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Attorney for Maui Tomorrow Foundation, Inc.,
South Maui Citizens for Responsible Growth
and Daniel Kanahele

BEFORE THE LAND USE COMMISSION
STATE OF HAWAII

In the Matter of the Petition of

KAONOULU RANCH

To Amend the Agricultural Land Use
District Boundary into the Urban
Land Use District for
approximately 88 acres at
Kaonoulu, Makawao-Wailuku,
Maui, Hawaii

DOCKET NO. A94-706

DIRECT WRITTEN TESTIMONY OF
EXPERT VICTORIA A. HUFFMAN, P.E.

Filed by: Intervenors Maui Tomorrow
Foundation, Inc., South Maui Citizens for
Responsible Growth and Daniel Kanahele

SHOW CAUSE HEARING DATE:
November 1 & 2, 2012

DIRECT WRITTEN TESTIMONY OF EXPERT VICTORIA A. HUFFMAN, P.E.

Intervenors Maui Tomorrow Foundation, Inc., South Maui Citizens for Responsible Growth and Daniel Kanahele, through their attorney, Tom Pierce, Esq., submit the direct written testimony of Victoria A. Huffman, P.E., set forth below in support of their case. Intervenors reserve the right to call Victoria A. Huffman, P.E., for additional direct testimony, redirect, and rebuttal testimony at the time of the show cause hearing.

DATED: Makawao, Maui, Hawaii, October 19, 2012.

TOM PIERCE

DIRECT WRITTEN TESTIMONY OF EXPERT VICTORIA A. HUFFMAN, P.E.

Q. Please state your name for the record.

A. Victoria A. Huffman

Q. Are you a resident of Maui County?

A. No, I am still a resident of San Diego County, California, but I have purchased a home in Kihei, and Kihei will be my primary residence effective October 30, 2012.

Q. You have recently taken deferred retirement to move to Maui?

A. Yes, as of October 15, 2012.

Q. Please identify your former employer and occupation with that employer.

A. The City of San Diego, California. I was an Associate Traffic Engineer.

Q. How long were you employed by the City of San Diego in either its Development Services Department or the Transportation Department?

A. For seventeen years, since 1995.

Q. Do you hold any special licenses in the field of traffic engineering?

A. Yes, I am a Registered Traffic Engineer in the State of California, License Number TR 2012.

Q. What is your educational background?

A. I hold a Bachelor of Science degree in electrical engineering from San Diego State University.

Q. What have been the key job duties associated with your employment with the City of San Diego in the Development Services Department and the Transportation Department?

A. I calculated proposed development project trip generation, determined whether proposed development projects were in substantial compliance with previous entitlements and

permits, evaluated proposed development project site plans, reviewed traffic studies and environmental documents, performed capacity analysis for roadways and intersections, performed queuing analysis, evaluated crash data, provided recommendations to improve traffic safety, and established and maintained traffic signal timing for traffic signals.

Q. For how many years have you been engaged in these types of tasks?

A. For seventeen years.

Q. Are you familiar with traffic engineering standards and analytical tools used in the State of Hawaii for purposes of assessing traffic impacts of proposed developments?

A. Yes.

Q. Are the traffic engineering standards and analytical tools used in Hawaii relating to proposed developments similar to those that you would have used as a traffic engineer in California in conjunction with your work as a traffic engineer for the City of San Diego?

A. Yes.

Q. Are you familiar with the 88 acre parcel of land that is the subject of a decision and order in the above captioned case (hereinafter the "Property")?

A. Yes. I am familiar with the Property both from personal observation of the site as well as from documents describing it noted below.

Q. Have you been asked by the Intervenors to give expert testimony in this matter regarding different traffic impacts posed by light industrial use of the Property compared to those proposed by the current landowners - to develop the property into an outlet mall, shopping center and workforce housing?

A. Yes.

Q. Please identify what documents and things you have reviewed before formulating your opinion.

A. I reviewed three key documents: (1) the *Findings of Fact, Conclusions of Law, Decision & Order* made in this matter dated February 10, 1995; (2) *Traffic Impact Analysis Report for Kaonoulu Industrial Park* by Julian Ng, Inc. dated March 1994 that was submitted to the Hawaii Land Use Commission in conjunction with the Petition for Land Use District Boundary Amendment filed in July 1994, Docket # A94-706; and, (3) *Traffic Impact Analysis Report for Piilani Promenade* by Phillip Rowell and Associates dated January 30, 2012, revised May 7, 2012, that has been submitted to the Hawaii Department of Transportation.

I also reviewed two technical manuals, which are: (1) the Trip Generation, 8th Edition: An ITE Informational Report (2008) and (2) the Trip Generation Handbook, Second Edition: An ITE Recommended Practice (June 2004). These are both common reference manuals reasonably relied upon by professional traffic engineers in the performance of their work.

Q. Do you have an opinion whether there are different traffic impacts that would arise from light industrial use of the Property compared to the traffic impacts that would arise from the outlet center, retail shopping center and workforce housing uses?

A. Yes. The different uses produce significantly different traffic impacts. Let me explain. According to the *Traffic Impact Analysis Report for Piilani Promenade*, the shopping centers would be comprised of a 410,000 leasable square foot retail shopping center (including a 38,000 square foot outdoor garden area) and a 290,000 leasable square foot Outlet Mall. Using formulas from the Trip Generation, 8th Edition: An ITE Informational Report (2008) and assuming the shopping centers are two separate retail facilities as is assumed in the *Traffic*

Impact Analysis Report for Piilani Promenade, the proposed retail shopping center projects are estimated to generate approximately 30,900 driveway average daily trips (ADT). This is significantly greater than that for the Property that was estimated in the 1994 traffic analysis mentioned above, which estimated only 4,820 driveway ADT arising from light industrial use. In other words, a change in use from light industrial to retail increases expected driveway ADT by a factor of 6. Furthermore, the property would generate even more traffic (approximately 32,500 driveway ADT) when traffic from the 250 workforce housing is added.

Accordingly, it is reasonable to assume the new proposed retail shopping centers would have different traffic impacts than the originally entitled industrial park due to this dramatic increase in traffic. A review of the *Traffic Impact Analysis Report for Piilani Promenade* confirms this assumption. It indicates traffic from the proposed retail developments alone, not including traffic from the 250 workforce housing units, would have significant traffic impacts to the intersection of Pi'ilani Highway and Kaonoulu Street and the intersection of South Kihei Road and Kaonoulu Street.

Equally as important, however, the large increase in traffic from the proposed shopping centers could compromise public health and safety by increasing the potential for crashes and increasing emergency vehicle response times. The potential for crashes and emergency vehicle response times would increase due the increased traffic volumes on Pi'ilani Highway and excessive queuing at the project's sole signalized project access point of Pi'ilani Highway/Kaonoulu Street as well as excessive vehicular delay at this intersection. The lack of provision of a frontage road and connector roads within the developments, as ordered by the Land Use Commission in Condition 5 of its 1995 Order in Docket No. A94-706, may also compromise public safety by providing no pedestrian connectivity for development north and

south of the proposed project site, including the proposed Kihei High School which is planned to be constructed abutting the Property to the south. Without this frontage road, students from the future high school wishing to walk to and from the proposed shopping centers or workforce housing units would be required to use Pi'ilani Highway, a substandard, high speed, principal arterial with no sidewalks and little paved shoulder.

Based on the content of the 1994 traffic study identified above, these impacts to traffic and public safety related to the above new proposed uses were not disclosed to the Land Use Commission or to the public at the time this matter was originally heard by the Commission. Therefore, with respect to traffic impacts and transportation related safety issues, it is clear that the proposed shopping centers and workforce housing units represent substantially different impacts compared to those originally presented to, and considered by, the Commission.

I declare under penalty of law that the foregoing, and any attachments hereto, are true and correct.

DATED: October 18, 2012.

A handwritten signature in blue ink, appearing to read "VA Huffman".

Victoria A. Huffman, P.E.