



Kihei Community Association

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

LAND USE COMMISSION
STATE OF HAWAII

2017 MAY -8 A 9:01

May 5, 2017

✓ State of Hawaii, Land Use Commission (Approving Agency)
Department of Business, Economic Development & Tourism
Daniel Orodener, Executive Officer
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Pi'ilani Promenade North, LLC & Pi'ilani Promenade South, LLC.
c/o Sarofim Realty Advisors (Applicant)
Robert Poyner, Vice President
8115 Preston Road, Suite 400
Dallas, TX 75225

Chris Hart and Partners, Inc. (Consultant)
Jordan E. Hart, President
115 N. Market Street
Wailuku, HI 96793

Dawn Takeuchi-Apuna, Asst. A. G.
Office of Planning, State of Hawaii
235 South Beretania Street
Honolulu, Hawaii 96813

**Kihei Community Association's Response to the Proposed
Pi'ilani Promenade
Environmental Impact Statement dated April 2017
LUC #A94-706 Kaonoulu Ranch OSC**

Why KCA is Testifying Against Accepting this EIS

The Kihei Community Association (KCA) has a 50-year history of representing the desires of the Kihei community. To make clear what those desires are, KCA has developed a series of white papers covering a variety of topics such as street designs, storm water management and transportation. Our website has a specific section for developers, encouraging them to meet with us early in their planning process

to help make their projects positive components of our community. The developers' section includes scorecards so that developers can evaluate their projects according to Kihei's standards for smart growth, smart transportation, impact on the natural world and cultural heritage. Unfortunately, Sarofim Developers did not consult with the KCA before deciding to build a regional retail outlet in our community.

The KCA has serious concerns about the negative environmental impacts of the proposed Pi'ilani Promenade. To put it mildly, the community does not support the project in its current configuration. KCA holds bi-monthly community meetings to discuss topics of general interest, and several meetings regarding this project have had record turnouts of concerned citizens who are angry about the proposed project.

In the 1990's, KCA members who worked on the Kihei-Makena Community Plan (KMCP) were committed to smart growth and designed the Plan to prevent further sprawl and concentrate commercial activities makai of Pi'ilani Highway. Four areas were designated for commercial services (page 17):

1. North Kihei between the existing South Kihei Road, Pi'ilani Highway and Uwapo Road.
2. A central business and commercial center for Kihei clustered about the South Kihei Road/Road C (Pi'ikea Street) intersection.
3. In existing commercially zoned areas along South Kihei Road in the vicinity of Kalama Park.
4. Along South Kihei Road opposite the Kama'ole Beach Park.

The reason for so locating the commercial areas is described in the Plan (p16)

"Kihei's linear form has been largely defined by two parallel roadways, South Kihei Road and Pi'ilani Highway. This linear pattern of development, combined with near total reliance on South Kihei Road and Pi'ilani Highway, forces residents to travel by car for their shopping, recreation and other basic needs, often resulting in traffic congestion. A general theme of the Plan is to create more independent neighborhoods within Kihei, thus reducing unnecessary vehicular trips to South Kihei Road and Pi'ilani Highway."

The proposed Pi'ilani Promenade site is not among the commercial sites approved by the KMCP. Of the approved sites, sites 3 and 4 have been developed, site 2 is still in the process of development, and site 1 has not been developed. The KCA has worked hand-in-hand for ten years with The Krausz Companies, Inc. to plan for their development of site 2 as Kihei Town Center. It has been designed to meet the needs of the community and is fully supported by KCA. KCA does not want to see competition from the proposed Sarofim project in attracting anchor tenants contribute to failure of the Kihei Town Center.

Response to the Vague Conceptual Nature of the Project

Before discussion of specific sections of the EIS, we want to point out the vague nature of the overall plan, which is referred to frequently in the EIS as "conceptual." While the owner has designated areas for light-industrial, retail and apartments, without specific site layouts, building use or building designs, it is difficult to predict actual impacts of this project on many areas such as traffic and drainage. This is further complicated by the Sarofim website which designates this property solely as retail, even though categories of Industrial, residential and business are assigned to their other properties. (Figure 2) Does this indicate that the owner hopes to build out the site as 100% retail?

Response to Specific Sections of the EIS

(Quotations from the EIS are highlighted in gray to differentiate them from KCA's commentary.)

ALTERNATIVES

Pi'ilani Promenade Objectives – Objectives of the Pi'ilani Promenade project are rooted in the desire to create a vibrant regional and sub-regional shopping experience for local residents and visitors...

Then it proceeds to discuss two alternatives: No Residential Component and Alternative Site.

Regarding the Alternative Site, the large scale of the proposed 530,000 s.f. of commercial buildings is not in the scale of a town center but of a regional mall. A regional mall is not called for in the KMCP, and is contrary to town goals for development. Currently South Maui has a retail inventory of 747,914 s.f. Of this, 10.17% is currently available. In Kihei, Azeka Mall, Kukui Mall and Ohukai Industrial Park all have long term vacancies.

An additional 336,000 s.f. of commercial space in Kihei is currently under construction or nearly permitted in Wailea and at the Kihei Town Center (being developed by The Krausz Companies, Inc.) on Pi'ikea Street, (site 2 mentioned above in the KMCP). These projects will provide a 45% increase in commercial space for our town. The Kihei Town Center is planned with a street grid and small footprint buildings along the street front, creating a walkable village, which is consistent with the KMCP and a marked contrast to the Pi'ilani Promenade plans for large footprint buildings in a mall configuration.

If the Pi'ilani Promenade commercial space of 157,588 s.f. on the north side and 430,000 s.f. on the south side were to be built, that would increase available retail space in Kihei from the current 747,914 s.f. to 1,355,502 s.f., **an increase of 55% in commercial space**. This is well beyond what the Kihei community of 20,881 can support.

On the other hand, Kahului is an established commercial center for the island with mainland retailers Costco, Home Depot, Lowe's, Walmart and Kmart (closing) in the Dairy Road area. Queen Ka'ahumanu Center hosts Macy's and Sears. The Maui Mall has Whole Foods and TJ Maxx, with Ross across the street. Additional retail space is being constructed at the Target site in the Maui Business Park. There is plenty of space in this new park for additional national retailers. An alternate site in Kahului would be much more appropriate for a regional mall such as the proposed Pi'ilani Promenade.

There is an additional alternative that is not discussed in the EIS, that KCA finds preferable. Since the KMCP was adopted in 1998, four major changes not anticipated by the Plan have impacted the community. These changes are:

1. The nationwide failure of retail centers. Kihei has witnessed increasing long-term vacancies in existing malls. The need for additional retail space is questionable.
2. Mauka of Pi'ilani Highway, the Research and Technology Park on East Lipoa has been re-visioned as a mixed use neighborhood. The new Kihei Charter School is under construction in that area, about a mile south of the Sarofim site. Residential developments are underway.
3. The State of Hawaii DOE has commenced construction of the long-awaited Kihei High School on the site directly adjacent and south of the Sarofim site.
4. Lack of housing for local families has reached crisis proportions.

With these four changes in mind, KCA has debated the best use for the Sarofim parcel. Our conclusion is that housing is most needed and that this site adjacent to the high school makes sense for ease of access. KCA has drawn up detailed plans (Figure 1) showing a mix of residential spaces including 226 apartment units, 88 multi-family condominiums and live work units, and 100 single family homes. A connector road will carry students from residential areas to the north through the development to the high school without impacting traffic on Pi'ilani Highway. The gulch which Sarofim plans to cover over will be left in its natural state with cultural sites intact and in situ, meeting the community's desire to preserve cultural sites. This also will minimize existing storm water drainage issues. We presented this plan to the owners for consideration, but have no commitment that they will revise their plans.

No alternative design shown in the FEIS preserves the small gulch, reduces existing flooding down slope or protects significant cultural sites on the land. No alternative design shows all residential use of the property. The FEIS analysis is incomplete in meeting minimum requirements listed in HAR §11-200-17.

III. AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATION MEASURES

A. Physical Environment

2. Topography and Soils

Potential Impacts and Mitigation Measures

Drainageway "A" will be routed to the East Kaonoulou Street right of way with no increase in downstream flow and will terminate at the existing culverts routing the system under and *makai* of the Pi'ilani Highway. This change will not increase the quantity of drainage water traveling through this system or downstream.

KCA: Numerous places on the mainland are "daylighting" water systems that were previously rerouted because the detrimental effects of buying or rerouting waterways have been proven. Yet the owner proposes to reroute the tributary of Kulanihakoi Gulch which crosses the site (referred to in the EIS as Drainageway A). Rerouting this natural waterway into a culvert will prevent natural absorption into the ground and increase the amount and velocity of water entering Kulanihakoi Gulch, currently the site of monthly flooding affecting downstream residences. Flooding problems will be exacerbated.

During site preparation, storm runoff from the site will be controlled in accordance with the County's "Soil Erosion and Sediment Control Standards".

The County's Standards have proven lacking and the eroded soil is easily visible on Maui's reefs downstream of building projects. KCA has created a more stringent Best Management Practices for soil erosion and sediment control that any development in Kihei should abide by, as stated on our web site. Our beaches are our most valuable economic asset and must be protected.

Management Measure.

"Develop a watershed protection program to:

1. Avoid conversion, to the extent practicable, of areas that are particularly susceptible to erosion and sediment loss;
2. Preserve areas that provide important water quality benefits and/or are necessary to maintain riparian and aquatic biota; and 3. Site development, including roads, highways, and bridges, to protect to the extent practicable the natural integrity of waterbodies and natural drainage systems.

Here the EIS states that the natural integrity of natural drainage systems shall be maintained, in contradiction to the owner's plan to reroute the tributary to Kulanihakoi Gulch.

In the section Site Development, the EIS discusses using drainage improvements to mitigate the damage caused by increasing impervious surfaces. Without building foot prints, it is not possible to determine how large detention basins will need to be in order to offset the new buildings and surrounding hardscape, including the proposed 1,609 conceptual parking spaces. Can the site accommodate the required detention and the proposed site improvements?

8. Historical and Archaeological Resources

KCA finds this section incomplete and defers to other testifiers to delineate the details.

9. Visual Resources

Potential Impacts and Mitigation Measures

The project site is adjacent to the Pi'ilani Highway. Building heights within this area are limited to 60 feet. The site plan and building layout for the Pi'ilani Promenade will be designed to preserve the view towards Haleakala from Pi'ilani Highway.

KCA: With good reason, the KMCP calls for a maximum 35' building height in new commercial areas. It is not just summit views, but views of the flanks of Haleakala that are part of its majesty. Public views of as much of Haleakala as possible should be preserved, not, as stated above, just views of the summit. And views from other parts of Kihei should be considered, not, as stated above, just views from the Highway.

A 60' tall building located above the Pi'ilani Highway would be visible from many points in Kihei. It will exceed the maximum limit as stated in the KCPM. Commercial buildings in Kihei are limited to 35' height to maintain our view planes.

11. Groundwater Resources

Existing Conditions

Drinking water for the proposed project will come from the network owned and operated by the Maui Department of Water Supply (DWS). Water for the Central Maui Water System is pumped from existing groundwater wells located in upper Waiehu and North Waihee which draws groundwater from the Iao and Waihee Aquifers.

Potential Impacts and Mitigation Measures

The findings of the report indicate that the proposed project will not have any significant negative effect on water quality.

KCA: Reports show that fresh water in the existing aquifer is being depleted. While adding additional users to the system may not have immediate impact on water quality, it will increase the rate of depletion of water for all South Maui residents. This must be addressed.

B. Socio-Economic Environment

3. Economy

Potential Impacts and Mitigation Measures

While there will inevitably be some cross-over, the Pi'ilani Promenade and Downtown Kihei development will appeal to different customer and tenant types. Downtown Kihei does not offer the exposure, access, intercept or site characteristics that Pi'ilani Promenade does. According to Downtown Kihei market study, the primary patrons of the Project will be visitors.

KCA: Because the "Downtown Kihei" development (Kihei Town Center) has been planned in cooperation with the KCA, the primary patrons will be residents as well as visitors, not primarily visitors as stated above.

The proposed new 530,000 s.f. of commercial space for the Pi'ilani Promenade would require 10 stores the size of Safeway to fill the proposed space or 26.5 stores the size of Longs Drugs. Local population will not support this much retail business, especially considering that the Krausz *Kihei Town Center* project will provide 300,000 s.f. of new commercial space before this project is started.

Development which would compromise the beauty of our view planes and the quality of our water and air and would increase traffic will have a major negative impact on our economy if it reduces the number of visitors who come to South Maui each year.

Business Intelligence (September 16, 2014) reports

The retail industry is undergoing a dramatic shift: E-commerce is capturing a larger share of sales than ever before. ...Hundreds of retail stores are closing.

A chart shows the following US retail store closings: JC Penny: 33 stores by May 2014; Aeropostale: 175 stores to close between 2014 and 2019; Abercrombie & Fitch: 180 stores to close by 2015; Gap: 189 stores closed in 2012 and 2013; GameStop: 200 stores closed in 2013; Staples: 225 stores to close by the end of 2015; Barnes & Noble: 226 stores to close between 2011 and 2021.

A *Forbes* article (2/12/2014) headlined *Retail In Crisis* states

There is a crisis in retail. During the 2013 holiday season, U. S. retailers received approximately half the holiday foot traffic they experienced just three years ago... With consumer confidence growing in leaps and bounds, the decline in foot traffic signifies a tectonic shift in the way consumers buy and shop. ...Consumers find researching and shopping on the Web far more convenient than brick-and-mortar visits.

The draft EIS ignores this trend away from brick-and-mortar stores to online shopping when proposing to increase local retail space by 55%.

4. Cultural Resources

KCA finds this section incomplete and defers to other testifiers to delineate the details.

4. Schools

Table 2 DOE School Enrollment & Capacity

Schools	2013-2014 Enrollment	Capacity	2014-2015 Projected Enrollment
Kihei Elementary	947	890	851
Kamali'i Elementary	585	928	584
Lokelani Intermediate	550	826	525

KCA: Actual enrollment for 2014-2015 is:

Kihei Elementary : 880 (851 projected)

Kamali'i Elementary: 554 (584)

Lokelani Intermediate: 555 (525)

While these enrollment numbers appear to be below the stated capacity, many of the school buildings are outdated modular units which were meant to serve temporarily, but are now beyond their service expectations. True capacity would show that enrollment exceeds capacity.

D. Infrastructure**1. Roadways****Transportation Management Plan**

The purpose of the Transportation Management Plan (TMP) is typically to identify and describe transportation management strategies to reduce travel demand, primarily "single-occupancy private vehicles", or to redistribute demand in time.

Transportation Management Plan Strategies

- A Transportation Coordinator will should be designated by the developer or property manager. The Transportation Coordinator will be responsible for establishing, coordinating and managing the TMP strategies identified in the plan. The Transportation Coordinator will should also document and respond to any traffic related complaints received from the surrounding community.

KCA: We find the entire traffic analysis incomplete. A number of intersections showed a decrease in level of service to an unacceptable level with the project constructed. The consultant suggested possible mitigations, but did not stipulate when they would be constructed and who would be responsible and pay for the necessary improvements.

The impacted intersections whose service levels would be unacceptable in 2035 included at least the following:

- Unsignalized intersection Kenolio Street and Kaonoulu Street
- Pi'ilani Highway and Ohukai Road
- Pi'ilani Highway and Pi'ikea Avenue
- Pi'ilani Highway and Kaiwahine Street

The Applicant agreed they will be responsible for providing the following improvements at the intersection of Pi'ilani Highway and Kaonoulu Street as part of the project:

- Install traffic signals and striped pedestrian crosswalks across Pi'ilani Highway.
- Southbound approach will have double left turn lanes, two through lanes, and a channelized right turn lane.
- Northbound approach will have a dedicated left turn lane, two through lanes, and a channelized right turn lane.
- Eastbound approach will have a left turn lane, a through lane, and a channelized right turn lane.
- Westbound approach will have dual left turn lanes, a through lane and channelized right turn lane with an acceleration lane.
- The project also includes the construction of a shared-use pedestrian and bike path along the mauka-side of Pi'ilani Highway, adjacent to the project and within the project site, in

addition to bike lanes on Pi'ilani Highway. Because of the conceptual nature of the project, these are not documented, so it is not possible to evaluate if they meet community standards. In summary, the applicant has traffic impacts in South Maui that he does not propose to mitigate. Impacts beyond his study area could contribute to degradation of level of service on road systems elsewhere on Maui.

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. While pedestrian paths are mentioned, there is no mention of bike paths through the various parking lots. The draft EIS does not provide site plans, so it is not possible to comment on the extent or usability of the pedestrian paths. The plan as described does not comply with the state Complete Streets policy.

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

The size of the community will not support the proposed commercial square footage, so marketing will likely be done to the whole island. This will result in commercial traffic from other areas, which is not considered in this analysis.

We find doubtful the proposal that a Transportation Coordinator will be able to resolve the traffic problems generated by the project. If traffic should become an issue, what recourse will the community have to seek improvements?

In addition to finding the traffic analysis incomplete, the increased traffic from this project is contrary to the KMCP general goal of reducing traffic on Pi'ilani Highway, as stated before.

2. Drainage

Potential Impacts and Mitigation Measures

Offsite surface runoff conveyed in Drainageways "A" and "B" will be routed via underground drainlines to a new diversion ditch constructed along the project's eastern boundary where an underground drain line along the future East Kaonoulu Street will convey the runoff to the existing 102-inch culvert crossing at Pi'ilani Highway.

KCA: While the storm water proposal for the project appears to meet the County and Department of Health Guide lines, this does not address the damage to the environment, to wit:

- The County's Best Management Practices during construction do not assure that there will be no impact on the ocean water quality or damage to the ocean reef system. An example of this damage is the Mahana Ridge project using County BMPs.
- The storm water will increase the pollutant load in the ocean waters. In Maui 25% of the reefs are dead and 50% more are in danger. The project should mitigate the pollutants by practices like the Makena Project with permeable pavements and green street approaches.
- The paved areas will keep the storm water from recharging the ground water. The total runoff into the ocean will increase even if the flow rate off the property is not increased.
- The tributary to Kulanihakoi Gulch (Drainageway A) is proposed to be placed in a pipe system with the logic that storm water is in a pipe upstream and downstream and the development requires it to be in a pipe. Alternate designs are possible. Placing the storm water in a pipe will also lessen the ability to recharge the ground water.
- The development while meeting the County standards does not mitigate the impacts of the project because the County standards are too low.

As stated by the KMCP, enclosing natural gulches in a culvert is against our community values of preserving the natural environment. A waterway left in its natural state reduces the amount of pollution that reaches the ocean, cleans and filters water for recreation and drinking, and supports the area wildlife and fisheries. Converting a natural gulch to a concrete culvert prevents these natural processes from occurring and increases marine degradation.

Downstream from these gulches, where they cross South Kihei Road, is an area of perpetual flooding. Converting Kaonoulu Gulch to a culvert will increase flooding potential here by decreasing the amount of water that can be absorbed by the land on its downhill trip to the ocean. The two gulches on this site, Kulanihakoi and Ka'ono'ulu, are cultural and environmental resources that must be preserved, not buried.

Per the Hawaii State Office of Planning document, "Stormwater Impact Assessments." cumulative impacts must be considered, not just conditions and impacts at the site. It states the following:

Cumulative effects on a given resource, ecosystem, or human community are rarely aligned with political or administrative boundaries. Cumulative effects on natural systems must use natural ecological boundaries. For stormwater, the natural geographic boundary is the watershed. (page 4)

Cumulative effects are caused by the aggregate of past, present, and reasonably foreseeable actions. (page 4)

Hawaii's watersheds include nearshore waters and proposed actions should account for secondary impacts to nearshore resources. (page 10) In other words, effects of the development on the entire ahupua'a shall be considered (including nearshore waters) and these effects should include other future and concurrent development within the watershed.

3. Water

KCA: The proposed five improvements to the County Water System are improvements to infrastructure which will **not** increase the island's water sources. Reports show that fresh water in the existing aquifer is being depleted. Adding additional users to the system will increase the rate of depletion. This has not been addressed.

Analysis of the Draft EIS Discussion of the Kihei Makena Community Plan (KMCP)

Section 3 of the draft EIS, (Relationship to Governmental Plans, Policies and Controls), discusses point by point the relationship of the proposed Pi'ilani Promenade to our KMCP. The draft EIS rates each item as Supportive (S), Non-supportive (N/S) or Not Applicable (N/A). The following items are ones in which we disagree with their analysis or we find significant their failure to support the Plan. The **yellow** text is from the EIS KMCP discussion, followed by their proposed designation.

Objectives and Policies

h. Develop commercial services at the following locations to meet community needs:

- 1) North Kihei, between the existing South Kihei Road, Pi'ilani Highway and Uwapo Road.
- 2) A central business and commercial center for Kihei clustered about the South Kihei Road/Road "C" intersection.
- 3) In *existing* commercially zoned areas along South Kihei Road in the vicinity of Kalama Park.
- 4) Along South Kihei Road opposite the Kamaole beach parks.

Not Applicable

KCA: This is one of the key points of the KMCP and the project does not support it. We dispute the N/A designation. The correct designation should be Non-supportive. This is significant.

k. Provide for limited expansion of light industrial services in the area south of Ohukai and *mauka* of Pi'ilani Highway, as well as limited marine-based industrial services in areas next to Maalaea Harbor. Provide for moderate expansion of light industrial use in the Central Maui Baseyard, along Mokulele Highway. These areas should limit retail business or commercial activities to the extent that they are accessory or provide service to the predominate light industrial use. These actions will place industrial use near existing and proposed transportation arteries for the efficient movement of goods.

Supportive

KCA: The project proposes businesses which are not accessory to or providing service to the preredominate light industrial use. The correct designation should be Non-supportive.

Implementing Actions:

f. Establish and enforce building height limits and densities *mauka* of Pi'ilani Highway which preserve significant *mauka* views and vistas.

Not Applicable

KCA: The project proposes 60' high buildings, which will impact Kihei's views of Haleakala. The correct designation should be Non-supportive.

The proposed project will strengthen Maui's economy by making the Pi'ilani Promenade a more attractive location for the limited light industrial activities envisioned within the KMCP as well as much needed retail businesses. These businesses will create a diverse range of jobs for Maui residents which, in turn, will benefit the local and Statewide economy. The result will be an increase in economic activities and employment opportunities consistent with community needs and desires, which will promote increased employment and entrepreneurial opportunities for Maui's residents. Thus, while the Pi'ilani Promenade project does not strictly support all of goals in the KMCP, it meets other important competing planning criteria within the KMCP.

KCA: The Pi'ilani Promenade does not meet the key goals of the KMCP and, as noted before, we dispute the idea that it will strengthen Kihei's economy. An increase of 55% commercial space is not sustainable without an equal increase in population. We dispute the idea that retail is "much needed."

Cultural Resources

Goal: Identification, preservation, enhancement, and appropriate use of cultural resources, cultural practice, and historic sites that

a. Provides a sense of history and defines a sense of place for the Kihei Makena region; ...

Not applicable

KCA: The Pi'ilani Promenade proposes to divert an historic gulch which provides an important sense of place for the Ka'ono'ulu Ranch area. Numerous cultural historic sites have been identified in this area and should be preserved in situ. The correct designation should be Non-supportive.

Economic Activity

Goal: A diversified and stable economic base which serves resident and visitor needs while providing long-term resident employment.

Objectives and Policies:

a. Establish a sustainable rate of economic development consistent with concurrent provision of needed transportation, utilities, and public facilities improvements.

Supportive

KCA: Because of its location mauka of the highway, neither transportation, utilities nor public facilities are in place to support this project. The correct designation should be Non-supportive.

b. Expand educational opportunities and encourage research and technological activities.

Not applicable

KCA: This project is purely commercial. There are no educational or research and technology components to the proposed project. The tributary gulch with its multitude of cultural sites provides an

opportunity to make this a valuable educational area. Unfortunately the proposed plan does not take advantage of this opportunity.

The correct designation should be Non-supportive.

f. Increase the availability and variety of commercial services to provide for regional needs and strategically establish small scale commercial uses within, or in close proximity to, residential areas.

Supportive

KCA: The scale of the commercial segment of the project is far greater than the scale of the residential segment. This large mall is contrary to the goals of the KMCP. The correct designation should be Non-supportive.

Housing and Urban Design

Objectives and Policies:

d. Provide for integration of natural physical features with future development of the region. New development shall incorporate features such as gulches and wetlands into open space and pedestrian pathway and bikeway systems.

Supportive

KCA: The draft EIS proposes to eliminate the gulches, not develop them as natural resources. There is no mention of incorporating them in transportation pathways. The correct designation should be Non-supportive.

Physical and Social Infrastructure

Objectives and Policies:

Transportation

c. Strengthen the coordination of land use planning and transportation planning to promote sustainable development and to reduce dependence on automobiles. New residential communities should provide convenient pedestrian and bicycle access between residences and neighborhood commercial areas, parks and public facilities.

Supportive

KCA: This project will increase automobile use in the community. There is no evidence of connectivity between the proposed project and surrounding developments. The correct designation should be Non-supportive.

g. Plan, design, and construct a pedestrian and bikeway network throughout the Kihei-Makena region which considers the utilization of existing stream beds, drainageways, wetlands and public rights-of-way along coastal and inland areas.

Supportive

KCA: The EIS states that there will be bikeways, but without any plans available, this is not possible to evaluate. Until bikeways are shown on the drawings, the correct designation should be Non-supportive.

Drainage**Objectives and Policies:**

b. Construct necessary drainage improvements in flood prone areas. Where replacement drainage are required for flood protection, these systems shall be designed, constructed, and maintained using structural controls and best management practices to preserve the functions of the natural system that are beneficial to water quality. These functions include infiltration, moderation of flow velocity, reduced erosion, uptake of nutrients and pollutants by plants, filtering, and settlement of sediment particles. The use of landscaped swales and unlined channels shall be urged.

Supportive

KCA: The draft EIS proposes to increase flooding by replacing a natural gulch with a culvert, the opposite of what this point is trying to encourage. As noted in previous comments, a project such as this needs to take a more pro-active stance in reducing downstream waters per the Hawaii State Office of Planning "Stormwater Impacts Assessment Document". The correct designation should be Non-supportive.

d. Minimize the increase in discharge of storm water runoff to coastal waters by preserving flood storage capacity in low-lying areas, and encouraging infiltration of runoff.

Supportive

KCA: The draft EIS proposes to discourage infiltration by moving the natural gulch into a concrete culvert, which will prohibit infiltration of runoff. The correct designation should be Non-supportive.

C. Planning Standards**Land Use Standards**

a. All zoning applications and/or proposed land uses and developments shall be consistent with the Land Use Map and Objectives and Policies of the Kihei-Makena Community Plan.

Supportive

KCA: The proposed residential and business uses are not consistent with the Light Industrial designation shown on the KMCP map. The correct designation should be Non-supportive.

e. Encourage the use of setbacks and flood protection areas as part of an open space pedestrian-way and bikeway network throughout the region.

Supportive

KCA: There is no evidence of this in the proposed conceptual plans. The correct designation should be Non-supportive.

Urban Design Standards:*a. Building Form*

- 1) Establish a maximum of thirty-five (35) feet in building height for new commercial facilities.
- 2) Establish a maximum of forty-five (45) feet for multi-family development.
- 3) Limit resort development throughout the region to thirty-five (35) feet in building height for sites near the shoreline. Building height limits may gradually be increased up to seventy-five (75) feet for inland

resort development provided that important *maukalimakai* vistas are maintained, and impacts to coastal resources are minimized. Resort community planning and design shall integrate recreational amenities with adequate shoreline setback and public shoreline access provisions.

4) Limit the height of industrial buildings to thirty-five (35) feet. Within large industrial tracts, separate industrial design guidelines should be formulated to guide development. Such guidelines shall, among other issues, address landscaping and building design to achieve design continuity for the overall industrial development area.

Supportive

KCA: The draft EIS proposes a 60' maximum height, contrary to the KMCP maximum of 35'. The correct designation should be Non-supportive.

Conclusion

KCA has observed the Krausz developers using the KMCP from the very start of their project as a guideline to minimize environmental impact. The Kihei Town Center being developed by Krausz will provide for our future retail needs without degrading the environment and even by enhancing the environment.

KCA would like to make clear that the Pi'ilani Promenade project is contrary to our KMCP in significant ways. It appears that either the applicant was not aware of the KMCP or chose to ignore it. The KMCP is a legal document created by the community to guide development in the community. By circumventing the wishes of the community, which are spelled out clearly in the legal document of the KMCP, the Pi'ilani Promenade, as proposed, will be detrimental to our natural, cultural, and economic environment, upon which our island economy is based.

Aloha,



Mike Moran
President, KCA

Attachments:

F1 – KCA Alternate Plan for 100% Residential Use of the Site

F2- Sarofim web page showing site as 100% Retail

TO
EXISTING
LIGHT INDUSTRIAL
PARK

KCA PROPOSAL FOR PI'ILANI PROMENADE

April 21, 2017



LEGEND

- Single Family
- Multi Family
- Apartment
- Live Work
- Light industry

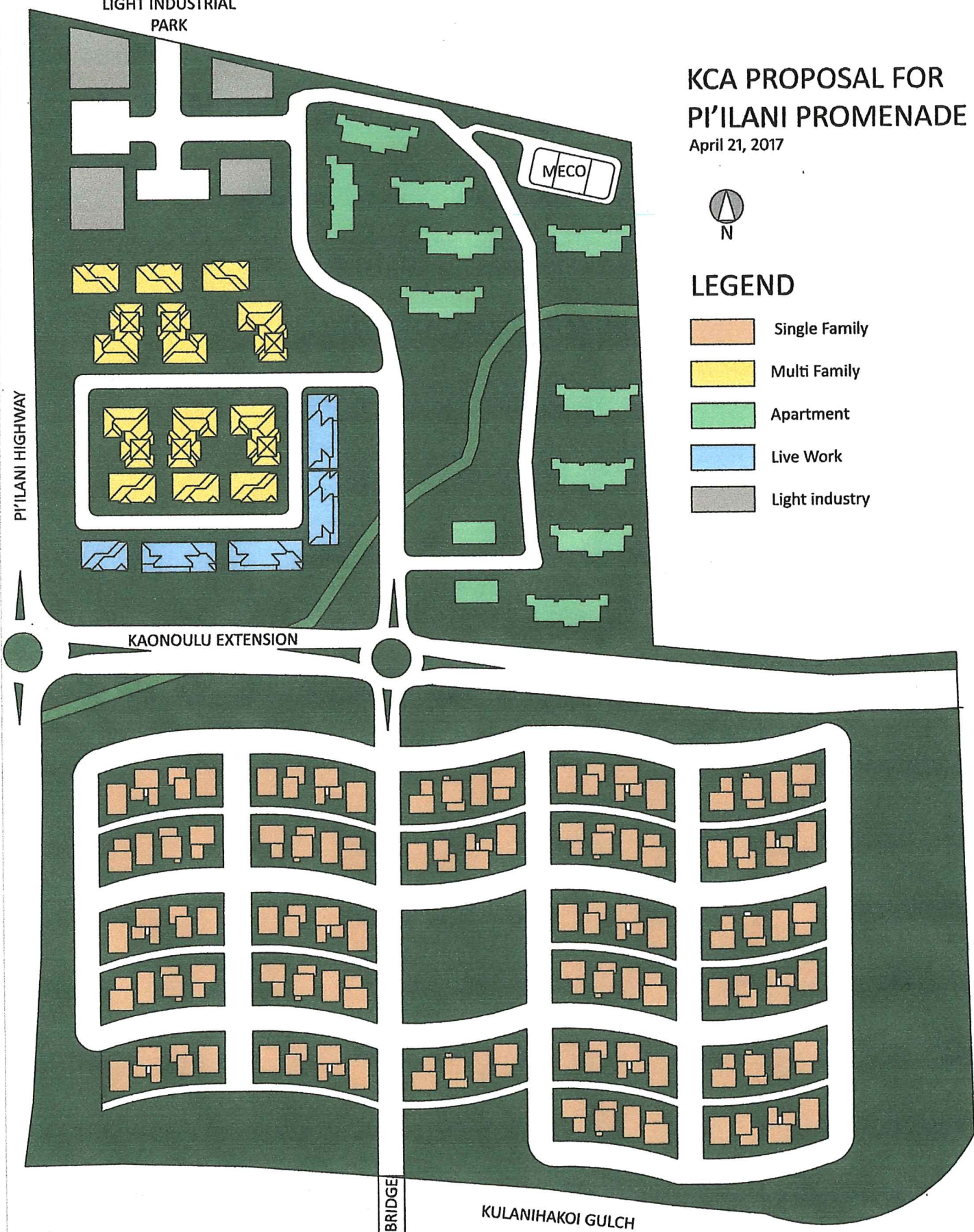
PI'ILANI HIGHWAY

KAONOULU EXTENSION

BRIDGE
TO
KIHEI

HIGH SCHOOL

KULANIHAKOI GULCH



SAROFIM REALTY ADVISORS

Releasing The Hidden Value In Real Estate Investments

HOME ABOUT US INVESTMENTS CLIENT SERVICES RESEARCH PORTFOLIO MANAGEMENT CAREERS

We manage investments nationwide. The following maps represent the breadth of our experience in releasing the hidden value in real estate investments (*current and historical*). To see specific locations, please click each property type in the legend below.

Separate Accounts
Funds
• Property Locations

