

TO: State of Hawai'i Land Use Commission November 13, 2015
Department of Business, Economic Development & Tourism
P.O. Box 2359 Honolulu, Hawai'i 96804-2359

FROM: Michael Foley, Former Maui County Planning Director
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**RE: A10-786 Olowalu Town Master Plan
Testimony on the Final-EIS and the Applicant's Responses to my Comments**

Aloha Land Use Commissioners,

This letter concerns the official responses that I received recently concerning my April 19, 2012 comments on the Draft EIS on the Olowalu project. These responses are vague and incomplete. They DO NOT fully address my original concerns and therefore the Final EIS remains inadequate.

Prior to my retirement I worked for 42 years as a community planner and environmental consultant. I have extensive experience both preparing and reviewing environmental reports. I have appeared before this Commission both as the former Maui County Planning Director, as well as an expert witness in the field of planning.

In the early phases of the Maui County General Plan update, senior planners from the county planning department, working with consultants, evaluated 33 potential development projects for inclusion within Maui's Urban Growth Boundaries. Please note that this Olowalu project finished in absolute last place in this evaluation by Maui County planners.

As far as the inadequate responses, let me begin by stating that the Final EIS response ignored my point that the real reason people previously lived in

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Olowalu was because of agricultural employment; there was a sugar mill for employment. After the mill closed the population of Olowalu plummeted.

The responses also failed to acknowledge that in addition to the 1,500 housing units being proposed, there legally could be at least 800 ohana units built. An impact analysis is required to address the worst case scenario, which would be the 2,300 units, not 1,500. This was not done anywhere.

As an example, the traffic impact of people living in 2,300 housing units would be significantly more than the impact of only 1,500 housing units.

The responses also continue to ignore that there are already around 12,000 housing units approved for West Maui, indicating that there is no NEED for the Olowalu development.

The Final EIS is required to include a discussion of alternatives to the proposed project. The current documents are extremely incomplete concerning alternatives. For instance, because these are prime agricultural lands, there should be an analysis concerning the Olowalu property being developed as an agricultural project with large agricultural sites and only 200 to 300 homes.

Another topic that is inadequately addressed is the fact that the Maui County Council voted to exclude the makai portion of the Olowalu project from the Maui Island Plan's Urban Growth Boundary. There were a number of reasons for this decision to exclude any new development between the ocean and the existing highway, but one of the most important related to that area being within the tsunami zone.

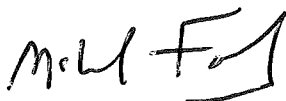
The responses also failed to acknowledge that there would be very little employment within the Olowalu project, therefore requiring thousands of new residents to drive through heavy traffic into West Maui or through the pali tunnel, where there have been many accidents and wildfires, to Central and South Maui. The Final-EIS responses say there would be around 1,000 jobs

created in Olowalu, so where is the information concerning the types of jobs proposed or salaries of these jobs? With 2,300 housing units there could be well over 4,000 people going to work daily, all commuting over an already congested highway that is threatened by rising ocean levels.

My concerns regarding the developers providing land for schools, a fire station, and other services was also not answered. The State and County are not financially prepared to build schools, a fire station, streets, a sewer treatment plant, public parks and a water system in Olowalu. The cost of the land, buildings and personnel will consequently have to be borne by the future residents of Olowalu. The costs of this infrastructure will make the creation of affordable housing impossible or make it impossible for low-income local families to be able to afford to live there. The developers have been very vague about the amount and cost of the housing they propose and the exact costs that will have to be paid for the needed infrastructure.

The Final EIS continues to refer to commercial facilities with no detail. Are there hotels or supermarkets or gas stations or shops or offices being proposed? The responses refer to "small scale lodging" being planned. How many hotel rooms are proposed and where would they be located?

The Final EIS and responses inadequately address the proposed Olowalu project's non-compliance with the current West Maui Community Plan and Pali to Puamana Parkway Master Plan. The Community Plan shows the subject property as agricultural, and the Pali to Puamana Plan was applied to this area by the *General Plan* Advisory Committee, Maui Planning Commission and Maui County Council when they adopted the Countywide Policy Plan and Maui Island Plan.



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