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La Mesa, CA 91941
April 15, 2012

Mr. Orlando "Dan" Davidson
State Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

Subject: *Draft Environmental Impact Statement for the Proposed Olowalu Town Master Plan (TMK Nos. (2)4-8-003:84,98 through 118, and 124)*

Dear Mr. Davidson:

We appreciate the opportunity to review the Draft Environmental Impact Statement (DEIS) for the proposed Olowalu Town Master Plan. We visit Maui frequently and enjoy driving north to Kapalua on Honoapi'ilani Highway (State Route 30). We are very concerned by the lack of existing or planned roadway infrastructure to support a development the size of the proposed Olowalu Town Master Plan. As California Registered Traffic Engineers with a combined 60 years experience in a variety of traffic engineering fields including reviewing traffic studies and environmental documents for development projects, we are sending you these comments in an effort to provide you with an understanding of this project's impacts to circulation. If this project is approved as proposed, traffic flow between West Maui and Central and South Maui will become extremely constrained. Honoapi'ilani Highway between Pali and Ma'alaea (which is not identified for improvements in the draft Maui Island Plan) would be a critical choke point restricting island circulation. This could have a profound negative economic impact on the island.

The DEIS does not disclose the proposed project's impacts to Honoapi'ilani Highway (State Route 30) outside the project site and the substantial affect this impact could have on public safety and on the economic welfare of the community and the State. Additionally, the DEIS does not analyze each phase of the development as required by HAR Section 11-200-17. For these reasons, we have found the DEIS for the Olowalu Town Master Plan to be inadequate.

Traffic Impacts Not Disclosed:

The DEIS and its Preliminary Traffic Impact Analysis Report ("TIAR") does not acknowledge or disclose any significant impact to Honoapi'ilani Highway for the following reasons:

- The TIAR assumes Honoapi'ilani Highway is widened to four lanes north of the project site; however, there is no identified funding for this costly infrastructure improvement.

- The TIAR assumes Honoapi'ilani Highway can accommodate substantially more traffic than it actually can before failing. The TIAR assumes Honoapi'ilani Highway south of the project site can accommodate 33,300 average daily vehicle trips (ADT) based on the assumption that this highway is an uninterrupted flow highway rather than an arterial with access points to the beach and to scenic lookouts. *The Proposed Roadway Development Program* dated January 2007 prepared for the County of Maui Planning Department for the draft *Maui Island Plan* assumed Honoapi'ilani Highway south of the Olowalu Town Master Plan site could accommodate about 22,000 ADT before failing.
- An unreasonably high, and technically unjustified, internal capture rate of 55% for project generated trips is assumed in the TIAR. Consequently, not enough project trips are distributed to Honoapi'ilani Highway. The Institute of Traffic Engineers (ITE) defines internal trip capture rate as a percentage reduction that can be applied to the trip generation estimates for the individual land uses to account for trips internal to the site. A nationally recognized methodology used by traffic engineers, such as the *Trip Generation Handbook, 2nd Edition, by the Institute of Traffic Engineers (ITE)* should be used to calculate internal capture. This methodology was used to calculate internal capture for both the *Wail'e* project in Central Maui and the *Honoua'ula* project in South Maui. The internal capture rates for *Wail'e* and *Honoua'ula* were about 10% and 15%, respectively. (See Attachment A). Using the *Trip Generation Handbook* methodology, the internal capture of the Olowalu Master Plan would be about 15%.
- An unreasonably high, and technically unjustified, number of pass-by and diverted linked trips were assumed in the TIAR. Consequently not enough project trips are distributed to Honoapi'ilani Highway. Pass-by trip reductions should not be applied to re-aligned Honoapi'ilani Highway because it is not anticipated driveways would be allowed on this access controlled facility. The diverted linked trip reductions are high compared to documented rates in ITE and other credible sources.
- Future traffic volumes on Honoapi'ilani Highway are underestimated, due to the following:
 - Existing traffic counts used by the TIAR to develop future traffic volumes are too low. These existing counts were gathered in October 2010 during low tourist season and after the Great Recession of 2008. The TIAR states Honoapi'ilani Highway south of the project site carried 22,840 vehicles per day in October 2010. In contrast, this roadway west of the Pali tunnel is shown as carrying 24,422 ADT in Year 2003 in the *Proposed Roadway Development Program* prepared for the County of Maui Planning Department for the draft Maui Island Plan.
 - Traffic from other known projects in the area, such as Ukumehame, and traffic from other reasonably foreseeable projects were not assumed in the future analysis
 - Additionally, it cannot be confirmed whether the 1% annual growth factor used in the TIAR to estimate future volumes on Honoapi'ilani Highway is reasonable,

since no supporting data was provided showing how the 1% annual growth factor was determined.

As an example demonstrating how the future volumes are underestimated in the TIAR, the future volumes estimated on Honoapi'ilani Highway south of the project site in the TIAR without project traffic is 24,670 ADT, but this roadway segment is shown to carry 24,422 in 2003 in the *Proposed Roadway Development Program* prepared for County of Maui Planning Department for the draft *Maui Island Plan*. (See Attachment B.) This is an increase of only 248 vehicles on Honoapi'ilani Highway in 17 years.

It should also be noted that the TIAR indicates that Honoapi'ilani Highway south of the project site would operate at level of service (LOS) E at full build out of the project, but the *Proposed Roadway Development Program* shows this segment to be failing in the peak hour in Year 2003.

Using professionally accepted standards, we estimate that the proposed project would add about 12,000 ADT to Honoapi'ilani Highway north of the project site and about 8,000 ADT to Honoapi'ilani Highway south of the project site. This is more than three times the amount of project traffic estimated in the TIAR. Honoapi'ilani cannot accommodate this much added traffic.

The TIAR should be revised to use nationally recognized and accepted methodologies for determining project trip generation and analyzing transportation impacts. When this is done, it will be clear that the Olowalu Master Plan would have significant impacts to Honoapi'ilani Highway.

Potential Substantial Affects on Public Health Not Disclosed or Discussed:

Traffic safety impacts to Honoapi'ilani Highway from the development of the proposed Olowalu project were not addressed. Honoapi'ilani Highway would be heavily congested with stopped queues of vehicles, and there would be fewer gaps for vehicles to turn into. Consequently, there would be an increased potential for a higher accident rate along this highway.

Additionally, the proposed "O-turns" along Honoapi'ilani Highway may also compromise public safety. Therefore, the DEIS should evaluate and discuss:

- The potential increase in vehicular accidents on Honoapi'ilani Highway caused by the weaving and merging maneuvers of O-turns.
- The potential increase in pedestrian and bicycle accidents on Honoapi'ilani Highway since pedestrians would not be provided a safe crossing as would be provided by traffic signals. The DEIS should address how pedestrians and bicyclists will be prevented from crossing Honoapi'ilani Highway.

Phased Analysis Not Provided

The DEIS indicates in many places that the project would be developed in phases spread out over a period of approximately 10 years. However, only one scenario, Full Buildout Year 2020, was analyzed in TIAR. The TIAR should be revised to include an analysis of each phase of the project; otherwise, the DEIS does not comply with Hawaii Administrative Rules (HAR) Section 11-200-17 I which states that a DEIS, "... shall include a statement of the probable impact of the proposed action on the environment, and impacts of the natural or human environment on the project, which shall include consideration of all phases of the action and consideration of all consequences of the environment; direct and indirect effect shall be included."

It should also be noted that the internal capture rate of the project would vary with different phases of the development. For example, if the residential phase of the project were to be constructed first with no commercial, then the project's internal capture rate would be zero. This variation in internal capture rate by phase should be accounted for in the analyses.

Other Specific Comments to the DEIS:

1. The DEIS should provide more details to support its claim that the proposed project is a smart growth development. For example, it should describe what specific design features would be incorporated to ensure the development is a pedestrian & bicycle friendly community. Specifically, the DEIS should describe whether roadways within the project site would provide non contiguous sidewalks, street trees, and traffic calming features such as bulb-outs, road humps, traffic circles. The DEIS should also describe what type of bicycle amenities (e.g. bicycle racks, lockers, showers, bicycle corrals) and bicycle facilities (e.g. bicycle paths, bicycle lanes) would be provided to ensure the site is a bicycle friendly community.
2. The DEIS should state the "Purpose and Need" for the proposed action as required by HAR Section 11-200-17 D. The DEIS only states the project's need (which the DEIS states is to increase the supply of housing for Maui residents) but does not state the project's purpose. Without a statement of purpose, it is impossible to identify reasonable alternatives since reasonable alternatives are those that substantially meet both the purpose and the need.
3. A reduced project alternative should be proposed, since a reduced project alternative may have fewer impacts to Honoapi'ilani Highway.
4. The TIAR conclusions are contingent on specific land uses with precise square footage being constructed on the proposed project site. The DEIS should indicate how it would be assured that these land uses, and their square footages, would be constructed.
5. Should the Olowalu Master Plan be approved, the project should be conditioned to construct development not to exceed the ADT, a.m. peak-hour inbound trips, a.m. peak-hour outbound trips, p.m. peak-hour inbound trips, and the p.m. peak-hour outbound trips evaluated in the Final TIAR. Additionally, these thresholds should be tracked as the project site is developed. If the project site were to generate more traffic than assumed and analyzed in the Final TIAR, then the project could have other traffic impacts not disclosed to the approving agency in the Master Plan's FEIS.

6. The DEIS should discuss the effects of construction traffic on Honoapi'ilani Highway.
7. The DEIS should discuss the effect the proposed O-turns would have on pedestrian connectivity mauka and makai of Honoapi'ilani Highway.
8. A Transportation Demand Management Plan (TDM) should be provided by this project in an effort to meet the goals and objectives of the *Maui General Plan*. The DEIS should provide a discussion of this TDM Plan.

Specific Comments to the TIAR:

1. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR utilizes data from several other TIARs which have been done for other projects on the west side of Maui over the last five years. The TIAR should specifically name which reports it utilized.
2. Page 1, Introduction, Purpose and Methodology: The TIAR states the TIAR uses information from studies done by Maui County. The TIAR should name which studies it utilized.
3. Page 1, Introduction, Purpose and Methodology: The TIAR states, "The Final TIAR will address peak hour traffic flows and utilize the methods that are normally employed in standard traffic assessments. That TIAR will also analyze in detail the predicted traffic operations at the access points to Honoapi'ilani Highway. It will assess the need for any mitigation and analyze the need for traffic control measures and devices that may be required for proper functioning of the street system. This preliminary report will not cover all items that may be studied and analyzed in the future detailed TIAR and it is not intended to substitute for that more comprehensive analysis." The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.
4. Page 2, Introduction, Purpose and Methodology: The TIAR states that the level of analysis in the TIAR does not include detailed analysis of all traffic movements at individual intersections. The TIAR provided in this DEIS should provide a full analysis to determine significant impacts of the proposed project, and these impacts should be disclosed to the public during the public review period.
5. Page 2, Introduction, Purpose and Methodology: The TIAR states that the TIAR is intended to illustrate that the increase in vehicular traffic along the Honoapi'ilani Highway attributed to Olowalu Town will be successfully mitigated by way of implementing the proposed transportation plan and the related improvements, including the relocation and widening of the segment of Honoapi'ilani Highway which traverses the subject property. Clarify in this section of the TIAR what is specifically meant by the "proposed transportation plan."
6. Page 3, Description of Olowalu Town: The first paragraph of this section should describe how much square footage of office and how much square footage of commercial retail is proposed by this project rather than just describing the number of dwelling units proposed.

7. Page 3, Description of Olowalu Town: The TIAR states the design of Olowalu Town incorporates smart growth principles. One of the 10 accepted principles that define Smart Growth is to create walkable neighborhoods. The TIAR should describe specific examples of design features that would be incorporated to create walkable neighborhoods.
8. Page 8, Figure 5, Summary of Trip Generation for Olowalu Town: For ITE Code 730, Government Office Building, the proper trip rate per unit is 68.93 trips per 1,000 sf; therefore, the estimated traffic generated by that component of the site is of 1034 trips. Therefore, the total traffic generated by the site would be 33,655 ADT rather than the 32,800 ADT shown in the table. Revise the TIAR and its analyses accordingly.
9. Page 10, Background Traffic Growth: The TIAR states that several studies were made available which analyzed traffic growth trends on Honoapi'ilani Highway and that these studies are included in the appendices. However, this data was not included in the appendices. This data should be included in an appendix.
10. Page 10, Background Traffic Growth: In determining future volumes for the Year 2020 analysis, other reasonably foreseeable development project traffic be added to Honoapi'ilani Highway in addition to using an appropriate growth rate based on historical data.
11. Page 10, Background Traffic Growth: Provide a copy of the existing count data for Honoapi'ilani Highway in the appendix of the TIAR.
12. Page 10, Background Traffic Growth: Existing counts on Honoapi'ilani Highway were taken during October 2010 during low tourist season. However, existing counts should be taken during peak tourist season.
13. Page 10, Background Traffic Growth: The 24,667 ADT assumed on Honoapi'ilani Highway in Year 2020 is only 248 ADT more than existed in Year 2003 per the *Proposed Roadway Development Program* prepared for County of Maui Planning Department for the draft *Maui Island Plan*. Provide an explain why only 248 more vehicles per day would be expected to use Honoapi'ilani Highway in Year 2020.
14. Page 10, Traffic Analysis in Year 2020 without Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapi'ilani Highway, since it has beach access points and driveways to scenic lookouts, and therefore should not be considered an uninterrupted flow highway.
15. Page 11, Figure 6, Output from Highplan Software for Honoapi'ilani Highway for Year 2020 without Project in Place:
- Clarify why the output sheet says "yes" under median type
 - Clarify why the output sheet says "no" under left turn impact when no left turn pockets are provided for the beach access points or scenic outlooks
 - The assumed maximum capacity at LOS E of 1500 vehicles per hour per lane (vphpl) is too high. Per the FDOT 2009 Quality/Level of Service Handbook which provides

guidance on using the FDOT software, the maximum capacity at LOS E should be assumed to be 850 vphpl. (See Attachment C). It should be noted that agencies in southern California assume much lower capacities for roadways constructed and functioning similar to Honoapi'ilani Highway. As an example, the County of San Diego assigns the capacity of 16,200 ADT to a two-lane rural facility. (See Attachment D).

16. Page 12, Traffic Generation for Olowalu Town: The TIAR takes a 15% reduction in trip generation to account for walking and bicycling within the project site and cites other local governments such as the City of Frederick, Maryland as allowing this as well. However, the reduction allowed by the City of Frederick includes walking, bicycling, and internal capture. (See Attachment E). Therefore, using the City of Frederick as an example is not correct and this reference (as well as the associated page included in Appendix 4 of the TIAR) should be removed from the TIAR.

17. Page 12, Traffic Generation for Olowalu Town: Reducing the ITE trip generation rate by 15% for walking and bicycling is not appropriate. The internal capture rate already accounts for this reduction.

18. Page 12, Traffic Generation for Olowalu Town: The TIAR states that based on the anticipated plan for the proposed project, the TIAR determined that significant proportions of total travel could and would be made within the town itself, without any requirement to travel on Honoapi'ilani Highway to Lahaina, Ma'alea or elsewhere on the island. Please clarify how this statement can be supported since:

- Facilities such as schools, a library, and a post office are not assured but require public funds to be constructed and/or operated.
- There is no assurance that the Olowalu Master Plan would provide land uses to serve all residents day to day needs such as a grocery store, pharmacy, and restaurants.
- The proposed project would not provide enough jobs for all its residences.

19. Page 12, Traffic Generation for Olowalu Town: The amount of internal capture rate assumed by the TIAR should be calculated using worksheets in the *ITE Trip Generation Handbook*, 2nd edition, and completed worksheets should be provided in an appendix of the TIAR. Alternatively, the methodology outlined in the NCHRP Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*, by the Transportation Research Board of the National Academies could be used although its researchers do not recommend its use on sites over 300 acres. (See Attachment F).

20. Page 12, Traffic Generation for Olowalu Town: The TIAR states that due to the design of the town and its street network, many of the trips within the town will likely be made via walking or cycling and not require use of the automobile. This element will be addressed in detail in the final TIAR. This element of the TIAR should be addressed in the DEIS rather than the FEIS.

21. Page 13, Traffic Generation for Olowalu Town, Table 1, Internal Capture of Trips in Olowalu Town: The internal capture rates shown for each land use in Table 1 should be

supported by appropriate technical data; otherwise, the *ITE Trip Generation Handbook*, 2nd edition methodology should be used for computing internal capture.

22. Page 13, Traffic Generation for Olowalu Town: The TIAR states that the Maui LRTP was used to assist in estimating the amount of "pass-by" trips to Olowalu Town. However, "Pass-by trips" are defined by ITE as trips made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Since the proposed project's land uses have no direct access to Honoapi'ilani Highway, the number of pass-by trips for this project would be zero.

23. Page 13, Traffic Generation for Olowalu Town: Revise the name of Table 2 from "Pass-by and Diverted Trips on Honoapi'ilani Highway" to simply, "Diverted Linked Trips on Honoapi'ilani Highway."

24. Page 13, Traffic Generation for Olowalu Town: The percent of diverted linked trips for each land use should be based on empirical data from a reliable source such as the *ITE Trip Generation Handbook* or San Diego Association of Government's (SANDAG) *(Not So) Brief Guide of Vehicular Traffic Generation Rates For The San Diego Region*, available on-line at the following URL:

http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf

Most of the diverted linked rates shown in Table 2 are very high compared to the rates shown in the SANDAG document. (See Attachment G). Diverted linked rates used in the TIAR should be documented.

25. Pages 12 - 14, Tables 2 - 4: Table 2, Table 3, and Table 4 list an elementary school as a land use but Figure 5 on Page 8, which is the trip generation summary, does not. Please explain this apparent discrepancy.

26. Page 16, Trip Distribution: Table 4 should be renamed, "Trip Distribution for Diverted Linked Trips" assuming there are no proposed land uses with direct access to Honoapi'ilani Highway.

27. Page 17, Traffic Assignment: The TIAR does not include analysis of travel from the mauka side to/from the makai side of the Olowalu Town and the trips made between mauka and makai side via the connector street, and that these items will be reviewed in detail in the final TIAR. These analyses should be provided in this DEIS and available for public review and comment.

28. Page 18, Development of Future Traffic Data: Clarify why a 15% growth rate is used for Figure 10 and the access analyses in Appendix 3, but other portions of the document indicate an 8% growth rate was used.

29. Page 19, Figure 7, Existing Traffic Volumes on Honoapi'ilani Highway: Provide another figure depicting the traffic volumes on Honoapi'ilani Highway from counts taken during

February which is peak tourist season. Use whichever figure has the higher volumes to develop future volumes .

30. Page 20, Figure 8, Future Year 2020 Traffic Volumes without Project on Honoapi'ilani Highway: Revise this figure to include traffic from other reasonably foreseeable projects that would be constructed and occupied by Year 2020 (in addition to the background growth factor already assumed).

31. Page 21-22, Figures 9-10, Traffic Added from Olowalu Town Project and Olowalu Town Study Network Traffic with Full Buildout of Project in Place: Revise these figures to address our comments regarding trip generation, internal capture, and diverted linked trip rates.

32. Page 23, Future Roadway Network: Conduct a weaving analysis for the proposed "O-turns." The results of these weaving analyses should be provided in an appendix of the TIAR. Additionally, the effects of weaving on capacity of the proposed re-aligned Honoapi'ilani Highway should be evaluated.

33. Page 23, Future Roadway Network: Provide a queuing analysis to determine if the proposed left turn pockets for the proposed O-turns are sufficient to accommodate the vehicular demand without having vehicles spill into the through lane.

34. Page 23, Future Roadway Network: Provide calculations to determine the appropriate length of the acceleration and deceleration lanes of the proposed O-turns.

35. Page 23, Future Roadway Network: Data should be provided demonstrating the proposed "O-turns" weaving will not comprise public safety by creating a higher incidence of side swipe and rear end collisions caused by merging.

36. Page 23, Future Roadway Network: Discuss the effects of the proposed O-turns on pedestrian connectivity between the mauka and makai side of Honoapi'ilani Highway.

37. Page 23, Future Roadway Network: Evaluate pedestrian safety issues of the proposed O-turns , since the O-turns do not provide protected pedestrian crossings across Honoapi'ilani Highway as would be provided by signalized intersections. Also discuss how pedestrians would be prevented from crossing Honoapi'ilani Highway.

38. Page 25, Analysis of Impacts of Olowalu Town Project: HighPlan software is not appropriate to use to determine the capacity and level of service of Honoapi'ilani Highway south of the project site, since it would still have beach access points and scenic lookout points in Year 2020 and therefore cannot be considered an uninterrupted flow highway. If FDOT software were to be used, ArtPlan would be the appropriate software to utilize.

39. Page 25, Analysis of Impacts of Olowalu Town Project: The estimated daily maximum capacity of 56,600ADT and predicted speed of 50 mph Honoapi'ilani Highway within the project site is too high since there would be weaving, merging, acceleration, and deceleration associated with the proposed O-turns.

40. Page 25, Analysis of Impacts of Olowalu Town Project: The predicted speed of 29 mph for Honoapi'ilani Highway and maximum capacity of 33,300 ADT south of the project is too high as this highway segment would not have uninterrupted flow.

41. Page 25, Analysis of Impacts of Olowalu Town Project: The TIAR indicates detailed program outputs for the Highplan analyses sheets shown are Figures 12 - 14 are provided in the appendices. However, these sheets are not provided in the appendices.

42. Page 26, Figure 14, Output from Highplan Software for Portion of Honoapi'ilani Highway with Existing Roadway Configuration:

- The roadway variables portion of the data sheet shows "yes" for median type but this portion of Highway 30 has no median.
- The LOS E maximum capacity of 1,500 vehicles per hour per lane (vphpl) is too high. The *Proposed Roadway Development Plan* by Fehr & Peers assumed 1000 vehicles per hour at level of service E, using the *Highway Capacity Manual*. (See Attachment H).
- The LOS E maximum capacity of 33,300 ADT is too high.

43. Page 27, Figure 13, Output from Highplan Software with Relocated and Widened Honoapi'ilani Highway in Place at Full Buildout of Olowalu Town:

- The data sheet indicates the segment from the Old Land Fill to Mile 14 is 5 miles long but this same segment is shown as 2.6 miles long on Figure 6.
- The LOS E maximum capacity of 2,950 vphpl is too high.
- The LOS E maximum capacity of 56,600 ADT is too high.

44. Page 28, Figure 14, Output from Highplan Software for Portion of Honoapi'ilani Highway South of the Project Site at Full Buildout of Olowalu Town:

- The data sheet indicates the number of through lanes is 4 but this is a two-lane facility.
- The data sheet shows "yes" for median type but this portion of Highway 30 has no median.
- The assumed free flow speed of 50 miles/hour is too high.
- The LOS E maximum capacity of 1500 vphpl is too high. The LOS E maximum capacity of 33,300 ADT is too high.

45. Page 29, Table 6, Capacity, ADTs and Levels of Service for Honoapi'ilani Highway In Full Buildout Year of 2020:

- The assumed daily maximum capacity of 56,600 for the segments between the southern project boundary and north of the transfer station is too high.
- The assumed daily maximum capacity of 33,300 for the segment called "existing roadway south of Olowalu Town Project" is too high.
- The table indicates the segment north of the transfer station is widened to two through lanes in each direction. Clarify in the TIAR on what basis this is assumed. Only projects

that are fully funded and scheduled for construction prior to Year 2020 should be assumed.

46. Appendix 3, Intersection Turning Movements: Clarify why the data sheets indicate 15 percent growth when the TIAR indicates an 8 percent growth rate was used to develop Year 2020 ADT volumes.

47. Appendix 4, Traditional Development of Trip Generation Characteristics: The internal capture rates for the developments discussed in this paper do not support the 55% internal capture assumed in the TIAR.

48. Appendix 4, Traditional Development of Trip Generation Characteristics: The conclusion of this paper indicates the authors support the use of internal capture estimates produced using the ITE *Trip Generation Handbook* methodologies. The TIAR should use this method to determine internal capture.

Thank you once again for providing us the opportunity to review and comment on the DEIS.

We hope that these comments help the approving agency make an informed decision when determining whether to approve the proposed Olowalu Master Plan development project.

Sincerely,



Victoria A. Huffman, P.E.



Walton H. Huffman JR, P.E.

cc: Olowalu Town, LLC
Colleen Suyama, Munekiyo & Hiraga, Inc.