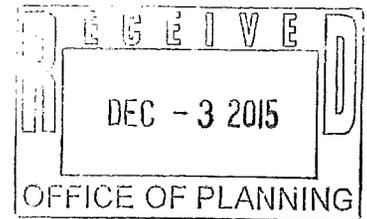


ALAN M. ARAKAWA  
Mayor  
WILLIAM R. SPENCE  
Director  
MICHELE CHOUTEAU McLEAN  
Deputy Director



COUNTY OF MAUI  
**DEPARTMENT OF PLANNING**

November 24, 2015

2015 DEC - 3 P 1:33  
LAND USE COMMISSION  
STATE OF HAWAII

Mr. Daniel Orodenker, Executive Officer  
State Land Use Commission  
235 South Beretania Street, # 406  
Honolulu, Hawaii 96813

Dear Mr. Orodenker:

**SUBJECT: COMMENTS AND CONCERNS REGARDING DOCKET NO. A10-786, OLOWALU TOWN LLC AND OLOWALU EKOLU LLC, TO CONSIDER ACCEPTANCE OF A FINAL ENVIRONMENTAL IMPACT STATEMENT FOR APPROXIMATELY 320 ACRES OF LAND SITUATED AT OLOWALU, ISLAND OF MAUI, HAWAII; TMKS: (2) 4-8-003: 084, 098 – 118, and 124**

The Department of Planning (Department) has reviewed the Draft Final Environmental Impact Statement (Draft FEIS) for the above-referenced project. After review of the Draft FEIS and in light of comments from the Office of Planning and public testimony heard at the November 18, 2015 Land Use Commission meeting, the Department has the following comments and concerns:

1. The Applicant's response to the Planning Department's Comment No. 25 is insufficient. The Department specifically commented by letter dated April 17, 2012 that, "Impacts and mitigation for traffic impacts to Honoapi'ilani Highway, between Ma'alaea and Puamana should be evaluated." The Applicant's response, dated October 26, 2015, states *"with the agreement of HDOT, the traffic study was limited to the length of the highway from roughly the Olowalu Recycling and Refuse Convenience Center to approximately mile marker 14 or so."*

The area of study specified by HDOT only comprises a distance of approximately three (3) to four (4) miles in the project vicinity. While that may be adequate for HDOT's purposes, it is not adequate for the Department. The area of study specified by the Department is approximately twelve (12) miles, and comprises the length of one of the most heavily congested roads on Maui.

The County is especially concerned about a stretch of highway between Ma'alaea and Ukumehame otherwise known as the "Pali." While we note that Honoapi'ilani Highway is proposed to be realigned and widened in increments at some unspecified time in the future, no improvements are proposed for the Pali.

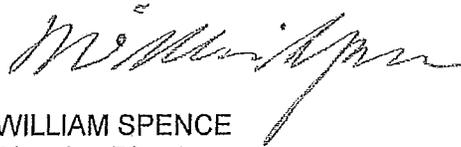
Mr. Daniel Orodener, Executive Officer  
November 24, 2015  
Page 2

The TIAR assigns forty percent (40%) of the outbound trips toward Ma'aleaea, but there appears to be no analysis for this stretch of road; and

2. Project documents have historically stated that Olowalu Town will contain 1,500 units with a breakdown of approximately 900 single-family and 600 multi-family units. The Draft FEIS discusses the various types of dwelling units envisioned in the project and lists the option for accessory dwellings in the Agricultural Home, Rural Home, Large Town Lot Home, Medium Town Lot Home, Small Town Home, and Sideward House lots. The Department would like clarification as to whether the 1,500-unit count presented to the public, various Boards and Commissions, the Maui County Council, and contained in documents regarding the project include the potential accessory dwellings. If it does not, the Department also seeks clarification as to whether the Draft FEIS and all the included reports and studies account for the total potential amount of units within the project.

Thank you for the opportunity to comment. Should you require further clarification of this letter, please contact Staff Planner Danny Dias at [danny.dias@mauicounty.gov](mailto:danny.dias@mauicounty.gov) or by phone at (808) 270-7557.

Sincerely,



WILLIAM SPENCE  
Planning Director

xc: Danny A. Dias, Staff Planner (PDF)  
Office of Planning  
Olowalu Town, LLC  
Project File  
General File

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