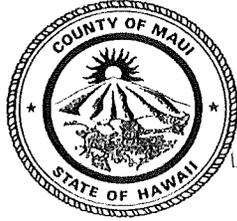


ALAN M. ARAKAWA  
Mayor

KYLE K. GINOZA, P.E.  
Director

MICHAEL M. MIYAMOTO  
Deputy Director



MICHAEL RATTE  
Solid Waste Division  
ERIC NAKAGAWA, P.E.  
Wastewater Reclamation Division

LAND USE COMMISSION  
STATE OF HAWAII

COUNTY OF MAUI 2015 NOV 27 A 9:32  
DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT  
2050 MAIN STREET, SUITE 1C  
WAILUKU, MAUI, HAWAII 96793

November 24, 2015

Makila Land Co., LLC  
ATTN: Heidi Bigelow  
305 East Wakea Avenue, Suite 100  
Kahului, Hawaii 96732

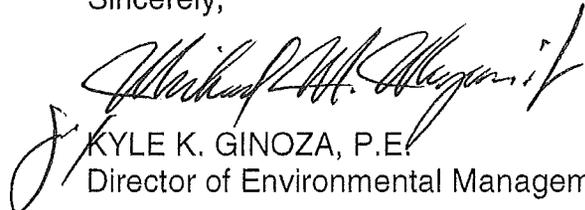
**SUBJECT: MAKILA RURAL COMMUNITY  
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE  
TMK (2) 4-7-013:001 THRU 012, LAUNIUPOKO-POLANUI, LAHAINA**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:
  - a. None.
2. Wastewater Reclamation Division (WWRD) comments:
  - a. The County does not have an existing wastewater system in the area of the subject project.

If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.

Sincerely,

  
KYLE K. GINOZA, P.E.  
Director of Environmental Management

xc: PBR HAWAII & Associates, Inc.  
ATTN: Tom Schnell, Principal  
1001 Bishop Street, Suite 650  
Honolulu, Hawaii 96813

xc: ✓ State of Hawaii Land Use Commission  
ATTN: Daniel E. Orodener, Executive Officer  
Department of Business, Economic Development & Tourism  
Honolulu, Hawaii 96804-3822

November 23, 2015

State of Hawaii Land Use Commission  
P. O. Box 2359  
Honolulu, HI 96804

LAND USE COMMISSION  
STATE OF HAWAII

2015 NOV 27 A 9:32

Re: State Land Use Commission  
Docket A15-799  
Makila Rural Community EIS

To Whom It May Concern:

We are adamantly opposed to the concept of adding any high density housing communities in Lahaina's West Maui Mountains: specifically the Makila Rural Community (Makila Village Development).

Primarily, the infrastructure is woefully inadequate, and the current proposal fails to adequately address the issues of ingress, egress, water, sewage, public safety, and stewardship of the reef and ocean. The Mahanalua Nui neighborhood has only one narrow, private road for literally hundreds of residents and contractors daily. Two "emergency exits" are virtually impassable, and the traffic light / beach access at Kai Hele Ku and the Honoapiilani highway is a travesty!

Secondly, one has only to put on a snorkel mask to see what the proliferation of hotels and condominiums has done to the coral reefs on West Maui in the past 20 years. And another sewage plant along the highway? With leaks and floods? Have we learned nothing from Oahu?

Thirdly, must we develop every acre of farmable land in the name of progress? While we agree that Maui is very much in need of more affordable housing for its residents, this should be accomplished in an area that will not have a detrimental impact on current residents, as well as visitors and others trying to get to the west side.

The Wai'ale South project (Maui News, Nov. 22, 2015) makes a little more sense: they already have a four lane highway bordering on the east, and Waiko Road connecting to Honoapiilani Highway on the west. Also, when their water treatment plant dumps raw sewage, it won't run immediately to the ocean.

We have been owners in Mahanalua Nui since 2002 and were never informed during the 2006-2008 time period about this proposed development. As with the STR issue in our neighborhood, we feel we did not receive early, adequate notification to allow us to respond long before this. We highly recommend that approval is not given to move forward with the proposed Makila Rural Community.

Mahalo for your consideration.

Sincerely,



David & Jo Neary  
34 Awaiku St.  
Lahaina, HI 96761

State of Hawaii Land Use Commission

Department of Business, Economic Development and Tourism

PO Box 2359

Honolulu, HI 96804

LAND USE COMMISSION  
STATE OF HAWAII

2015 NOV 27 A 9:32

West Maui

Makila Rural Community

Docket Number A15-799

Subject: EISPN

TMK: (2)4-7-013:001,002,003,004,005,006,007,008,009,010,011 and 012

Attention: Daniel Orodener, Executive Officer

Dear Mr. Orodener:

I am writing in response to the EISPN for the Makila Rural Community. I have many concerns about how this development will impact the environment and the community.

In addition to the following well known items of concern, the development may have an impact on the coral reefs below it. What measures will be taken to prevent this and how will monitoring take place to insure that the measures are successful? Not readily identified is the lack of consideration of storm water treatment facilities in this and other developments resulting from covering natural drainage with cement roads, driveways, and building envelopes. It might be helpful for you to review the findings of Dr. Eric Brown, marine biologist, in the Maui Planning Commission Report of 2008 & 2009 regarding Olowalu reefs.

Will there be an adequate water supply for this development and will this shared water supply result in shortages for existing neighboring agricultural developments? Nearly every summer the Makila Plantation HOA receives a notice from the water company asking residents to conserve water due to low supply. With Makila not fully sold out yet, we see water shortages already. This new development will put triple the demand on an already stressed water supply.

This new development is likely to result in further road congestion at the bottom of Kai Hele Ku Street. How will a tripling of traffic (due to a tripling of population) be accommodated without resulting backups?

With a serious increase in population density, emergency evacuation becomes an issue. Evacuation routes out of Launiupoko in the case of another fire starting from above the subdivision, seem insufficient for our current area population. How will this be addressed with a tripling of population creating an even bigger strain on evacuation routes? (Kai Hele Ku is the only road that goes straight down to the highway.)

With a large increase in population there is likely to be an increase in the need for services such as police, paramedic and fire. How will this be addressed?

The soil in the Makila Rural Community area is primarily designated as "good soil". It is Hawaii state policy not to remove good soil areas out of AG use. Why is this area being removed from AG? (It is worth noting that while the area is currently not used for AG purposes, this is because the owner has chosen not to use for AG purposes. It is not because the land is poor AG land.)

How will the likely increase in both light and noise pollution be addressed?

The Plan calls for a sewage treatment plant on the property. How will issues of smell wafting up to the neighboring development be handled? With the proximity to the ocean, what plan is in place to prevent sewage flooding and overflow during storms and what ongoing monitoring will occur to ensure flooding is not occurring?

We have seen Nene geese flying up from the direction of the fields below. The area in question is likely to be Nene habitat. Nene is an endangered species. What is being done to ensure that Nene habitat is not disturbed? What is being done to comply with federal rules regarding this?

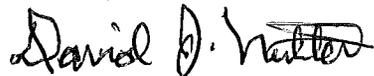
The plan does NOT conform to the Maui Island Plan's requirement for 50% or greater open space. According to the US EPA, Open space is any open piece of land that is undeveloped and is accessible to the public. This Makila Rural Community Plan achieves its 50% open space requirement by including portions of people's lots (Lots they intend to sell) as open space. People's yards should NOT be counted as open space. They are not accessible to the public and therefore should not count towards the 50% requirement.

The plan does NOT conform to the Maui Island Plan because it contains a 40 acre urban core which will include smaller lots (making it a higher density area) for workforce housing. The workforce housing should be on the same size lots as the remainder of the housing. There is no provision for 40 acres of urban in the Maui Island Plan.

We live on agricultural land and work hard to respect the land designation. The designation should NOT be changed for the convenience and financial requirements of the developer. We must all work together to preserve our AG lands and the character of our community.

In addition, we purchased our home in Launiupoko in 2007 and were never approached about this plan to have the adjoining land rezoned for higher density and commercial use.

Sincerely,



David & Christie Nutter

524 Kai Hele Ku St

Lahaina, HI 96761

TMK RP2-4-7-009-031-0001-000

Jeff and Sue Anderson  
75 S. Lauhoe Pl.  
Lahaina, HI 96761

LAND USE COMMISSION  
STATE OF HAWAII

2015 NOV 27 A 9:32

November 22, 2015

West Maui

Makila Rural Community

Docket Number A15-799

Subject: EISPN

TMK: (2)4-7-013:001,002,003,004,005,006,007,008,009,010,011 and 012

Dear Ms. Bigelow, Mr. Orodener and Mr. Schnell,

We are writing in response to the EISPN for the "Makila Rural Community". We have many concerns about how this development will impact the environment and the community.

We recently learned about this project from a consultant to the developer in a talk given to our Launiupoko Makila homeowners group. The consultant presented the project as if it was a done deal and he was just filling us in with what will happen. We were shocked that a project of this impact could get that far and escape our attention, a common sentiment among our neighbors. We are happy to learn that this project isn't pre-approved and that it will go through a full environmental impact review.

Here are several things that should be addressed in the EIS:

1. Water Supplies (potable and non-potable). Will there be an adequate water supply for this project or will it result in shortages to it and the existing neighboring agricultural neighborhoods? This summer, we received notice from the water company asking Launiupoko residents to conserve water due to low supply. With existing neighborhoods not yet fully developed, we already see water shortages. This new development will triple the demand on these stressed water supplies.
2. Traffic. This new development is likely to result in further road congestion at the bottom of Kai Hele Ku Street. How will a tripling of traffic (due to a tripling of population) be accommodated without backups and delays?
3. Evacuation. With a serious increase in population density, emergency evacuation becomes a bigger issue. There is currently just one paved way in and out of Launiupoko. There is also a sometimes maintained dirt path. Evacuation routes out of Launiupoko in the case of another fire seem insufficient for our current population. How will this be addressed with a tripling of population creating a bigger strain on evacuation routes?

4. Reef Protection (during and after construction). West Maui reefs are arguably our greatest asset but they are under stress today. A recent study identified silt smothering as a primary cause of reef decline in West Maui. What robust temporary and permanent catchment and settling solutions will the developer utilize to eliminate silt runoff? What ongoing monitoring will be performed? As the recent Kapalua Mahana Estates fiasco points out, a poor plan coupled with weak oversight will result in environmental disaster.
5. Emergency Services. With a large increase in population there is likely to be an increase in the need for services such as police, paramedic and fire. How will this be addressed?
6. Loss of Prime Agricultural Land. The soil under the proposed Makila Rural Community area is primarily designated as "good soil". It is Hawaii state policy not to remove good soil areas from agricultural use. Should this area be removed from the agricultural zone? (It is worth noting that while the area is currently fallow, this is because the owner has chosen not to use for agricultural purposes, not because the land is poor agricultural land.) What will be done to mitigate the permanent loss of this good agricultural land?
7. Sewage Treatment. The developers' plan includes a sewage treatment plant on the property. As Federal lawsuits exemplify, Maui, and West Maui in particular, does not have a good track record avoiding ocean water impacts from sewage treatment. Further, existing West Maui treatment facilities, like the one mauka of Kaanapali, create horrible noxious fumes affecting the surrounding area. How will this new treatment facility be designed, built and monitored to permanently prevent any ocean water contamination? How will this new treatment facility be designed, built and monitored to prevent noxious sewer gases from wafting through the project and surrounding neighborhoods?
8. Open Space. The developers claim their plan meets the Maui Island Plan requirement for 50% or greater open space. They acknowledge, though, that it is met by counting space in people's back yards. According to the US EPA, Open space is any open piece of land that is undeveloped and is *accessible to the public*. How will the project legitimately meet the requirement and provide for reasonable open space?
9. Urban Space. The developers' plan includes 40 acres of urban space, which includes densely packed housing and commercial space. This use violates the Maui Island Plan and the good planning notion to avoid sprawl by limiting urban expansion to existing urban hubs. Dotting the coastline with strip malls is not good planning. How will the developers follow good planning practices?
10. Noise Pollution. Dense housing and commercial establishments generate lots of noise. The neighborhoods surrounding the project currently enjoy quiet days and very quiet evenings. What steps will the developers take to mitigate noise pollution to prevent the noisy bustle of this new small city invading the adjacent neighborhoods?

11. Light Pollution. Launiupoko is currently a dark skies neighborhood with many amateur astronomers. Dense housing and especially commercial establishments threaten to ruin star gazing forever. What steps will the developer take to mitigate sky-bound like from the project?
12. Endangered Species. Endangered Nene Geese frequent the project area. What will be done to mitigate any impact to this majestic bird?
13. Beach Park Overcrowding. The local Launiupoko Beach Park is packed on weekends and holidays. Parking is scarce and the facilities, the park area, the beach and the ocean are crammed. Tripling Launiupoko population, with new residents within easy walking distance to Launiupoko beach, will explode beach park attendance. What will be done to accommodate beach goers in an enjoyable and safe environment? What will be done to protect the reef from the new heavy use?

Thanks in advance for consideration of our concerns.

Sincerely,



Jeff and Sue Anderson

Applicant: Makila Land Co., LLC

305 East Wakea Avenue, Suite 100

Kahului, HI 96732

Attention: Ms. Heidi Bigelow

Approving Agency: State of Hawaii Land Use Commission

Department of Business, Economic Development and Tourism

PO Box 2359

Honolulu, HI 96804

Attention: Daniel Orodener, Executive Officer

Consultant: PBR & Associates, Inc.

1001 Bishop Street, Suite 650

Honolulu, HI 96813

Attention: Tom Schnell, Principal