



Kihei Community Association

"e malama pono"...dedicated to protecting,  
sustaining and enhancing our 'āina, kai and 'ohana

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**Approving Agency**

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**KCA Response to the proposed Makena Resort M-5/M-6/S-7/B-2 Project Draft Environmental Assessment (DEA)**

The KCA disputes the anticipated Finding of No Significant Impact and will document below specific instances of significant negative environmental impact that this project would have if it were to be built. We recommend that a full Environmental Impact Statement be required.

Our comments will focus on two sections:

*Section II. Description of the Existing Environment, Potential Impacts, and Mitigation Measures*

*Section III. Relationship to Governmental Plans, Policies and Controls, Item D. Kihei-Makena Community Plan.*

**Section II. DESCRIPTION OF EXISTING ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATION MEASURES.**

**A. PHYSICAL ENVIRONMENT**

**3. Topography and Soil Characteristics**

The report mentions using Best Management Practices (BMPs) during construction to prevent soil erosion. The BMPs required by Maui County have proven ineffective. Because of the precarious state of

local coastal reefs, KCA has published on its website , a *Position Statement Addressing Best Management Practices during Construction, December, 2014*. [http://gokihei.org/wp-content/uploads/BestManagementPractices\\_12-14.pdf](http://gokihei.org/wp-content/uploads/BestManagementPractices_12-14.pdf) . This statement lists ten requirements, in addition to the County BMPs, to be included in the drainage plans for any South Maui developments. These advanced requirements should apply to this project and should be referred to in the Environmental Assessment.

The report shows that grading on 47 acres of very steep land will be accompanied by use of fill. The slopes of the finished configuration are as steep as 2:1 slopes, a slope which would make it difficult to prevent erosion.

### **5. Nearshore Water Quality**

According to the Marine Water Quality Report (Appendix E), four tables show levels of turbidity that are already too high, and some well over the 0.20 NTU level. Coastal water is not in compliance with the Clean Water Act. Turbidity kills the reef and marine life. The more turbidity, the more the damage.

### **8. Flora and Fauna**

Hawaiians traditionally understand that an *ahupua'a* or ecosystem extends from the mountaintop to the outer reef. This report stops its analysis at the shoreline as if the marine environment were not impacted by the adjacent land. The Makena Bay area is home to the endangered Hawaiian hawksbill turtle as well as green turtles and a wide variety of fish. The report makes no mention of how it will prevent runoff from further endangering the Hawaiian hawksbill turtle and impacting the other marine life. This is a serious environmental oversight.

For the popular sea turtle nesting habitat at Big Beach (aka Oneloa Beach), it would be detrimental to increase human density and lights. What impacts will increased lighting and human density caused by this project have on the endangered Hawaiian hawksbill turtle?

### **11. Scenic and Open Spaces Resources**

While the report notes that Makena Alanui Highway is a "high value scenic corridor," plans show twelve 45 to 55 foot high condos located along and parallel to this highway, blocking that scenic corridor from public view.

### **12. Archaeological Resources**

There are 36 documented sites in the Archaeological Inventory Survey (Appendix I). One site has 5 features. There are a total of 49 features identified in the project area. The report shows only 7 of 36 identified cultural sites are recommended for preservation, with the remainder being permanently destroyed. This project definitely "Involves an irrevocable commitment to loss or destruction of any natural or cultural resource" (to quote Hawaii Administrative Rules Title 11, Chapter 200), in that the result of this action will destroy forever the majority of the historical and cultural archaeological properties in the project area.

In addition, at the Maui Planning Commission hearing of 1/26/16 on the Makena Resort Expansion DEA, lineal descendants of Makena testified that their ancestors took care of a heiau located on subject property and that they wish to continue that practice.

This is new information that should require attention by State Historic Preservation Division (SHPD) that approved the Archaeological Inventory Survey (AIS) for the project. Any new information brought forward that pertains to identifying new historic properties or effect site significance determinations for document sites in the project area can be a cause for reopening the AIS. We therefore recommend that new information brought forward at the MPC hearing by lineal descendants of Makena regarding the existence of a heiau not recorded in the approved AIS should be investigated by the contract archaeologist for the developer and SHPD.

## **B. SOCIO-ECONOMIC ENVIRONMENT**

### **2. Population and Demography**

The project provides housing for “a few local residents, with the majority of buyers being from off-island.” There is no information on how and where the required affordable housing will be built.

## **D. INFRASTRUCTURE**

### **1. Roadways**

While the traffic study covers the immediately adjacent intersections, these are not the only intersections that will be impacted. The distance of this project from services is a concern to KCA because vehicle travel will be required for most activity outside the home, placing traffic on the already stressed Pi'ilani Highway and South Kihei Road. Traffic studies for other projects have shown that key intersections on these roads are already at Level F. Additional traffic from Makena would only exacerbate the holdups at these intersections. A full EIS is needed to address all the impacted intersections.

## **Section III. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES AND CONTROLS.**

### **D. KIHEI-MAKENA COMMUNITY PLAN**

While the report states that the project is in conformance with the KMCP, we find that this is not true. The KMCP says:

Upon adoption of this plan, allow no further development unless new infrastructure, public facilities, and services needed to service new development are available prior to or concurrent with the impacts of the new development. (page 17, Part III, B, c.)

Other projects' traffic studies have shown that key intersections at Pi'ilani Highway and S. Kihei Road are already failing and cannot handle more traffic. The KMCP assumed that the NS Collector Road and an upcountry bypass would be completed along with new residential construction.

The KMCP further states:

Upon adoption of this plan, it shall be required that adequate facilities and infrastructure will be built concurrent with future development. The land use designations on the community plan map are not an assertion that infrastructure will be provided to these areas but merely that it would be appropriate to develop these areas as designated on the maps if the necessary infrastructure and services are available. (Page 15, Part III, A, 1.)

Because infrastructure to support additional residents is not in place, or even planned for yet by the County, new residential construction in Makena is not supported by the KMCP, regardless of what the KMCP Land Use maps show as future zoning designations.

### **Conclusion**

Because of the serious environmental impacts that this project presents, the KCA recommends that a full Environmental Impact Statement be required before this project proceeds.

Aloha,

Mike Moran  
KCA President