

PUAMANA COMMUNITY  
ASSOCIATION

December 8, 2015

Daniel E. Orodenker, Executive Officer  
State of Hawaii Land Use Commission  
Department of Business, Economic Development & Tourism  
P.O. Box 2359  
Honolulu, Hawaii 96804  
Sent via U.S.P.S First Class Mail  
And Email to [luc@dbedt.hawaii.gov](mailto:luc@dbedt.hawaii.gov)  
And Fax to (808) 587-3827

2015 DEC 14 A 9:43  
LAND USE COMMISSION  
STATE OF HAWAII

Re: In the Matter of the Petition of Makila Land Company, LLP

Docket No. A 15-799

Dear Mr. Orodenker:

Puamana Community Association is a planned unit development consisting of 230 low rise residential units on 30 acres located a short distance across the Honoapi'ilani Highway from the development proposed by Makila Land Company. I am a member of the Board of Directors and been authorized to write on behalf of the Association with respect to the Environmental Impact Statement Preparation Notice published in the Office of Environmental Quality Control's November 8, 2015 bulletin *The Environmental Notice*. We request that Puamana be consulted during the drafting of the Environmental Impact Statement.

We join in and incorporate the comments and objections contained in the letter from Wright & Kirschbraun dated December 4, 2015 on behalf of Makila Plantation Homeowners Association, Inc. and the comments and objections we anticipate being filed on behalf of the Pu'unoa Homeowners Association. From our perspective, the proposed development is objectionable and must address problems in four general categories:

#### Zoning/Land Use/Density

Our owners and others living in the area relied on the agricultural nature and zoning of the surrounding area when buying their homes. As one moves away from the urban center of Lahaina, one should expect density and nature of development to be maintained if not reduced – certainly not increased and intensified. Makila proposes a form of spot zoning and urban sprawl by building high density and commercial developments in its own island in an area separated from Lahaina by large lot agricultural residences. Makila should conform with current zoning and existing development: its lot sizes should be no smaller than those in adjacent Launiupoko and there should be no rural or commercial development. While workforce and low income housing is desirable, it should not take place in agricultural areas some distance from places of work and should not be without regard to the existing agricultural zoning and surroundings.



## PUAMANA COMMUNITY ASSOCIATION

### Traffic

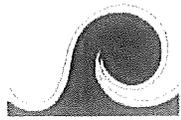
West Maui's access is almost exclusively by motor vehicle and limited to the two lane Honoapi'ilani Highway. A traffic study is necessary to show the impact of adding the additional residences and any businesses at this location. The study should consider not only existing traffic, but the traffic assuming 100% occupancy of the existing and planned homes and businesses in West Maui for the foreseeable future (eg. Olowalu, Kahoma, etc.) as well as traffic increases resulting from growth elsewhere on Maui. The traffic study should further consider the impact of future road building proposed for West Maui, including further extensions of the Lahaina Bypass. The study should address delays in travel, the delivery of emergency services (paramedic, fire, law enforcement) and further congestion of intersections, particularly at Kai Hele Ku and Hoki'oki'o and elsewhere in the Lahaina area. The study should also address not only the traffic resulting from the occupants of and visitors to the new development, but also added traffic by the growth of schools, businesses and services in West Maui needed to service the new residents.

### Protection of the Environment

The Environmental Impact Statement should address in detail sources of water, sewer, water disposal and how surrounding areas, the shoreline and the ocean will not be adversely affected during the development, construction and occupancy of the land in question. It should also address compliance with all applicable environmental protection laws. It should also address the appearance of the development in light of its surroundings, and light pollution from the development and vehicles traveling to, from and in the development. It should further address how it maintains open agricultural spaces for the community.

### Infrastructure

Maui is an island with limited capacity for population growth and development while maintaining a high standard of living. Such growth can and should occur in existing urban areas without creating new ones. West Maui, being linked for the foreseeable future to the rest of the island by a two lane highway, is also an island unto itself with limited capacity for population growth and development while maintaining its current quality of living. A growing population requires growth in schools, fire and police protection, other essential services and businesses. The Environmental Impact Statement should address such impacts and how they will be addressed.



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Thank you for your consideration.

Respectfully submitted on behalf of Puamana Community Association



William E. Johnson, Member

Puamana Board of Directors

Cc: Heidi Bigelow, Makila Land Co., LLC (By First Class U.S. Mail and Fax to (808) 877-9409)

Tom Schnell, AICP, Principal, PBR Hawaii & Associates, Inc. (By First Class U.S. Mail and  
Fax to (808) 523-1402)

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12/9/15

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

2015 DEC 14 9:45  
LAND USE COMMISSION  
STATE OF HAWAII

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

Dear Sirs or Madam:

I just learned of the above proposed matter and am writing to object to it.

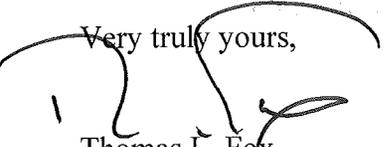
I am the original owner of the Mahanalua Nui Phase 3, Lot 13, which is now addressed as 991 Kai Hele Ku Place, Lahaina, HI 96761. I have never been sent notice by the developer of their intention for this development which I understand is a requirement under state law. That alone should invalidate the project.

I am concerned about the reclassification of this land and the potential environmental impact on Lahaina. Of primary concern to me, first, is the fact that no prior notice was provided by the developer to me, and I am certain of others. This should speak loudly about not only their character, but also to their motives and about the plan itself.

Second, just this year, I was given notice of the need for water conversation in the area. I am a part time resident who currently only spends about 4 months of the year at my Maui home, though that will change in the near future, so I don't use much water at all. If I understand the plan correctly, this new reclassification and subsequent development will impact the current water system. If conversation is now needed by current residents, what will the impact be of the high density development that the developer now intends?

The fact that I am just learning about this frustrates and angers me. Other than the recent November 17<sup>th</sup> letter from the homeowner's association, I have not been notified of these proceedings or the intent of the developer. I am now responding because I just returned to Los Angeles where the letter was waiting for me. Fundamental principles of due process require both notice and an opportunity to be heard. I have been provided neither. I object to the proposed plan by the developers.

Very truly yours,

  
Thomas L. Fox  
Attorney at Law