

**Response to the Proposed Pi'ilani Promenade Environmental Impact  
Statement, May 2017**

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## **Testimony Against the Acceptance of the Proposed Pi'ilani Promenade Environmental Impact Statement, May 2017**

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### **Importance of Watershed Protection**

Twenty years ago the Center for Watershed Protection Association (cwp.org) gathered a diverse cross section of developers, planners, architects, government agencies, and scientists to craft and design a "Consensus Agreement On Model Development Principles to Protect Our Streams, Lakes, and Wetlands"\*. They developed 22 excellent principles that have been followed by communities nationwide.

In reference to the tributary gulch that transects the property to the Kulanihako'i gulch, the Pi'ilani Promenade EIS fails to consider the following principles of Model Development.

- 1. Create a variable width, naturally vegetated buffer system along all perennial streams that also encompasses critical environmental features such as the 100 year flood plain...*
- 2. The riparian stream buffer should be restored and preserved with native vegetation that can be maintained through out the plan review, delineation, construction, and occupancy stages of development.*

The EIS states that **Drainageway "A" will be routed to the East Kaonoulu Street right of way.** This is directly contrary to the purpose of the Model Development Consensus. The natural course of the existing gulch should not be changed, nor should the gulch be hardened or placed into conduit.

Another article from the library of the Center for Watershed Protection is the "Architecture of Urban Stream Buffers"\*\*. An average buffer width of 50 to 200 feet is required to allow for variation in gulch flow during high storm activity. Proper vegetation stabilizes the ground to help decrease erosion and increase uptake into the ground. None of this is addressed in the EIS.

As a professional architect, living for 20 years makai of the proposed Sarofim Development, I am alarmed by the narrow vision shown in the EIS. Already our family has watched brown water conditions occur repeatedly in the ocean with worsening intensity. Storms have increased in frequency and duration. Flooding is now commonplace. We need to be working to prevent future occurrences, not

aggravate them. The gulch that has served this acreage over millennia should not be altered. It needs to be restored and preserved.

The Pi'ilani Promenade project is not sensitive to the unique and fragile concerns of our oceanside community. The apparent cut and fill and manipulation of the site, including relocating a gulch and the attendant archeologically significant relics seems cavalier to the real cost to those of us who reside here, to visitors and to the quality of our physical environment.

I request that consideration be made by the Hawaii Land Use Commissioners to bring Hawaii land usage into alignment with Model Development Principles that seek to protect and enhance rather than change our home irreparably with destructive practices that are clearly harmful to our cherished islands and waters. Let us be leaders of doing what is "pono".

\* Center for Watershed Protection. 1998. Consensus Agreement On Model Development Principles To Protect Our Streams, Lakes, And Wetlands. Center for Watershed Protection, Ellicott City, MD benefits, development, Model This companion to Better Site Design outlines the series of 22 nationally endorsed principles developed by the Site Planning Roundtable.

\*\* Schueler, T. 2000. The Architecture of Urban Stream Buffers: The Practice of Watershed Protection. Center for Watershed Protection, Ellicott City, MD.