

Social + Economic Issues/Problems

November 18, 2015

Introduction and My background: Professor (Econ + Geog); former Maui Planning Commissioner; Vice-Chair of Planning advisory bodies (especially General Plan Advisory Committee (GPAC); Reviewer of EIS documents for UH Environmental Center

Olowalu Town Final-EIS is: DEFECTIVE

Dismissive of comments

Devious

Deceptive

Ohanas

Evolving Numbers

Seniors included in “workforce”

H-DOT position

“Bait and Switch”

Local residents will make up 95%

Transit and O-Turns

Source of Infrastructure \$s

3,000+ household to benefit

Fire and Police

of Affordables

Ohanas not included in infrastructure

Ambulance

Taxes vs. public expenditures

1. Isolation of Olowalu Town, which was really a “plantation camp”, not an historical town.

Not near any urban lands.

Overall impact from isolation: not discussed.

HOUSING

2. ACCESSORY DWELLINGS == OHANAS: Volume 1 PDF 52-54 Pages 26-28

920 potential Ohana units are not considered in infrastructure impacts or needs: schools, traffic, water, parks, wastewater, police, fire, school busses, solid waste, etc.

“Ohana units will be an option.”

3a. Number of AFFORDABLE/WORKFORCE HOMES: “Bait and Switch”

Number of affordable homes kept being reduced.

500 “affordable”+ 500 sub-market “gap housing” to GPAC to get UBC and RBC

This what got GPAC members willing to draw Urban and Rural growth boundaries!

(Only 13 votes from GPAC Committee of 25.)

Then “Bait and Switch”.

750 in Draft-EIS which we all used to make comments in preparation of the Final-EIS.

Then “Bait and Switch” again”. Only 375 in Final-EIS

3b. Number of market priced homes:

500 to GPAC to get UBC and RBC (Only 13 votes from Committee of 25)

This what got GPAC members willing to draw Urban and Rural growth boundaries!

750 in Draft-EIS

1,125 in Final-EIS

3c. Seniors are included within workforce housing. See PDF 57 Page 31

The developer could meet the 375 affordables with many 2 bedroom units in the multi-family buildings, thus supplying the needs of seniors, but not of the many young families with children.

Providing senior housing is also an important element of the project. The aging population of Maui residents will require appropriate housing. Senior housing is proposed in a variety of forms and types of units. Much of such senior housing is expected to be within the workforce housing pricing requirements.

3d. No assurance that local families will have first access, although claims of 95%.

3e. Phasing of workforce/senior housing is unclear over the build-out.

5. Public Infrastructure Costs:

INFRASTRUCTURE

Lots of new facilities Volume 1 PDF 61 Page 39

Much verbiage about what will be available, but no accurate calculations on OTMP's contributions or commitments to needed infrastructure: community center, fire, police, walking trails, etc,

6. Infrastructure – Mauka Highway: Volume 1 PDF 76 Page 53

ONLY \$18 million for miles of highway and a bridge over stream

H-DOT has not accepted TIAR; H-DOT specifically asked in a November 6, 2015 letter to the applicant that H-DOT not to be made to look like they have approved any Olowalu Town actions.

The SDOT has reviewed a draft of the traffic section of the proposed final Environmental Impact Study and request that references to the SDOT requiring or approving various actions of Olowalu Town be deleted from the text.

The public also has not had the ability to review their TIAR.

H-DOT has its own mauka highway plans. The Olowalu Town mauka highway section may not align with the highway to be proposed by H-DOT.

H-DOT is initiating its own FEDERAL EIS that is much stricter about protecting endangered species and cultural sites; the OTMP highway may not meet the federal EIS standard..

7. Infrastructure – Existing Honoapi'ilani Highway: Volume 1 PDF 60 Page 38

Coastal road is cut in two places, making it much less available for both Maui residents and visitors. However the Final-EIS states, “

As shown on Figure 4 in the Draft EIS, the existing Honoapiilani Highway will connect to the new mauka highway at the north and south end of the OTMP. Travelers through OTMP will have the option to utilize the mauka bypass or the existing highway. The

8. Infrastructure – Police and Fire:

Fire station: \$11 million, + \$1.25 Fire truck, + \$1 million,/ year

Police \$360,000 year

9. Infrastructure – Ambulance:

Ambulance: Closest is Napili (State not County as stated in FEIS)

Response:

As with other emergency services (i.e. fire and police), ambulance service will be coordinated with the County of Maui in conjunction with the implementation of the OTMP. As appropriate, ambulance service may be co-located with the proposed fire station.

10. Because of isolation, Water and Wastewater will be provided by private companies which may charge a higher monthly amount than people in affordables can pay.

11. Infrastructure – Beach Access

My comments ignored, and problems will be solved by putting up signs and handing out cards

12. Infrastructure – Hydro-Electricity may be used:

My comments ignored totally.

**13. Public Facilities and Financing: County and State Expenditures: Volume 4 Appendix L Page 7
County and State Expenditures underestimated. OTMP will “contribute.”**

14a. Deceptive school enrollments Volume 1 (Table 32) Pages 218

Units: 900 Multi-Family and only 600 Single Family → 462 students

Number of pupils are actually underestimated because they told DOE; 900 Multi-Family and 600 SF so that number would look lower than it will be. DOE formula assumes about 3X more pupils from SF than MF.

Table 2032. Estimated New Students at Olowalu Town Master Plan for Alternatives 1 and 2

	Single-Family Student Generation Rate	Single-Family Students ^(a)	Multi-Family Student Generation Rate	Multi-Family Students ^(b)	Total Students
Elementary	0.22	132	0.09	81	213
Middle	0.12	72	0.04	36	108
High	0.16	96	0.05	45	141
TOTAL	0.5	300	0.18	162	462

Notes:
^(a) Based on 600 single-family residences.
^(b) Based on 900 multi-family residences.
 Source: Department of Education, 2010.

	Units	Formula	Total Students
Single Family	600	0.5 X 600	300
Multi Family	900	0.18 X 900	162
		TOTAL	462

Source: Department of Education, West Maui Impact Fee Schedule, 2014

14b. Infrastructure – Schools: Volume 1 (Table 31) Pages 216 + 217

	Capacity now	Enrollment 2015	Already Over Capacity
Kam 3 Elementary	646	788	142
Princess Nahienaena	612	675	63
Lahaina Intermed	571	672	101
Lahainaluna High	969	1,081	112

Lahaina schools are already over-capacity and the DOE ‘impact fee’ is too low to build even a small part of a school.

- Only 10-15 acres being potentially offered by OTMP
- Who will pay the costs of bussing 462+ kids every day to Lahaina? Final-EIS says increase the one bus by about 30 students.

14a. **Constantly changing numbers** make reviews of OTMP difficult and lead one to think that the numbers will change again if and after the Final-EIS were accepted.

- **Highway Right-of-Way** **200' to 160'**
- **Commercial space** **25,000 sq ft - 300,000+ sq ft**
- **Affordable + gap housing** **from 1,000 to 750 to 375**
- **Market housing** **from 500 to 750 to 1,125**
- **No. of acres in boundary amendment application** **320 acres to 426 acres to 434 acres**

In a November 9, 2015 letter from Applicant’s Attorney, Jennifer Lim

OTMP is a proposed new community to be located in the once thriving Olowalu plantation town on the west side of the island of Maui. It is located along Honoapi‘ilani Highway, approximately four (4) miles south of Lāhainā Town. The OTMP area is comprised of approximately 23 parcels of land and approximately 636 acres of land, almost all of which are currently designated within the State Land Use Agricultural District. Within the OTMP area, approximately 434 acres will be proposed for reclassification pursuant to an amended Petition for District Boundary Amendment.¹

¹ Please note that the Petition Area described in the Initial Petition was approximately 320 acres (175 acres from State Land Use Agricultural to State Land Use Urban District, and 145 acres from State Land Use Agricultural to State Land Use Rural District). Through the EIS process Petitioner has greatly refined its understanding of the land areas proposed for reclassification. The exact acreages, including metes and bounds description if required, will be provided when Petitioner files its First Amended Petition. However, Petitioner anticipates, consistent with what has been described in the FEIS, that the proposed reclassification will be approximately 266 acres from the Agricultural District to the Urban District and 168 acres from the Agricultural District to the Rural District.

14b. Phony Numbers:

95% of residents will be local; therefore little additional cost to supply County and state services. The services will just follow the residents.

14c. Number of Construction Jobs and households benefitting is misleading and exaggerated:

Comment:

Phony Numbers: Both Appendix K and L, by the same two authors, develop a set of phony numbers to make the Olowalu Town project look good. For example, they multiply by a factor of 10, all job numbers, residents supported, and households that will benefit!! For example: 477 jobs on Maui and Oahu are made to look like 4,770 jobs; 351 households magically and inappropriately become 3,510. They hope no one will notice.

Response:

To clarify your example, the multiplier of “10” is *not* a factor but the number of years projected to complete the OTMP. Thus, any annual figure identified in the report is multiplied by 10 to arrive at the total over the projected 10-year development period. The multiplier of “10” is based on the anticipated timeframe for full buildout of OTMP.

However, they say it will take 8 years of construction after 2 years of entitlements.

14d. Jobs within the community Volume 3

In discussion with ACM, the 1,000 jobs estimated to be created within the community is based on an average of one (1) employee per 300 square feet of commercial space projected to be developed within the OTMP. A copy of the information is attached as **Exhibit “2”** for your information.

15. Agricultural Land, specifically “Prime Agricultural Land”

According to our agricultural consultant, modern technology has altered the way in which farming is conducted in the 21st Century. For example, there is a strong and well-established trend of growing food hydroponically in greenhouses. In comparison to field farming, hydroponic farming in greenhouses provides higher quality produce; generates far higher yields, allows for year-round production regardless of season, provides secure production unaffected by droughts and storms, does not require good-quality farmland, requires much less land, water and energy, and requires no pesticides or herbicides. In this regard, modern farming is not dependent on the use of prime agricultural lands. We note that current agricultural use within the OTMP is limited.

16. Undiscussed Alternative

- **Leave the land in agriculture with a solar PV farm.** Final-EIS states that repairing the irrigation system would cost only \$1 million.
- It would better meet the State’s desire to increase sustainability.
- This would not diminish future decision makers to convert these lands into urban land-use when needed. OTMP’s project would prevent a reversion to agriculture.

17. Unrealistic 8 year construction timeframe.

Used to be able to satisfy LUC requirements, and then used to inflate the number of jobs.

18. Premature to be asking for the Makai lands, before West Maui Community Plan

They will claim that they have an approved FEIS, even though it is based on misleading info

19. Desire to move outside of UGB into Makai area.

In case they get only mauka boundary amendment.

Alternative #2 is used as their “fall-back” position.

Olowalu Town Final-EIS is DEFECTIVE, and should not be accepted at this time.