implemented. Such efforts work towards protection of the Olowalu reef system.

Comment:

The traffic created by this proposed development would create a massive gridlock that West Maui cannot handle. Tourism would greatly be affected by this gridlock because it will take hours to get from the airport in Kahalui to points North. Tourists will not want to be stuck in that gridlock. West Maui does not have the proper infrastructure to support such an increase in traffic and population such as this. I have heard that a resort/hotel company has already placed a bid for the land where the current highway is located ... Contrary to the developer of this proposed development stating their interest is respectful of the community. This means even MORE harmful use to the reef. Where is this going to end?

Response:

The OTMP is proposed to be a “sustainable community” in which residents are able to live, work, and enjoy recreational pursuits within the community itself. The Master Plan

also includes design standards to reduce dependency on the automobile. The various land uses are planned to be within five (5) minutes walking distance to encourage residents to walk to work, shop, or enjoy the public and recreational amenities offered within the community. A system of pedestrian and bicycle access ways are planned throughout the Master Plan, and we will continue to work with the County of Maui to expand the public bus transportation system within the project. In addition, pedestrian and bicycle connections between the mauka and makai areas of the OTMP are proposed which will also benefit the 14-lot Olowalu Mauka Subdivision as these access ways will be available to the Olowalu community and public.

Recognizing the current traffic congestion on Honoapiilani Highway, the OTMP proposes to realign the highway further mauka in conjunction with the HDOT's Widening and Realignment of Honoapiilani Highway (Maalaea to Launiupoko) project. In coordination with HDOT, the OTMP includes the introduction of "O-Turns" used elsewhere in the U.S. which will allow the free flow of traffic on the highway while allowing motorists to exit the highway. The OTMP will be coordinated with the HDOT to ensure that traffic improvements are completed in conjunction with each phase of the development which is expected to take ten (10) years to complete. The phased approach will ensure that appropriate and timely mitigation measures are implemented such that traffic impacts are properly managed and addressed over the project build-out duration.

As clarification, we note the current alignment of the Honoapiilani Highway will remain intact, to enable its use as a local shoreline access roadway,

Comment:

Another prime example of this developers deceit is in the enclosed excerpt from the sales and marketing brochure presented to prospective buyers of Olowalu Mauka at the inception. If you look at the rendering enclosed, you will see absolutely no resemblance to what exists today ... Our HOA had to fight with them just to remove the cattle gate that was there ... Another example, quoted in their brochure "Canopies of mature trees." We were to receive over 200 trees planted and that never happened. Total misrepresentations The residents here in Olowalu Mauka have been victims for much too long of these developers empty promises and deceitful ways, it just goes on and on. The same will happen if they are allowed to proceed with this proposed development. A precious commodity, treasured by so many, will be inevitably destroyed. PLEASE don't let them get away with this any longer, Enough is Enough.

Response:

While we wish to offer our understanding as to your concerns over landscaping, we also note, as previously indicated, that as the developers of the proposed OTMP, we are

distinct from Olowalu Elua Associates, LLC, developer of the 14-lot Olowalu Mauka Subdivision. We do understand however, that the phased landscaping plan has been planted in the 14-lot Olowalu Mauka Subdivision and the Planning Department has confirmed all conditions of the SMA Permit, including the phased landscape plan have been met by Olowalu Elua Associates, LLC. The OTMP proposes a network of greenways that will connect to the existing greenways in the Olowalu Mauka Subdivision which will eventually provide a buffer between the OTMP and Olowalu Mauka Subdivision, as well as connect the Olowalu Mauka Subdivision to commercial/office, public/quasi-public and recreational uses in the OTMP.

Comment:

P.S. Where is their proposed sewage treatment plan to be located? I certainly hope that issue is brought to the forefront before we end up with another situation such as Kaanapali with the stench.

Response:

The proposed wastewater treatment facility will be located at the western extent of the Proposed OTMP, mauka of Honoapiilani Highway. See **Exhibit "1"**, Conceptual Plan, which was provided in the Draft EIS as Figure 4. For your ease of reference, however, we have highlighted the location of the wastewater treatment facility.

As documented in the Olowalu Town Wastewater Management Plan prepared by Brown and Caldwell, we note that wastewater treatment plants can be a source of nuisance odors to surrounding communities if the plants are not designed or operated correctly. Not all processes within plants, however, generate nuisance odors. Such odors are most often times associated with anaerobic (without oxygen) conditions and with residual solids processing.

The OTMP wastewater treatment facility will use innovative, efficient, and sustainable technology to minimize adverse odors. The headworks is commonly an odorous process area at wastewater treatment plants because incoming raw wastewater can be anaerobic and the screening and grit removal processes involve solids processing. The proposed OTMP wastewater treatment facility headworks will be enclosed to facilitate the management of foul odor. The air removed from the building will be treated in an odor control biofilter (or similar process). Biofilters consist of an engineered bed of compost with distribution piping. The foul air is treated as it flows through the compost media. Biofilters are capable of removing a wide variety of odorous compounds from the air.

We also note that the liquid treatment processes within the proposed wastewater treatment facility will not be a source of nuisance odors because the process tanks will

Jan Ehrenkrook
October 26, 2015
Page 7

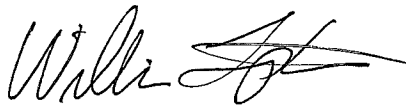
be aerated to maintain oxygen concentrations. Similarly, waste solids will be pumped to an aerobic digester for stabilization of oxygen concentrations. Assurance of continuous, uninterrupted aeration will be provided with the inclusion of at least one (1) redundant blower for each aeration system.

The solids dewatering process is another potential source of odors at the wastewater treatment plants. The dewatering equipment at the proposed OTMP facility will, however, be enclosed in a room to facilitate foul air collection. This foul air will then be routed to a biofilter for treatment.

In summary, the OTMP wastewater treatment facility will use innovative, efficient, and sustainable technology to minimize adverse impacts associated with process-related odors.

Thank you again for your comments. A copy of your letter and this response will be included in the Final EIS. Should you wish to receive a copy of the Final EIS document, or portion thereof, please submit your request in writing to Munekiyo Hiraga, 305 High Street, Suite 104, Wailuku, Hawaii 96793 (Attention: Colleen Suyama).

Very truly yours,



William Frampton
Olowalu Town, LLC



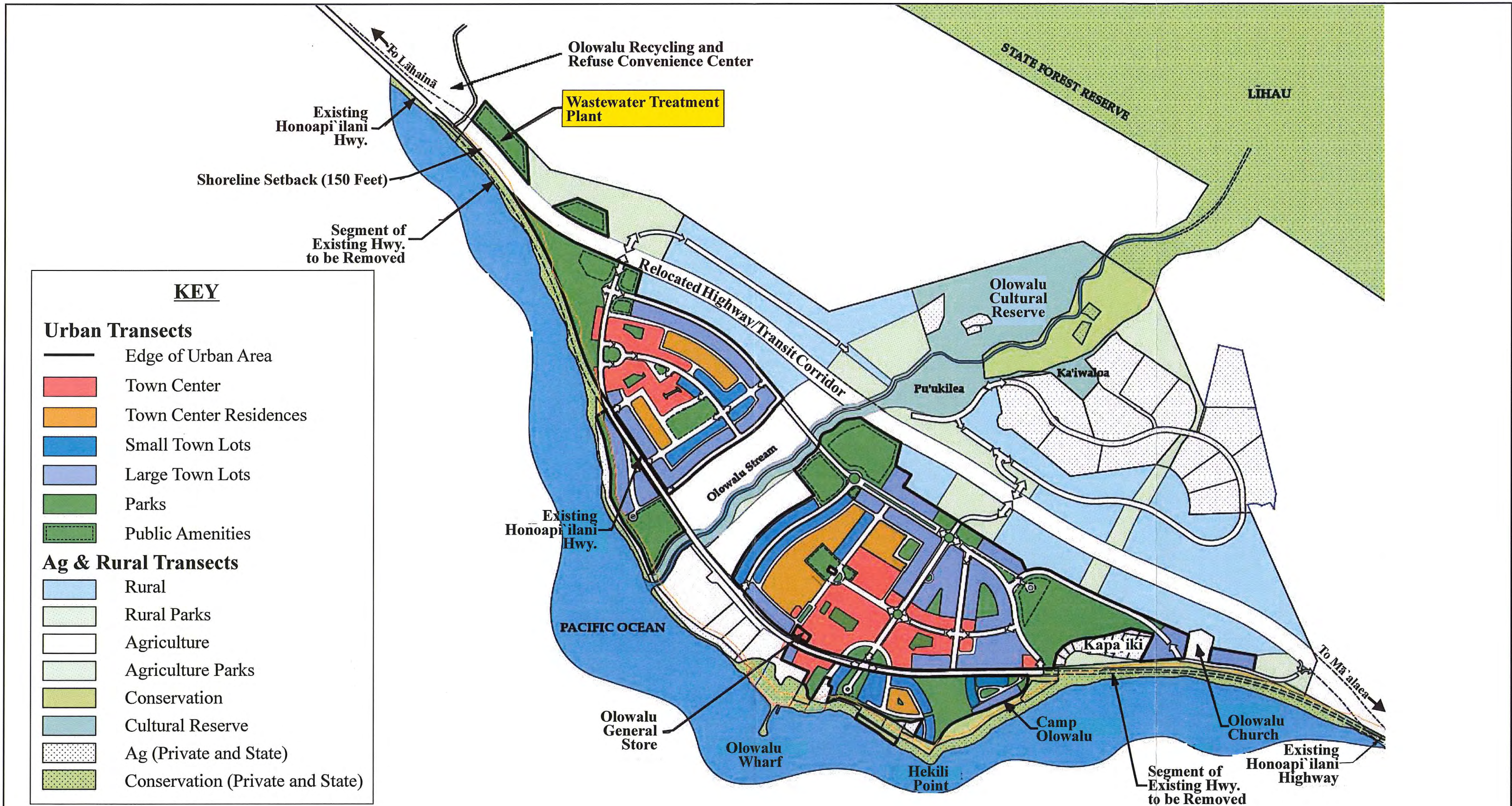
David Ward
Olowalu Town, LLC

WF:DW

Attachment

cc: Peter Martin, Olowalu Ekolu, LLC
Daniel Orodener, Executive Director, Land Use Commission
Jennifer Lim, Carlsmith Ball, LLP
Colleen Suyama, Munekiyo Hiraga

K:\DATA\OlowaluTown\MasterPlan\Draft EIS\Response Letters\Ehrenkrook Response.doc



Source: Artel, Inc.

Figure 4

Proposed Olowalu Town Master Plan
Alternative 1 Conceptual Master Plan

NOT TO SCALE



Prepared for: Olowalu Town, LLC and Olowalu Ekolu, LLC

EXHIBIT 1



OlowaluTown/MasterPI/Final EIS/conceptualplan(revised)

APR 19 2012

9909 Lemon Ave
La Mesa, CA 91941
April 15, 2012

Mr. Orlando "Dan" Davidson
State Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

Subject: *Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan (TMK Nos. (2)4-8-003:84,98 through 118, and 124)*

Dear Mr. Davidson:

We appreciate the opportunity to review the Draft Environmental Impact Statement (DEIS) for the proposed Olowalu Town Master Plan. We visit Maui frequently and enjoy driving north to Kapalua on Honoapi'ilani Highway (State Route 30). We are very concerned by the lack of existing or planned roadway infrastructure to support a development the size of the proposed Olowalu Town Master Plan. As California Registered Traffic Engineers with a combined 60 years experience in a variety of traffic engineering fields including reviewing traffic studies and environmental documents for development projects, we are sending you these comments in an effort to provide you with an understanding of this project's impacts to circulation. If this project is approved as proposed, traffic flow between West Maui and Central and South Maui will become extremely constrained. Honoapi'ilani Highway between Pali and Ma'alaea (which is not identified for improvements in the draft Maui Island Plan) would be a critical choke point restricting island circulation. This could have a profound negative economic impact on the island.

The DEIS does not disclose the proposed project's impacts to Honoapi'ilani Highway (State Route 30) outside the project site and the substantial affect this impact could have on public safety and on the economic welfare of the community and the State. Additionally, the DEIS does not analyze each phase of the development as required by HAR Section 11-200-17. For these reasons, we have found the DEIS for the Olowalu Town Master Plan to be inadequate.

Traffic Impacts Not Disclosed:

The DEIS and its Preliminary Traffic Impact Analysis Report ("TIAR") does not acknowledge or disclose any significant impact to Honoapi'ilani Highway for the following reasons:

- The TIAR assumes Honoapi'ilani Highway is widened to four lanes north of the project site; however, there is no identified funding for this costly infrastructure improvement.

- The TIAR assumes Honoapi'ilani Highway can accommodate substantially more traffic than it actually can before failing. The TIAR assumes Honoapi'ilani Highway south of the project site can accommodate 33,300 average daily vehicle trips (ADT) based on the assumption that this highway is an uninterrupted flow highway rather than an arterial with access points to the beach and to scenic lookouts. *The Proposed Roadway Development Program* dated January 2007 prepared for the County of Maui Planning Department for the draft *Maui Island Plan* assumed Honoapi'ilani Highway south of the Olowalu Town Master Plan site could accommodate about 22,000 ADT before failing.
- An unreasonably high, and technically unjustified, internal capture rate of 55% for project generated trips is assumed in the TIAR. Consequently, not enough project trips are distributed to Honoapi'ilani Highway. The Institute of Traffic Engineers (ITE) defines internal trip capture rate as a percentage reduction that can be applied to the trip generation estimates for the individual land uses to account for trips internal to the site. A nationally recognized methodology used by traffic engineers, such as the *Trip Generation Handbook, 2nd Edition*, by the Institute of Traffic Engineers (ITE) should be used to calculate internal capture. This methodology was used to calculate internal capture for both the *Wail'ele* project in Central Maui and the *Honua'ula* project in South Maui. The internal capture rates for *Wail'ele* and *Honua'ula* were about 10% and 15%, respectively. (See Attachment A). Using the *Trip Generation Handbook* methodology, the internal capture of the Olowalu Master Plan would be about 15%.
- An unreasonably high, and technically unjustified, number of pass-by and diverted linked trips were assumed in the TIAR. Consequently not enough project trips are distributed to Honoapi'ilani Highway. Pass-by trip reductions should not be applied to re-aligned Honoapi'ilani Highway because it is not anticipated driveways would be allowed on this access controlled facility. The diverted linked trip reductions are high compared to documented rates in ITE and other credible sources.
- Future traffic volumes on Honoapi'ilani Highway are underestimated, due to the following:
 - Existing traffic counts used by the TIAR to develop future traffic volumes are too low. These existing counts were gathered in October 2010 during low tourist season and after the Great Recession of 2008. The TIAR states Honoapi'ilani Highway south of the project site carried 22,840 vehicles per day in October 2010. In contrast, this roadway west of the Pali tunnel is shown as carrying 24,422 ADT in Year 2003 in the *Proposed Roadway Development Program* prepared for the County of Maui Planning Department for the draft *Maui Island Plan*.
 - Traffic from other known projects in the area, such as Ukumehame, and traffic from other reasonably foreseeable projects were not assumed in the future analysis
 - Additionally, it cannot be confirmed whether the 1% annual growth factor used in the TIAR to estimate future volumes on Honoapi'ilani Highway is reasonable,

since no supporting data was provided showing how the 1% annual growth factor was determined.

As an example demonstrating how the future volumes are underestimated in the TIAR, the future volumes estimated on Honoapi'ilani Highway south of the project site in the TIAR without project traffic is 24,670 ADT, but this roadway segment is shown to carry 24,422 in 2003 in the *Proposed Roadway Development Program* prepared for County of Maui Planning Department for the draft *Maui Island Plan*. (See Attachment B.) This is an increase of only 248 vehicles on Honoapi'ilani Highway in 17 years.

It should also be noted that the TIAR indicates that Honoapi'ilani Highway south of the project site would operate at level of service (LOS) E at full build out of the project, but the *Proposed Roadway Development Program* shows this segment to be failing in the peak hour in Year 2003.

Using professionally accepted standards, we estimate that the proposed project would add about 12,000 ADT to Honoapi'ilani Highway north of the project site and about 8,000 ADT to Honoapi'ilani Highway south of the project site. This is more than three times the amount of project traffic estimated in the TIAR. Honoapi'ilani cannot accommodate this much added traffic.

The TIAR should be revised to use nationally recognized and accepted methodologies for determining project trip generation and analyzing transportation impacts. When this is done, it will be clear that the Olowalu Master Plan would have significant impacts to Honoapi'ilani Highway.

Potential Substantial Affects on Public Health Not Disclosed or Discussed:

Traffic safety impacts to Honoapi'ilani Highway from the development of the proposed Olowalu project were not addressed. Honoapi'ilani Highway would be heavily congested with stopped queues of vehicles, and there would be fewer gaps for vehicles to turn into. Consequently, there would be an increased potential for a higher accident rate along this highway.

Additionally, the proposed "O-turns" along Honoapi'ilani Highway may also compromise public safety. Therefore, the DEIS should evaluate and discuss:

- The potential increase in vehicular accidents on Honoapi'ilani Highway caused by the weaving and merging maneuvers of O-turns.
- The potential increase in pedestrian and bicycle accidents on Honoapi'ilani Highway since pedestrians would not be provided a safe crossing as would be provided by traffic signals. The DEIS should address how pedestrians and bicyclists will be prevented from crossing Honoapi'ilani Highway.

Phased Analysis Not Provided

The DEIS indicates in many places that the project would be developed in phases spread out over a period of approximately 10 years. However, only one scenario, Full Buildout Year 2020, was analyzed in TIAR. The TIAR should be revised to include an analysis of each phase of the project; otherwise, the DEIS does not comply with Hawaii Administrative Rules (HAR) Section 11-200-17 I which states that a DEIS, "... shall include a statement of the probable impact of the proposed action on the environment, and impacts of the natural or human environment on the project, which shall include consideration of all phases of the action and consideration of all consequences of the environment; direct and indirect effect shall be included."

It should also be noted that the internal capture rate of the project would vary with different phases of the development. For example, if the residential phase of the project were to be constructed first with no commercial, then the project's internal capture rate would be zero. This variation in internal capture rate by phase should be accounted for in the analyses.

Other Specific Comments to the DEIS:

1. The DEIS should provide more details to support its claim that the proposed project is a smart growth development. For example, it should describe what specific design features would be incorporated to ensure the development is a pedestrian & bicycle friendly community. Specifically, the DEIS should describe whether roadways within the project site would provide non contiguous sidewalks, street trees, and traffic calming features such as bulb-outs, road humps, traffic circles. The DEIS should also describe what type of bicycle amenities (e.g. bicycle racks, lockers, showers, bicycle corrals) and bicycle facilities (e.g. bicycle paths, bicycle lanes) would be provided to ensure the site is a bicycle friendly community.
2. The DEIS should state the "Purpose and Need" for the proposed action as required by HAR Section 11-200-17 D. The DEIS only states the project's need (which the DEIS states is to increase the supply of housing for Maui residents) but does not state the project's purpose. Without a statement of purpose, it is impossible to identify reasonable alternatives since reasonable alternatives are those that substantially meet both the purpose and the need.
3. A reduced project alternative should be proposed, since a reduced project alternative may have fewer impacts to Honoapi'ilani Highway.
4. The TIAR conclusions are contingent on specific land uses with precise square footage being constructed on the proposed project site. The DEIS should indicate how it would be assured that these land uses, and their square footages, would be constructed.
5. Should the Olowalu Master Plan be approved, the project should be conditioned to construct development not to exceed the ADT, a.m. peak-hour inbound trips, a.m. peak-hour outbound trips, p.m. peak-hour inbound trips, and the p.m. peak-hour outbound trips evaluated in the Final TIAR. Additionally, these thresholds should be tracked as the project site is developed. If the project site were to generate more traffic than assumed and analyzed in the Final TIAR, then the project could have other traffic impacts not disclosed to the approving agency in the Master Plan's FEIS.

6. The DEIS should discuss the effects of construction traffic on Honoapi'ilani Highway.
7. The DEIS should discuss the effect the proposed O-turns would have on pedestrian connectivity mauka and makai of Honoapi'ilani Highway.
8. A Transportation Demand Management Plan (TDM) should be provided by this project in an effort to meet the goals and objectives of the *Maui General Plan*. The DEIS should provide a discussion of this TDM Plan.

Specific Comments to the TIAR:

1. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR utilizes data from several other TIARs which have been done for other projects on the west side of Maui over the last five years. The TIAR should specifically name which reports it utilized.
2. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR uses information from studies done by Maui County. The TIAR should name which studies it utilized.
3. Page 1, Introduction, Purpose and Methodology: The TIAR states, "The Final TIAR will address peak hour traffic flows and utilize the methods that are normally employed in standard traffic assessments. That TIAR will also analyze in detail the predicted traffic operations at the access points to Honoapi'ilani Highway. It will assess the need for any mitigation and analyze the need for traffic control measures and devices that may be required for proper functioning of the street system. This preliminary report will not cover all items that may be studied and analyzed in the future detailed TIAR and it is not intended to substitute for that more comprehensive analysis." The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.
4. Page 2, Introduction, Purpose and Methodology: The TIAR states that the level of analysis in the TIAR does not include detailed analysis of all traffic movements at individual intersections. The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.
5. Page 2, Introduction, Purpose and Methodology: The TIAR states that the TIAR is intended to illustrate that the increase in vehicular traffic along the Honoapi'ilani Highway attributed to Olowalu Town will be successfully mitigated by way of implementing the proposed transportation plan and the related improvements, including the relocation and widening of the segment of Honoapi'ilani Highway which traverses the subject property. Clarify in this section of the TIAR what is specifically meant by the "proposed transportation plan."
6. Page 3, Description of Olowalu Town: The first paragraph of this section should describe how much square footage of office and how much square footage of commercial retail is proposed by this project rather than just describing the number of dwelling units proposed.

7. Page 3, Description of Olowalu Town: The TIAR states the design of Olowalu Town incorporates smart growth principles. One of the 10 accepted principles that define Smart Growth is to create walkable neighborhoods. The TIAR should describe specific examples of design features that would be incorporated to create walkable neighborhoods.

8. Page 8, Figure 5, Summary of Trip Generation for Olowalu Town: For ITE Code 730, Government Office Building, the proper trip rate per unit is 68.93 trips per 1,000 sf; therefore, the estimated traffic generated by that component of the site is of 1034 trips. Therefore, the total traffic generated by the site would be 33,655 ADT rather than the 32,800 ADT shown in the table. Revise the TIAR and its analyses accordingly.

9. Page 10, Background Traffic Growth: The TIAR states that several studies were made available which analyzed traffic growth trends on Honoapi'ilani Highway and that these studies are included in the appendices. However, this data was not included in the appendices. This data should be included in an appendix.

10. Page 10, Background Traffic Growth: In determining future volumes for the Year 2020 analysis, other reasonably foreseeable development project traffic be added to Honoapi'ilani Highway in addition to using an appropriate growth rate based on historical data.

11. Page 10, Background Traffic Growth: Provide a copy of the existing count data for Honoapi'ilani Highway in the appendix of the TIAR.

12. Page 10, Background Traffic Growth: Existing counts on Honoapi'ilani Highway were taken during October 2010 during low tourist season. However, existing counts should be taken during peak tourist season.

13. Page 10, Background Traffic Growth: The 24,667 ADT assumed on Honoapi'ilani Highway in Year 2020 is only 248 ADT more than existed in Year 2003 per the *Proposed Roadway Development Program* prepared for County of Maui Planning Department for the draft *Maui Island Plan*. Provide an explain why only 248 more vehicles per day would be expected to use Honoapi'ilani Highway in Year 2020.

14. Page 10, Traffic Analysis in Year 2020 without Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapi'ilani Highway, since it has beach access points and driveways to scenic lookouts, and therefore should not be considered an uninterrupted flow highway.

15. Page 11, Figure 6, Output from Highplan Software for Honoapi'ilani Highway for Year 2020 without Project in Place:

- Clarify why the output sheet says "yes" under median type
- Clarify why the output sheet says "no" under left turn impact when no left turn pockets are provided for the beach access points or scenic outlooks
- The assumed maximum capacity at LOS E of 1500 vehicles per hour per lane (vphpl) is too high. Per the FDOT 2009 Quality/Level of Service Handbook which provides

guidance on using the FDOT software, the maximum capacity at LOS E should be assumed to be 850 vphpl. (See Attachment C). It should be noted that agencies in southern California assume much lower capacities for roadways constructed and functioning similar to Honoapi'ilani Highway. As an example, the County of San Diego assigns the capacity of 16,200 ADT to a two-lane rural facility. (See Attachment D).

16. Page 12, Traffic Generation for Olowalu Town: The TIAR takes a 15% reduction in trip generation to account for walking and bicycling within the project site and cites other local governments such as the City of Frederick, Maryland as allowing this as well. However, the reduction allowed by the City of Frederick includes walking, bicycling, and internal capture. (See Attachment E). Therefore, using the City of Frederick as an example is not correct and this reference (as well as the associated page included in Appendix 4 of the TIAR) should be removed from the TIAR.

17. Page 12, Traffic Generation for Olowalu Town: Reducing the ITE trip generation rate by 15% for walking and bicycling is not appropriate. The internal capture rate already accounts for this reduction.

18. Page 12, Traffic Generation for Olowalu Town: The TIAR states that based on the anticipated plan for the proposed project, the TIAR determined that significant proportions of total travel could and would be made within the town itself, without any requirement to travel on Honoapi'ilani Highway to Lahaina, Ma'alea or elsewhere on the island. Please clarify how this statement can be supported since:

- Facilities such as schools, a library, and a post office are not assured but require public funds to be constructed and/or operated.
- There is no assurance that the Olowalu Master Plan would provide land uses to serve all residents day to day needs such as a grocery store, pharmacy, and restaurants.
- The proposed project would not provide enough jobs for all its residences.

19. Page 12, Traffic Generation for Olowalu Town: The amount of internal capture rate assumed by the TIAR should be calculated using worksheets in the *ITE Trip Generation Handbook*, 2nd edition, and completed worksheets should be provided in an appendix of the TIAR. Alternatively, the methodology outlined in the NCHRP Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*, by the Transportation Research Board of the National Academies could be used although its researchers do not recommend its use on sites over 300 acres. (See Attachment F).

20. Page 12, Traffic Generation for Olowalu Town: The TIAR states that due to the design of the town and its street network, many of the trips within the town will likely be made via walking or cycling and not require use of the automobile. This element will be addressed in detail in the final TIAR. This element of the TIAR should be addressed in the DEIS rather than the FEIS.

21. Page 13, Traffic Generation for Olowalu Town, Table 1, Internal Capture of Trips in Olowalu Town: The internal capture rates shown for each land use in Table 1 should be

supported by appropriate technical data; otherwise, the *ITE Trip Generation Handbook*, 2nd edition methodology should be used for computing internal capture.

22. Page 13, Traffic Generation for Olowalu Town: The TIAR states that the Maui LRTP was used to assist in estimating the amount of "pass-by" trips to Olowalu Town. However, "Pass-by trips" are defined by ITE as trips made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Since the proposed project's land uses have no direct access to Honoapi'ilani Highway, the number of pass-by trips for this project would be zero.

23. Page 13, Traffic Generation for Olowalu Town: Revise the name of Table 2 from "Pass-by and Diverted Trips on Honoapi'ilani Highway" to simply, "Diverted Linked Trips on Honoapi'ilani Highway."

24. Page 13, Traffic Generation for Olowalu Town: The percent of diverted linked trips for each land use should be based on empirical data from a reliable source such as the *ITE Trip Generation Handbook* or San Diego Association of Government's (SANDAG) *(Not So) Brief Guide of Vehicular Traffic Generation Rates For The San Diego Region*, available on-line at the following URL:

http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf

Most of the diverted linked rates shown in Table 2 are very high compared to the rates shown in the SANDAG document. (See Attachment G). Diverted linked rates used in the TIAR should be documented.

25. Pages 12 - 14, Tables 2 - 4: Table 2, Table 3, and Table 4 list an elementary school as a land use but Figure 5 on Page 8, which is the trip generation summary, does not. Please explain this apparent discrepancy.

26. Page 16, Trip Distribution: Table 4 should be renamed, "Trip Distribution for Diverted Linked Trips" assuming there are no proposed land uses with direct access to Honoapi'ilani Highway.

27. Page 17, Traffic Assignment: The TIAR does not include analysis of travel from the mauka side to/from the makai side of the Olowalu Town and the trips made between mauka and makai side via the connector street, and that these items will be reviewed in detail in the final TIAR. These analyses should be provided in this DEIS and available for public review and comment.

28. Page 18, Development of Future Traffic Data: Clarify why a 15% growth rate is used for Figure 10 and the access analyses in Appendix 3, but other portions of the document indicate an 8% growth rate was used.

29. Page 19, Figure 7, Existing Traffic Volumes on Honoapi'ilani Highway: Provide another figure depicting the traffic volumes on Honoapi'ilani Highway from counts taken during

February which is peak tourist season. Use whichever figure has the higher volumes to develop future volumes .

30. Page 20, Figure 8, Future Year 2020 Traffic Volumes without Project on Honoapi'ilani Highway: Revise this figure to include traffic from other reasonably foreseeable projects that would be constructed and occupied by Year 2020 (in addition to the background growth factor already assumed).

31. Page 21-22, Figures 9-10, Traffic Added from Olowalu Town Project and Olowalu Town Study Network Traffic with Full Buildout of Project in Place: Revise these figures to address our comments regarding trip generation, internal capture, and diverted linked trip rates.

32. Page 23, Future Roadway Network: Conduct a weaving analysis for the proposed "O-turns." The results of these weaving analyses should be provided in an appendix of the TIAR. Additionally, the effects of weaving on capacity of the proposed re-aligned Honoapi'ilani Highway should be evaluated.

33. Page 23, Future Roadway Network: Provide a queuing analysis to determine if the proposed left turn pockets for the proposed O-turns are sufficient to accommodate the vehicular demand without having vehicles spill into the through lane.

34. Page 23, Future Roadway Network: Provide calculations to determine the appropriate length of the acceleration and deceleration lanes of the proposed O-turns.

35. Page 23, Future Roadway Network: Data should be provided demonstrating the proposed "O-turns" weaving will not compromise public safety by creating a higher incidence of side swipe and rear end collisions caused by merging.

36. Page 23, Future Roadway Network: Discuss the effects of the proposed O-turns on pedestrian connectivity between the mauka and makai side of Honoapi'ilani Highway.

37. Page 23, Future Roadway Network: Evaluate pedestrian safety issues of the proposed O-turns , since the O-turns do not provide protected pedestrian crossings across Honoapi'ilani Highway as would be provided by signalized intersections. Also discuss how pedestrians would be prevented from crossing Honoapi'ilani Highway.

38. Page 25, Analysis of Impacts of Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapi'ilani Highway south of the project site, since it would still have beach access points and scenic lookout points in Year 2020 and therefore cannot be considered an uninterrupted flow highway. If FDOT software were to be used, ArtPlan would be the appropriate software to utilize.

39. Page 25, Analysis of Impacts of Olowalu Town Project: The estimated daily maximum capacity of 56,600ADT and predicted speed of 50 mph Honoapi'ilani Highway within the project site is too high since there would be weaving, merging, acceleration, and deceleration associated with the proposed O-turns.

40. Page 25, Analysis of Impacts of Olowalu Town Project: The predicted speed of 29 mph for Honoapi'ilani Highway and maximum capacity of 33,300 ADT south of the project is too high as this highway segment would not have uninterrupted flow.

41. Page 25, Analysis of Impacts of Olowalu Town Project: The TIAR indicates detailed program outputs for the Highplan analyses sheets shown are Figures 12 - 14 are provided in the appendices. However, these sheets are not provided in the appendices.

42. Page 26, Figure 14, Output from Highplan Software for Portion of Honoapi'ilani Highway with Existing Roadway Configuration:

- The roadway variables portion of the data sheet shows "yes" for median type but this portion of Highway 30 has no median.
- The LOS E maximum capacity of 1,500 vehicles per hour per lane (vphpl) is too high. The *Proposed Roadway Development Plan* by Fehr & Peers assumed 1000 vehicles per hour at level of service E, using the *Highway Capacity Manual*. (See Attachment H).
- The LOS E maximum capacity of 33,300 ADT is too high.

43. Page 27, Figure 13, Output from Highplan Software with Relocated and Widened Honoapi'ilani Highway in Place at Full Buildout of Olowalu Town:

- The data sheet indicates the segment from the Old Land Fill to Mile 14 is 5 miles long but this same segment is shown as 2.6 miles long on Figure 6.
- The LOS E maximum capacity of 2,950 vphpl is too high.
- The LOS E maximum capacity of 56,600 ADT is too high.

44. Page 28, Figure 14, Output from Highplan Software for Portion of Honoapi'ilani Highway South of the Project Site at Full Buildout of Olowalu Town:

- The data sheet indicates the number of through lanes is 4 but this is a two-lane facility.
- The data sheet shows "yes" for median type but this portion of Highway 30 has no median.
- The assumed free flow speed of 50 miles/hour is too high.
- The LOS E maximum capacity of 1500 vphpl is too high. The LOS E maximum capacity of 33,300 ADT is too high.

45. Page 29, Table 6, Capacity, ADTs and Levels of Service for Honoapi'ilani Highway In Full Buildout Year of 2020:

- The assumed daily maximum capacity of 56,600 for the segments between the southern project boundary and north of the transfer station is too high.
- The assumed daily maximum capacity of 33,300 for the segment called "existing roadway south of Olowalu Town Project" is too high.
- The table indicates the segment north of the transfer station is widened to two through lanes in each direction. Clarify in the TIAR on what basis this is assumed. Only projects

that are fully funded and scheduled for construction prior to Year 2020 should be assumed.

46. Appendix 3, Intersection Turning Movements: Clarify why the data sheets indicate 15 percent growth when the TIAR indicates an 8 percent growth rate was used to develop Year 2020 ADT volumes.

47. Appendix 4, Traditional Development of Trip Generation Characteristics: The internal capture rates for the developments discussed in this paper do not support the 55% internal capture assumed in the TIAR.

48. Appendix 4, Traditional Development of Trip Generation Characteristics: The conclusion of this paper indicates the authors support the use of internal capture estimates produced using the ITE *Trip Generation Handbook* methodologies. The TIAR should use this method to determine internal capture.

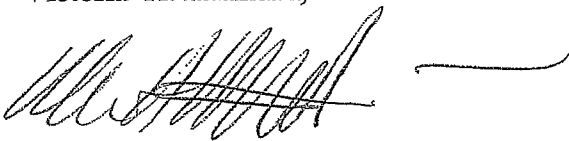
Thank you once again for providing us the opportunity to review and comment on the DEIS.

We hope that these comments help the approving agency make an informed decision when determining whether to approve the proposed Olowalu Master Plan development project.

Sincerely,

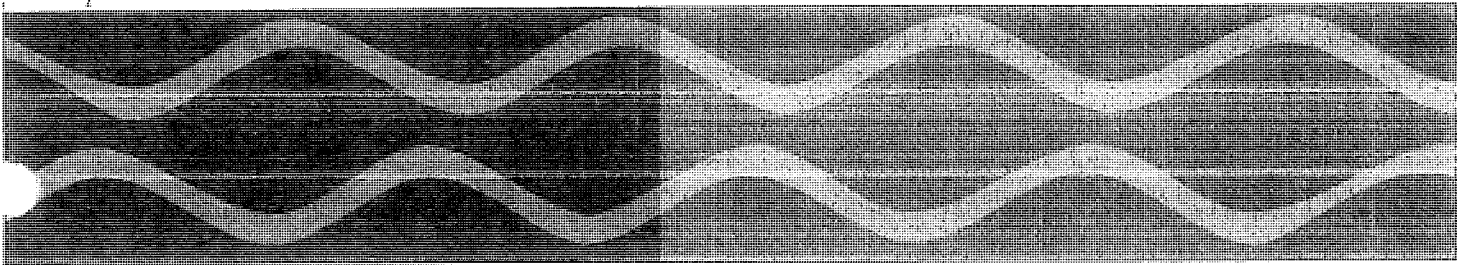


Victoria A. Huffman, P.E.



Walton H. Huffman JR, P.E.

cc: Olowalu Town, LLC
Colleen Suyama, Munekiyo & Hiraga, Inc.



WAI'ALE
FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME 2 OF 2 | APPENDICES

PREPARED BY:



OCTOBER 2011



Table 6: Year 2022 with Project Trip Generation

Land Use (ITE Code)	Independent Variable	AM Peak hour of traffic		PM Peak hour of traffic	
		Enter (vph)	Exit (vph)	Enter (vph)	Exit (vph)
Single Family (210)	1,420 (DU)	253	760	750	441
<i>SF</i>	1,240 (DU)	219	658	638	375
<i>County SF</i>	180 (DU)	34	102	112	66
Multi-Family (230)	1,130 (DU)	76	364	352	174
<i>MF</i>	481 (DU)	31	151	147	72
<i>VMX MF</i>	529 (DU)	34	163	158	78
<i>County MF</i>	120 (DU)	11	50	47	24
Commercial (820)	230,000 (GFA)	154	99	545	567
Village Mixed Use (815) AM and (814) PM	250,000 (GFA)	181	85	274	349
General Industrial (130)	175,000 (GFA)	131	29	38	140
Middle School (522)	820 (Students)	244	199	64	67
Total		1,039	1,536	2,024	1,738
Internal Capture	N/A	-	-	164	164
Diverted Link Trip	N/A	-	-	82	82
TOTAL		1,039	1,536	1,778	1,492

B. Trip Distribution

Trips generated by the Project were assigned onto the network based on the future employment zones. Similar to Figure 4 in Section III, trips were assigned to the four (4) major employment areas as follows:

- Kahului/Hana/Upcountry at 35 percent
- Wailuku at 30 percent
- Lahaina/West Maui at 20 percent
- Kihei /South Maui at 15 percent




The project is planned as a mixture of housing, commercial, industrial and school land uses. The multi-use of the Project is aimed at providing close proximity between these land uses to reduce the amount of external trips.

The Institute of Transportation Engineers, Trip Generation Handbook second edition (2004) provides internal capture rates for multi-use developments for the (PM) peak hour of traffic only. Rates provided for retail to/from retail and retail to/from residential were applied. Overall, the internal capture was assumed to account for less than 10 percent of the total Project generated entering and exiting trips during the PM peak hour of traffic. Internal capture was not applied to AM peak hour traffic. }

*

Diverted linked trips were also assumed to occur for 4 percent of the trips generated by the Project during the PM peak hour of traffic. This is where commercial trips are considered existing trips (i.e. on Kuihelani Highway) that make intermediate stops at commercial land uses on their way to their final destinations.

HONUA'ULA



DRAFT ENVIRONMENTAL IMPACT STATEMENT

VOLUME 3 OF 3
(APPENDICES L-Q)

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

Applicant:
Honua'ula Partners, LLC

Prepared by:



March 2010

IV. FUTURE YEAR TRAFFIC CONDITIONS WITH THE PROJECT

A. Trip Generation

Trip generation estimates the total number of trips produced by a given land use. Trip rates contained in the nationally published ITE, Trip Generation, 8th Edition were used to estimate the number of trips generated by the Project. Additionally, the Resort Residential Trip Generation Rate Development prepared by Parsons Brinkerhoff Quade & Douglas, Inc. dated October 2, 2006 as accepted by the SDOT, is utilized to estimate the number of trips generated by resort residential units. Table 5, as shown in the previous section, shows these trip generation rates and Table 6 shows the number of peak hour trips that are expected to be generated by the Project.

* An estimation of the percentage of internal trip capture was obtained from the ITE Trip Generation Handbook, Second Edition, which was determined to be approximately 15 percent. The internal trip capture was only applied to the PM peak hour of traffic since commercial areas are typically closed during the AM peak hour of traffic. The 15 percent internal trip capture rate was applied to the number of residential trips and the result was applied to the commercial trips, in order to match the number of internal trips between the residential areas and commercial areas. Internal trips are assumed within the Project. *

B. Trip Distribution

The Project generated trips were distributed based on the distribution utilized by the Maui Travel Demand Forecasting Model; Figure 8 shows the general distribution. Phase I of the Project proposes to construct the east leg of the Piilani Highway/Wailea Ike Drive intersection and Kaukahi Street will be extended into the Project. Since Kaukahi Street is a private street, it is planned to be gated within the Project site to address concerns of current owners along the street. Phase II of the Project proposes to extend Piilani Highway, forming the south leg of the Piilani Highway/Wailea Ike Drive intersection. Figures 9, 10, and 11 show the Project generated traffic volumes during Year 2016, 2018, and 2022, respectively.

Attachment B

1 of 2

PROPOSED ROADWAY DEVELOPMENT PROGRAM

JANUARY 2007

PREPARED FOR

COUNTY OF MAUI PLANNING DEPARTMENT

PREPARED BY

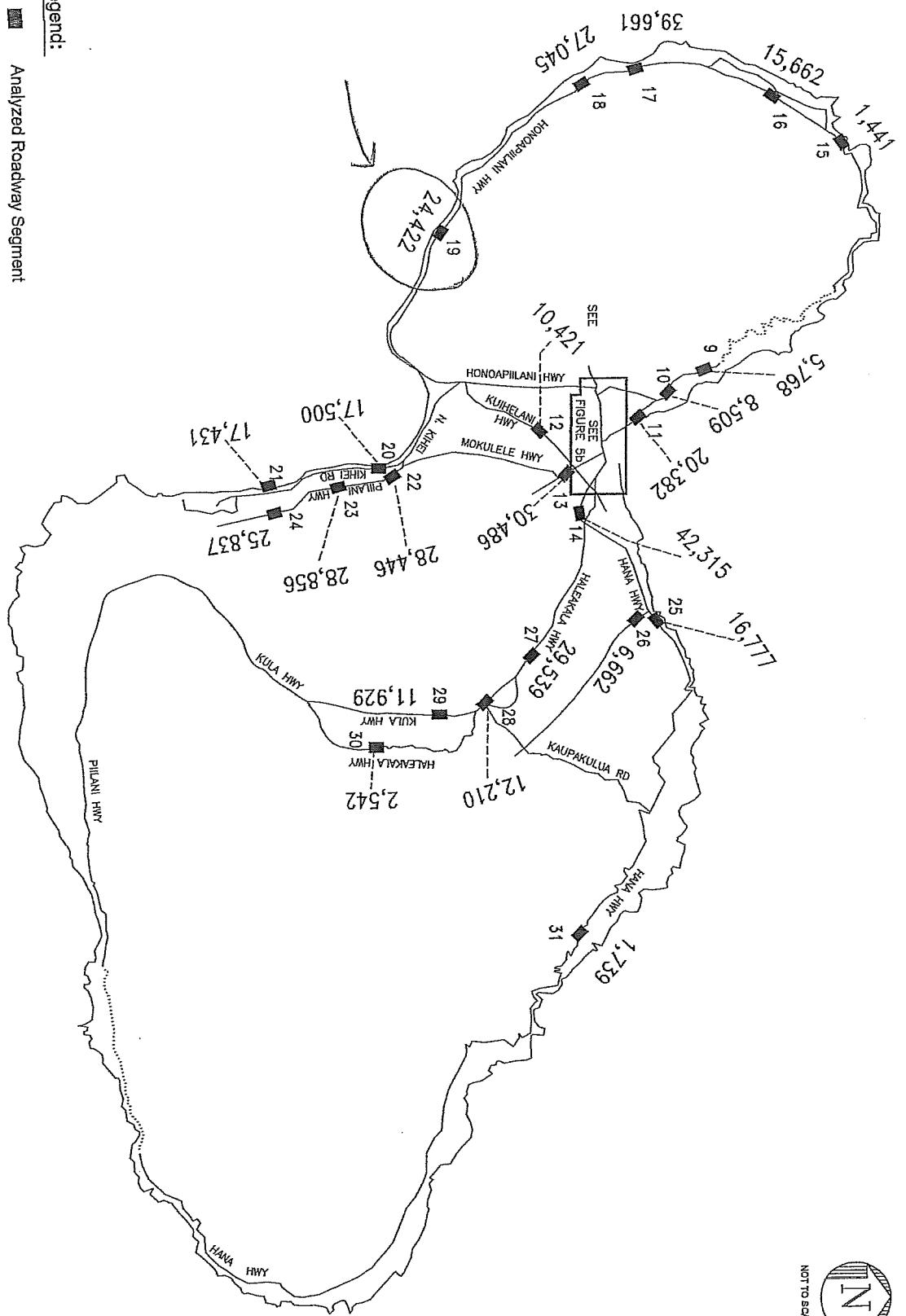

FEHR & PEERS

KAKU ASSOCIATES

Legend:

Analyzed Roadway Segment

X,XXX Average Daily Traffic Volumes

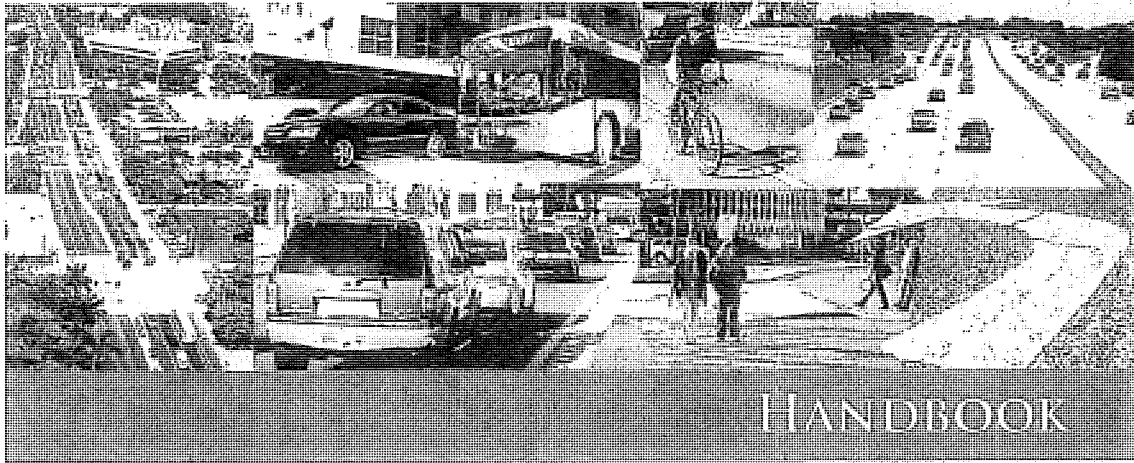


NOT TO SCALE

FIGURE 5A
ISLAND-WIDE 2003 AVERAGE DAILY TRAFFIC VOLUMES

FEHR & PEERS
KAKUMASSOCIATES

2009 QUALITY/LEVEL OF SERVICE



2009
State of Florida
Department of Transportation



7

MAXIMUM ACCEPTABLE CAPACITY VOLUMES

Use of highway capacity and LOS tools, whether applied appropriately or not, has resulted in projected traffic volumes beyond normal capacity ranges found on Florida facilities. The causes are many-fold, but to aid analysts and reviewers on what capacity values will normally be acceptable, FDOT the following guidance. These values are based on site specific freeway studies and counts, and arterial maximum acceptable thru movement effective green ratios (g/C). For the benefit of users conducting LOS analyses, FDOT's updated LOSPLAN programs will automatically check capacity and provide warnings and messages if acceptable capacities are exceeded. (Note: Under most circumstances the maximum service volume for LOS E equals capacity.)

7.1 Maximum Acceptable Capacity Volumes for Facilities

For arterial facilities the maximum generally acceptable per lane approach volumes are as follows:

- Large urbanized – 1,000 vehicles per hour per lane (vphpl)
- Other urbanized – 950 vphpl
- Transitioning – 920 vphpl
- Urban – 920 vphpl
- Rural – 850 vphpl

Note: arterial segments and sections may have higher values.

For freeway facilities and sections, the maximum generally acceptable volumes are as follows:

- Large urbanized – 2,100 vphpl (1900 vphpl if oversaturated)
- Other urbanized – 2,000 vphpl (1900 vphpl if oversaturated)
- Transitioning – 1,900 vphpl
- Urban – 1,800 vphpl
- Rural – 1,800 vphpl

For highway (generally uninterrupted flow highways) segments, the maximum generally acceptable per lane approach volumes are as follows:

- Two-lane
 - Developed – 1,600 vphpl
 - Undeveloped – 1,500 vphpl
- Multilane
 - Developed – 1,850 vphpl
 - Undeveloped – 1,600 vphpl

PUBLIC ROAD STANDARDS



COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS

March 3, 2010

**PUBLIC ROAD STANDARDS
COUNTY OF SAN DIEGO**

**TABLE 1
AVERAGE DAILY VEHICLE TRIPS***

CIRCULATION ELEMENT ROADS		LEVELS OF SERVICE					
Road Classification	# of Travel Lanes	A	B	C	D	E	
Expressway (6.1)	6	<36,000	<54,000	<70,000	<86,000	<108,000	
Prime Arterial (6.2)	6	<22,200	<37,000	<44,600	<50,000	<57,000	
Major Road (4.1A)	4	<14,800	<24,700	<29,600	<33,400	<37,000	
	w/ Intermittent Turn Lanes (4.1B)	4	<13,700	<22,800	<27,400	<30,800	<34,200
Collector	4	<13,700	<22,800	<27,400	<30,800	<34,200	
Boulevard	w/ Raised Median (4.2A)	4	<18,000	<21,000	<24,000	<27,000	<30,000
	w/ Intermittent Turn Lanes (4.2B)	4	<16,800	<19,600	<22,500	<25,000	<28,000
Town Collector	2	<3,000	<6,000	<9,500	<13,500	<19,000	
Community Collector	w/ Raised Median (2.1A)	2	<10,000	<11,700	<13,400	<15,000	<19,000
	w/ Continuous Left Turn Lane (2.1B)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	w/ Intermittent Turn Lane (2.1C)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	w/ Passing Lane (2.1D)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	No Median (2.1E)	2	<1,900	<4,100	<7,100	<10,900	<16,200
Light Collector	w/ Raised Median (2.2A)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	w/ Continuous Left Turn Lane (2.2B)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	w/ Intermittent Turn Lane (2.2C)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	w/ Passing Lane (2.2D)	2	<3,000	<6,000	<9,500	<13,500	<19,000
	No Median (2.2E)	2	<1,900	<4,100	<7,100	<10,900	<16,200
	w/ Reduced Shoulder (2.2F)	2	<1,900	<4,100	<7,100	<10,900	<16,200
Rural Collector	2	<1,900	<4,100	<7,100	<10,900	<16,200	
Rural Light Collector	2	<1,900	<4,100	<7,100	<10,900	<16,200	
Rural Mountain	2	<1,900	<4,100	<7,100	<10,900	<16,200	
Recreational Parkway	2	<1,900	<4,100	<7,100	<10,900	<16,200	
Minor Collector	w/ Raised Median (2.3A)	2	<3,000	<6,000	<7,000	<8,000	<9,000
	w/ Intermittent Turn Lane (2.3B)	2	<3,000	<6,000	<7,000	<8,000	<9,000
	No Median (2.3C)	2	<1,900	<4,100	<6,000	<7,000	<8,000
NON-CIRCULATION ELEMENT ROADS**		LEVELS OF SERVICE					
Residential Collector	2	-	-	<4,500	-	-	
Rural Residential Collector***	2	-	-	<4,500	-	-	
Residential Road	2	-	-	<1,500	-	-	
Rural Residential Road***	2	-	-	<1,500	-	-	
Residential Cul-de-Sac or Loop Road	2	-	-	<200	-	-	

* The values shown are subject to adjustment based on the geometry of the roadway, side frictions, and other relevant factors as determined by the Director, Department of Public Works.

** Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

*** Rural Residential Collectors and Rural Residential Roads are intended to serve areas with lot sizes of 2 acres or more which do not have a demand for on-street parking. On-street parking is not assured for these cross sections. Additional right-of-way is needed if on-street parking is in paved area.

**** See Tables 2A and 2B for roadway surfacing and right-of-way widths.

TABLE 2A: COUNTY OF SAN DIEGO - PUBLIC ROAD STANDARDS

CLASSIC CIRCULATION ELEMENT ROAD CLASSIFICATIONS										
ROAD CLASSIFICATION	# LANES / LANE WIDTH	MEDIAN WIDTH	ROAD SURFACING WIDTH	R.O.W. WIDTH	PAVED SHOULDERS (#/WIDTH)	PARKWAY WIDTH	MIN. CURVE RADIUS	MAX. DESIRABLE GRADE	MIN. DESIGN SPEED (MPH)	
Expressway (6.1)	6 / 12'	34'	126'	146'	2 / 10'	10'	1,700'	6%	65	
Prime Arterial (6.2)	6 / 12'	14'	102'	122'	2 / 8'	10'	1,700'	6%	65	
Major Road (4.1A)	4 / 12'	14'	78'	98'	2 / 8'	10'	1,200'	7%	55	
Collector	4 / 12'	-	64'	84'	2 / 8'	10'	1,200'	7%	55	
Town Collector	2 / 12'	12'	54'	74'	2 / 8'	10'	500'	9%	40	
Light Collector	2 / 12'	-	40'	60'	2 / 8'	10'	700'	9%	45	
Rural Collector	2 / 12'	-	40'	84'	2 / 8'	22'	500'	12%	40	
Rural Light Collector	2 / 12'	-	40'	60'	2 / 8'	10'	500'	12%	40	
Rural Mountain	2 / 12'	-	40'	100'	2 / 8'	30'	500'	12%	40	
Recreational Parkway	2 / 12'	-	40'	100'	2 / 8'	30'	400'	12%	25	
MODERN CIRCULATION ELEMENT ROAD CLASSIFICATIONS										
Major Road	4 / 12'	-	64' - 78'	84' - 98'	2 / 8'	10'	1,200'	7%	55	
* With Intermittent Turn Lanes (4.1B)										
Boulevard	4 / 12'	14'	78'	106'	2 / 8'	14'	500'	9%	40	
*** With Raised Median (4.2A)										
*** With Intermittent Turn Lanes (4.2B)				92' - 106'	2 / 8'	14'	500'	9%	40	
Community Collector										
** With Raised Median (2.1A)	2 / 12'	14'	54'	74'	2 / 8'	10'	700'	9%	45	
** With Continuous Left Turn Lane (2.1B)	2 / 12'	14'	54'	74'	2 / 8'	10'	700'	9%	45	
*** With Intermittent Turn Lanes (2.1C)	2 / 12'	-	40' - 54'	60' - 74'	2 / 8'	10'	700'	9%	45	
*** With Passing Lane (2.1D)	2 / 12'	-	40'	84'	2 / 8'	10'	700'	9%	45	
* No Median (2.1E)	2 / 12'	-	40'	60'	2 / 8'	10'	700'	9%	45	
Light Collector										
** With Raised Median (2.2A)	2 / 12'	14'	54'	78'	2 / 8'	10'	500'	9%	40	
** With Continuous Left Turn Lane (2.2B)	2 / 12'	14'	54'	78'	2 / 8'	10'	500'	9%	40	
*** With Intermittent Turn Lanes (2.2C)	2 / 12'	-	40' - 54'	64' - 78'	2 / 8'	10'	500'	9%	40	
*** With Passing Lane (2.2D)	2 / 12'	-	40'	88'	2 / 8'	10'	500'	9%	40	
** No Median (2.2E)	2 / 12'	-	40'	64'	2 / 8'	10'	500'	9%	40	
*** With Reduced Shoulder (2.2F)	2 / 12'	-	40'	52'	2 / 2'	10'	500'	9%	40	
Minor Collector										
*** With Raised Median (2.3A)	2 / 12'	14'	54'	82'	2 / 8'	10'	350'	12%	35	
*** With Intermittent Turn Lanes (2.3B)	2 / 12'	-	40' - 54'	66' - 82'	2 / 8'	10'	350'	12%	35	
*** No Median (2.3C)	2 / 12'	-	40'	68'	2 / 8'	10'	350'	12%	35	

LEGEND: * Similar to existing Collector Road
 ** Similar to existing Town Collector
 *** Similar to existing Rural Collector
 + Same as existing Light Collector
 ++ Similar to existing Rural Light Collector
 +++ New Classification/Standard

NOTES: 1 Minimum longitudinal gradient shall be 1.0 percent for all road classifications shown above.
 2 The maximum grade for a permanent cul-de-sac street turning area shall be 6 percent.
 3 The maximum grade for a temporary cul-de-sac street turning area shall be that of the classification of the road being constructed.
 4 For standards, see County Design Standard Drawing DS-2, DS-3, DS-4, and Section 4.5N of these Standards.
 5 Additional pavement and ROW may be required for CE Collectors (4 feet) and Light Collectors (12 feet) in Industrial/Commercial Zones.
 6 CE roads needing additional turn lanes will require an additional 12 to 14 feet of pavement and ROW for each lane.
 7 The maximum super-elevation allowed on CE roads is 6%. Super-elevation is not normally required on Non-CE roads.
 8 CE roads designated with Bike Lanes will require an additional 10 feet of pavement and ROW. This may be increased to 12' for Collector Roads and above based upon the provisions in Section 7.3 of these standards.
 9 The minimum curve radii, shown in the table above, are based on the design speed with 6% super-elevation.
 10 Interim roads are to be a minimum of 28 feet A.C. within a 40 feet graded roadbed. They may be larger if traffic volumes require more travel lanes.

(c) Density

Density shall be calculated as provided in §405.

(d) Floor Area Ratio

- (1) For development of an individual platted lot, "floor area ratio" means the ratio of the total building floor area to the total lot area, in square feet.
- (2) For a subdivision plat, master plan, or site plan that includes multiple buildings, "floor area ratio" means ratio of the total building floor area to the total area of the development site, in square feet.
- (3) Floor Area ratio of PND relates to entire portion of the nonresidential component of the development.

(e) Trip Generation

- (1) The total number of average daily trips (ADT) generated by the proposed development shall not exceed the amount prescribed in the Performance Standards Matrix (Table 407-1), Column (D), per acre of development site. The applicant shall calculate total trips using the procedures established for Traffic Impact Studies (see Article 12.
- (2) Because mixed use development involves a balance between residential and non-residential facilities and a high level of pedestrian infrastructure, many trips are typically captured on-site or are made by non-vehicular modes such as walking or public transportation. In addition, the City finds that design standards for buildings, streets, and building-street relationships are an important factor in reducing the number of trips generated. Accordingly, an application using a TND, PND, or MXE may reduce the projected trips for all eligible uses (see subsection (4), below), as computed in accordance with the *ITE Manual*, by the amount shown in Table 407-2 below. In order to reduce the number of trips as provide in this subsection, the applicant shall provide a phasing schedule consistent with the following:

- A. Following approval of a final site plan and subdivision plat, the first seventy five percent (75%) of all certificates of occupancy for dwelling units shall be issued prior to the establishment of any non-residential use.
- B. No certificate of use and occupancy may be issued for the remaining dwelling units until a certificate of use and occupancy has been issued for one-hundred percent (100%) of the non-residential floor area.

Table 407-2 Trip Reductions for Mixed Use Development

Percent Residential Equivalent Units	Percent Non-residential Equivalent Units	Percent Trips Reduced
85-100%	0-14%	Not Applicable
75-84%	15-25%	10%
65-74%	25-35%	20%
35-65%	35-74%	30%
25-34%	65-74%	20%
15-24%	75-84%	10%
0-14%	85-100%	Not Applicable

Rules of Interpretation for Table 407-2:

For purposes of computing the percentage established above, one dwelling unit or 800 square feet of non-residential space shall equal one (1) equivalent unit. The equivalent units shall be located within the boundaries of the proposed development.

- (3) For purposes of this section, the overall trip generation for an eligible use (see subsection (4), below) in the DR, DB, or DBO district shall be reduced by thirty percent (30%).
- (4) For purposes of this subsection, an "eligible use" includes any residential, retail, institutional or industrial use except Auto-Oriented Uses as defined in Article 10 of this Code.

(f) Stormwater management

Stormwater credits are defined in the Maryland Department of Environment, 2000 Maryland Stormwater Design Manual, which is hereby incorporated by reference. Credits are calculated for using non-structural practices including Natural Area Conservation, Disconnection of Rooftop Runoff, Disconnection of Non Rooftop Runoff, Sheet Flow to Buffers, Open Channel Use, and Environmentally Sensitive Development. The percentage refers to the reduction in Water Quality Volume (WQv) from a development.

NCHRP

REPORT 684

Enhancing Internal Trip Capture Estimation for Mixed-Use Developments

TRANSPORTATION RESEARCH BOARD
OF THE NATIONAL ACADEMIES

NATIONAL
COOPERATIVE
HIGHWAY
RESEARCH
PROGRAM

With the increase in emphasis on livability, compact cities, and smart growth in general, MXDs have become more popular. Many are found in midtown-type urban areas (i.e., the central portion of a city or urban area that is outside the CBD but has higher densities than suburban or general urban and may include an outlying business district). Others are found in suburban locations and a few in urban peripheries. The research team did not include downtowns because they would be very difficult to survey and do not develop as one project or development and, therefore, would not need a TIA for the downtown.

During the period this project was active, the research team received dozens of calls asking for internal capture data for land uses and time periods not included in the ITE method. Requests were most frequently received for

- A.M. peak-hour internal capture rates;
- Land uses not included in the ITE method—most notably hotels, cinemas, and restaurants; and
- Very large MXDs in outlying areas.

Available Data

There are very limited data available that are capable of supporting internal capture rate estimation methodology that can use information that is *available at the time of zoning*. Three Florida surveys plus three pilot studies conducted for this project were the only surveys with enough detail to develop internal capture methodology

- For both A.M. and P.M. peak hours;
- For use with information that is available at the time of zoning requests and can be reliably projected;
- That provides the ability to analyze the effect of proximity of land uses to each other; and
- That is sensitive to differences in land use mix.

Some cordon counts have been completed for various periods and could be used for validation testing, but, by themselves with land use information, they do not provide what is needed to develop a sensitive procedure. More data are needed.

Internal Capture Estimation Methodology

Expanded ITE Methodology

This project expanded the database from three to six developments and, after considering options, expanded the ITE method to

- Add the weekday A.M. peak hour;
- Add restaurant, cinema, and hotel land uses;

- Create a land use classification structure that would permit disaggregation of the six land uses to more detailed categories should enough data become available;
- Include the effects of proximity (i.e., convenient walking distance) among interacting land uses to represent both compactness and design; and
- Provide a method that could easily be put in spreadsheet form.

This method was tested for its ability to estimate external vehicle trip generation. The existing ITE method estimates produce about one-half of the estimation error that raw ITE trip generation rates produce. The method developed in this project cuts the estimation error in half again, or roughly to about one-fourth of the raw trip generation rates.

The recommended method is described in Chapter 3. The researchers recommend its use for developments of up to 300 acres. Additional data and/or further testing could validate its use for larger developments, but that has not yet been attempted. The researchers do not recommend use of this method for downtowns, SACs, or new town types of development; the researchers do not believe it will be applicable.

The method produced has a component that estimates the effects of proximity. Unfortunately, the database is small enough for the P.M. period that factors could only be developed for some land use pairs. Absence of A.M. peak-hour data from the Florida studies precluded any A.M. proximity factors from being developed. This project's estimation method generally produced slightly closer P.M. estimates with the proximity factor included. It is recommended for use, but it is also recommended that when additional data becomes available, attempts should be made to develop proximity factors for more land use pairs.

Suggested Modifications to Existing ITE Procedures

As mentioned previously, the recommended estimation method builds on the current ITE internal trip capture procedures contained in the second edition of the *Trip Generation Handbook (1)*. Incorporation of this project's recommendations could be accomplished by performing the following:

- Expanding Tables 7.1 and 7.2 of the *Trip Generation Handbook (1)* to include all six land uses covered in this report; and
- Adding the proximity adjustment to be made after the unconstrained internal capture estimates are performed but before the balancing process.

The data collection procedures could be modified to include those recommended in this project, including the next section.

(NOT SO)
BRIEF GUIDE OF VEHICULAR TRAFFIC GENERATION RATES
FOR THE SAN DIEGO REGION



401 B Street, Suite 800
San Diego, California 92101
(619) 699-1900 • Fax (619) 699-1950

APRIL 2002

NOTE: This listing only represents a *guide* of average, or estimated, traffic generation "driveway" rates and some very general trip data for land uses (emphasis on acreage and building square footage) in the San Diego region. These rates (both local and national) are subject to change as future documentation becomes available, or as regional sources are updated. For more specific information regarding traffic data and trip rates, please refer to the San Diego Traffic Generators manual. *Always check with local jurisdictions for their preferred or applicable rates.*

LAND USE	TRIP CATEGORIES (PRIMARY:DIVERTED:PASS-BY)*	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio)		TRIP LENGTH (Miles) ^b
			Between 6:00-9:30 A.M.	Between 3:00-6:30 P.M.	
AGRICULTURE (Open Space)	[80:18:2]	2/acre**			10.8
AIRPORT	[78:20:2]				12.5
Commercial General Aviation		60/acre, 100/flight, 70/1000 sq. ft.**	8% (6:4)	8% (5:5)	
Helpports		6/acre, 2/flight, 6/based aircraft**	8% (7:3)	15% (5:5)	
100/acre**					
AUTOMOBILES ^c					
Car Wash					
Automatic		900/site, 600/acre**	4% (5:5)	8% (5:5)	
Self-serve		100/washstall**	4% (5:5)	8% (5:5)	
Gasoline	[21:51:28]				2.8
with/Food Mart		160/vehicle fueling space**	7% (5:5)	8% (5:5)	
with/Food Mart & Car Wash		155/vehicle fueling space**	8% (5:5)	8% (5:5)	
Older Service Station Design		150/vehicle fueling space, 900/station**	7% (5:5)	8% (5:5)	
Sales (Dealer & Repair)		50/1000 sq. ft., 300/acre, 60/service stall**	8% (7:3)	8% (4:6)	
Auto Repair Center		20/1000 sq. ft., 400/acre, 20/service stall**	8% (7:3)	17% (4:6)	
Auto Parts Sales		60/1000 sq. ft.,**	4%	10%	
Quick Lube		40/service stall**	7% (6:4)	10% (5:5)	
Tire Store		25/1000 sq. ft., 30/service stall**	7% (6:4)	11% (5:5)	
CEMETERY		5/acre*			
CHURCH (or Synagogue)	[64:25:11]	9/1000 sq. ft., 30/acre** (quadruple rates for Sunday, or days of assembly)	8% (6:4)	8% (5:5)	5.1
COMMERCIAL/RETAIL ^d					
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft., ^e 400/acre*	4% (7:3)	10% (5:5)	
Regional Shopping Center (40-80 acres, 400,000-800,000 sq. ft., w/usually 2+ major stores)	[54:35:11]	50/1000 sq. ft., ^e 500/acre*	4% (7:3)	9% (5:5)	5.2
Community Shopping Center (15-40 acres, 125,000-400,000 sq. ft., w/usually 1 major store, detached restaurant(s), grocery and drug stores)	[47:31:22]	80/1000 sq. ft., 700/acre**	4% (6:4)	10% (5:5)	3.6
Neighborhood Shopping Center (Less than 15 acres, less than 125,000 sq. ft., w/usually grocery & drugstore, cleaners, beauty & barber shop, & fast food services)		120/1000 sq. ft., 1200/acre**	4% (6:4)	10% (5:5)	
Commercial Shops	[45:40:15]				4.3
Specialty Retail/Strip Commercial		40/1000 sq. ft., 400/acre*	3% (6:4)	8% (5:5)	
Electronics Superstore		50/1000 sq. ft.**		10% (5:5)	
Factory Outlet		40/1000 sq. ft.**	3% (7:3)	8% (5:5)	
Supermarket		150/1000 sq. ft., 2000/acre**	4% (7:3)	10% (5:5)	
Drugstore		90/1000 sq. ft.**	4% (6:4)	10% (5:5)	
Convenience Market (15-16 hours)		500/1000 sq. ft.**	8% (5:5)	8% (5:5)	
Convenience Market (24 hours)		700/1000 sq. ft.**	9% (5:5)	7% (5:5)	
Convenience Market (w/gasoline pumps)		850/1000 sq. ft., 550/vehicle fueling space**	8% (5:5)	7% (5:5)	
Discount Club		60/1000 sq. ft., 600/acre**	7% (7:3)	9% (5:5)	
Discount Store		60/1000 sq. ft., 600/acre**	3% (6:4)	8% (5:5)	
Furniture Store		6/1000 sq. ft., 100/acre**	4% (7:3)	9% (5:5)	
Lumber Store		30/1000 sq. ft., 150/acre**	7% (6:4)	9% (5:5)	
Home Improvement Superstore		40/1000 sq. ft.*	8% (6:4)	8% (5:5)	
Hardware/Paint Store		60/1000 sq. ft., 600/acre**	2% (6:4)	8% (5:5)	
Garden Nursery		40/1000 sq. ft., 80/acre**	3% (6:4)	10% (5:5)	
Mixed Use: Commercial (w/supermarket)/Residential		110/1000 sq. ft., 2000/acre* (commercial only)	3% (6:4)	8% (5:5)	
		15/dwelling unit, 200/acre* (residential only)	9% (3:7)	13% (6:4)	
EDUCATION					
University (4 years)	[91:9:0]	2.4/student, 100 acre*	10% (8:2)	9% (3:7)	8.9
Junior College (2 years)	[92:7:1]	1.2/student, 24/1000 sq. ft., 120/acre**	12% (8:2)	9% (6:4)	9.0
High School	[75:19:6]	1.3/student, 15/1000 sq. ft., 60/acre**	20% (7:3)	10% (4:6)	4.8
Middle/Junior High	[63:25:12]	1.4/student, 12/1000 sq. ft., 50/acre**	30% (6:4)	9% (4:6)	5.0
Elementary	[57:26:10]	1.6/student, 14/1000 sq. ft., 90/acre**	32% (6:4)	9% (4:6)	3.4
Day Care	[28:58:14]	5/child, 80/1000 sq. ft.**	17% (5:5)	18% (5:5)	3.7
FINANCIAL ^e	[35:42:23]				3.4
Bank (Walk-In only)		150/1000 sq. ft., 1000/acre**	4% (7:3)	8% (4:6)	
with Drive-Through		200/1000 sq. ft., 1500/acre*	8% (6:4)	10% (5:5)	
Drive-Through only		250 (125 one-way)/lane*	3% (5:5)	13% (5:5)	
Savings & Loan		60/1000 sq. ft., 600/acre**	2%	8%	
Drive-Through only		100 (50 one-way)/lane**	4%	15%	
HOSPITAL	[73:25:2]				8.3
General		20/bed, 25/1000 sq. ft., 250/acre*	8% (7:3)	10% (4:6)	
Convalescent/Nursing		3/bed**	7% (6:4)	7% (4:6)	
INDUSTRIAL					
Industrial/Business Park (commercial included)	[79:19:2]	16/1000 sq. ft., 200/acre**	12% (8:2)	12% (2:8)	9.0
Industrial Park (no commercial)		8/1000 sq. ft., 90/acre**	11% (9:1)	12% (2:8)	
Industrial Plant (multiple shifts)	[92:5:3]	10/1000 sq. ft., 120/acre**	14% (8:2)	15% (3:7)	11.7
Manufacturing/Assembly		4/1000 sq. ft., 50/acre**	15% (9:1)	20% (2:8)	
Warehousing		5/1000 sq. ft., 60/acre**	13% (7:3)	15% (4:6)	
Storage		2/1000 sq. ft., 0.2/vault, 30/acre*	8% (5:5)	9% (5:5)	
Science Research & Development		8/1000 sq. ft., 80/acre*	16% (9:1)	14% (1:9)	
Landfill & Recycling Center		6/acre	11% (5:5)	10% (4:6)	

(OVER)

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista and County of San Diego.
ADVISORY/LIAISON MEMBERS: California Department of Transportation, County Water Authority, U.S. Department of Defense, S.D. Unified Port District and Tijuana/Baja California.

LAND USE	TRIP CATEGORIES (PRIMARY:DIVERTED:PASS-BY)*	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN-OUT ratio)		TRIP LENGTH (Miles)**
			Between 6:00-9:30 A.M.	Between 3:00-6:30 P.M.	
LIBRARY	[44:44:12]	50/1000 sq. ft., 400/acre**	2%	(7:3) 10% (5:5)	3.9
LODGING	[58:38:4]				7.6
Hotel (w/convention facilities/restaurant)		10/occupied room, 300/acre	8%	(6:4) 8% (6:4)	
Motel		9/occupied room, 200/acre*	8%	(4:6) 9% (6:4)	
Resort Hotel		8/occupied room, 100/acre*	8%	(6:4) 7% (4:6)	
Business Hotel		7/occupied room**	8%	(4:6) 8% (6:4)	
MILITARY	[82:16:2]	2.5/military & civilian personnel*	9%	(9:1) 10% (2:8)	11.2
OFFICE					
Standard Commercial Office (less than 100,000 sq. ft.)	[77:19:4]	20/1000 sq. ft., 300/acre*	14%	(9:1) 13% (2:8)	8.8
Large (High-Rise) Commercial Office (more than 100,000 sq. ft., 6+ stories)	[82:15:3]	17/1000 sq. ft., 600/acre*	13%	(9:1) 14% (2:8)	10.0
Office Park (400,000+ sq. ft.)		12/1000 sq. ft., 200/acre* **	13%	(9:1) 13% (2:8)	
Single Tenant Office		14/1000 sq. ft., 180/acre*	15%	(9:1) 15% (2:8)	8.8
Corporate Headquarters		7/1000 sq. ft., 110/acre*	17%	(9:1) 16% (1:9)	
Government (Civic Center)	[50:34:16]	30/1000 sq. ft., 300/acre**	9%	(9:1) 12% (3:7)	6.0
Post Office					
Central/Walk-In Only		90/1000 sq. ft.**	8%		7%
Community (not including mail drop lane)		200/1000 sq. ft., 1300/acre*	8%	(6:4) 8% (5:5)	
Community (w/mail drop lane)		300/1000 sq. ft., 2000/acre*	7%	(5:5) 10% (5:5)	
Mail Drop Lane only		1500 (750 one-way)/lane**	7%	(5:5) 12% (5:5)	
Department of Motor Vehicles		160/1000 sq. ft., 900/acre**	8%	(6:4) 10% (4:6)	
Medical-Dental	[60:30:10]	50/1000 sq. ft., 500/acre*	8%	(8:2) 11% (3:7)	6.4
PARKS	[66:28:6]				5.4
City (developed w/meeting rooms and sports facilities)		50/acre*	13%	(5:5) 9%	(5:5)
Regional (developed)		20/acre*			
Neighborhood/County (undeveloped)		5/acre (add for specific sport uses), 6/picnic site* **			
State (average 1000 acres)		1/acre, 10/picnic site**			
Amusement (Theme)		80/acre, 130/acre (summer only) **			8%
San Diego Zoo		115/acre*			(6:4)
Sea World		80/acre*			
RECREATION					
Beach, Ocean or Bay	[52:39:9]	600/1000 ft. shoreline, 60/acre*			6.3
Beach, Lake (fresh water)		50/1000 ft. shoreline, 5/acre*			
Bowling Center		30/1000 sq. ft., 300/acre, 30/lane **	7%	(7:3) 11% (4:6)	
Campground		4/campsite**	4%		8%
Golf Course		7/acre, 40/tee, 700/course* **	7%	(8:2) 9% (3:7)	
Driving Range only		70/acre, 14/tee box*	3%	(7:3) 9% (5:5)	
Marinas		4/berth, 20/acre* **	3%	(3:7) 7% (6:4)	
Multi-purpose (miniature golf, video arcade, batting cage, etc.)		90/acre	2%		8%
Racquetball/Health Club		30/1000 sq. ft., 300/acre, 40/court*	4%	(6:4) 9% (6:4)	
Tennis Courts		18/acre, 30/court**	5%		11% (5:5)
Sports Facilities					
Outdoor Stadium		50/acre, 0.2/seat*			
Indoor Arena		30/acre, 0.1/seat*			
Racetrack		40/acre, 0.5 seat*			
Theaters (multiplex w/matinee)	[66:17:17]	80/1000 sq. ft., 1.8/seat, 360/screen*	13%		8%
RESIDENTIAL	[86:11:3]				7.9
Estate, Urban or Rural (average 1-2 DU/acre)		12/dwelling unit**	8%	(3:7) 10% (7:3)	
Single Family Detached (average 3-6 DU/acre)		10/dwelling unit**	8%	(3:7) 10% (7:3)	
Condominium (or any multi-family 6-20 DU/acre)		8/dwelling unit**	8%	(2:8) 10% (7:3)	
Apartment (or any multi-family units more than 20 DU/acre)		6/dwelling unit**	8%	(2:8) 9% (7:3)	
Military Housing (off-base, multi-family) (less than 6 DU/acre)		8/dwelling unit	7%	(3:7) 9% (6:4)	
(6-20 DU/acre)		6/dwelling unit	7%	(3:7) 9% (6:4)	
Mobile Home					
Family		5/dwelling unit, 40/acre*	8%	(3:7) 11% (6:4)	
Adults Only		3/dwelling unit, 20/acre*	8%	(3:7) 10% (6:4)	
Retirement Community		4/dwelling unit**	9%	(4:6) 7% (6:4)	
Congregate Care Facility		2.5/dwelling unit**	4%	(6:4) 8% (5:5)	
RESTAURANT*	[51:37:12]				4.7
Quality		100/1000 sq. ft., 3/seat, 500/acre* **	7%	(6:4) 8% (7:3)	
Sit-down, high turnover		160/1000 sq. ft., 6/seat, 1000/acre* **	8%	(5:5) 8% (6:4)	
Fast Food (w/drive-through)		650/1000 sq. ft., 20/seat, 3000/acre* **	7%	(5:5) 7% (5:5)	
Fast Food (without drive-through)		700/1000 sq. ft.**	8%	(6:4) 7% (5:5)	
Delicatessen (7am-4pm)		150/1000 sq. ft., 11/seat*	9%	(6:4) 3% (3:7)	
TRANSPORTATION					
Bus Depot		25/1000 sq. ft.**			
Truck Terminal		10/1000 sq. ft., 7/bay, 80/acre**	9%	(4:6) 8% (5:5)	
Waterport/Marine Terminal		170/berth, 12/acre**			
Transit Station (Light Rail w/parking)		300/acre, 2 1/2/parking space (4/occupied)**	14%	(7:3) 15% (3:7)	
Park & Ride Lots		400/acre (600/paved acre), 5/parking space (8/occupied)* **	14%	(7:3) 15% (3:7)	

* Primary source: San Diego Traffic Generators.
 ** Other sources: ITE Trip Generation Report [5th Edition], Trip Generation Rates (other agencies and publications), various SANDAG & CALTRANS studies, reports and estimates.
 * Trip category percentage ratios are daily from local household surveys, often cannot be applied to very specific land uses, and do not include non-resident drivers (draft SANDAG Analysis of Trip Diversion, revised November, 1990).
 PRIMARY - one trip directly between origin and primary destination.
 DIVERTED - linked trip having one or more stops along the way to a primary destination) whose distance compared to direct distance > 1 mile.
 PASS-BY - undiverted or diverted < 1 mile.

¹ Trip lengths are average weighted for all trips to and from general land use site. (All trips system-wide average length = 6.9 miles)
² Fitted curve equation: $\ln(T) = 0.502 \ln(d) + 6.945$
³ Fitted curve equation: $\ln(T) = 0.756 \ln(d) + 3.950$ } T = total trips, x = 1,000 sq. ft.
⁴ Fitted curve equation: $\ln(T) = -2.169 \ln(d) + 12.85$ } T = trips/DU, d = density (DU/acre), DU = dwelling unit

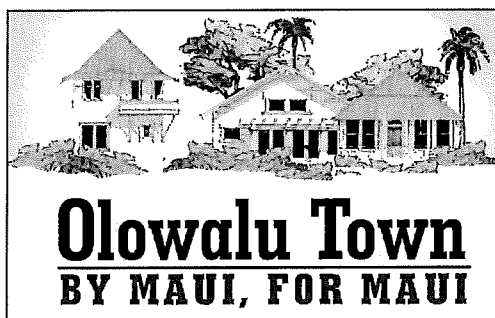
⁵ Suggested PASS-BY (undiverted or diverted < 1 mile) percentages for trip rate reductions only during P.M. peak period (based on combination of local data/review and other sources**):

COMMERCIAL/RETAIL	
Regional Shopping Center	20%
Community	30%
Neighborhood	40%
Specialty Retail/Strip Commercial (other)	10%
Supermarket	40%
Convenience Market	50%
Discount Club/Store	30%
FINANCIAL	
Bank	25%
AUTOMOBILE	
Gasoline Station	50%
RESTAURANT	
Quality	10%
Sit-down high turnover	20%
Fast Food	40%

⁷ Trip Reductions - In order to help promote regional "smart growth" policies, and acknowledge San Diego's expanding mass transit system, consider vehicle trip rate reductions (with proper documentation and necessary adjustments for peak periods). The following are some examples:
 [1] A 5% daily trip reduction for land uses with transit access or near transit stations accessible within 1/4 mile.
 [2] Up to 10% daily trip reduction for mixed-use developments where residential and commercial retail are combined (demonstrate mode split of walking trips to replace vehicular trips).

TABLE 7
2004 ROADWAY SEGMENT LEVEL OF SERVICE ANALYSIS

Location	Peak Hour	Lanes N/E	Lanes S/W	Capacity N/E	Capacity S/W	Volume N/E	Volume S/W	V/C N/E	V/C S/W	LOS N/E	LOS S/W
18 Honoapiilani Hwy @ Fleming Rd & Front St (S Junction)	AM	2	2	850	850	1069	778	0.63	0.46	B	A
	PM	2	2	850	850	1155	1142	0.68	0.67	B	B
19 Honoapiilani Hwy 1.07 Mi W of Tunnel	AM	1	1	1000	1000	665	993	0.66	0.99	B	E
	PM	1	1	1000	1000	1105	1001	1.11	1.00	F	F
20 South Kihei Rd @ Mokulele Hwy	AM	1	1	800	800	935	540	1.17	0.68	F	B
	PM	1	1	800	800	841	914	0.80	1.14	D	F
21 South Kihei Rd @ Keonekal Rd	AM	1	1	750	750	482	498	0.64	0.66	B	B
	PM	1	1	750	750	672	651	0.90	0.87	D	D
22 Piilani Hwy @ Mokulele Hwy	AM	2	2	850	850	857	1305	0.50	0.77	A	C
	PM	2	2	850	850	1168	1069	0.69	0.63	B	B
23 Piilani Hwy @ Lipoa St & Lipoa Pkwy	AM	1	1	1200	1200	969	1079	0.81	0.90	D	D
	PM	1	1	1200	1200	1195	1046	1.00	0.87	E	D
24 Piilani Hwy between Kanani & Alanui Ke Aili Rds	AM	1	1	1200	1200	943	928	0.79	0.77	C	C
	PM	1	1	1200	1200	1107	1005	0.92	0.84	E	D
25 Hana Hwy & Baldwin Av	AM	1	1	1000	1000	463	890	0.46	0.89	A	D
	PM	1	1	1000	1000	729	557	0.73	0.56	C	A
26 Hana Hwy & Baldwin Av	AM	1	1	400	400	294	198	0.74	0.48	C	A
	PM	1	1	400	400	252	271	0.66	0.68	B	B
27 Haleakala Hwy @ Hallimale Rd	AM	2	2	1200	1200	2076	545	0.87	0.23	D	A
	PM	2	2	1200	1200	918	1918	0.38	0.80	A	C
28 Haleakala Hwy @ Makawao Av & Loha St	AM	1	1	600	600	461	588	0.77	0.98	C	E
	PM	1	1	600	600	516	552	0.86	0.92	D	E
29 Kula Hwy @ Omaoplo Rd	AM	1	1	1000	1000	729	447	0.73	0.45	C	A
	PM	1	1	1000	1000	471	546	0.47	0.55	A	A
30 Haleakala Hwy & Kekaulike Av @ Haleakala Crater Rd	AM	1	1	850	850	147	94	0.17	0.11	A	A
	PM	1	1	850	850	110	88	0.13	0.10	A	A
31 Hana Hwy & Kalua Bridge	AM	1	1	300	300	28	101	0.09	0.34	A	A
	PM	1	1	300	300	120	39	0.40	0.13	A	A



2035 MAIN STREET WAILUKU HAWAII 96793

OFFICE: 808-249-2224 / FAX: 249-2333

October 26, 2015

Victoria and Walton Huffman
9909 Lemon Avenue
La Mesa, CA 91941

SUBJECT: Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan at Olowalu, Hawaii

Dear Mr. and Mrs. Huffman:

We thank you for your letter responding to our request for comments on the Draft Environmental Impact Statement (EIS) for the proposed Olowalu Town Master Plan (OTMP). We offer the following information in response to the comments noted in the letter.

Comment:

We are very concerned by the lack of existing or planned roadway infrastructure to support a development the size of the proposed Olowalu Town Master Plan. As California Registered Traffic Engineers with a combined 60 years experience in a variety of traffic engineering fields including reviewing traffic studies and environmental documents for development projects, we are sending you these comments in an effort to provide you with an understanding of this project's impacts to circulation. If this project is approved as proposed, traffic flow between West Maui and Central and South Maui will become extremely constrained. Honoapi'ilani Highway between Pali and Ma'alaea (which is not identified for improvements in the draft Maui Island Plan) would be a critical choke point restricting island circulation. This could have a profound negative economic impact on the island.

Response:

We appreciate your comment on the Draft EIS. For your information since then the Maui Island Plan (MIP) has been adopted and includes the realignment of Honoapi'ilani Highway.

Comment:

The DEIS does not disclose the proposed project's impacts to Honoapi`ilani Highway (State Route 30) outside the project site and the substantial affect this impact could have on public safety and on the economic welfare of the community and the State. Additionally, the DEIS does not analyze each phase of the development as required by HAR Section 11-200-17. For these reasons, we have found the DEIS for the Olowalu Town Master Plan to be inadequate.

Response:

A Final Traffic Impact Analysis Report (TIAR) in coordination with the State of Hawaii, Department of Transportation (HDOT) has been prepared addressing your comment and has been included in the Final EIS as "Appendix P-1". A copy of the TIAR is provided. See **Exhibit "1"**.

Comment:

The DEIS and its Preliminary Traffic Impact Analysis Report ("TIAR") does not acknowledge or disclose any significant impact to Honoapi`ilani Highway for the following reasons:

The TIAR assumes Honoapi`ilani Highway is widened to four lanes north of the project site; however, there is no identified funding for this costly infrastructure improvement.

The TIAR assumes Honoapi`ilani Highway can accommodate substantially more traffic than it actually can before failing. The TIAR assumes Honoapi`ilani Highway south of the project site can accommodate 33,300 average daily vehicle trips (ADT) based on the assumption that this highway is an uninterrupted flow highway rather than an arterial with access points to the beach and to scenic lookouts. The Proposed Roadway Development Program dated January 2007 prepared for the County of Maui Planning Department for the draft Maui Island Plan assumed Honoapi'ilani Highway south of the Olowalu Town Master Plan site could accommodate about 22,000 ADT before failing.

Response:

Regarding the foregoing comments, we offer the following responses in the order presented:

- A Draft EIS for the Realignment and Widening of Honoapi`ilani Highway (Maalaea to Launiupoko) is being prepared for the HDOT. Although not currently funded, completion of the EIS process will enable the HDOT to seek funding

sources for the highway improvements. Consideration of this improvement is appropriate since development of the OTMP will take several years to implement. We are aware that construction of the highway improvement is necessary in order to implement the total Master Plan. As such, a future highway corridor is included in the Master Plan. As a follow-up to discussions with the HDOT, the Final TIAR includes recent traffic counts obtained in 2013 to estimate the average daily traffic (ADT) of 33,300 vehicles. As such, the ADT in the TIAR is more current than the 2007 Planning Department study.

- In addition to access points to scenic lookouts on the "pali", the Ukumehame Rifle Range and a parking lot to a beach park along the shoreline, there are two (2) access points to a subdivision at Ukumehame south of the project site. According to the transportation consultant the current roadway operates in many ways like a highway with very limited access for much of the day. Honoapi`ilani Highway south of the project site has wide shoulders, limited points of access, and very few left turns which enables the highway to function similar to a facility having uninterrupted flow of traffic.

Comment:

An unreasonably high, and technically unjustified, internal capture rate of 55% for project generated trips is assumed in the TIAR. Consequently, not enough project trips are distributed to Honoapi`ilani Highway. The Institute of Traffic Engineers (ITE) defines internal trip capture rate as a percentage reduction that can be applied to the trip generation estimates for the individual land uses to account for trips internal to the site. A nationally recognized methodology used by traffic engineers, such as the Trip Generation Handbook, 2nd Edition, by the Institute of Traffic Engineers (ITE) should be used to calculate internal capture. This methodology was used to calculate internal capture for both the Wail`ele project in Central Maui and the Honua`ula project in South Maui. The internal capture rates for Wail`ele and Honua`ula were about 10% and 15%, respectively. (See Attachment A). Using the Trip Generation Handbook methodology, the internal capture of the Olowalu Master Plan would be about 15%.

Response:

Methodologies used in jurisdictions across the country show the ability of Honoapi`ilani Highway to handle larger volumes of traffic than a typical two-lane road and the estimated 22,000 average daily vehicle trips (ADT) identified in the 2007 Report prepared for the Planning Department. The Final TIAR estimated the ADT in the OTMP would be between 31,775 to 34,220 vehicles at full buildout. The Final TIAR estimated the capacity of the existing 2-lane Honoapi`ilani Highway as 33,300 ADT and the estimated daily maximum capacity of the realigned 4-lane Honoapi`ilani Highway as 55,500 vehicles.

- According to the traffic consultant, the Institute of Traffic Engineers (ITE) Trip Generation Handbook (9th Edition) procedure for internal capture relies on data for developments such as Honua`ula and Waiale which follow more typical land use spatial allocations and relationships. The OTMP differs from these projects in that it proposes to follow the principals of the Hawaiian ahupua`a system of land management. The ITE methodology does not adequately address a sustainable new town such as the OTMP which follows the principals of the Hawaiian ahupua`a system. The 55 percent internal capture rate was developed as indicated in the report taking into account the type and style of the OTMP and its ability to support the anticipated retail and office developments. The methodology used is generally that of the Florida Department of Transportation in recent publications as noted in the report along with information from other states. As a follow-up to discussions with the HDOT, the Final TIAR was prepared with a project recommended internal capture rate of 64/36 percent and a HDOT internal capture rate of 25/75 percent.

Comment:

An unreasonably high, and technically unjustified, number of pass-by and diverted linked trips were assumed in the TIAR. Consequently not enough project trips are distributed to Honoapi`ilani Highway. Pass-by trip reductions should not be applied to re-aligned Honoapi`ilani Highway because it is not anticipated driveways would be allowed on this access controlled facility. The diverted linked trip reductions are high compared to documented rates in ITE and other credible sources.

Future traffic volumes on Honoapi`ilani Highway are underestimated, due to the following:

Existing traffic counts used by the TIAR to develop future traffic volumes are too low. These existing counts were gathered in October 2010 during low tourist season and after the Great Recession of 2008. The TIAR states Honoapi`ilani Highway south of the project site carried 22,840 vehicles per day in October 2010. In contrast, this roadway west of the Pali tunnel is shown as carrying 24,422 ADT in Year 2003 in the Proposed Roadway Development Program prepared for the County of Maui Planning Department for the draft Maui Island Plan.

Traffic from other known projects in the area, such as Ukumehame, and traffic from other reasonably foreseeable projects were not assumed in the future analysis.

Additionally, it cannot be confirmed whether the 1% annual growth factor used in the TIAR to estimate future volumes on Honoapi`ilani Highway is reasonable, since no

supporting data was provided showing how the 1% annual growth factor was determined.

Response:

- According to the TIAR, due to the isolated nature to the site, with long travel distance to other populated areas on the island, it is less likely that residents on other parts of the island would make special trips to Olowalu Town for employment, shopping opportunities, or other services that could be found closer to their respective home region. However, a significant number of trips that will be made to and from Olowalu Town that are not generated within Olowalu Town will be from travelers already on Honoapiʻilani Highway or “pass-by or diverted trips”.

An analysis of trip length frequency curves from the Maui Long Range Transportation Plan (LRTP) was made to assist in estimating the amount of “pass-by” trips that would have destinations or origins in Olowalu Town that would already be on the highway. Table 2 of the Preliminary TIAR (Appendix “M” of the Draft EIS) estimated the proportion of “pass-by and diverted” trips. The traffic consultant affirms that based on this methodology and assumption set, the results of the pass-by and diverted linked trips are appropriate.

- The Preliminary TIAR does indicate the rationale for the annual growth rate. Based on a review of current data provided by the HDOT, an annual traffic volume growth rate of approximately one (1) percent was used for Honoapiʻilani Highway resulting in a total growth rate of eight (8) percent between 2011 and full buildout of the OTMP. This eight (8) percent growth rate was applied to the existing volumes on Honoapiʻilani Highway to derive future year traffic volumes without the OTMP project in place. The Final TIAR utilized a nine (9) percent growth rate applied to traffic counts obtained in 2013. The Final TIAR estimated the background growth rate would be eleven (11) percent from 2013 to full buildout in 2024.

Comment:

As an example demonstrating how the future volumes are underestimated in the TIAR, the future volumes estimated on Honoapiʻilani Highway south of the project site in the TIAR without project traffic is 24,670 ADT, but this roadway segment is shown to carry 24,422 in 2003 in the Proposed Roadway Development Program prepared for County of Maui Planning Department for the draft Maui Island Plan. (See Attachment B.) This is an increase of only 248 vehicles on Honoapiʻilani Highway in 17 years.

It should also be noted that the TIAR indicates that Honoapiʻilani Highway south of the project site would operate at level of service (LOS) E at full build out of the project, but the Proposed Roadway Development Program shows this segment to be failing in the peak hour in Year 2003.

Using professionally accepted standards, we estimate that the proposed project would add about 12,000 ADT to Honoapiʻilani Highway north of the project site and about 8,000 ADT to Honoapiʻilani Highway south of the project site. This is more than three times the amount of project traffic estimated in the TIAR. Honoapiʻilani cannot accommodate this much added traffic.

The TIAR should be revised to use nationally recognized and accepted methodologies for determining project trip generation and analyzing transportation impacts. When this is done, it will be clear that the Olowalu Master Plan would have significant impacts to Honoapiʻilani Highway.

Response:

The transportation consultant concurs that the 2010 ADT is below historical data collected in 2003 which is outdated and conditions affecting traffic have occurred since then in which traffic volumes have declined. However, the annual traffic volume growth rate accommodate for these changes in traffic conditions. For this reason, the transportation consultant concludes that the traffic counts derived in the Preliminary TIAR are reliable and appropriate. It is noted that as the project progresses through the entitlement process, updated TIARs with updated traffic counts will be prepared. As noted previously, a Final TIAR has been prepared with updated traffic counts. Refer to **Exhibit "1"**.

The preliminary TIAR does not include a review of the methodology used in developing the referenced Proposed Roadway Development Program. We do not know how that study developed the referenced future volumes as compared to our analysis. Again, the preliminary TIAR did not include any peak hour analysis. However, the Final TIAR based on the 2013 traffic counts determined 7:00 to 8:00 a.m. and 4:00 to 5:00 p.m. as the peak hours of traffic.

The preliminary TIAR did use ITE rates (modified based on the site development plan) and reasonable internal capture estimates based on the town plan. The Final TIAR has been completed. Refer to **Exhibit "1"**. As noted previously, as the project progresses and further refinements to the development are made updated TIARs will be prepared.

Comment:

Potential Substantial Affects on Public Health Not Disclosed or Discussed:

Traffic safety impacts to Honoapiʻilani Highway from the development of the proposed Olowalu project were not addressed. Honoapiʻilani Highway would be heavily congested with stopped queues of vehicles, and there would be fewer gaps for vehicles to turn into. Consequently, there would be an increased potential for a higher accident rate along this highway.

Additionally, the proposed “O-turns” along Honoapiʻilani Highway may also compromise public safety. Therefore, the DEIS should evaluate and discuss:

The potential increase in vehicular accidents on Honoapiʻilani Highway caused by the weaving and merging maneuvers of O-turns.

The potential increase in pedestrian and bicycle accidents on Honoapiʻilani Highway since pedestrians would not be provided a safe crossing as would be provided by traffic signals. The DEIS should address how pedestrians and bicyclists will be prevented from crossing Honoapiʻilani Highway.

Response:

Regarding the proposed “O-turns” along the realigned and widened Honoapiʻilani Highway, extensive discussions have been conducted with the HDOT. Although not used in Hawaii, the HDOT is aware that “O-turns” are extensively used in Michigan and other areas of the country. There is substantial evidence that the use of “O-turns” which allows the free flow of traffic has safety benefits over traditional intersection design. Bike and pedestrian crossings from one side of the highway to the other will be made via grade separated connections under the anticipated bridge structures. As requested by HDOT, the Final TIAR analyzes the proposed intersections with “O-Turns” and with traditional traffic signals. Refer to **Exhibit “1”**.

We agree that traffic safety must be addressed as implementation of the OTMP proceeds. Specificity in traffic safety measure will be identified in coordination with the HDOT. It is noted that internal pedestrian and bicycle routes within the OTMP are intended to provide pedestrians and bicycle mobility separate from the highway, thereby providing a significant measure of public safety. The locations, alignments and geometric configurations for these measures will be developed as part of the project implementation phase of development. With respect to pedestrian and bicycle crossings from one side of the highway to the other, We envision grade separated connections, as may be permitted, for example the Olowalu Cultural Reserve (OCR) bridge crossing.

Comment:

Phased Analysis Not Provided:

The DEIS indicates in many places that the project would be developed in phases spread out over a period of approximately 10 years. However, only one scenario, Full Buildout Year 2020, was analyzed in TIAR. The TIAR should be revised to include an analysis of each phase of the project; otherwise, the DEIS does not comply with Hawaii Administrative Rules (HAR) Section 11-200-17 I which states that a DEIS, “ ... shall include a statement of the probable impact of the proposed action on the environment, and impacts of the natural or human environment on the project, which shall include consideration of all phases of the action and consideration of all consequences of the environment; direct and indirect effect shall be included.”

It should also be noted that the internal capture rate of the project would vary with different phases of the development. For example, if the residential phase of the project were to be constructed first with no commercial, then the project's internal capture rate would be zero. This variation in internal capture rate by phase should be accounted for in the analyses.

Response:

Pursuant to Hawaii Administrative Rules (HAR) Section 11-200-17, the 10-year buildout scenario analyzed in the TIAR considers the project in totality. It addresses the probable impact of the total proposed development on the environment and impacts on the natural or human environment on the project. However, in consultation with HDOT a Final TIAR has been prepared. Refer to **Exhibit “1”**. Additionally, as may be required by HDOT, TIAR updates will be prepared over the course of project development. HDOT requires updates once every three (3) years.

Regarding your comments on the internal capture rate, the intent is to construct the town center and residential units as a unified phase which would ensure relative stability over time in the internal capture rate identified in the TIAR. As the plan progresses, monitoring of the internal capture rate will be conducted and adjusted accordingly, as necessary.

Comment:

Other Specific Comments to the DEIS:

Comment 1. The DEIS should provide more details to support its claim that the proposed project is a smart growth development. For example, it should describe what specific design features would be incorporated to ensure the development is a

pedestrian & bicycle friendly community. Specifically, the DEIS should describe whether roadways within the project site would provide non contiguous sidewalks, street trees, and traffic calming features such as bulb-outs, road humps, traffic circles. The DEIS should also describe what type of bicycle amenities (e.g. bicycle racks, lockers, showers, bicycle corrals) and bicycle facilities (e.g. bicycle paths, bicycle lanes) would be provided to ensure the site is a bicycle friendly community.

Response:

The OTMP proposes to follow the Leadership in Energy and Environmental Design (LEED) Neighborhood Development recommended standards to accomplish "Smart Growth". See Appendix "A-1" of the DEIS. Olowalu Town is master planned to incorporate LEED criteria that meet its goal of creating a community that follow the Hawaiian ahupua`a system of land management where people co-exist with nature. See pp 12-15, Draft EIS.

While specific standards of development are generally identified at the more detailed project design stage of development, we are committed to LEED principles and anticipate incorporating measures such as bicycle amenities, traffic calming measures, and noncontiguous sidewalks.

Comment:

Comment 2. The DEIS should state the "Purpose and Need" for the proposed action as required by HAR Section 11-200-17 D. The DEIS only states the project's need (which the DEIS states is to increase the supply of housing for Maui residents) but does not state the project's purpose. Without a statement of purpose, it is impossible to identify reasonable alternatives since reasonable alternatives are those that substantially meet both the purpose and the need.

Response:

As noted in the Draft EIS, OTMP is to provide needed resident housing as a sustainable community following appropriate LEED standards incorporated within the Hawaiian ahupua`a system of land management.

Comment:

Comment 3. A reduced project alternative should be proposed, since a reduced project alternative may have fewer impacts to Honoapi'ilani Highway.

Response:

The Alternatives Analysis has been revised to include the MIP Alternative which removed the lands makai of Honoapiʻilani Highway from the Directed Growth Map. See **Exhibit “2”**. This Alternative is the reduced project alternative. Further, a planned sustainable community Olowalu Town encourages residents to use alternative modes of travel, such as walking and bicycling, to reduce traffic rather than your suggested approach that less densities creates less traffic. Olowalu Town is planned where centers of activities such as shopping, employment, public services and recreation are conveniently planned to be within a five (5) minute walk of residences to encourage people to walk rather than use an automobile for their daily needs.

Comment:

Comment 4. The TIAR conclusions are contingent on specific land uses with precise square footage being constructed on the proposed project site. The DEIS should indicate how it would be assured that these land uses, and their square footages, would be constructed.

Response:

Throughout implementation of the Master Plan, several TIARs will be prepared with increasing specificity as site specific plans are developed. As these reports are prepared, they will include updated analyses of the specific land uses with precise square footage being constructed. Beyond the Draft EIS, opportunity will be given throughout the implementation process for public review and comment of the updated TIARs.

Comment:

Comment 5. Should the Olowalu Master Plan be approved, the project should be conditioned to construct development not to exceed the ADT, a.m. peak-hour inbound trips, a.m. peak-hour outbound trips, p.m. peak-hour inbound trips, and the p.m. peak-hour outbound trips evaluated in the Final TIAR. Additionally, these thresholds should be tracked as the project site is developed. If the project site were to generate more traffic than assumed and analyzed in the Final TIAR, then the project could have other traffic impacts not disclosed to the approving agency in the Master Plan's FEIS.

Response:

One of the key purposes of the TIAR in the land use entitlement process is to ensure that project-related impacts are mitigated by the proposing entity in a manner which is deemed relational and fair. Project development and accompanying traffic analysis are

considered process-based; that is, they must examine conditions on an ongoing basis and provide current assessments and applicable mitigation measures at the time of development implementation. For this reason, it is expected that updated TIARs will be required over the course of project implementation. As circumstances warrant, the HDOT will require that we adhere to appropriate performance and mitigation conditions. For this reason, we have, and will continue working with the HDOT during the various stages of the land use entitlements process to ensure that HDOT requirements are appropriately addressed.

Comment:

Comment 6. The DEIS should discuss the effects of construction traffic on Honoapi'ilani Highway.

Response:

Construction-related impacts are expected to include traffic delays and temporary detours to accommodate construction procedures. The specific nature of these impacts, however, will be determined as construction plans are prepared, and traffic safety and mitigation measures can be identified based on the construction locations, surrounding roadway systems, and the proposed scope of construction activities. Construction plans will be reviewed by the HDOT. Mitigation measures anticipated to be incorporated in these plans would include Best Management Practices for erosion control and traffic safety plans. Other mitigation measures generally associated with roadway construction activities include procedures for public notification and procedures for coordination with local authorities having emergency response responsibilities.

Comment:

Comment 7. The DEIS should discuss the effect the proposed O-turns would have on pedestrian connectivity mauka and makai of Honoapi'ilani Highway.

Response:

As noted previously, pedestrian and bicycle crossings from one side of the highway to the other is proposed via grade separated connections under the anticipated bridge structure(s), primarily through the OCR. As a sustainable community a comprehensive pedestrian and bicycle circulation system will be developed for the OTMP which proposes to incorporate open space and park areas.

Comment:

Comment 8. A Transportation Demand Management Plan (TDM) should be provided by this project in an effort to meet the goals and objectives of the Maui General Plan. The DEIS should provide a discussion of this TDM Plan.

Response:

As noted previously, as the project progresses through the numerous processes and refinements to the development are made updated TIARs as required by HDOT will be prepared as well as a Transportation Demand Management Plan (TDM) at the appropriate time of development as determined by HDOT.

Comment:

Specific Comments to the TIAR:

Comment 1. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR utilizes data from several other TIARs which have been done for other projects on the west side of Maui over the last five years. The TIAR should specifically name which reports it utilized.

Response:

The project sources referenced on Page 1 of the Preliminary TIAR has been included in the Final TIAR. Refer to **Exhibit "1"**.

Comment:

Comment 2. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR uses information from studies done by Maui County. The TIAR should name which studies it utilized.

Response:

The County sources referenced on Page 1 of the Preliminary TIAR has been included in the Final TIAR. Refer to **Exhibit "1"**.

Comment:

Comment 3. Page 1, Introduction, Purpose and Methodology: The TIAR states, "The Final TIAR will address peak hour traffic flows and utilize the methods that are normally employed in standard traffic assessments. That TIAR will also analyze in detail the

predicted traffic operations at the access points to Honoapi'ilani Highway. It will assess the need for any mitigation and analyze the need for traffic control measures and devices that may be required for proper functioning of the street system. This preliminary report will not cover all items that may be studied and analyzed in the future detailed TIAR and it is not intended to substitute for that more comprehensive analysis." The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.

Response:

As noted previously, the Final TIAR determined peak hour traffic and an assessment of the proposed intersections. Refer to **Exhibit "1"**. Further, as the project progresses through the numerous processes refinements to the development will be made and updated TIARs will be prepared in coordination with the HDOT. These subsequent processes will allow for public review and disclosure.

Comment:

Comment 4. Page 2, Introduction, Purpose and Methodology: The TIAR states that the level of analysis in the TIAR does not include detailed analysis of all traffic movements at individual intersections. The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.

Response:

As noted previously, a Final TIAR has been prepared with an assessment of the proposed intersections. Refer to **Exhibit "1"**. As the project progresses, updated TIARs will be prepared in coordination with the HDOT, as well as the Department of Public Works (DPW). As appropriate and as the hierarchy of roads are developed, detailed analysis of traffic movements at individual intersections will be included in the updated TIARs. The public will have the opportunity to review the updated TIARs during the subsequent public review processes.

Comment:

Comment 5. Page 2, Introduction, Purpose and Methodology: The TIAR states that the TIAR is intended to illustrate that the increase in vehicular traffic along the Honoapi'ilani Highway attributed to Olowalu Town will be successfully mitigated by way of implementing the proposed transportation plan and the related improvements, including the relocation and widening of the segment of Honoapi'ilani Highway which traverses

the subject property. Clarify in this section of the TIAR what is specifically meant by the “proposed transportation plan.”

Response:

The “proposed transportation plan” refers to the future widening and relocation of Honoapiʻilani Highway further inland within the OTMP as well as the HDOT’s plan for the relocation and widening of Honoapiʻilani Highway (Maalaea to Launiupoko) towards Lahaina.

Comment:

Comment 6. Page 3, Description of Olowalu Town: The first paragraph of this section should describe how much square footage of office and how much square footage of commercial retail is proposed by this project rather than just describing the number of dwelling units proposed.

Response:

Page 8 of the Preliminary TIAR (Appendix “M” of DEIS) includes a table summarizing the land uses proposed for the OTMP. In addition to the number of residential units, the table includes the square footage of the proposed office and commercial uses. Approximately 15,000 square feet (sq. ft.) of government offices; 60,000 sq. ft. of general office space; 239,000 sq. ft. of commercial retail space and 5,000 sq. ft. of public (post office) space are proposed.

Comment:

Comment 7. Page 3, Description of Olowalu Town: The TIAR states the design of Olowalu Town incorporates smart growth principles. One of the 10 accepted principles that define Smart Growth is to create walkable neighborhoods. The TIAR should describe specific examples of design features that would be incorporated to create walkable neighborhoods.

Response:

The project is at the preliminary stage of the numerous processes. As it progresses more specificity in project development will occur. As appropriate, specific examples of design features to create walkable neighborhoods will be discussed in updated TIARs.

Comment:

Comment 8. Page 8, Figure 5, Summary of Trip Generation for Olowalu Town: For ITE Code 730, Government Office Building, the proper trip rate per unit is 68.93 trips per 1,000 sf; therefore, the estimated traffic generated by that component of the site is of 1034 trips. Therefore, the total traffic generated by the site would be 33,655 ADT rather than the 32,800 ADT shown in the table. Revise the TIAR and its analyses accordingly.

Response:

As noted previously, the Final TIAR estimated the ADT in the OTMP would be 31,250 to 34,220 vehicles at the three (3) proposed intersections at full buildout.

Comment:

Comment 9. Page 10, Background Traffic Growth: The TIAR states that several studies were made available which analyzed traffic growth trends on Honoapi'ilani Highway and that these studies are included in the appendices. However, this data was not included in the appendices. This data should be included in an appendix.

Response:

As noted previously, the studies referenced in the Preliminary TIAR have been included in the Final TIAR.

Comment:

Comment 10. Page 10, Background Traffic Growth: In determining future volumes for the Year 2020 analysis, other reasonably foreseeable development project traffic be added to Honoapi'ilani Highway in addition to using an appropriate growth rate based on historical data.

Response:

According to the transportation consultant, due to the uncertainty of when developments would come on line, a single background growth rate was utilized in the TIAR.

Comment:

Comment 11. Page 10, Background Traffic Growth: Provide a copy of the existing count data for Honoapi'ilani Highway in the appendix of the TIAR.

Response:

Updated traffic count data has been included in the Final TIAR. Refer to **Exhibit “1”**.

Comment:

Comment 12. Page 10, Background Traffic Growth: Existing counts on Honoapiʻilani Highway were taken during October 2010 during low tourist season. However, existing counts should be taken during peak tourist season.

Response:

The Final TIAR traffic counts were taken during 2013. Refer to **Exhibit “1”**.

Comment:

Comment 13. Page 10, Background Traffic Growth: The 24,667 ADT assumed on Honoapiʻilani Highway in Year 2020 is only 248 ADT more than existed in Year 2003 per the Proposed Roadway Development Program prepared for County of Maui Planning Department for the draft Maui Island Plan. Provide an explain why only 248 more vehicles per day would be expected to use Honoapiʻilani Highway in Year 2020.

Response:

Access to the methodology used in the study was not available for comparison. However, as noted previously, a Final TIAR has been prepared. Refer to **Exhibit “1”**.

Comment:

Comment 14. Page 10, Traffic Analysis in Year 2020 without Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapiʻilani Highway, since it has beach access points and driveways to scenic lookouts, and therefore should not be considered an uninterrupted flow highway.

Response:

According to the transportation consultant, use of the HighPlan software is appropriate since beach and scenic lookouts are rarely accessed in the a.m. and p.m. peak hours. In this context, the transportation consultant has concluded that Honoapiʻilani Highway functions as a highway with limited access. However, the TIAR provides operational data for comparison to intersections on arterial streets.

Comment:

Comment 15. Page 11, Figure 6, Output from Highplan Software for Honoapiʻilani Highway for Year 2020 without Project in Place:

Clarify why the output sheet says “yes” under median type.

Clarify why the output sheet says “no” under left turn impact when no left turn pockets are provided for the beach access points or scenic outlooks.

The assumed maximum capacity at LOS E of 1500 vehicles per hour per lane (vphpl) is too high. Per the FDOT 2009 Quality/Level of Service Handbook which provides guidance on using the FDOT software, the maximum capacity at LOS E should be assumed to be 850 vphpl. (See Attachment C). It should be noted that agencies in southern California assume much lower capacities for roadways constructed and functioning similar to Honoapiʻilani Highway. As an example, the County of San Diego assigns the capacity of 16,200 ADT to a two-lane rural facility. (See Attachment D).

Response:

According to the transportation consultant, Honoapiʻilani Highway does not function as a rural two-lane facility. It is a much higher design type with almost no passing, and few access points, and with a left turn lane design that approximates median and wide shoulders, it operates much like an uninterrupted facility.

Comment:

Comment 16. Page 12, Traffic Generation for Olowalu Town: The TIAR takes a 15% reduction in trip generation to account for walking and bicycling within the project site and cites other local governments such as the City of Frederick, Maryland as allowing this as well. However, the reduction allowed by the City of Frederick includes walking, bicycling, and internal capture. (See Attachment E). Therefore, using the City of Frederick as an example is not correct and this reference (as well as the associated page included in Appendix 4 of the TIAR) should be removed from the TIAR.

Response:

The transportation consultant notes that the 15 percent reduction in the Preliminary TIAR is indicative that the town will have many pedestrian oriented trips and that the residents will want a community that relies less on the automobile. The 85 percent value was selected to reflect this assumption set. Town residents are expected to travel about 15 percent less by motor vehicle than the national average, owing to the sustainable design of the town. The Final TIAR utilized a project recommended 64/36 percent

internal capture rate and a HDOT 25/75 percent internal capture rate. Refer to Appendix 8 in **Exhibit "1"**.

Comment:

Comment 17. Page 12, Traffic Generation for Olowalu Town: Reducing the ITE trip generation rate by 15% for walking and bicycling is not appropriate. The internal capture rate already accounts for this reduction.

Response:

According to the transportation consultant internal capture and community capture rates are two different rates.

Comment:

Comment 18. Page 12, Traffic Generation for Olowalu Town: The TIAR states that based on the anticipated plan for the proposed project, the TIAR determined that significant proportions of total travel could and would be made within the town itself, without any requirement to travel on Honoapiʻilani Highway to Lahaina, Maʻalaea or elsewhere on the island. Please clarify how this statement can be supported since:

Facilities such as schools, a library, and a post office are not assured but require public funds to be constructed and/or operated.

There is no assurance that the Olowalu Master Plan would provide land uses to serve all residents day to day needs such as a grocery store, pharmacy, and restaurants.

The proposed project would not provide enough jobs for all its residences.

Response:

As a sustainable community, the OTMP includes uses for shopping, employment, public services and recreation that is expected to reduce the daily commute outside of Olowalu. The project is anticipated to take 10 years for full build-out which will allow the employment and shopping uses to be established as well as public agencies to plan and fund necessary public facilities and services. The development time frame will also allow the developer to investigate opportunities for private-public partnerships to fund public facilities.

During the initial development phases of Olowalu Town, it is expected that the need to commute will be greater than at full buildout as employment, shopping, public facilities and recreation are developed. At full buildout, the project does not expect to provide

employment for all its residents and there will be commutes outside of Olowalu Town to employment centers although it may reduce the commute distance and time for these employees. The Preliminary and Final TIARs account for external travel by these employees.

Olowalu Town is proposed as a Project District in which land use standards as well as conditions may be imposed by approving agencies to ensure that Olowalu Town is developed in accordance with representations made by the applicant including the applicant's intent to develop residential units concurrent with necessary public infrastructure and services.

Comment:

Comment 19. Page 12, Traffic Generation for Olowalu Town: The amount of internal capture rate assumed by the TIAR should be calculated using worksheets in the ITE Trip Generation Handbook, 2nd edition, and completed worksheets should be provided in an appendix of the TIAR. Alternatively, the methodology outlined in the NCHRP Report 684, Enhancing Internal Trip Capture Estimation for Mixed-Use Developments, by the Transportation Research Board of the National Academies could be used although its researchers do not recommend its use on sites over 300 acres. (See Attachment F).

Response:

The transportation consultant noted that the OTMP is not a "standard" mixed use development, but instead is a town that can stand alone for many of its needs, such as shopping, employment, public services and recreation. Behavioral response to contextual factors such as density, diversity, design, and regional accessibility is expected to influence travelers' trip-making decisions such as walking and biking to these services rather than traveling by automobile. The typical ITE methodology is not necessarily applicable because there are several proposed land uses not included in current ITE methodology. Also, the ITE method does not address a new town, but are geared toward multi-use developments in existing urban and suburban areas. As such, the TIAR uses a methodology appropriate to the OTMP. Refer to Appendix 8 in **Exhibit "1"**.

Comment:

Comment 20. Page 12, Traffic Generation for Olowalu Town: The TIAR states that due to the design of the town and its street network, many of the trips within the town will likely be made via walking or cycling and not require use of the automobile. This element will be addressed in detail in the final TIAR. This element of the TIAR should be addressed in the DEIS rather than the FEIS.

Response:

Alternative modes of travel such as walking and bicycling are appropriately addressed in the Draft EIS. As refinement of the development are made, as appropriate, the updated TIARs will address trips within the town likely to be made by walking or cycling.

Comment:

Comment 21. Page 13, Traffic Generation for Olowalu Town, Table 1, Internal Capture of Trips in Olowalu Town: The internal capture rates shown for each land use in Table 1 should be supported by appropriate technical data; otherwise, the ITE Trip Generation Handbook, 2nd edition methodology should be used for computing internal capture.

Response:

As noted previously, the typical ITE methodology is not applicable because this is not a "standard" mixed use development, but instead is a town that can stand alone for many of its needs.

Comment:

Comment 22. Page 13, Traffic Generation for Olowalu Town: The TIAR states that the Maui LRTP was used to assist in estimating the amount of "pass-by" trips to Olowalu Town. However, "Pass-by trips" are defined by ITE as trips made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Since the proposed project's land uses have no direct access to Honoapi'ilani Highway, the number of pass-by trips for this project would be zero.

Response:

Since publication of the Draft EIS, a final TIAR has been prepared and your comments on "pass-by" trips are no longer applicable.

Comment:

Comment 23. Page 13, Traffic Generation for Olowalu Town: Revise the name of Table 2 from "Pass-by and Diverted Trips on Honoapi'ilani Highway" to simply, "Diverted Linked Trips on Honoapi'ilani Highway."

Response:

Table 2 in the Preliminary TIAR has been renamed as “Diverted Linked Trips on Honoapiʻilani Highway” in the Final TIAR. Refer to **Exhibit “1”**.

Comment:

Comment 24. Page 13, Traffic Generation for Olowalu Town: The percent of diverted linked trips for each land use should be based on empirical data from a reliable source such as the ITE Trip Generation Handbook or San Diego Association of Government’s (SANDAG) (Not So) Brief Guide of Vehicular Traffic Generation Rates For The San Diego Region, available on-line at the following URL: http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf

Response:

As noted previously, this is not the typical mixed use development and requires a different analytical approach. In coordination with the HDOT, the HighPlan methodology was deemed appropriate and utilized in the Preliminary TIAR.

Comment:

Comment 25. Pages 12 -14, Tables 2 -4: Table 2, Table 3, and Table 4 list an elementary school as a land use but Figure 5 on Page 8, which is the trip generation summary, does not. Please explain this apparent discrepancy.

Response:

A Final TIAR has been prepared with current tables. Refer to **Exhibit “1”**.

Comment:

Comment 26. Page 16, Trip Distribution: Table 4 should be renamed, “Trip Distribution for Diverted Linked Trips” assuming there are no proposed land uses with direct access to Honoapiʻilani Highway.

Response:

As noted previously, a Final TIAR has been prepared with current tables.

Comment:

Comment 27. Page 17, Traffic Assignment: The TIAR does not include analysis of travel from the mauka side to/from the makai side of the Olowalu Town and the trips made between mauka and makai side via the connector street, and that these items will be reviewed in detail in the final TIAR. These analyses should be provided in this DEIS and available for public review and comment

Response:

The Final TIAR includes an analysis of travel from the mauka side to/from the makai side of Olowalu Town and the trips between through the connector street. Refer to **Exhibit "1"**.

Comment:

Comment 28. Page 18, Development of Future Traffic Data: Clarify why a 15% growth rate is used for Figure 10 and the access analyses in Appendix 3, but other portions of the document indicate an 8% growth rate was used.

Response:

According to the transportation consultant the growth rate should be 1 percent per year which has been corrected in the Final TIAR. Refer to **Exhibit "1"**.

Comment:

Comment 29. Page 19, Figure 7, Existing Traffic Volumes on Honoapi`ilani Highway: Provide another figure depicting the traffic volumes on Honoapi`ilani Highway from counts taken during February which is peak tourist season. Use whichever figure has the higher volumes to develop future volumes.

Response:

The Final TIAR includes traffic counts taken in 2013. Refer to **Exhibit "1"**.

Comment:

Comment 30. Page 20, Figure 8, Future Year 2020 Traffic Volumes without Project on Honoapi`ilani Highway: Revise this figure to include traffic from other reasonably foreseeable projects that would be constructed and occupied by Year 2020 (in addition to the background growth factor already assumed).

Response:

The transportation consultant notes that the background growth factor reasonably accommodates the foreseeable projects by Year 2024 without the project and the requested revision will yield a double counting of traffic without the project. Refer to **Exhibit “1”**.

Comment:

Comment 31. Page 21-22, Figures 9-10, Traffic added from Olowalu Town project and Olowalu Town Study Network Traffic with Full Buildout of Project in Place: Revise these figures to address our comments regarding trip generation, internal capture, and diverted linked trip rates.

Response:

The Final TIAR for the project addresses your comments regarding trip generation, internal capture and diverted linked trip rates. Refer to **Exhibit “1”**.

Comment:

Comment 32. Page 23, Future Roadway Network: Conduct a weaving analysis for the proposed “O-turns”. The results of these weaving analyses should be provided in an appendix of the TIAR. Additionally, the effects of weaving on capacity of the proposed re-aligned Honoapiʻilani Highway should be evaluated.

Response:

The Final TIAR includes an analysis of the proposed “O-turns” and the typical signalized intersections. Refer to **Exhibit “1”**.

Comment:

Comment 33. Page 23, Future Roadway Network: Provide a queuing analysis to determine if the proposed left turn pockets for the proposed O-turns are sufficient to accommodate the vehicular demand without having vehicles spill into the through lane.

Response:

The Final TIAR includes a queuing analysis of the left turn pockets for the proposed “O-turns” and the typical signalized intersection. Refer to **Exhibit “1”**.

Comment:

Comment 34. Page 23, Future Roadway Network: Provide calculations to determine the appropriate length of the acceleration and deceleration lanes of the proposed O-turns.

Response:

The Final TIAR includes calculations to determine the appropriate length of the acceleration and deceleration lanes for the proposed O-turns. Refer to **Exhibit "1"**.

Comment:

Comment 35. Page 23, Future Roadway Network: Data should be provided demonstrating the proposed "O-turns" weaving will not compromise public safety by creating a higher incidence of side swipe and rear end collisions caused by merging.

Response:

The Final TIAR includes an analysis that demonstrates that the proposed O-turns will not compromise public safety during merging. Refer to **Exhibit "1"**.

Comment:

Comment 36. Page 23, Future Roadway Network: Discuss the effects of the proposed O-turns on pedestrian connectivity between the mauka and makai side of Honoapi`ilani Highway.

Response:

The Final TIAR discusses the effects of the proposed O-turns on pedestrian connectivity between the mauka and makai side of Honoapi`ilani Highway. Grade separated connection from mauka to makai sides of the OTMP will accommodate pedestrian and bicyclists and local travel without utilizing Honoapi`ilani Highway. Refer to **Exhibit "1"**.

Comment:

Comment 37. Page 23, Future Roadway Network: Evaluate pedestrian safety issues of the proposed O-turns, since the O-turns do not provide protected pedestrian crossings across Honoapi`ilani Highway as would be provided by signalized intersections. Also discuss how pedestrians would be prevented from crossing Honoapi`ilani Highway.

Response:

The Final TIAR evaluates pedestrian safety issues relating to the proposed O-turns. The OTMP encourages pedestrians and bicyclists to utilize the proposed pathways that connect the mauka and makai area through the OCR. As previously stated, grade separated connection from mauka to makai sides of the OTMP will accommodate pedestrians and bicyclists and local travel without utilizing Honoapi`ilani Highway. Refer to **Exhibit "1"**.

Comment:

Comment 38. Page 25, Analysis of Impacts of Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapi`ilani Highway south of the project site, since it would still have beach access points and scenic lookout points in Year 2020 and therefore cannot be considered an uninterrupted flow highway. If FDOT software were to be used, ArtPlan would be the appropriate software to utilize.

Response:

As previously mentioned, use of the HighPlan software is appropriate since beach and scenic lookouts are rarely accessed in the a.m. and p.m. peak hours. As such, Honoapi`ilani Highway is appropriately considered to be an uninterrupted flow highway.

Comment:

Comment 39. Page 25, Analysis of Impacts of Olowalu Town Project: The estimated daily maximum capacity of 56,600ADT and predicted speed of 50 mph Honoapi`ilani Highway within the project site is too high since there would be weaving, merging, acceleration, and deceleration associated with the proposed O-turns.

Response:

According to the transportation consultant, discussions with professionals in other states with similar facilities indicate the volumes are well within the range of capacity for multilane roads containing O-turns with signal control. The proposed "O-turn" will not have signal control but will allow by-pass traffic to move freely through the area at the higher speed while allowing traffic diversion in and out of Olowalu Town following a right-in/ right-out traffic pattern.

Comment:

Comment 40. Page 25, Analysis of Impacts of Olowalu Town Project: The predicted speed of 29 mph for Honoapiʻilani Highway and maximum capacity of 33,300 ADT south of the project is too high as this highway segment would not have uninterrupted flow.

Response:

As previously mentioned, Honoapiʻilani Highway approximates an uninterrupted flow highway, rather than a rural two-lane road. As such the predicted speed of 29 mph and maximum capacity of 33,300 ADT south of the project is considered valid in the Final TIAR.

Comment:

Comment 41. Page 25, Analysis of Impacts of Olowalu Town Project: The TIAR indicates detailed program outputs for the Highplan analyses sheets shown are Figures 12 -14 are provided in the appendices. However, these sheets are not provided in the appendices.

Response:

The Final TIAR includes the detailed program outputs for the HighPlan analyses sheets referenced as Figures 12-14 in the appendices of the Preliminary TIAR. Refer to **Exhibit "1"**.

Comment:

Comment 42. Page 26, Figure 14, Output from Highplan Software for Portion of Honoapiʻilani Highway with Existing Roadway Configuration:

The roadway variables portion of the data sheet shows "yes" for median type but this portion of Highway 30 has no median.

The LOS E maximum capacity of 1,500 vehicles per hour per lane (vphpl) is too high. The Proposed Roadway Development Plan by Fehr & Peers assumed 1000 vehicles per hour at level of service E, using the Highway Capacity Manual. (See Attachment H).

The LOS E maximum capacity of 33,300 ADT is too high.

Response:

Although this portion of Highway 30 does not include a median, according to the transportation consultant the left turn lane approximates a median. As previously mentioned, a Final TIAR has been prepared. Refer to **Exhibit "1"**.

Comment:

Comment 43. Page 27, Figure 13, Output from Highplan Software with Relocated and Widened Honoapi'ilani Highway in Place at Full Buildout of Olowalu Town:

The data sheet indicates the segment from the Old Land Fill to Mile 14 is 5 miles long but this same segment is shown as 2.6 miles long on Figure 6.

The LOS E maximum capacity of 2,950 vphpl is too high.

The LOS E maximum capacity of 56,600 ADT is too high.

Response:

According to the transportation consultant these capacities are for the ultimate four-lane divided facility with access control and a high-type design in accordance with the Realignment and Widening of Honoapi'ilani Highway (Maalaea to Launiupoko).

Comment:

Comment 44. Page 28, Figure 14, Output from Highplan Software for Portion of Honoapi'ilani Highway South of the Project Site at Full Buildout of Olowalu Town:

The data sheet indicates the number of through lanes is 4 but this is a two-lane facility.

The data sheet shows "yes" for median type but this portion of Highway 30 has no median.

The assumed free flow speed of 50 miles/hour is too high.

The LOS E maximum capacity of 1500 vphpl is too high. The LOS E maximum capacity of 33,300 ADT is too high.

Response:

As previously mentioned, these capacities are for the ultimate four-lane divided facility with access control and a high-type design in accordance with the Realignment and Widening of Honoapiʻilani Highway (Maalaea to Launiupoko). Speed surveys of existing flows confirmed the free flow speeds which are also observed at low flow times of the day.

Comment:

Comment 45. Page 29, Table 6, Capacity, ADTs and Levels of Service for Honoapiʻilani Highway In Full Buildout Year of 2020:

The assumed daily maximum capacity of 56,600 for the segments between the southern project boundary and north of the transfer station is too high.

The assumed daily maximum capacity of 33,300 for the segment called “existing roadway south of Olowalu Town Project” is too high.

The table indicates the segment north of the transfer station is widened to two through lanes in each direction. Clarify in the TIAR on what basis this is assumed. Only projects that are fully funded and scheduled for construction prior to Year 2020 should be assumed.

Response:

As previously mentioned, discussions with professionals in other states with similar facilities indicate the volumes are well within the range of capacity for multilane roads containing O-turns. The OTMP is to be developed over a ten-year timeframe. Within that timeframe it is expected that the Realignment and Widening of Honoapiʻilani Highway north and south of Olowalu Town will occur concurrently with the development.

Comment:

Comment 46. Appendix 3, Intersection Turning Movements: Clarify why the data sheets indicate 15 percent growth when the TIAR indicates an 8 percent growth rate was used to develop Year 2020 ADT volumes.

Response:

As previously noted, the Final TIAR reflects the correct annual growth rate of 1 percent. Refer to **Exhibit “1”**.

Comment:

Comment 47. Appendix 4, Traditional Development of Trip Generation Characteristics: The internal capture rates for the developments discussed in this paper do not support the 55% internal capture assumed in the TIAR.

Response:

The Final TIAR supports the project recommended internal capture rate of 64/36 percent for the developments proposed in the OTMP. Refer to **Exhibit "1"**.

Comment:

Comment 48. Appendix 4, Traditional Development of Trip Generation Characteristics: The conclusion of this paper indicates the authors support the use of internal capture estimates produced using the ITE Trip Generation Handbook methodologies. The TIAR should use this method to determine internal capture.

Response:

As noted previously, the Final TIAR supports the project recommended internal capture rates for the developments proposed in the OTMP. In this regard, the analysis and conclusions of the Final TIAR are considered valid. Refer to Appendix 8 of **Exhibit "1"**.

Thank you again for your participation in the Chapter 343, Hawaii Revised Statutes review process. A copy of your letter and this response will be included in the Final EIS. Should you wish to receive a copy of the Final EIS document or portion thereof, please submit your request in writing to Munekiyo Hiraga at 305 High Street, Suite 104, Wailuku, Hawaii 96793 (Attention: Colleen Suyama).

Very truly yours,



William Frampton
Olowalu Town LLC



David Ward
Olowalu Town LLC

WF:DW

cc: Peter Martin, Olowalu Ekolu LLC
Jennifer Lim, Carlsmith Ball, LLP
Roger Dyar, Transportation Engineer
Colleen Suyama, Munekiyo Hiraga

EXHIBIT “1”

***Updated TIAR on CD
Appendix “P-1” in EIS
(Included with Original Letter Only)***

B. ALTERNATIVE 2: UTILIZE LANDS MAUKA OF HONOAPI`ILANI HIGHWAY (MIP SCENARIO)

Alternative 2 (the MIP scenario) also follows the principles of ahupua`a land management and is in concert with the directed growth boundaries of the MIP. In this regard, Alternative 2 does not include the makai portion or approximately 45 acres in the proposed OTMP. Except for the existing residential uses, this alternative limits the use of the makai area to the existing OCR, agriculture, and recreation uses. Refer to **Figure 5**. Portions of the vacant makai lands are currently overgrown with kiawe, shrubs and grasses. Except for Camp Olowalu, which is available to fee paying guests, the vacant lands have not been developed for parks or recreational uses beyond public access to and informal access along portions of the shoreline from both ends of Olowalu and a public beach access with unpaved parking from the former Olowalu Mill site. A portion of the makai area is located within the OCR and will be subject to land altering activities to implement the objectives of the OCR. As with Alternative 1, LID measures will need to be incorporated into any land altering work necessary to meet the objectives of the OCR to minimize impacts on the nearshore waters.

Alternative 2 will keep the makai land in its present condition and retain it in the State Land Use (SLU) Agricultural District. Existing, limited, and agricultural uses (tree farms) will continue on the makai properties. Development of future parks and public access improvements will require land acquisition and development funds by the County of Maui. Also, current drainage patterns will be maintained with stormwater runoff eventually sheet flowing into the ocean.

With respect to the mauka lands, similar to Alternative 1, Alternative 2 will retain as much runoff onsite as possible, primarily on the mauka side of Honoapi`ilani Highway, and discontinue the existing conditions in which stormwater runoff from the mauka vacant lands exit through existing culverts under Honoapi`ilani Highway directly into the ocean.

Alternative 2 maintains the same residential unit count and land uses as Alternative 1, except it limits development to the area mauka of Honoapi`ilani Highway. Alternative 2 may be perceived as more appropriate due to the distance from the shoreline and perceived lesser impact to the nearshore waters, primarily the reefs (coral) and marine biota (i.e. manta rays and black tip sharks). However, as noted previously, under Alternative 2 stormwater runoff from the makai lands will continue to sheet flow into the ocean. Although Alternative 2 will leave the makai lands available for implementation of the County of Maui's proposed Pali to Puamana Plan which identifies portions of the makai lands for park use, it will require land acquisition by the County of Maui.

Alternative 2 will have similar impacts on infrastructure and public services as those assessed for Alternative 1.

From a financial feasibility standpoint, Alternative 2, like Alternative 1, is considered to be a viable planning option. The overall total cost for Alternative 2 will be slightly lower than that of Alternative 1 as the costs of developing the makai park and open space lands would not be a cost component. However, the cost savings will be offset with the elimination of potential ocean front market units, which will reduce overall revenue benefits. While market attractiveness may be diminished without the makai lands, the value of housing units and commercial areas is expected to exceed the cost of infrastructure systems and vertical construction, yielding a benefit-cost indicator which would point to project viability.

C. ALTERNATIVE 3: NO ACTION

On September 12, 2000 the Olowalu lands were granted Special Management Area Use Permit No. 990021 to develop the existing agricultural lots, including the Olowalu Makai Subdivision and Olowalu Mauka Subdivision. Lots in the Olowalu Makai Subdivision and the Olowalu Mauka Subdivision have been sold. Of the remaining agricultural lots under the control of Olowalu Ekolu, LLC and Olowalu Town, LLC, there is limited diversified farming occurring on the properties. These include a tomato farm, tree farms, cattle and horse grazing. It is noted that these current limited agricultural enterprises share the benefit of low lease rents which support the business-side element of the farming operations.

Alternative 3 would result in the continued sale of the remaining agricultural lots and the current small-scale agricultural use of the lots. While this option is considered an alternative from a planning perspective, it does not provide needed housing for local residents through a comprehensively planned sustainable community. Alternatives 1 and 2 will provide housing employment and recreational opportunities. In addition, Alternative 3 does not include any improvements to address the current runoff of sediments into the ocean. Therefore, Alternatives 1 and 2 are considered to yield a greater community benefit than Alternative 3. The rationale for the foregoing is provided below.

With the demise of Pioneer Mill in 1999 and cessation of pineapple cultivation in West Maui in 2009, there is an abundance of agricultural lands available for farming operations. Existing constraints, such as the ease in getting out-of-State agricultural products to State-wide markets at lower cost, limits diversified agriculture from expanding at a pace that would absorb the available agricultural lands. In the foreseeable future, there is no cash crop similar to sugarcane or pineapple envisioned that will be able to absorb the available vacant agricultural

APR 19 2012

P. O. Box 511
Kahului, HI 96733
April 18, 2012

Mr. Orlando "Dan" Davidson
Executive Director
State Land Use Commission
P. O. Box 2359
Honolulu, HI 96813

SUBJECT: Draft Environmental Impact Statement (EIS) For Olowalu Town Master Plan at TMK (2)4-8-003:084, 098 Through 118, and 124, Olowalu, Lahaina, Maui, Hawaii

Dear Mr. Davidson:

On August 4, 2010, I wrote to you in a response to a similar Draft EIS regarding the proposed realignment of Honoapiilani Highway in Olowalu from its current location.

I am one of the partners of the Fujii Family, Ltd Partnership which owns a business property on the mauka side of the existing highway in Olowalu. Olowalu General Store and Leoda's Kitchen & Pie Shop are two enterprises located on the property. Our family residence is also located on the same property.

A little historical background of our family in Olowalu is provided here. Our family grew up in Olowalu. Although initially under a different name, our family owned the store from the early 1930s. Although the current store complex was built about 1965, the original store on the same location was already in existence from the very early 1900s when the Olowalu Sugar Plantation was a thriving industry. Back then the store drew its primary customers from the large sugar village.

Today, the store thrives heavily on commuters, beach goers and tourists who stop for quick snacks, bentos and cold refreshments. With Honoapiilani Highway adjacent to the store, customers readily see the "oasis" and can readily get off the highway to drop in. Should Honoapiilani Highway be moved to the mauka side of the proposed Olowalu Town, we can predict a drastic drop in customers patronizing at Olowalu Store. It is conceivable that the store will go out of business as it depends very heavily on the commuting traffic.

Similarly, we can anticipate potential customers for the newly opened Leoda's Kitchen & Pie Shop to be drastically lower, too. With the demise of the Olowalu Store and Leoda's, there will be an economic loss both to the lessees and our family.

Additionally, losing the store will bring about a loss of the Olowalu history, culture and the last remaining retail business in that community. The loss of the business will mean that any new retail business will not have the history nor being in existence over 100 years in Olowalu.

Predicting that some time in the future, there will be a four-lane high passing through Olowalu, we would suggest that Instead of moving Honoapiilani Highway above the proposed Olowalu Town, use the existing highway as the Lahaina-Wailuku two-lane highway. Then to create the additional two-lanes for the Wailuku-Lahaina bound traffic, we propose using the old existing cane haul road, especially that part which borders the mauka side of the Olowalu Store. If this were to happen, with some modifications to the Olowalu Store and Leoda's we can continue having a reasonable number of customers stopping by to patronize.

Should our suggested modified alignment of Honoapiilani Highway for the proposed Olowalu Town part of the Honoapiilani Highway be accepted, we would be satisfied that we can continue to operate the store and Leoda's for many more years in the future. Our family and the lessees have expended over \$200,000 in meeting the EPA's septic system and nearly a million dollars to meet other current building requirements. The lessees have about another 20 years in their current leases with the possibility of extensions. They need to continue as successful lessees in order to recover what they already invested heavily with the renovations.

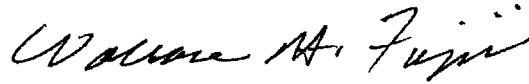
Relocating the business is not a viable option as it will incur a heavy financial burden on the family. Besides there would be the need to purchase the land, construct the building, and go through a long planning and permitting process all over again. We do not consider that a feasible option.

As you drive along the current highway in Olowalu, there is about a mile of monkey pod trees bordering it. These trees, I am sure, are about 100 year old. If the cane haul road is used for the Lahaina bound traffic in the future four-lane highway, both the Lahaina and Wailuku bound traffic will continue to be shaded by these giant trees. We believe, too, that tourists would be awed as they drive along this beautiful tree-lined part of the highway.

May we request that our suggestion be strongly considered instead of a completely new mauka highway in the proposed Olowalu Town. We should use much of the existing alignment so that both our local people and tourists will have an up-front opportunity of enjoying and appreciating the natural beauty of the ocean, shoreline and views as they drive to and from Lahaina. Such a scenic panorama is rare to find today.

We thank you for this opportunity to input our concerns and proposals. Should you have any questions or needs for clarification, please feel free to write to me or email me at whfujii@hotmail.com.

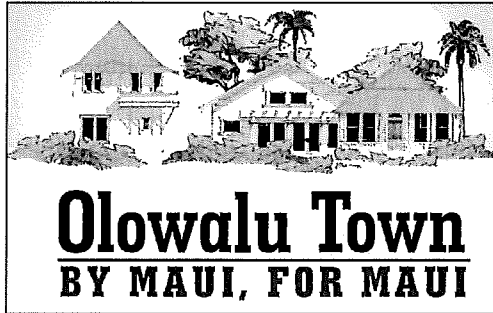
Yours sincerely,



Wallace H. Fujii, Partner
Fujii Family Limited Partnership

cc:
Olowalu Town, LLC and Olowalu Ekolu, LLC
2035 Main Street, Suite 1
Wailuku, Hawaii 96793

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



2035 MAIN STREET WAILUKU HAWAII 96793

OFFICE: 808-249-2224 / FAX: 249-2333

October 26, 2015

Wallace H. Fujii
Fujii Family Limited Partnership
P.O. Box 511
Kahului, Hawaii 96733

SUBJECT: Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan at Olowalu, Hawaii

Dear Mr. Fujii:

Thank you for your letter of April 19, 2012 to the Land Use Commission providing comments on the Draft Environmental Impact Statement (EIS) for the Olowalu Town Master Plan. We appreciate meeting with you and your brother on August 13, 2012. As the project progresses through the various development processes, we would appreciate continuing our dialogue with you. In the meantime, Olowalu Town, LLC offers the following information in response to the comments noted in your letter.

Comment No. 1:

A little historical background of our family in Olowalu is provided here. Our family grew up in Olowalu. Although initially under a different name, our family owned the store from the early 1930s. Although the current store complex was built about 1965, the original store on the same location was already in existence from the very early 1900s when the Olowalu Sugar Plantation was a thriving industry. Back then the store drew its primary customers from the large sugar village.

Today, the store thrives heavily on commuters, beach goers and tourists who stop for quick snacks, bentos and cold refreshments. With Honoapiilani Highway adjacent to the store, customers readily see the "oasis" and can readily get off the highway to drop in. Should Honoapiilani Highway be moved to the mauka side of the proposed Olowalu Town, we can predict a drastic drop in customers patronizing at Olowalu Store. It is

conceivable that the store will go out of business as it depends very heavily on the commuting traffic.

Similarly, we can anticipate potential customers for the newly opened Leoda's Kitchen & Pie Shop to be drastically lower, too. With the demise of the Olowalu Store and Leoda's, there will be an economic loss both to the lessees and our family.

Additionally, losing the store will bring about a loss of the Olowalu history, culture and the last remaining retail business in that community. The loss of the business will mean that any new retail business will not have the history nor being in existence over 100 years in Olowalu.

Response:

We greatly appreciate the sharing of your knowledge and family's historic connection to Olowalu and look forward to your continued involvement in this process. The stories you shared are valuable and desired in order to appropriately plan for the Olowalu area. As we discussed at our meeting, we share your concerns regarding the loss of business that would result due to the State of Hawaii, Department of Transportation (HDOT) proposed realignment of Honoapiilani Highway. Based on our shared concern, one of the town centers in the Olowalu Town Master Plan (OTMP) is proposed to be located adjacent to Olowalu General Store. It is envisioned that the Olowalu General Store and its history would remain an integral part of the OTMP community. Before Honoapiilani Highway is realigned, it is anticipated that a portion of the OTMP will be constructed and occupied providing new customers to Olowalu General Store.

Comment No. 2:

Predicting that sometime in the future, there will be a four-lane highway passing through Olowalu, we would suggest that instead of moving Honoapiilani Highway above the proposed Olowalu Town, use the existing highway as the Lahaina-Wailuku two-lane highway. Then to create the additional two-lanes for the Wailuku-Lahaina bound traffic, we propose using the old existing cane haul road, especially that part which borders the mauka side of the Olowalu Store. If this were to happen, with some modifications to the Olowalu Store and Leoda's we can continue having a reasonable number of customers stopping by to patronize.

Should our suggested modified alignment of Honoapiilani Highway for the proposed Olowalu Town part of the Honoapiilani Highway be accepted, we would be satisfied that we can continue to operate the store and Leoda's for many more years in the future. Our family and the lessees have expended over \$200,000 in meeting the EPA's septic system and nearly a million dollars to meet other current building requirements. The lessees have about another 20 years in their current leases with the possibility of

extensions. They need to continue as successful lessees in order to recover what they already invested heavily with the renovations.

Relocating the business is not a viable option as it will incur a heavy financial burden on the family. Besides there would be the need to purchase the land, construct the building, and go through a long planning and permitting process all over again. We do not consider that a feasible option.

Response:

As noted previously, prior to realignment of the highway a portion of the OTMP will be constructed and occupied, including parks for new recreational users, that we anticipate will create a new clientele of residents and visitors who will patronize the Olowalu General Store. We note that the present two-lane highway is proposed to remain as an internal roadway within the OTMP. Vehicular traffic fronting the Olowalu General Store is, therefore, envisioned to continue. As a sustainable community, the highway will be enhanced with sidewalks and bikeways and become much safer than the present situation. We hope to work together with you to maintain the Olowalu General Store as Olowalu's historical retail establishment in the community with over 100 years of existence in Olowalu.

Comment No. 3:

As you drive along the current highway in Olowalu, there is about a mile of monkey pod trees bordering it. These trees, I am sure, are about 100 year old. If the cane haul road is used for the Lahaina bound traffic in the future four-lane highway, both the Lahaina and Wailuku bound traffic will continue to be shaded by these giant trees. We believe, too, that tourists would be awed as they drive along this beautiful tree-lined part of the highway.

May we request that our suggestion be strongly considered instead of a completely new mauka highway in the proposed Olowalu Town. We should use much of the existing alignment so that both our local people and tourists will have an up-front opportunity of enjoying and appreciating the natural beauty of the ocean, shoreline and views as they drive to and from Lahaina. Such a scenic panorama is rare to find today.

Response:

We agree that the existing monkey pod trees along the highway are significant and provide a beautiful and enjoyable experience through Olowalu Town. For this reason, we have designed the OTMP to avoid any harmful impacts to the monkey pod trees with the trees remaining as a significant feature within the OTMP.

We appreciate your suggestion to utilize the former cane haul roadway as an alternative to the mauka realignment of the highway. As noted previously, the OTMP includes the HDOT's proposed realignment of Honoapiilani Highway which will remove the high speed traffic from Olowalu Town and transform the existing Honoapiilani Highway to a lower speed internal roadway which will continue to provide access to the Olowalu General Store. We believe the OTMP will provide housing, employment and recreational opportunities in a sustainable community that will protect the historic and cultural character of Olowalu Town, including the Olowalu General Store.

We appreciate the input provided and will be including a copy of your letter and this response letter in the Final EIS for the project. Should you wish to receive a copy of the Final EIS document or portion thereof, please submit your request in writing to Munekiyo Hiraga at 305 High Street, Suite 104, Wailuku Hawaii 96793 (Attention: Colleen Suyama).

Very truly yours,



William Frampton
Olowalu Town, LLC



David Ward
Olowalu Town, LLC

WF:DW

cc: Peter Martin, Olowalu Ekolu LLC
Daniel Orodener, Executive Director, Land Use Commission
Jennifer Lim, Carlsmith Ball, LLP
Colleen Suyama, Munekiyo Hiraga