

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.

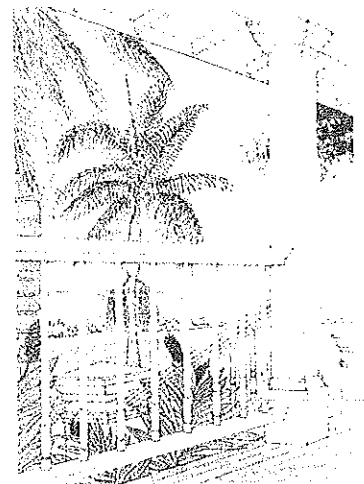
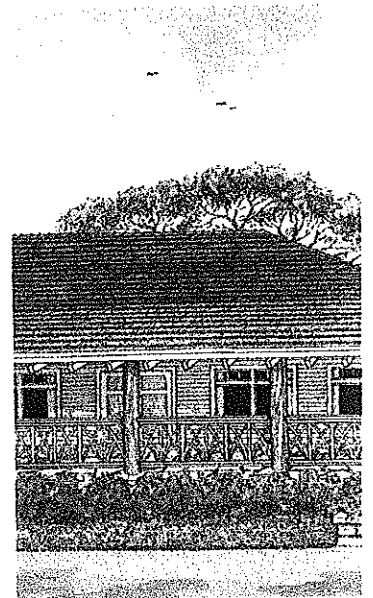
Included in this new community is a "Cultural Reserve" of approximately 74 acres being administered by a private non-profit corporation, whose mission statement is as follows:

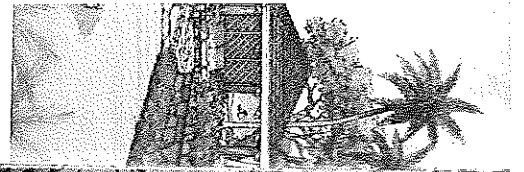
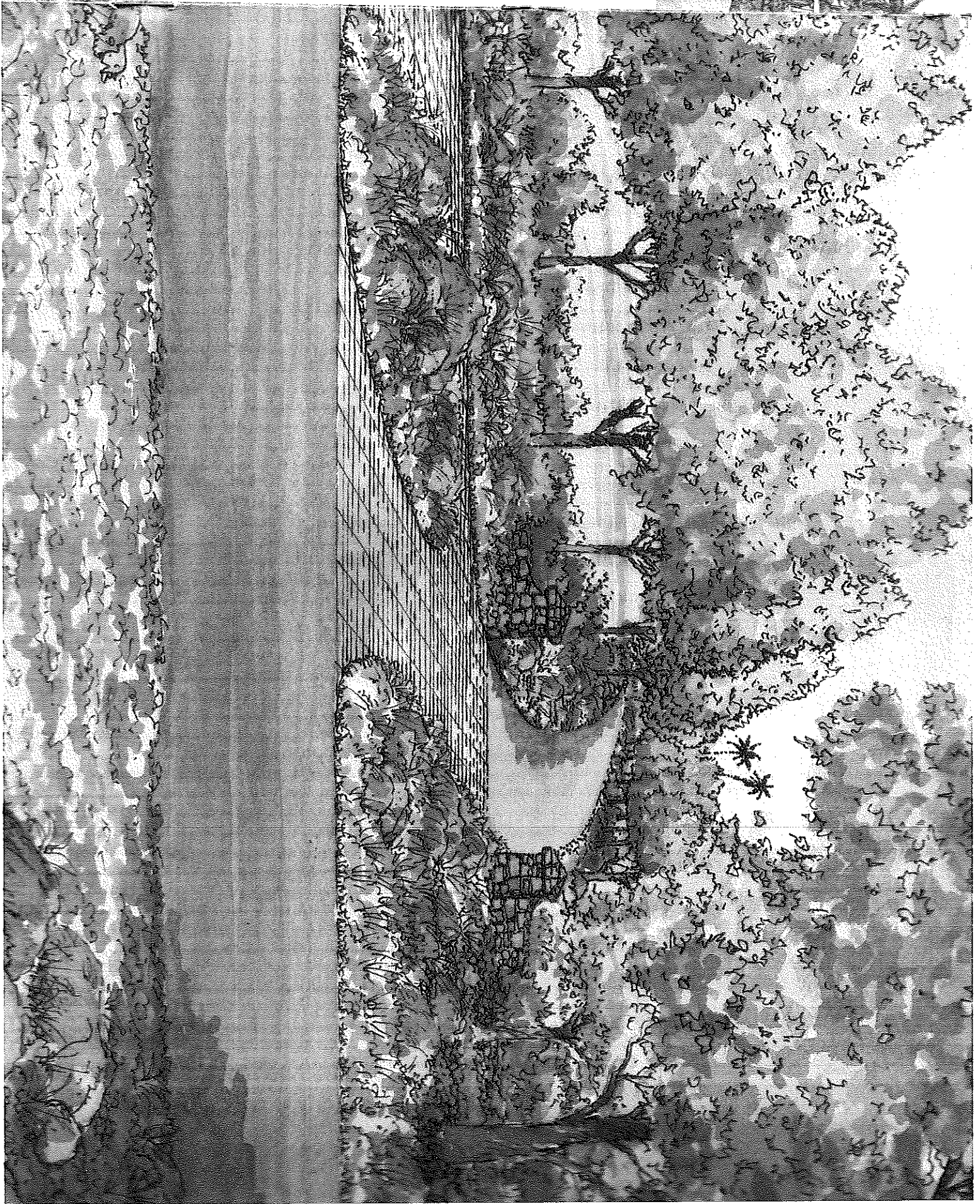
*To perpetuate the traditional and customary practices of "kanaka maoli" of these Hawaiian Islands and promote opportunities to regain the spiritual connection of "malama aina" of our ancestors by insuring these beliefs and customs are passed down to future generations.*

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.





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, 2<sup>nd</sup> 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'e* project in Central Maui and the *Honoua'ula* project in South Maui. The internal capture rates for *Wail'e* and *Honoua'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

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](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

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.

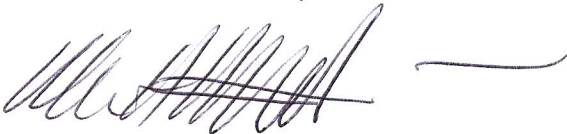
Thank you once again for providing us the opportunity to review and comment on the DEIS.

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:



PBR HAWAII  
& ASSOCIATES, INC.

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>	<i>1,240 (DU)</i>	<i>219</i>	<i>658</i>	<i>638</i>	<i>375</i>
<i>County SF</i>	<i>180 (DU)</i>	<i>34</i>	<i>102</i>	<i>112</i>	<i>66</i>
Multi-Family (230)	1,130 (DU)	76	364	352	174
<i>MF</i>	<i>481 (DU)</i>	<i>31</i>	<i>151</i>	<i>147</i>	<i>72</i>
<i>VMX MF</i>	<i>529 (DU)</i>	<i>34</i>	<i>163</i>	<i>158</i>	<i>78</i>
<i>County MF</i>	<i>120 (DU)</i>	<i>11</i>	<i>50</i>	<i>47</i>	<i>24</i>
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
<b>Total</b>		<b>1,039</b>	<b>1,536</b>	<b>2,024</b>	<b>1,738</b>
Internal Capture	N/A	-	-	164	164
Diverted Link Trip	N/A	-	-	82	82
<b>TOTAL</b>		<b>1,039</b>	<b>1,536</b>	<b>1,778</b>	<b>1,492</b>

**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



# HONUA'ULA



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## DRAFT ENVIRONMENTAL IMPACT STATEMENT

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### VOLUME 3 OF 3 (APPENDICES L-Q)

Prepared for:

Accepting Authority

Maui Planning Department / Maui Planning Commission

Applicant:

Honua'ula Partners, LLC

Prepared by:



**PBR HAWAII**  
& ASSOCIATES, INC.

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  

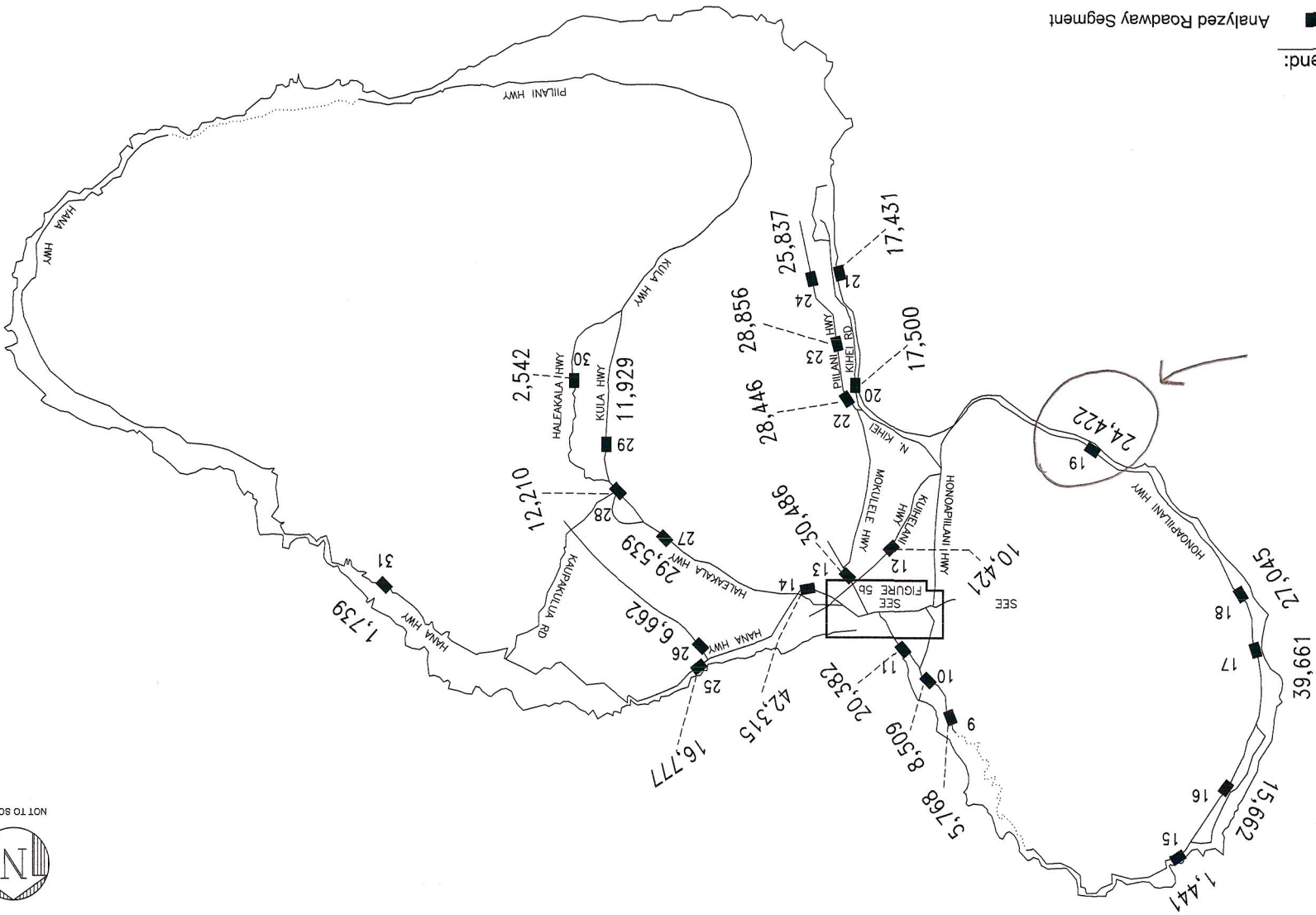
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KAKU ASSOCIATES

ISLAND-WIDE 2003 AVERAGE DAILY TRAFFIC VOLUMES  
 FIGURE 5A

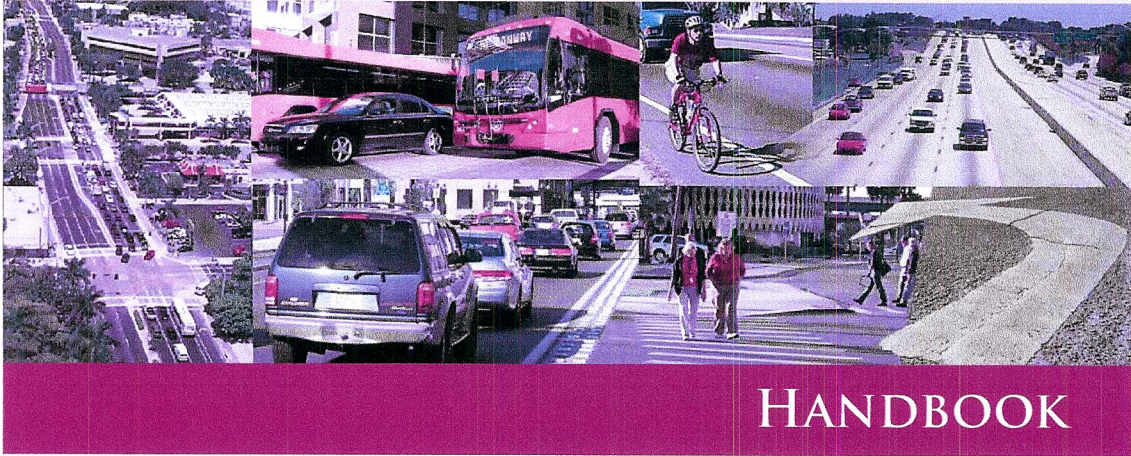
Fehr & Peers  
 KAKU ASSOCIATES

Legend:  
 # Analyzed Roadway Segment  
 X,XXX Average Daily Traffic Volumes



NOT TO SCALE

# 2009 QUALITY/LEVEL OF SERVICE



HANDBOOK

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 SHOULDER (# / 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**

<b>Major Road</b>									
*	With Intermittent Turn Lanes (4.1B)	-	64' - 78'	84' - 98'	2 / 8'	10'	1,200'	7%	55
<b>Boulevard</b>									
***	With Raised Median (4.2A)	14'	78'	106'	2 / 8'	14'	500'	9%	40
***	With Intermittent Turn Lanes (4.2B)	-	64' - 78'	92' - 108'	2 / 8'	14'	500'	9%	40
<b>Community Collector</b>									
**	With Raised Median (2.1A)	14'	54'	74'	2 / 8'	10'	700'	9%	45
**	With Continuous Left Turn Lane (2.1B)	14'	54'	74'	2 / 8'	10'	700'	9%	45
**	With Intermittent Turn Lanes (2.1C)	-	40' - 54'	60' - 74'	2 / 8'	10'	700'	9%	45
***	With Passing Lane (2.1D)	-	40'	84'	2 / 8'	10'	700'	9%	45
*	No Median (2.1E)	-	40'	60'	2 / 8'	10'	700'	9%	45
<b>Light Collector</b>									
**	With Raised Median (2.2A)	14'	54'	78'	2 / 8'	10'	500'	9%	40
**	With Continuous Left Turn Lane (2.2B)	14'	54'	78'	2 / 8'	10'	500'	9%	40
***	With Intermittent Turn Lanes (2.2C)	-	40' - 54'	64' - 78'	2 / 8'	10'	500'	9%	40
***	With Passing Lane (2.2D)	-	40'	88'	2 / 8'	10'	500'	9%	40
**	No Median (2.2E)	-	40'	64'	2 / 8'	10'	500'	9%	40
***	With Reduced Shoulder (2.2F)	-	40'	52'	2 / 2'	10'	500'	9%	40
<b>Minor Collector</b>									
***	With Raised Median (2.3A)	14'	54'	82'	2 / 8'	10'	350'	12%	35
***	With Intermittent Turn Lanes (2.3B)	-	40' - 54'	68' - 82'	2 / 8'	10'	350'	12%	35
***	No Median (2.3C)	-	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 superlevation allowed on CE roads is 6%. Superlevation 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% superlevation.  
 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

NATIONAL  
COOPERATIVE  
HIGHWAY  
RESEARCH  
PROGRAM

### Enhancing Internal Trip Capture Estimation for Mixed-Use Developments

TRANSPORTATION RESEARCH BOARD  
OF THE NATIONAL ACADEMIES

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



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) <sup>1</sup>	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN-OUT ratio)		TRIP LENGTH (Miles) <sup>2</sup>
			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 Heliports		60/acre, 100/flight, 70/1000 sq. ft. * ** 6/acre, 2/flight, 6based aircraft* ** 100/acre* *	5% (6:4) 9% (7:3)	6% (5:5) 15% (5:5)	
AUTOMOBILES <sup>5</sup>					
Car Wash					
Automatic Self-serve		900/site, 600/acre** 100/washstall**	4% (5:5) 4% (5:5)	9% (5:5) 8% (5:5)	
Gasoline .....	[21:51:28]				2.8
with/Food Mart with/Food Mart & Car Wash Older Service Station Design Sales (Dealer & Repair) Auto Repair Center Auto Parts Sales Quick Lube Tire Store		160/vehicle fueling space** 155/vehicle fueling space** 150/vehicle fueling space, 900/station** 50/1000 sq. ft., 300/acre, 60/service stall* ** 20/1000 sq. ft., 400/acre, 20/service stall* 60/1000 sq. ft. * ** 40/service stall** 25/1000 sq. ft., 30/service stall**	7% (5:5) 8% (5:5) 7% (5:5) 5% (7:3) 8% (7:3) 4% 7% (6:4) 7% (6:4)	8% (5:5) 9% (5:5) 9% (5:5) 8% (4:6) 11% (4:6) 10% 10% (5:5) 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)	5% (6:4)	8% (5:5)	5.1
COMMERCIAL/RETAIL <sup>5</sup>					
Super Regional Shopping Center (More than 80 acres, more than 800,000 sq. ft., w/usually 3+ major stores)		35/1000 sq. ft., <sup>c</sup> 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., <sup>c</sup> 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 drugstore)	[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]				
Specialty Retail/Strip Commercial Electronics Superstore Factory Outlet Supermarket Drugstore Convenience Market (15-16 hours) Convenience Market (24 hours) Convenience Market (w/gasoline pumps) Discount Club Furniture Store Lumber Store Home Improvement Superstore Hardware/Paint Store Garden Nursery Mixed Use: Commercial (w/supermarket)/Residential		40/1000 sq. ft., 400/acre* 50/1000 sq. ft.** 40/1000 sq. ft.** 150/1000 sq. ft., 2000/acre* ** 90/1000 sq. ft.** 500/1000 sq. ft.** 700/1000 sq. ft.** 850/1000 sq. ft., 550/vehicle fueling space** 60/1000 sq. ft., 600/acre* ** 60/1000 sq. ft., 600/acre* ** 6/1000 sq. ft., 100/acre* ** 30/1000 sq. ft., 150/acre** 40/1000 sq. ft.** 60/1000 sq. ft., 600/acre** 40/1000 sq. ft., 90/acre** 110/1000 sq. ft., 2000/acre* (commercial only) 15/dwelling unit, 200/acre* (residential only)	3% (6:4) 10% (5:5) 3% (7:3) 4% (7:3) 4% (6:4) 8% (5:5) 9% (5:5) 6% (5:5) 1% (7:3) 3% (6:4) 4% (7:3) 7% (6:4) 5% (6:4) 2% (6:4) 3% (6:4) 3% (6:4) 9% (3:7)	9% (5:5) 10% (5:5) 9% (5:5) 10% (5:5) 8% (5:5) 7% (5:5) 9% (5:5) 8% (5:5) 9% (5:5) 9% (5:5) 7% (6:4) 8% (5:5) 9% (5:5) 10% (5:5) 9% (5:5) 13% (6:4)	4.3
EDUCATION					
University (4 years) Junior College (2 years) High School Middle/Junior High Elementary Day Care	[91:9:0] [92:7:1] [75:19:6] [63:25:12] [57:25:10] [28:58:14]	2.4/student, 100 acre* 1.2/student, 24/1000 sq. ft., 120/acre* ** 1.3/student, 15/1000 sq. ft., 60/acre* ** 1.4/student, 12/1000 sq. ft., 50/acre* ** 1.6/student, 14/1000 sq. ft., 90/acre* ** 5/child, 80/1000 sq. ft. **	10% (8:2) 12% (8:2) 20% (7:3) 30% (6:4) 32% (6:4) 17% (5:5)	9% (3:7) 9% (6:4) 10% (4:6) 9% (4:6) 9% (4:6) 18% (5:5)	8.9 9.0 4.8 5.0 3.4 3.7
FINANCIAL <sup>5</sup>	[35:42:23]				3.4
Bank (Walk-In only) with Drive-Through Drive-Through only Savings & Loan Drive-Through only		150/1000 sq. ft., 1000/acre* ** 200/1000 sq. ft., 1500/acre* ** 250 (125 one-way)/lane* 60/1000 sq. ft., 600/acre** 100 (50 one-way)/lane**	4% (7:3) 5% (6:4) 3% (5:5) 2% 4%	8% (4:6) 10% (5:5) 13% (5:5) 9% 15%	
HOSPITAL .....	[73:25:2]				8.3
General Convalescent/Nursing		20/bed, 25/1000 sq. ft., 250/acre* 3/bed**	8% (7:3) 7% (6:4)	10% (4:6) 7% (4:6)	
INDUSTRIAL					
Industrial/Business Park (commercial included) Industrial Park (no commercial) Industrial Plant (multiple shifts) Manufacturing/Assembly Warehousing Storage Science Research & Development Landfill & Recycling Center	[79:19:2] [92:5:3]	16/1000 sq. ft., 200/acre* ** 8/1000 sq. ft., 90/acre** 10/1000 sq. ft., 120/acre* 4/1000 sq. ft., 50/acre** 5/1000 sq. ft., 60/acre** 2/1000 sq. ft., 0.2/vault, 30/acre* 8/1000 sq. ft., 80/acre* 6/acre	12% (8:2) 11% (9:1) 14% (8:2) 19% (9:1) 13% (7:3) 6% (5:5) 16% (9:1) 11% (5:5)	12% (2:8) 12% (2:8) 15% (3:7) 20% (2:8) 15% (4:6) 9% (5:5) 14% (1:9) 10% (4:6)	9.0 11.7

(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) <sup>g</sup>	ESTIMATED WEEKDAY VEHICLE TRIP GENERATION RATE (DRIVEWAY)	HIGHEST PEAK HOUR % (plus IN:OUT ratio)		TRIP LENGTH (Miles) <sup>h</sup>
			Between 6:00-9:30 A.M.	Between 3:00-6:30 P.M.	
<b>LIBRARY</b> .....	[44:44:12]	50/1000 sq. ft., 400/acre**	2%	(7:3) 10%	(5:5) 3.9
<b>LODGING</b> .....	[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*	9%	(6:4) 7%	(4:6)
Business Hotel		7/occupied room**	8%	(4:6) 9%	(6:4)
<b>MILITARY</b> .....	[82:16:2]	2.5/military & civilian personnel*	9%	(9:1) 10%	(2:8) 11.2
<b>OFFICE</b>					
Standard Commercial Office .....	[77:19:4]	20/1000 sq. ft., 300/acre*	14%	(9:1) 13%	(2:8) 8.8
(less than 100,000 sq. ft.)					
Large (High-Rise) Commercial Office .....	[82:15:3]	17/1000 sq. ft., 600/acre*	13%	(9:1) 14%	(2:8) 10.0
(more than 100,000 sq. ft., 6+ stories)					
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)
Corporate Headquarters		7/1000 sq. ft., 110/acre*	17%	(9:1) 16%	(1:9)
Government (Civic Center) .....	[50:34:16]	30/1000 sq. ft.**	9%	(9:1) 12%	(3:7) 6.0
Post Office					
Central/Walk-In Only		90/1000 sq. ft.**	3%		7%
Community (not including mail drop lane)		200/1000 sq. ft., 1300/acre*	8%	(6:4) 9%	(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		180/1000 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
<b>PARKS</b> .....	[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*			
Sea World		80/acre*			
<b>RECREATION</b>					
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		16/acre, 30/court**	5%		11%
Sports Facilities					
Outdoor Stadium		50/acre, 0.2/seat*			
Indoor Arena		30/acre, 0.1/seat*			
Racetrack		40/acre, 0.6/seat*			
Theaters (multiplex w/matinee) .....	[66:17:17]	80/1000 sq. ft., 1.8/seat, 360/screen*	13%		8%
<b>RESIDENTIAL</b> .....	[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*	9%	(3:7) 10%	(6:4)
Retirement Community		4/dwelling unit**	5%	(4:6) 7%	(6:4)
Congregate Care Facility		2.5/dwelling unit**	4%	(6:4) 8%	(5:5)
<b>RESTAURANT<sup>s</sup></b> .....	[51:37:12]				4.7
Quality		100/1000 sq. ft., 3/seat, 500/acre* **	1%	(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.* **	5%	(6:4) 7%	(5:5)
Delicatessen (7 am-4pm)		150/1000 sq. ft., 11/seat*	9%	(6:4) 3%	(3:7)
<b>TRANSPORTATION</b>					
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 <sup>1/2</sup> /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 [6th Edition], Trip Generation Rates (other agencies and publications), various SANDAG & CALTRANS studies, reports and estimates.

<sup>g</sup> 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  $\geq 1$  mile.  
PASS-BY - undiverted or diverted < 1 mile.

<sup>h</sup> Trip lengths are average weighted for all trips to and from general land use site. (All trips system-wide average length = 6.9 miles)  
<sup>c</sup> Fitted curve equation:  $\ln(T) = 0.502 \ln(x) + 6.945$   
<sup>d</sup> Fitted curve equation:  $\ln(T) = 0.756 \ln(x) + 3.950$

<sup>e</sup> Fitted curve equation:  $t = -2.169 \ln(d) + 12.85$   
 $t = \text{trips/DU}, d = \text{density (DU/acre)}, DU = \text{dwelling unit}$

<sup>s</sup> 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%

<sup>†</sup> 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 PM	2 2	2 2	850 850	850 850	1069 1155	778 1142	0.63 0.68	0.46 0.67	B B	A B
19	Honoapiilani Hwy 1.07 Mi W of Tunnel	AM PM	1 1	1 1	1000 1000	1000 1000	655 1105	993 1001	0.66 1.11	0.99 1.00	B F	E F
20	South Kihei Rd @ Mokulele Hwy	AM PM	1 1	1 1	800 800	800 800	935 641	540 914	1.17 0.80	0.68 1.14	F D	B F
21	South Kihei Rd @ Keonekal Rd	AM PM	1 1	1 1	750 750	750 750	482 672	498 651	0.64 0.90	0.66 0.87	B D	B D
22	Piilani Hwy @ Mokulele Hwy	AM PM	2 2	2 2	850 850	850 850	857 1168	1305 1069	0.50 0.69	0.77 0.63	A B	C B
23	Piilani Hwy @ Lipoa St & Lipoa Pkwy	AM PM	1 1	1 1	1200 1200	1200 1200	969 1195	1079 1046	0.81 1.00	0.90 0.87	D E	D D
24	Piilani Hwy between Kanani & Alanui Ke Alii Rds	AM PM	1 1	1 1	1200 1200	1200 1200	943 1107	928 1005	0.79 0.92	0.77 0.84	C E	C D
25	Hana Hwy & Baldwin Av	AM PM	1 1	1 1	1000 1000	1000 1000	463 729	890 557	0.46 0.73	0.89 0.56	A C	D A
26	Hana Hwy & Baldwin Av	AM PM	1 1	1 1	400 400	400 400	294 262	193 271	0.74 0.66	0.48 0.68	C B	A B
27	Haleakala Hwy @ Hallimaile Rd	AM PM	2 2	2 2	1200 1200	1200 1200	2076 918	545 1918	0.87 0.38	0.23 0.80	D A	A C
28	Haleakala Hwy @ Makawao Av & Loha St	AM PM	1 1	1 1	600 600	600 600	461 516	588 552	0.77 0.86	0.98 0.92	C D	E E
29	Kula Hwy @ Omaopio Rd	AM PM	1 1	1 1	1000 1000	1000 1000	729 471	447 546	0.73 0.47	0.45 0.55	C A	A A
30	Haleakala Hwy & Kekaulike Av @ Haleakala Crater Rd	AM PM	1 1	1 1	850 850	850 850	147 110	94 88	0.17 0.13	0.11 0.10	A A	A A
31	Hana Hwy & Kailua Bridge	AM PM	1 1	1 1	300 300	300 300	28 120	101 39	0.09 0.40	0.34 0.13	A A	A A





Testimony re. Olowalu  
Pete155  
to:  
LUC  
06/03/2010 05:01 PM  
Show Details

Aloha Dan Davidson,

Petition A - 10786

Please distribute this testimony to the Land Use Commissioners:

This testimony relates to the petition to reclassify 320 acres at Olowalu, Maui from Agriculture to Urban and Rural designations.

My name is Mike Foley. I have 42 years of experience as a community planner and environmental consultant, including 4 years as the Maui County Planning Director.

I oppose the urbanization of Olowalu. When the County Planning Department began the update of the Maui General Plan 4 years ago we evaluated all of the development projects proposed for Maui. The project that scored the lowest was Olowalu.

One of the main criteria in the new Maui Island Plan is whether new development would be near existing jobs and urban infrastructure. Development at Olowalu is miles from jobs, and miles from a fire station and schools. The County cannot afford to build & staff a fire station in Olowalu, and the State cannot afford to build & staff a school in Olowalu. There have been numerous wildfires in and near Olowalu.

Affordable housing would be impossible after the developers pay for a water system, a sewage treatment system and a realigned Honoapillani Highway.

The healthiest reef around Maui is at Olowalu. Many of our reefs have been damaged by runoff from construction projects, and we cannot afford to damage our precious reef at Olowalu.

Urban development at Olowalu is opposed by the West Maui Community Plan and the Maui County Planning Department. The development proponents argue that there was a community at Olowalu, but people lived in Olowalu when all of the jobs were at the Olowalu Sugar Mill. All workers in a new development in Olowalu would have to drive through existing traffic congestion to jobs in Lahaina or drive through the Pali to jobs in South Maui or Central Maui.

Mike Foley, former Maui County Planning Director  
3625 Piikea Place, Makawao : 572-7281

2010 JUN -4 A 7:52  
LAND USE COMMISSION  
STATE OF HAWAII

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

LAND USE COMMISSION  
STATE OF HAWAII  
2012 APR 19 A 7:23

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](mailto:whfujii@hotmail.com).

Yours sincerely,

A handwritten signature in black ink that reads "Wallace H. Fujii". The signature is written in a cursive, flowing style.

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