

WAILUKU APARTMENT RENTAL HOUSING PROJECT

SUMMARY Multiple affordable housing projects are needed on Maui, ones that will meet our local residents' housing needs. **HOWEVER**, this project includes:

- too many market units resulting in a very crowded project with many undesirable impacts;
 - too few affordables for lower income renters
 - far too many 201-h exemptions that will cost the community dearly; and
 - several severe impacts (some disclosed and others not described) that
- ➔ **NECESSITATED A COMPLETE EIS, (not just an EA with a FONSI approved by applicant HHFDC)**

In view of the impacts and information deficiencies noted in the existing Environmental Assessment, and the fact that the impacts of the project are significant, as defined by HAR 11-200-12, an Environmental Impact Statement was required instead of an Environmental Assessment. Specifically, the EA did not adequately address many impacts and their mitigation:

- Cumulative impacts of traffic from new developments and roads
- Cumulative impacts on over-capacity schools
- Secondary impacts on other developments resulting from this project's water use
- Cumulative impacts on Central Maui's sewage capacity

1. **HOUSING UNIT NUMBERS:** Although this project is being described as a 201H affordable housing rental project, in fact only 110 out of 324 units (only 34% of the units) are for those under 100% of Maui's median income (the AMI). In other words, 214 units (the vast majority) are for those over the median Maui family income, either as 190 market units or 24 higher rent affordables.

2. According to the Environmental Assessment, Maui County Code Chapter 2.96 requires an income group distribution for the affordable units to be **one-third very low- and low-income (50-80% AMI), one-third at below-moderate income at 80-100% AMI, and one-third at moderate income at 100-120% AMI.** This project does NOT meet the County requirement. **Modify the ordinance to require 2.96 compliance.**
MCC 2.96.040 - Residential workforce housing requirements.

2. Unless an exemption is granted by the director, the percentage of rental units within each income group shall be as follows:

- a. One-third of the rental units shall be for "very low income" and "low income" residents.
- b. One-third of the rental units shall be for "below-moderate income" residents.
- c. One-third of the rental units shall be for "moderate income" residents.

Table 2. HHFDC Maui Affordable Rental Guidelines, Distribution of Units by Income Category and Rental Ranges

**Maui County Requirement
MCC 2.96.040.2**

| Area Median Income Level | Income Group | Number of Units | Rental Range* | Percentage of Units |
|-------------------------------------|---------------------|-----------------|--------------------|---------------------|
| 51-80% | Low income | 55 | \$627 - \$1,616* | 17% |
| 81-100% | Low-moderate income | 55 | \$1,123 - \$2,107* | 17% |
| 101-120% | Low-moderate income | 55 | \$1,453 - \$2,598* | 17% |
| 121-140% | Moderate income | 30 | \$1,783 - \$3,089* | 9% |
| Subtotal of Affordable Units | | 195 | | 60% |
| N/A | Market | 129 | | 40% |
| Grand Total | | 324 | | 100% |

* Note: Rents are based on 2018 HHFDC Rent Guidelines minus utility allowances. These are subject to change based on annually published rent guidelines and utility allowances by State and County agencies.

| Percent | Units |
|------------|-----------|
| 33% | 65 |
| 33% | 65 |
| 33% | 65 |
| 0% | 0 |

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3. The Ordinance should be modified to require the project to implement the needed mitigations as represented in the Application, Environmental Assessment, and in oral testimony to the Council.

4. Although numerous exemptions are being requested, the impacts from the exempted statutes, ordinances, charter provisions, and rules relating to planning, zoning, construction standards for subdivisions, etc. MUST all be discussed and mitigated. They are not.

5. Wailuku Apartment Rental Housing Project's 2021 base year is much too short term. It has avoided looking clearly at the cumulative traffic impacts from the nearby projects that will soon be built and which will greatly impact all the intersections described in the TIAR.

6. The roads will be further congested in the years immediately after this project's premature "base Year" of 2021. Total potential unit counts: Waikapu (1,440) + adjacent Waiale Road apartment projects (146) + A&B Waiale (2,550) + Maui Lani (935) + Kehalani (956) + this Wailuku Apt. project (324) → 6,351 units in this already congested area.

A **proper TIAR is needed** to evaluate and mitigate the cumulative traffic impacts. The Waiale Road Extension and Waiko Road Improvements are planned roadway improvements to be constructed in the future. This will result in more traffic wanting to pass in front of this project, but there are inadequate setbacks along the right-of-way to allow Waiale Road and/or Kuikahi Drive to be widened. The roadway improvements were not included in this TIAR.

They should have been included; a full EIS would have discussed these road projects.

I request that the Council modify the ordinance and the Maui Planning Organization (MPO) require:

i) that, **along with the other developers, Wailuku Apartment Rental Housing Project be required to provide a "fair share" of the cost of: a comprehensive traffic study of the Central Maui region which will examine the cumulative effects/impacts from all the projects and indicate the necessary costs to mitigate regional traffic problems;** and

ii) that, **along with the other major developments, Wailuku Apartment Rental Housing project be required to pay its "fair share" to upgrade the highways, roads and intersections in this area.**

Their EA itself suggests: "Importantly, the TIAR recognizes regional improvements which may address existing peak hour congestion issues. Such regional improvement needs are best addressed through a comprehensive traffic impact fee system which can be equitably applied to projects without adversely affecting the equally important goal of providing affordable housing to local working families."

7. When it comes to describing impacts on infrastructure (schools and other facilities), the EA states that there will be no impact at all because people are merely moving around. This reasoning neglects to point out that people moving into this Wailuku project may be coming from upcountry, South Maui, even Honolulu or the mainland. In each case infrastructure (water, waste water, schools, will be "impacted" and should not be ignored. From EA: "We agree that impacts from the project should be independently analyzed irrespective of the relocation patterns of tenants." However, it does not do this.

8. **Schools** which will service the Wailuku Apartment Rental Housing Project's many families, are all significantly **over capacity NOW**.

"Pu'u Kukui Elementary School is currently over capacity by approximately 100 students.

Maui Waena Intermediate School is over capacity of approximately 250 students; and

Maui High School is over capacity by approximately 300 students and this over capacity condition is expected to increase to approximately 400 students."

9. **Play Areas and Parks**: The Wailuku Affordable Apartment project will have 324 units and approximately 1,000 residents.

The so called "swimming pool" appears to be merely a small wading pool, totally insufficient for 1,000 residents. The biggest of the four tiny play areas is 2,000 sq. ft.

10. **Project has a 300 foot+ cul-du-sac driveway**: Since there is no turn around at the end of the 300'+ driveway and the parking lot could be full at night with 600+ cars. Will fire trucks be able to access all buildings and be able to turn around, or even safely back-up?

Nor does it seem that big rubbish trucks will be able to turn around at the end of the 300'+ driveway. Backing up early in the morning will be a noisy disturbance.

I am hoping that you will question me on these issues.

Mahalo Dick Mayer