

9909 Lemon Ave
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.

