



Kihei Community Association

"Working together to shape our Community's future"

State of Hawaii, Land Use Commission
Department of Business, Economic Development and Tourism
State of Hawaii
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Subject: Docket No. A94-706/Ka'ono'ulu Ranch
Environmental Impact Statement Preparation Notice (EISPN) - Pi'lani
Promenade; TMK 3-9-01:16 and 170-174

Gentlemen,

The Kihei Community Association has reviewed the subject EISPN and provides our comments in Enclosure 1.

We are especially concerned that the Note under the Community Plan Amendment section of the Entitlements and Approvals is incorrect. This proposed project has never been determined by the County to be consistent with the Kihei-Makena Community Plan. Zoning for an industrial park was determined to be consistent with the Community Plan, based on the Environmental review for the previous Industrial Park project. A proposed project similar to this one, was cleared for zoning, but never reviewed for consistency with the Community Plan.

This is a new project, so the process must require that the Community Plan be updated to reflect the proposed project, as was done with the original project. Furthermore, as identified in our comments, the changes to the Community Plan are not just to the land use map, but also to many of the textual requirements in the Goals, Objectives and Policies section of the

plan with which this project is not in compliance. Then the Zoning must be changed to ensure consistency with the Community Plan and the Final EIS.

We appreciate being involved during the early consultation process and look forward to continuing as a consulting agency in this process.

Sincerely,

Mike Moran
President

Copy to:
Mayor Arakawa
Council member Couch



**KCA Comments on the EIS Preparation Notice
for Pi'ilani Promenade
October 14, 2013**

The Kihei Community Association (KCA) would like to submit comments on the following sections of the Pi'ilani Promenade EISPN dated August 15, 2013 and released on September 23, 2013.

II. Affected Environment, Potential Impacts and Mitigation Measures

A. Physical Environment

5. Flora and Fauna

The EISPN states that the project site is vacant land with minimal vegetation.

Please include in the draft EIS that this signifies limited rainfall at the site, and therefore the applicant's landscape design shall emphasize drought tolerant vegetation to limit irrigation required.

10. Visual Resources

The EISPN states that the site offers views of the Pacific Ocean, Molokini Crater, Ko'olawe, Lanai, the West Maui Mountains, and Haleakala.

Please include in the draft EIS that the applicant will design the development to take advantage of and enhance these views that are crucial to our tourist industry and therefore to our economy.

B. SocioEconomic Environment

3. Economy

The EISPN states that the County faces a challenge to increase living wage jobs and that development will increase long-term permanent employment.

Please include in the draft EIS an analysis of the potential jobs created by the project and identify potential mitigations that the applicant can use to provide long term employment that will maximize living wage jobs compared to the typical minimum-wage retail positions.

C. Public Services

6. Public Transportation

The EISPN states that the applicant will coordinate with the County on construction of future Maui bus stops.

Please include in the draft EIS potential mitigations that the applicant will include such as completely off-road bus turnouts or full-size bus stops within their site design.

D. Infrastructure

1. Roadways

The EISPN states that the Traffic Impact Analysis Report (TIAR) that was prepared previously will be revised.

The TIAR should define the current traffic conditions without the project. It should then provide a cumulative traffic projection and its impacts from the fully developed project and all the Kihei road systems both existing and proposed from the fully developed project. The traffic analysis for the fully developed project should include the traffic from all of the approved developments to date and those that would be likely in the next 20 years.

The TIAR should at least include the following approved developments: The Makena Developments (3700+/- units), Honua'ula, Wailea Resort, Maui Research and Technical Park, Kihei Downtown Center, Kihei High School, Honua'ula Affordable Housing, Kihei Mauka, North Kihei Housing, Kaiwahine Village, PulehuNui Industrial Area, Entitled South Maui Infill Projects, and Partly Entitled South Maui Infill Projects.

The traffic Impact Analysis should assume the complete up country highway and include mitigation required for the improvement of the intersections of Kaonoulu Street and the Piilani Highway and of Kaonoulu Street and South Kihei Road.

Please include in the TIAR the mitigation that the design of roadways within the development as well as public roads impacted by the development will meet the Hawaii State criteria for Complete Streets (providing for pedestrian and bicycle traffic in addition to motorized vehicles), the Kihei Road Design Standards* and the Green Streets criteria.**

Analyze roadway intersections with the intent to use roundabouts and mini roundabouts in lieu of signalized and stop sign intersections to conform to with Kihei-Makena Community Plan goals and implementing actions for a pedestrian oriented, walkable community.

Analyze the compliance of the project with the following section of the Kihei Design Guidelines:

Pedestrian and Community Safety and De-emphasis of the Automobile

*New developments shall provide measures for pedestrian and biking safety and deemphasize the automobile. Roadway standards have been developed by the KCA for use in new developments that provide for a narrowing of roadway widths thereby reducing traffic speed and creating a smaller scale and sense of place suitable for small towns and neighborhoods, (The complete Roadway Standards are available upon request). All roadways shall have street shade trees and planted separations between walkways and the street curbs. Roadways shall incorporate tree planted bulb out areas where parallel parking is included. Neighborhood roads should provide connectivity to adjacent neighborhoods. Crosswalks through roadways should be slightly elevated as a table; a change in texture and color from asphalt is preferred. Neighborhood developments should not place garage door entrances in front yards near the streetscape and should incorporate front porches and/or high visibility of streetscape from homes. Privacy walls at streetscape are discouraged.****

2. Utilities

The EISPN states that potential impacts to utilities will be analyzed in a Preliminary Engineering Report.

Please include in the draft EIS the mitigation that all utilities on or crossing the site will be placed underground.

3. Drainage

The EISPN states that the draft EIS will analyze existing site conditions and anticipated changes in storm-water runoff.

This project will result in less ground for the percolation of storm water into the ground water. The drainage from this project will likely contribute to additional flooding in North Kihei. The existing 100 yr flood flow from the flood channel serving the project causes downstream flooding, silt flow into the ocean, and damage to the ocean reefs and ecological systems.

Please discuss the cumulative effects per the Hawaii State Office of Planning document *Stormwater Impact Assessments* from the storm runoff and propose mitigation to lessen the impacts downstream and the summary of actions stipulated in the South Maui Watershed Plan II.****

Please analyze the compliance of the project with the following section of the Kihei Design Guidelines:

Open Space Drainage Ways and Flood Control

Major natural drainage ways shall remain undeveloped with a significant buffer to provide for visual open space and connectivity of neighborhoods to beaches, parks, schools, and commercial areas for pedestrians and bikers. Drainage ways left in a natural state or with native vegetation will aid in abating the serious flood problem that Kihei faces as a result of

*uncontrolled development. Detention and/or retention basins that may be required for maintaining the control of on-site runoff generated from proposed developments shall be substantially completed in their construction and improved with landscape and native vegetation prior to significant clearing, grubbing, grading, and building construction on the site.****

4. Water

The EISPN states that the draft EIS will analyze current water source and transmission requirements for the proposed project.

Please include in the report the cumulative impact of all identifiable future developments be included, specifically for Kihei High School and for Maui Technology Park additions. This development along with other increases in water demand in Kihei will cause further degradation of our aquifers with increased salinity. The mitigation for the rising salinity levels should be addressed.

In order to protect our water supply with new development, this project should consider as part of its mitigation the utilization of wastewater for irrigation.

III Relationship to Governmental Plans, Policies and Controls

D. Kihei-Makena Community Plan

The EISPN states that the applicant is considering applying for a Community Plan Amendment.

The Note under the Community Plan Amendment section of the Entitlements and Approvals is incorrect. This proposed project has never been determined by the County to be consistent with the Kihei-Makena Community Plan. Zoning for an industrial park was determined to be consistent with the Community Plan, based on the Environmental review for the previous Industrial Park project. A proposed project similar to this one, was cleared for zoning, but never reviewed for consistency with the Community Plan.

Since the previously proposed project did not comply with several conditions of the previous LUC approval, this is now a different project.

Please note that the EIS must consider it in that light. Furthermore, since this is a new project, the process will require that the Community Plan be updated to reflect the proposed project, as was done with the original project. Then the Zoning must be changed to ensure consistency with the Community Plan.

Please include in the draft EIS either specific plans to change the project land use to comply with the Kihei-Makena Community Plan or, if the project land use is to be as proposed, to apply for an amendment to the Community Plan and to apply for a change in zoning from Light Industrial to the proposed Commercial and Residential uses.

The Kihei-Makena Community Plan now states:

Environment

Implementing Actions

k. Provide for limited expansion of light industrial services in the area south of Ohukai and mauka of Pi'ilani Highway... These areas should limit retail business or commercial activities to the extent they are accessory or provide service to predominate light industrial use.

The proposed design does not meet these requirements. New design guidelines should be developed as part of the Community Plan amendment.

The published Kihei Design Guidelines currently support this type of development as follows:

Commercial and High Density Developments

*Developments should orient building fronts toward the streetscape with parking in the rear or side of buildings away from the streetscape and pedestrian access ways. Wide sidewalks at streetscapes with ample canopy on buildings should be incorporated. Streetscapes and sidewalks should include benches and shade trees. Buildings should have a comfortable scale relationship with the streetscape and sidewalks. Buildings at streetscapes are preferred to be three stories maximum with a massing progression of setting back the third level from the lower two. Mixed use buildings are highly encouraged in order to integrate the residential community into commercial neighborhoods. There should be transition in scale of buildings and their appearance as commercial areas meet residential areas. Commercial zoned lots adjacent to residential shall be limited to two stories and incorporate residential style massing and detailing. Village type commercial areas encouraging pedestrian activity and walk ability within the community are given preference. Signage and building design should be geared toward the pedestrian and slow speed traffic not high speed traffic.****

* http://www.getfitkauai.com/pdf/Hawaii_Complete_Streets_report_Dec-2011.pdf

** <http://www.lowimpactdevelopment.org/greenstreets/>

*** <http://www.gokihei.org/wp-content/uploads/2010/04/general-planning-guidelines-rev2.pdf>

**** <http://www.mauiwatershed.org/project/>