Mr. Grant Chun, Vice President A&B Properties, Inc. P.O. Box 156 Kahului, Hawai'i 96732

July 20, 2011

SUBJECT: Comments to Wai'ale Draft Environmental Impact Statement

Dear Mr. Chun,

The Waikapū Community Association appreciates this opportunity to provide comments on the proposed Wai'ale community.

Recognizing that the community of Waikapū finds itself at a point in its history when many factors—economic, political, societal, and environmental—are poised to impact the small town character of this village and potentially irrevocably change its unique and historically significant aspects already lost in so many other places in Hawai'i, the Waikapū Community Association has adopted a Statement of Values to articulate its expectations of proponents of development projects within the Waikapū region.

The Statement of Values is included with this letter, so that you may recognize the expectations this community has of developers to respect and protect the Waikapū that still is alive and well, and firmly rooted in its valuable and irreplaceable history. The Statement of Values also expressed the community's strong desire to see principles of smart and sustainable growth applied in harmony with a respect for its treasured past.

The Waikapū Community Association is encouraged to see evidence that some of the community's values are shared by the design team responsible for the Conceptual Master Plan for Wai'ale. There are many opportunities, still, to incorporate even more of those values in the plans for Wai'ale and to make the end product an addition to the region that the Waikapū community can support.

The following comments address the concerns expressed by members of the Waikapū community to the Waikapū Community Association in response to a request for

comments. The Waikapū Community Association is in full agreement with these comments and urges you to adjust the plans for the Wai'ale community accordingly.

- 1. The Waikapū community's great concern is the prospect of losing its visual identity as a separate, recognizable small town entity in Central Maui. The Urban Growth Boundaries as proposed for the Maui Island Plan by the General Plan Advisory Committee are viewed as critical to preserving the separation between Waikapū and its Wailuku and Kahului neighbor cities, as they create an open space buffer mauka to makai to the north of Waikapū. The Wai'ale plan seeks to interrupt that open space buffer by inserting business/light industrial uses and a sizeable allocation for County housing in the north-west corner of the proposed community. The Waikapū Community Association strongly urges the restoration of those lands to open space use through inclusion in the proposed Regional Park. The proposed Community Center should be move south, preferably across the street in a south-west location, to provide for a contiguous area for open space park use.
- 2. The proposed protection of the open space buffer will also serve to make the development gain more relevance to the Hawaiian land use concept of Ahupua'a, providing a mauka to makai orientation of the community, more appropriately lining itself up with the existing Waikapū community. As proposed now, it reflects the questionable practice of allowing suburban sprawl to radiate out from a central urban core, in this case Kahului's. Such suburban sprawl has obliterated many precious small communities in the past; it is one of the Draft Maui Island Plan's stated policy objectives to protect such small communities where they still exist on Maui. Waikapū is just such a community worthy of protecting as a distinct small community with a strong identity.
- 3. The Ahupua'a land use concept of mauka to makai orientation should be used to reorient the Village Mixed Use focus of the southern parts of the proposed community towards neighboring Waikapū. This would provide increased community connectivity for pedestrian and bicycle traffic between Wai'ale and Waikapū; the Greenway Path should be redesigned to make connections into existing Waikapū.
- 4. Waikapu Stream is a most obvious and defining natural landform and resource that should be protected and integrated into the surrounding Wai'ale and Waikapū neighborhoods, providing a strong connection between the natural and built environments. Therefore, the 'Park' designation that is proposed must result in a preserved resource with public access for the use of the residents' enjoyment and health benefits and not just in a neglected buffer space in response to the flood zone. In the report's mention of existing recreational facilities that affect this project there is the recognition that there are no significant recreational facilities in Waikapū yet none, other than for a small neighborhood park, is being proposed for the south end of this project.

- 5. The Draft Environmental Impact Statement does not include consideration of the impact on traffic flow through and around this proposed development from the Wai'ale Road Extension being planned by the County of Maui Department of Public Works. This extension should reasonably be expected to be completed well before any of the Wai'ale community is constructed, and should be expected to change regional traffic patterns considerably. While there is brief mention of this project, and the associated East Waiko Road Improvement project, in the Traffic Impact Analysis Report, the Draft EIS does not include any analysis of its impact. The Waikapū Community Association considers this notable deficiency in the document.
- 6. The Draft EIS provides little clarity as to the actual source of the required water supply for this development. Although the document provides discussion of potential sources that may be available, there are insufficient assurances that sufficient water supply will be developed. The Waikapū Community Association strongly urges that such assurances be required before the proposed applicant action be allowed to proceed.
- 7. A number of community members commented on their observation of native pue'o in the region proposed for the Wai'ale community. The report makes no mention of this bird, important in Hawaiian culture, in its inventory of fauna. The Waikapū Community Association is concerned that this conflict between community members' observations and the reports implied claim of absence will result in failure to take appropriate measures for habitat protection and preservation.

The Waikapū Community Association appreciates this opportunity to provide comments to the Draft Environmental Impact Statement. The members of this community look forward to their concerns being addressed in the Final EIS.

Respectfully,

Jacob Verkerke President.

Cc: Mr. Dan Davidson, State of Hawai'i Land Use Commission

Mr. Michael Shibata, PBR Hawai'l & Associates, Inc.