

BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAII

In the Matter of The Petition Of		DOCKET NO. A04-751
)	
MAUI LAND & PINEAPPLE COMPANY,)	DECLARATION OF GILBERT S.C. KEITH-
INC., a Hawaii corporation)	AGARAN
)	
To Amend The Agricultural Land Use District)	
Boundary Into The Urban Land Use District for)	
Approximately 310.440 Acres of Land at)	
Mahinahina and Kahana, Lahaina, Maui, Hawaii,)	
Tax Map Key: 4-3-01: Por. 31 And 79.)	
)	

DECLARATION OF GILBERT S.C. KEITH-AGARAN

I, GILBERT S.C. KEITH-AGARAN, declare under penalty of perjury:

1. I am one of the attorneys representing Maui Oceanview LP in this proceeding.
2. Attached as EXHIBIT M-2 EXCERPT are true and correct copies of Sections 6 and 7 of the Traffic Impact Analysis Report Pulelehua Development (August 13, 2019) which was a portion of EXHIBIT M-2, attached to the THIRD SUPPLMENTAL MEMORANDUM IN SUPPORT OF MOTION TO AMEND.
3. Attached as EXHIBIT O-1 is a true and correct copy of the Market Study, Economic Impact Analysis, and Public Fiscal Assessment of the Proposed Pulelehua 900-Unit Mixed-Use Project prepared by CBRE, which was attached to the SECOND SUPPLMENTAL MEMORANDUM IN SUPPORT OF MOTION.

4. Attached as EXHIBIT O-2 is a true and correct copy of the Market Study, Economic Impact Analysis, and Public Fiscal Assessment of the Proposed 100 Ohana Units Within the Pulelehua Mixed-Use Project prepared by CBRE, which was attached to the FIFTH SUPPLMENTAL MEMORANDUM IN SUPPORT OF MOTION.

5. Attached as EXHIBIT R-3 is a proposed decision and order. Maui Oceanview LP has not reached an agreement with either the County of Maui nor the State of Hawaii on a stipulated decision and order.

6. Attached as EXHIBIT W is a true and correct copy of the West Maui Community Plan Housing Technical Resource Paper (October 15, 2018) prepared by the Department of Planning, County of Maui. EXHIBIT W was marked and introduced during the Commission meeting of September 26, 2019.

7. Attached as EXHIBIT W-2 is a true and correct copy of the Maui Rental Market: Affordable Rental Housing Study Update, 2014 prepared by Ricky Cassidy for the Department of Housing and Human Concerns, County of Maui.

8. Attached as EXHIBIT W-3 is Hawaii State data overview page downloaded on November 12, 2019 from the National Low Income Housing Coalition website at <https://nlihc.org/housing-needs-by-state/hawaii>.

9. Attached as EXHIBIT AA is a true and correct copy of the following pages from the FINAL Environmental Impact Statement for Pulelehua: cover, 4-18, 95-101, 176-178, 186-191.

10. I am attaching a true and correct copy of the Declaration of Paul Cheng dated November 12, 2019. I will submit the original declaration to the Land Use Commission when it is received from Texas.

DATED: November 12, 2019, Wailuku, Maui, Hawaii.



GILBERT S.C. KEITH-AGARAN