

December 3, 2015

District: WEST MAUI

Project Name: 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.

Approving Agency:

State of Hawai'i Land Use Commission,

Department of Business, Economic Development & Tourism,

P.O. Box 2359, Honolulu, HI 96804;

Mr. Daniel Orodener, Executive Officer, (808) 587-3822

luc@dbedt.hawaii.gov

Dear Mr. Orodener,

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 quality of life of West Maui residents and visitors.

It violates the Maui Island Plan's requirement that 50% of the project be **open space**. The developers include portions of individual lots in their calculation of open space.

It violates the Maui Island Plan's designation of the project area as rural by including an **urban core** of 40 acres.

It violates the West Maui Community Plan, which designates the project area as **agricultural not rural**.

The project area, despite the developer's contention to the contrary, is **habitat for the nene, a federally recognized endangered species**. Clearly, this development threatens nene habitat. There may be other protected species present as well.

The **soil**, except in the drainage gulches, has been classified by the state as Grade B, or good. We need to use our limited good agricultural soil for growing food, given our well-documented food insecurity on Maui. There are many examples of food-producing farms in the area, so despite superficial appearances it can be done. Our property is directly upslope from the project in an area with Grade E soil (poor), yet we are successfully growing food on that native soil. If we can do that, people can — and should — grow food on our scarce good soil, not houses.

The proposed **traffic** design is flawed in at least three respects:

1. It hinders emergency evacuation of the adjoining subdivisions;

2. It will add too many cars to the main access road to the highway (Kai Hele Ku), where the wait for the signal is already long and often requires two cycles to clear the waiting cars; and
3. It will add too many cars to the highway, which already experiences frequent backups of traffic for no reason other than overuse.

Without a new, independent source of **water**, the project will overburden the existing water supply. The existing subdivisions have recently experienced a water shortage and request for voluntary conservation.

The proposal to build a **sewage** treatment plant is problematic on two counts: foul odors affecting nearby residents, and the risk of overflow and flooding during storms, with attendant damage to the coral reef below. Sewage treatment plant failures are common. Our coral reefs are already stressed. They shouldn't be subjected to this stressor too.

The proposal will jeopardize the enjoyment of **Launiupoko Beach Park** in at least three ways:

1. Overcrowding the park, which is already one of the most popular beach parks on Maui, drawing visitors from all parts of the island, with already limited parking;
2. Damage to the reef from silt and runoff during the construction phase; and
3. Risk of sewage plant overflow during storms.

These points apply as well to **Puamana Beach Park**.

The project will create **noise and light pollution** affecting the residents of the existing subdivisions. These are not trivial concerns. They have a large impact on quality of life.

The project will create additional **burdens on public services**, such as police, fire, ambulance, and schools, without providing any mitigation that we are aware of, aside from a mention of possibly reserving space for a fire and ambulance substation. We still do not have a hospital on the west side, so this project will add more residents who will have no choice but a long and expensive ambulance ride to Maui Memorial in a medical emergency.

The project will greatly increase the **risk of wildland fire**, not only for its own residents but for the existing upslope residents as well. The site is currently carpeted in fuel consisting of grasses, haole koa and keawe, with similarly hazardous adjacent areas to the north, east and south. It will be many years before all the vacant land is sold, and in the meantime there will be residents and traffic in close proximity to this fuel. The area is also known to experience extreme winds. These are all ingredients for a potential fire disaster.

Most of the concerns above would be remedied by maintaining the status quo, i.e. preserving the agricultural zoning and character of the project area. We urge the Land Use Commission to exercise its powers to accomplish this.

Sincerely,

Gordon Firestein & Doris Lang

186 Paia Pohaku Pl.
Lahaina HI 96761

cc:

Applicant:

Mākila Land Co., LLC,
305 East Wakea Avenue, Suite 100,
Kahului, Hawai'i 96732;
Contact: Ms. Heidi Bigelow, (808) 877-4202
mariah@westmauland.com

cc:

Consultant:

PBR & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813
Tom Schnell, AICP, Principal, (808) 521-5631
tschnell@pbrhawaii.com