



STATE OF HAWAII
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IN REPLY REFER TO:

HWY-PS 2.8170

October 6, 2014

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OCT - 8 2014

Mr. Jordan E. Hart
President
Chris Hart & Partners, Inc.
115 North Market Street
Wailuku, Hawaii 96793-1717

CHRIS HART & PARTNERS, INC.
Landscape Architecture and Planning

cc: Brett 10/29

Dear Mr. Hart:

Subject: Traffic Impact Analysis Report (June 6, 2014)
Piilani Promenade, Kihei, Maui
TMK: (2) 3-9-001:016, 170-174

Thank you for the opportunity to review the Traffic Impact Analysis Report (TIAR) for Piilani Promenade, prepared by Phillip Rowell Associates, dated June 6, 2014. Based on the TIAR, the proposed Piilani Promenade will be located on two parcels, designated as the North parcel and South parcel, adjacent to and on the east side of Piilani Highway. The North parcel will consist of approximately 100,000 square feet of business commercial, 226 rental apartment units, and 5 acres of light industrial uses, and the South parcel will consist of approximately 430,000 square feet of business commercial uses. The primary access to and from the project will be provided by an extension of Kaonoulu Street on the east side of Piilani Highway, State Route 31 to be provided by the project. Access to North and South parcels will be via four driveways to the extension of Kaonoulu Street. There is no direct access to Piilani Highway.

The TIAR also includes an analysis with the Honuaula Affordable Housing project, which will consist of 125 condominium and 125 apartment units. The affordable housing project is being developed by a different entity, but is part of the property subject to State Land Use Commission, Docket No. A94-706, and dependent on Piilani Promenade for access to Piilani Highway from the easterly extension of Kaonoulu Street.

We have the following comments:

1. Drive B South and Drive B North are too close to the Piilani Highway/Kaonoulu Street intersection.
2. The forecasted future background traffic volumes should include the Kihei Residential and the Downtown Kihei (Krauz) development or a discussion justifying why these projects were not included.

3. The 2018 background Level of Service (LOS) analysis includes several transportation improvements at the Piilani Highway/Ohukai Road intersection and Piilani Highway/Kaiwahine Street/Uwapo Road intersection that were assumed to be in place. For this assumption to be considered valid, the TIAR must confirm by whom and when these improvements are programmed or committed to be constructed. Otherwise, these improvements cannot be assumed to be in place or Piilani Promenade must commit to providing the improvements.
4. Tables 10 through 14 in the TIAR should include reference to the applicable ITE code for developing the trip generation for each land use. We note that the net new trips generated by the North Parcel's retail land use, as indicated in Table 15, is not consistent for a 100,000 square foot size development.
5. The application of the pass-by trips appears to be incorrect since access to the development would be more typically classified as diverted link trips being that all trips to Piilani Promenade would be via the Piilani Highway and Kaonuolu Street intersection. However, the Department of Transportation (DOT) may consider allowing trip reductions to be applied in determining the net new trips generated, with justification.
6. The methodology used to develop the AM peak hour pass-by trips in Table 15 based on Table 11, which indicates that no formula was provided, must be validated.
7. Trip distribution (75% Kihei and south Maui, 25% north) is acceptable. However, Indicate how the northern traffic will also impact Piilani Highway, not just Mokulele Highway, State Route 311, and North Kihei Road, State Route 310.
8. For consistency, regional traffic growth factors must be applied to all analyzed movements not just through movements.
9. Piilani Promenade shall provide satisfactory pedestrian connections between the project and Kihei High School.
10. The discussion for acceptable LOS on Piilani Highway, State Route 31, does not reflect current DOT requirements. It implies that LOS E or F on minor approaches is acceptable as a default threshold. Existing LOS conditions worse (lower) than D are generally not acceptable by the DOT. In accordance with the DOT guidelines, the Applicant shall mitigate all transportation impacts due to the project in order to maintain the satisfactory traffic operating LOS and delay levels at the without the project conditions for the horizon (background) year. In addition, should the background year LOS without the project be lower than the desirable DOT threshold of LOS D, the Applicant may be required to provide mitigation improvements to improve the State facilities to LOS D or better with the project condition.

11. Piilani Promenade shall provide all transportation mitigation improvements recommended in the TIAR that is accepted by the DOT, and at no cost to the State.
12. We are concerned about when the Honuaula Affordable Housing project will actually be constructed. The TIAR included Piilani Promenade and Honuaula Affordable Housing in its analysis with 2018 as the common background year, but no information about the plans for the actual buildout of the Affordable Housing project was provided. If the actual development year is different from Piilani Promenade, an updated TIAR will be required to determine what impacts the Affordable Housing project may have at its buildout year and any additional improvements that are required shall be provided by its developer, and at no cost to the State.

If there are any questions, please contact Ken Tatsuguchi, Engineering Program Manager, Highways Division, Planning Branch at (808) 587-1830. Please reference file review number PS 2014-130 in all contacts and correspondence regarding these comments.

Very truly yours,



FORD N. FUCHIGAMI
Interim Director of Transportation