



CHAPTER VIII

Alternatives Analysis



VIII. ALTERNATIVES ANALYSIS

Under HAR Title 11, DOH, Chapter 200, EIS Rules, Section 11-200-17(F), a Draft EIS must contain a section discussing alternatives that could attain the project objectives, regardless of cost, in sufficient detail to explain why the specific alternative was rejected. Alternatives to the WCT, along with reasons why each alternative was rejected, are described below.

WCT Project Objectives

The primary mission of the WCT Master Plan is to create a new mixed-use residential community that embodies the principles and policies of the MIP and that respects and implements the Statement of Values of the Waikapū Community Association. Key guiding principles in the MIP that have guided the development of the WCT Master Plan include:

1. Respect and encourage island lifestyles, cultures, and Hawaiʻian traditions;
2. Promote sustainable land use planning and livable communities;
3. Keep “urban-urban” and keep “country-country”;
4. Protect traditional small towns;
5. Protect open space and working agricultural landscapes;
6. Protect environmentally sensitive lands and natural resources;
7. Promote equitable development that meets the needs of each community;
8. Plan for and provide efficient and effective public facilities and infrastructure;
9. Support sustainable economic development and the needs of small business; and
10. Promote community responsibility, empowerment, and uniqueness

The WCT Master Plan also seeks to embody the values of the existing residents of Waikapū. The Waikapū Community Association’s Statement of Values and Supplemental Statements have

helped to shape the WCT Master Plan. These values and supplemental statements are listed in Section III.A of the DEIS.

In addition to the above-referenced guiding principles from the MIP and Waikapū Community Association Statement of Values, project specific objectives include the following:

- Be a profitable development for the project’s entrepreneurial developers, the County and State;
- Provide a diverse range of market and affordably priced housing in order to help address the projected housing demand through 2030;
- Develop a “complete community” with a diversity of housing, retail, and civic uses to support residents daily needs;
- Protect the environment by directing development away from sensitive lands and by incorporating sustainability practices into the design, development and operation of the project;
- Reduce automobile dependence;
- Provide a jobs and housing balance within the development;
- Create the opportunity for more active and healthy lifestyles;
- Reduce the project’s energy demand through conservation, energy efficient design and development of on-site renewables;
- Respect traditional Hawai’ian lifestyles and existing cultural practices;
- Facilitate agricultural development within the project’s protected agricultural lands;
- Maintain a sense of community where Maui residents feel comfortable visiting, living, working and playing.

The alternatives considered prior to selecting the preferred alternative included the following:

- No Action Alternative;
- Develop fewer units;
- Develop more units by producing more workforce housing than required;
- Develop at a lower density; and
- Develop at an alternative location.

Five (5) alternatives to the proposed WCT Master Plan were considered. These alternatives are described below.

1. No Action Alternative

Under the no action alternative, existing entitlements would remain. The approximate 485 acres of agricultural lands proposed for urban and rural development would remain in agricultural use pursuant to the permitted uses allowed by the State Land Use Law and the Maui County Code. Under this scenario farming of sugar cane by HC&S would likely continue into the foreseeable future on the WCT lands they currently lease. It would be expected that the existing diversified agricultural operations of Kumu Farms, Bobby Pā'ia and others would also continue their production activities.

The existing MTP would also likely continue functioning much as it currently does, in accordance with the provision of Maui County Code, Chapter 19.86 Wailuku-Kahului Project District 5 (Maui Tropical Plantation). The No Action Alternative assumes that the housing and commercial development proposed by the WCT would not be developed elsewhere within Central Maui. Therefore, should the No Action Alternative be implemented both the benefits and costs associated with the development would not be incurred at an alternative location.

Potential benefits of the No Action Alternative might include: 1) the existing “sense of place” and open space ambiance and integrity of existing views across agricultural lands to Haleakalā and the West Maui Mountains would remain unchanged by development; 2) approximately 485 acres of highly productive agricultural lands would remain undeveloped and available as a resource for agricultural production; 3) the existing MTP would continue to generate employment and serve as a visitor attraction for the benefit of the tourism industry; 4) there would be no short-term construction-related impacts (such as construction noise, construction equipment exhaust emissions and fugitive dust); 5) avoidance of additional infrastructure demands (water, wastewater flows, and solid waste disposal); 6) no increased WCT traffic impacts and associated infrastructure costs; and 7) less demand upon the region’s coastal and inland parks and recreation facilities generated by the project population. The No Action Alternative would not add to regional population increases, or require any public services, such as parks and schools, to accommodate an increase in population within the area.

Pursuing the No Action Alternative would also impose negative impacts upon the community. Under the No Action Alternative the project would not be built. This would be in direct contradiction to the recently adopted MIP (December 2012), which sets forth a managed and directed growth strategy for the island of Maui. The MIPs Directed Growth Plan states:

The Directed Growth Plan is the backbone of the Maui Island Plan (MIP). Taking into account population projections, it prescribes and outlines how Maui will grow over the next two decades, including the location and general character of new development. The Directed Growth Plan accommodates growth in a manner that provides for economic development, yet protects environmental, agricultural, scenic and cultural resources; economizes on infrastructure and public services; meets the needs of residents; and protects community character.

The No Action Alternative would negatively impact the community in the following ways:

- **Housing Supply.** The principal purpose of the WCT is to create additional housing supply to help address future demand. If the additional housing is not built, but demand remains strong and continues to outpace supply then home prices will remain prohibitively high for many island residents. High home costs place a significant burden on working families who also face high transportation costs, food costs, energy costs, medical costs and educational costs. The MIP states the following in the introduction to the Plan's housing element:

Housing is one of our most basic human needs. It is one of the fundamental building blocks in our communities and it is where our families gather and find shelter. All segments of our island have particular needs, whether it is the first home or apartment for young adults, or to accommodate the specified needs that come with age. Housing is not always treated as a human right. When adequate or appropriate housing is unattainable to a

large portion of the population, it negatively impacts the entire community and decreases overall quality of life. We can do many things to promote an adequate and permanent supply of affordable for-sale and rental housing to meet resident needs. To meet our island's housing needs, we must rethink Maui's paradigm. Due to numerous factors, Maui's housing prices have escalated dramatically in the last decade. With some of the highest housing prices in the nation, many Maui residents are struggling to afford housing on the island.

The MIP projects the total demand for new housing units on Maui through 2030 to be approximately 29,589 units of which about 10,845 units will need to be built on currently unentitled lands. The MIP designates four new planned growth areas for the Wailuku-Kahului region. These four areas are to accommodate about 4,437 units plus an undetermined number of rural lots, or about 41 percent of the projected demand island-wide. The WCTs percentage of the planned supply to be derived from newly entitled lands within Wailuku-Kahului is 32%. The No Action Alternative would therefore significantly reduce this planned supply, which would limit the diversity of housing supply available to prospective home buyers and renters and would likely lead to higher housing costs for Maui residents.

- **Economic Development.** The WCT is expected to indirectly support Maui's existing economic base activities by providing much needed housing to serve the island's workforce. The WCT is intended to provide housing along with supporting commercial, employment and institutional uses that will allow for the growth and diversification of Maui's economic base, while also allowing for the economy to become more sustainable - including the island's agricultural industry. By providing much needed housing in a format that will create a high quality of life for Maui's working families, and by generating both short- and long-term employment in the construction, trade and agricultural industries, the Project is directly supportive of the State and County's economic development. More specifically, the No Action Alternative would deprive the

State, County and general public of the significant economic benefits associated with the WCT, including an estimated:

- The WCT development will bring in \$609.1 million of new capital investment into the Maui economy.
 - The construction of the WCT components will directly create an estimated 2,320 "worker-years" of employment (the equivalent of 52 work weeks at 40 hours per week) in the trades and associated businesses during build-out, averaging about 193 worker years annually, with an estimated \$188.3 million in wages (averaging about \$15.7 million per year).
 - The on-going operations and maintenance of the business commercial and residential components will directly provide an estimated 4,251 FTE worker-years during the 2016-2030 projection period, providing stabilized employment for 531 permanent positions.
 - The Project will require an estimated 66 worker years of maintenance and common area element employment on a continual basis, and will generate some 1,750 worker years of off-site employment from 2016-2030 and a stabilized demand for 149 FTE positions.
 - In aggregate, during the development of the WCT 8,750 worker years of employment will be created during construction and operations, on-site/direct and off-site/indirect, with stabilized employment after completion of 746 jobs.
 - During the 15 years projection period, WCT will have a base economic impact of \$1.3 billion with a stabilized annual benefit of \$137.3 million thereafter.
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- **Master Plan Benefits.** The WCT is a master planned community that arose from the General Plan update process and which has had a tremendous amount of community input that has helped to shape and define the community design. Under the No Action Alternative, there would be no master-planned community utilizing "smart growth" and

“neo-traditional” town planning principles, such as locating growth close to infrastructure, employment and facilities; creating diverse residential opportunities for all income categories; designing mixed use neighborhoods incorporating commercial and civic uses to satisfy daily needs, incorporating abundant on-site recreational amenities and integrated bicycle and pedestrian networks. Moreover, under the No Action Alternative the opportunity to establish a permanent agricultural preserve comprising approximately 800 acres, with an additional 277 acres of agricultural lands with limited subdivision potential would be lost. The WCTs agricultural lands are an important component of the overall project and will serve to create on-site agricultural employment, greater self-sufficiency in food production and a permanent open space separation between Waikapū and Mā‘alaea.

For the following reasons, the No Action Alternative was rejected:

- Is not consistent with the MIPs Directed Growth Plan;
- Would exacerbate the County’s current housing deficit and would worsen the island’s affordable housing crisis;
- Would deny Maui residents of the many substantive benefits that would be implemented under the WCT Master Plan; and
- Would not provide the State, County and general public the significant economic benefits associated with the implementation of the WCT.

In summary, the benefits associated with the No Action Alternative are outweighed by the benefits to the community that the Project would bring.

2. Develop Fewer Units

Under this scenario, fewer units would be developed. For planning purposes, it was assumed that just the mauka lands encompassing the current MTP and surrounding agricultural lands would be developed. The site plan for the mauka lands would be updated to accommodate approximately half of the proposed development, or about 717 residential units and 100,000 square feet of commercial space. Developing the mauka lands, rather than the makai lands, is preferable because access to the project can be provided directly from Honoapi‘ilani Highway.

The full development of the mauka lands would not be dependent upon having the Wai'ale Bypass constructed whereas it is expected that this infrastructure is required for full development of the makai lands.

Under this scenario, there would be benefits and costs to the community. Potential benefits of this scenario include: 1) the integrity of existing views from Honoapi'ilani Highway across agricultural lands towards Haleakalā would remain unchanged by development; 2) approximately 236 acres of highly productive agricultural lands would remain undeveloped and available as a resource for agricultural production; 3) there would be no short-term construction-related impacts (such as construction noise, construction equipment exhaust emissions and fugitive dust) associated with development of the makai lands; 4) avoidance of additional infrastructure demands (water, wastewater flows, and solid waste disposal) associated with the development of about 716 residential units and 100,000 square feet of commercial on the makai lands; 6) no increased traffic and associated impacts from the development of the makai lands; and 7) less demand upon the region's coastal and inland parks and recreation facilities generated by the additional project population. Assuming that the makai units would not be built elsewhere by other projects within the region, the regional population increase may be less and the types of impacts associated with population growth, such as increased demand upon infrastructure and public services, would be less than the preferred alternative.

The Develop Fewer Units Alternative would negatively impact the community in many of the same ways that the No Action Alternative. However, the magnitude of the negative impacts would be proportionally less. The following summarizes the principal costs to the community associated with this alternative.

- **Housing Supply.** The principal purpose of the WCT is to create additional housing supply to help address future demand. If the additional housing is not built, but demand remains strong and continues to outpace supply, then home prices will remain prohibitively high for many island residents. In a market with constrained supply but strong demand, those with the greatest purchasing power will bid up the price until supply approaches equilibrium with demand. Those that cannot compete in such a

market are forced out, which is the current situation for many Maui residents. High home costs place a significant burden on working families who also face high transportation costs, food costs, energy costs, medical costs and educational costs.

As noted, the MIP projects total demand for new housing units on Maui through 2030 to be approximately 29,589 units of which about 10,845 units will need to be built on currently unentitled lands. The WCTs percentage of the planned supply from newly entitled lands within Wailuku-Kahului is 32%. The Develop Fewer Units Alternative would significantly reduce this planned supply, which would limit the diversity of housing supply available to prospective home buyers and renters and would likely lead to higher housing costs for Maui residents.

- ***Economic Development.*** The WCT is expected to indirectly support Maui's existing economic base activities by providing much needed housing to serve the island's workforce. The WCT is intended to provide housing along with supporting commercial, employment and institutional uses that will allow for the growth and diversification of Maui's economic base industries, while also allowing for the economy to become more sustainable - including the island's agricultural industry. By providing much needed housing in a format that will create a high quality of life for Maui's working families, and by generating both short- and long-term employment in the construction, trade and agricultural industries, the project is directly supportive of the State and County's economic development. As noted in the No Action Alternative, the full buildout of the WCT will produce significantly positive economic impacts to the community in the form of wages and employment. While the development of a smaller project will also generate positive economic impacts, these impacts will be significantly less by just developing the mauka lands.
- ***Master Plan Benefits.*** The WCT is a master planned community that arose from the General Plan update process and which has had a tremendous amount of community input that has helped to shape and define the community design. In describing the WCT Planned Growth Area, the MIP states in part:

Providing the urban character of a traditional small town, this area will have a mix of single-family and multifamily rural residences, park land, open space, commercial uses, and an elementary or intermediate school developed in coordination with the Wai'ale project. The area is located south of Waikapū along Honoapi'ilani Highway, and it will incorporate the integrated agricultural and commercial uses of the existing tropical plantation complex. This area is proximate to the Wai'ale planned growth area, providing additional housing in central Maui within the Wailuku-Kahului Community plan region. As part of this project, parcels to the south of the project (identified as Agricultural Preserve on Figure 8-1) shall be protected in perpetuity for agricultural use through a conservation easement.

Planned Growth Area Rationale:

Keeping the Waikapū Tropical Plantation as its town core, this area will become a self-sufficient small town with a mix of single-family and multifamily housing units in a walkable community that includes affordable housing in close proximity to Wailuku's employment centers. Schools, parks, police and fire facilities, transit infrastructure, wastewater, water supply resources, and other infrastructure should be developed efficiently, in coordination with neighboring developments including Maui Lani, Kehalani, Pu'unani and Wai'ale.

Under the Develop Fewer Units Alternative, it would be challenging to create a “complete community” where a diversity of housing could be provided at a scale that would make it economically feasible to make investments into infrastructure and public facilities – such as schools, water and wastewater systems. Moreover, it would be difficult to justify the dedication of agricultural lands for preservation, since future development pressure would likely warrant the urbanization of those lands.

For the following reasons, the no action alternative was rejected:

- Is not consistent with the MIPs Directed Growth Plan;

- Would exacerbate the County's current housing deficit and would worsen the island's affordable housing crisis;
- Would deny Maui residents of the many substantive benefits that would be implemented under the WCT Master Plan; and
- Would not provide the State, County and general public the significant economic benefits associated with the implementation of the Master Plan Update.

In summary, the benefits associated with the Develop Fewer Units Alternative are outweighed by the benefits to the community that full build-out of the Project would bring.

3. Develop More Units by Building More Workforce Housing

Under the "Develop More Units by Building More Workforce Housing" Alternative, the total number of units within the WCT would be increased by 300, or about 21 percent to 1,733 units. This alternative would be in conformance with the MIPs policy of allowing for additional units if provided as affordable housing in excess of what is required by law. The MIP states: *"Additional units may be permitted through a transfer of development rights program or to provide affordable housing in excess of what is required by law."*

In consideration of the current undersupply of affordably priced housing within Central Maui, this alternative may offer significant benefits to the community. However, by building additional units the project would also produce increased marginal impacts upon infrastructure and public facility systems. Developing additional affordable residential units would have to be conducted within the existing growth boundary designated by the MIP. Therefore, in order to accommodate additional units, the net residential density of the project would have to increase, specifically in the area currently planned for multi-family residences.

If this alternative were to be pursued, an approximate 300-unit workforce housing project would be proposed on the makai lands abutting the proposed elementary school and within close proximity to the Community Park, Main Street and the Main Street commercial districts. The WCT Master Plan designates this area for multi-family and country town mixed-use development (See: Figure No. 43, Preferred Location to Develop Additional Affordable Housing).

Waikapū

COUNTRY TOWN



If developed, the 100 percent affordable 201H project would likely be built as a two- and 3-story multi-family project with about one-half of the units offered for sale and the other half for rent. By developing 300 additional units within the areas of the WCT Master Plan designated for Multi-Family, the net residential density of the WCTs multi-family development would increase from about 10.61 units per acre to about 21.34 units per acre. The overall net residential density for the urban lands (excluding rural units) within the WCT would increase from about 8.29 units per acre to about 10.12 units per acre. The MIPs net residential density guideline for the WCTs Planned Growth Area is 9 to 12 dwelling units per acre. Thus, even with the development of a 100 percent affordable 300 unit workforce housing project, the WCT would still be well within the MIPs net residential density guideline. Under this scenario, the proportion of multi-family units to single-family units would increase from about 27 percent of the project to about 39 percent, which is consistent with the MIPs Planned Growth Area guideline of having a “balance of single-family to multi-family residences”.

This scenario presents benefits and costs to the community. Potential costs associated with this scenario relate mostly to the additional population generated by the development. If 300 additional workforce multi-family units are developed, it should be expected that the project population would increase by about 735 persons. The increase in the project population would increase demand for infrastructure and public facilities including parks, schools, water, police, fire and wastewater systems. The project would also generate additional traffic, which would impact roadways within the project area.

However, the additional workforce housing units would also produce significant benefits to the County. As noted, high home costs place a significant burden on working families who also face high transportation costs, food costs, energy costs, medical costs and educational costs. Many Maui families have been forced to leave Hawai‘i, live in overcrowded housing conditions, or have fallen into homelessness due to the limited availability and high cost of housing on Maui. The additional affordable units would increase the supply of affordable rentals and for sale housing units in an area within walking distance of an elementary school, an intermediate school (at the proposed Wai‘ale community), parks, shopping and employment. The project site is also within a short vehicular commute by transit, or personal automobile, to the employment, commercial and governmental centers within Wailuku, Kahului and Kīhei.

This scenario would also likely produce greater positive short- and longer-term operation phase employment and wage impacts relative to the preferred alternative. Another potential benefit of developing additional workforce housing, is the more efficient use of the urban lands that the MIP has placed within a designated growth boundary. By developing at higher densities, less land in the future may be required for urbanization and the marginal cost per unit for infrastructure and land typically decreases.

Developing additional workforce housing units will require further analysis of the associated impacts to infrastructure and public facility systems. It will also require further consultation with agency and community stakeholders to gauge community support for the workforce housing units.

4. Develop at a Lower Density

As an alternative to the preferred alternative, the project could also be developed at a lower density. For example, rather than developing the urban area of the project site at a net residential density of 8.29 units per acre the urban areas could be developed at 4 units per acre. In addition, rather than developing the rural lots at an average of about 1.5 acres per lot, these lots could be developed at an average net density of 1 unit per 4 acres.

Under such a scenario the urban land area would need to increase by about 214 acres to about 377 acres and the rural land area would increase from about 150 acres to about 345 acres. Thus, the MIPs small town and rural growth boundaries would need to increase in area by about 409 acres to accommodate the 1,433 units at a lower density.

Under this scenario, there are benefits and costs to the community. One benefit of this scenario might be an overall increase in the value of the residential and rural lots, which might generate greater property tax revenues to the County relative to fiscal costs. As such, the net fiscal impact to the County might be higher for a less dense, and assumably less affordable, project relative to a higher density project with the same number of units.

Some home buyers may also prefer this scenario because the project would offer considerably larger lots, with more privately owned open space, for their use and enjoyment. Regarding

development impacts, this scenario would likely produce similar impacts to public infrastructure and facility systems since the population of the project is assumed to be the same. However, by spreading development out over a larger area more land would need to be developed with impervious surfaces, such as roadways, and the need for larger and more expensive on-site detention basins to retain the a larger volume of runoff from the project site should be expected.

The negative impacts to the community are primarily four-fold:

- ***Higher Home Prices.*** It should be expected that with less density infrastructure and land costs will be higher, increasing the cost of each lot. Less density requires proportionally more roadways and longer utility runs for the same number of units. These costs are passed on to consumers, especially in an environment where there is a shortage of supply relative to demand. Developers will also often pass on the cost of the additional land, plus a profit, to buyers of larger lots. Moreover, many home buyers typically pay more for the perceived benefit of having larger lawns and greater separation between neighboring properties, which can make such communities more exclusive resulting in a crowding out of lower income working families. Larger lots are also often more expensive to maintain. Large lots require more time for maintenance and more water for irrigation. The cost of water is high on Maui and watering a lawn can add a considerable cost to home ownership.
- ***Greater Dependence upon the Automobile.*** Lower density communities generally require greater communing distances between residential neighborhoods, parks, schools and commercial services. Since the scenario described doubles the distance required for most residents to walk or bike to civic and commercial services, it should be expected that many residents will choose to drive rather than walk or bicycle. Automobile dependence places significant burdens upon society. These burdens include: increased air pollution and greenhouse gas emissions, decrease in physical activity, increase in the cost of living, congestion and the need for more land dedicated to parking and roadways.
- ***Impact on Prime Agricultural Lands.*** Lower density would also require the urbanization of an additional 409 acres of prime agricultural land. This would reduce the WCTs

agricultural lands from 1,077 to about 668 acres. While the loss of the additional agricultural lands to urbanization would likely not produce a significantly negative impact upon Maui County's agricultural economy, it would reduce the availability of this resource for future generations. Best planning practice generally prescribes that development should be directed away from prime resources lands in favor of lands without these values. Policy 7.1.1.f of the MIP states: "Strongly discourage the conversion of productive and important agricultural lands (such as sugar, pineapple and other produce lands) to rural or urban use, unless justified during the General Plan Update, or when other overriding factors are present." Developing additional prime agricultural lands in favor of a lower density development directly contradicts this MIP policy, and does not offer "overriding factors" that would justify such a proposal.

For the following reasons, the Develop at a Lower Density Alternative was rejected:

- Is not consistent with the MIPs Land Use Element or Directed Growth Plan;
- Would likely result in higher development costs and home prices for Maui consumers;
- Would reduce the area of the WCTs holdings of prime agricultural lands, which are intended to be leased to farmers for agricultural development.

In summary, the benefits associated with the Develop at a Lower Density Alternative are outweighed by the benefits to the community that the preferred alternative would bring.

5. Develop at an Alternative Location

Under the "Alternative Location" Alternative, the 1,433 residential units and associated commercial and civic spaces could be relocated to an alternative location within Central or South Maui. For example, the development could be relocated to one of the MIPs other Planned Growth Areas designated to receive residential development in Central or South Maui. Or, the development could be directed to other unentitled lands beyond the designated Urban and Rural Growth Boundaries. The MIP notes in its Directed Growth Chapter that Maui's future urban development will occur through infill and redevelopment, urban expansion, new towns and settlements, and infill and expansion of existing towns and villages.

Finding appropriate locations for urban development depends upon many factors including topography and soil conditions on the site, presence of natural and environmental resource constraints, proximity and availability of infrastructure and supporting public facilities, and proximity to employment. Other key factors include underlying land entitlements, community support and/or opposition to development, land ownership and amenity values.

The proposed project site scores favorably on most of these criteria. Its principal drawback is the underlying lands value for agricultural production. However, as documented in Section V.A.7 of the DEIS, an abundance of other highly suitable agricultural land is available on Maui. Moreover, the WCT is dedicating approximately 800 acres of prime agricultural lands, with access to affordable irrigation water, to create an agricultural preserve for long-term diversified agricultural production at the WCT.

Relocating the subject project would create similar demands upon infrastructure and public facilities regardless of location. Likewise, developing raw lands produces a set of similar impacts – such as construction phase dust, noise and drainage that must be mitigated regardless of location. Most urban expansion in Central Maui will produce some level of impact upon agricultural lands since the majority of the Central Maui isthmus is comprised of high quality agricultural lands. This is especially true on the urban fringe of Wailuku-Kahului, which also happens to be the area that is most proximate to employment and urban levels of infrastructure and services. Placing development mauka of Piilani Highway, within North and Central Kīhei, would displace less productive agricultural land, but this area has less favorable topography and soils, is significantly further from the Central Maui employment center, and would significantly burden the Piilani Highway.

The MIP considered many of these factors in selecting its Central Maui Planned Growth Areas, and through a highly transparent and thoroughly vetted public planning process, determined that the WCT location was a desirable location for future urban expansion – when considering the various factors described above.

For the following reasons, the Develop at an Alternative Location Alternative was rejected:

- Is not consistent with the MIPs Land Use Element or Directed Growth Plan;
- Would likely result in higher development costs and home prices for Maui consumers;
- Would likely produce a less desirable location for future Maui residents to live.

In summary, the benefits associated with developing at the proposed location outweigh relocating the development to an alternative location.