



Maui R & T Partners, LLC, Final Environmental Impact Statement (FEIS)

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to:

luc

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Aloha, Land Use Commissioner Kyle Chock and members.

This email concerns Action Item V on the agenda for this Thursday's Land Use Commission Meeting, which is to consider the acceptance of Maui R & T Partners, LLC, Final Environmental Impact Statement (FEIS). The FEIS for the *Maui Research & Technology Park Master Plan (MRTP) Update* is inadequate and should not be approved without further revision.

First, the FEIS has not provided responses to all my substantive comments in my August 5, 2012 letter located on pdf Page 683 of Volume 2 of the FEIS. In fact, the applicant has provided NO responses at all to my general comments (pdf Pages 683 - 688 Volume 2 of FEIS). However, HAR §11-200-18 D requires a final EIS to contain the responses of the applicant to each substantive question, comment, or recommendation received in the review and consultation processes. Additionally, many of my specific comments have not been addressed adequately, including my comment indicating the Project Description of the DEIS should be revised to indicate the maximum amount of traffic generated by each phase of MRTP. If the project is constructed with more traffic intense uses than is assumed in the FEIS, then the MRTP may have additional traffic impacts not disclosed in the FEIS.

Second, the FEIS fails to disclose all traffic impacts of the project, because its traffic impact analysis report (TIAR) only provides an analysis assuming the North South Makai Collector Road is constructed. It is likely a portion of MRTP will be constructed prior to the construction of the North South Makai Collector since the funding and timing of this collector is not assured. Without the North South Collector more of the traffic from MRTP in the north/south direction would need to utilize Pi'ilani Highway, a substandard 4 lane primary arterial nearing capacity.

Third, the FEIS fails to assess short term traffic impacts, since its TIAR's earliest scenario is Year 2024. Year 2024 is too far in the future to assess short term impacts. HAR §11-200-12 says that in determining whether an action may have a significant effect on the environment, both short term and long term effects of an action should be considered. The TIAR should be revised to include an Opening Day scenario to determine its short term traffic impacts.

Fourth, in my August 5, 2012 comment letter I pointed out that the TIAR indicated the MRTP had a significant traffic impact to the recently constructed roundabout at Liloa Drive/Pi'ikea Ave. The applicant chose not to respond to this comment. Instead, the revised TIAR in the FEIS shows that the roundabout would operate at LOS (level of service) A, which is considered free flow conditions, both with and without the project in Year 2024 and Year 2034. The FEIS should provide a response to my comment and explain why the roundabout is now found to operate so well in the revised TIAR.

Finally, the TIAR from the FEIS does not provide an accurate analysis of the project's traffic impacts. The TIAR should be revised to:

1. Include traffic generated from the *Downtown Kihei* project. The EA for *Downtown Kihei* was approved on March 12, 2013 by the Maui County Planning Commission. This project, which consists of 150 room hotel, a movie theater, and approximately 270,000sf of commercial & retail space, generates a large volume of traffic and will be located directly across Pi'ilani Highway from MRTTP. Additionally, *The Maui News* reported that the traffic from the *Downtown Kihei* project would be horrific and its traffic mitigation is currently unresolved. Please refer to the following weblink from The Maui News for more information:

<http://www.mauinews.com/page/content.detail/id/570697.html>

Traffic generated by the *Downtown Kihei* project when combined with traffic generated by MRTTP would significantly increase congestion in the area in the vicinity of Pikea Avenue and Lipoa Street and particularly the recently constructed, 2 million dollar taxpayer funded roundabout at Pikea Avenue/Liloa Street. By not including the traffic from the *Downtown Kihei* project, it is highly likely that many of the traffic impacts from the MRTTP are not disclosed in its proposed FEIS.

2. Analyze the traffic signal of Azeka Shopping Center/South Kihei Road (SKR) since a substantial amount of MRTTP traffic would use this signal, and it is one of three very tightly spaced traffic signals on a portion of SKR that is notorious for being congested most times of the day. The TIAR analyzed the signal to the north and the signal to the south of the Azeka Shopping Center/SKR signal, but did not analyze the Azeka Shopping Center signal.
3. Analyze the three signals along SKR as a coordinated signal system in all future scenarios since there is a fully funded CIP project (CBS No. CBS - 1043) for the Maui County Department of Public Works to coordinate these signals in Fiscal Year 2014.
4. Provide a queuing analysis for the three SKR signals and for signals along Pi'ilani Highway. Excessive queues increase delay and may also adversely affect public safety by increasing emergency vehicle response times, increasing the likelihood of rear end collisions if turn pockets are not long enough to accommodate queues, and increasing the likelihood of right angle collisions because motorists entering from side streets have to accept smaller gaps in traffic to enter the main thoroughfare.

MRTTP likely has significant impacts to Pi'ilani Highway, South Kihei Road, and/or the roundabout at Liloa Drive/Pi'ikea Avenue that are not disclosed in the FEIS.

Thank you for your consideration of my comments.

Victoria A. Huffman, P.E.

Kihei, HI