

EXHIBIT Y

Letter dated October 30, 2019 from Thomas G. Coppin of Kimley-Horn



October 30, 2019

Mr. Paul Cheng
Maui Oceanview LP
16610 North Dallas Parkway
Suite 1600
Dallas, TX 75248

Re: **“Good Cause” Justification in Support of the Revised Pulelehua Site Plan**

Dear Mr. Cheng:

The purpose of this letter is to present “Good Cause” justification for considering the revised Pulelehua site plan by the State of Hawaii Land Use Commission as presented by Maui Oceanview LP. The following observations and findings are based on a comparison of the original Maui Land and Pineapple site plan (“MLP plan”) and the current site plan proposed by Maui Oceanview LP (“MOV plan”).

Multi-Family Rentals vs. Single-Family For-Sale Units

The MOV plan consists of predominantly multi-family units (700), with the balance of the units being for-sale multi-family condominium units, and 100 single-family detached lots. In contrast, the MLP plan consisted of predominantly single-family, for-sale units. The preponderance of rental and multi-family units in the MOV plan directly and significantly addresses critical housing needs in West Maui. As such, the housing mix of the MOV plan is directed towards existing Maui inhabitants and not new population, which lessens the project’s impact on the regional infrastructure systems and arguably reduces traffic congestion by shortening commutes for workforce residents that will have an opportunity to live closer to places of employment. This is in contrast to the MLP plan which did not provide the same variety of housing types. To enhance the long-term sustainability of the affordable units, Maui Oceanview is entering into a 30-year workforce housing agreement with the County of Maui. Per the agreement, Pulelehua will provide 400 affordable rental and for-sale units. The agreement will guarantee a long-term supply of affordable housing options for “very low”, “low”, “below-moderate” and “moderate” income residents versus a one-time sale of single-family homes.

Site Plan Enhancements and Benefits

The MOV plan provides several enhancements that will directly benefit the Pulelehua residents, these include:

- Bus stops which provide alternative transportation options to local employment centers, and commercial destinations.
- Compact placement of units which promote pedestrian access and preserve 40% of the project area as open space.
- Primarily single story construction preserves mauka and makai views of the mountains and ocean for all residents and neighbors.
- Over 6 miles of multi-use trails and walkways to promote walking and biking options connect all locations within the community.
- Streets and units conform with the natural topography making a majority of the streets and walkways ADA accessible.
- A 10-ac community park will include soccer and baseball fields
- Over 20 community pocket parks will provide additional recreation opportunities for residents.
- Approximately 40% of the MOV plan is open space, versus approximately 32% of the MLP plan (124 acres vs. 99.2 acres).
- Less impact to existing neighboring communities, with significantly fewer units planned adjacent to the Kahana Ridge Subdivision, and without reliance and interconnection with the existing Kahana Ridge street network.

Development Costs

Kimley-Horn also performed a quantitative analysis of the major project infrastructure costs for the two plans. Major project elements and costs that were compared include, quantities for paving, water, sewer, storm drain and retaining walls. On average, we found the MLP plan required significantly more infrastructure, and cost almost triple what it will cost to develop the MOV plan.

	<u>Maui Oceanview Plan</u>		<u>Maui Land and Pineapple Plan</u>	
Pavement	1.1M sf	\$1.5M	2M sf	\$2.4M
8" Water Line	24,500 lf	\$2.2M	51,500 lf	\$4.6M
Fire Hydrants	46	\$207K	110	\$495K
8" Sewer Line	22,000	\$1.7M	51,500 lf	\$3.9M
24" Storm Drain	27,000 lf	\$2.7M	55,000 lf	\$5.5M
Retaining Walls	493,000 sf	\$30M	1.5M sf	\$90M
	Total Costs: \$38.3M		\$106.9M	

The highly gridded network of streets and alleys, and intensive placement of single-family lots in the MLP plan greatly increases the cost of infrastructure while decreasing the flexibility of the plan. The use of multi-family units in the MOV plan provides a condensed footprint which requires less developed land to implement the plan. The significantly reduced development costs for the MOV plan make is much more affordable to construct.

Summary

The MOV plan revolves around the delivery of sustainable long-term affordable housing options, desperately needed in the West Maui region. Every aspect of the plan is directed towards that goal, from the efficient layout to the mix of product, while still providing the features of a great community, like open space, views, recreational amenities, live-work opportunities and shopping that provide for safe, dignified, and affordable living. In addition, the cost to develop the MOV plan is significantly less making it more likely that the project will be developed as currently planned.

Sincerely:

KIMLEY-HORN AND ASSOCIATES, INC.



Thomas G. Coppin, P.E.
Vice President