

## PSLU Committee

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**From:** Tova Callender <tovacallender@gmail.com>  
**Sent:** Tuesday, February 9, 2021 10:43 AM  
**To:** PSLU Committee  
**Subject:** West Maui Plan- input on Action no.3.09 re: gulch buffer exception clause

Dear PSLU Committee Members,  
I'm reaching out with feedback on action 3.09 in the West Maui Community Plan (please see below for the specific language).

Firstly, thank you very much for including language that seeks to be protective of gulches, streams and wetlands. As we have learned from years of field work in West Maui (and confirmed in USGS reports) the edge effect from past land uses (agriculture and development) that modified the landscape right up to the gulch edge continues to be detrimental to coastal water quality, having left a legacy of sediment deposits in the gulches and streams below that are hydrologically connected to the ocean with each rain event. Knowing what we do, it is encouraging that we are seeking to do better going forward.

I am, however, concerned that the "unless LID strategies are implemented" clause negates the intent of the proposed gulch/stream/wetland amendment. While I am absolutely supportive of aggressively incorporating LIDs into urban developments as a more holistic means of managing stormwater, I am concerned that they are insufficiently protective in this case.

In addition, a secondary benefit of creating consistent buffers around gulches is in reestablishing a mauka-makai connectivity, which in some locations, may lend itself to public easements so that the community is no longer cut off from recreating and recharging in a "ridge to reef" setting. Thirdly, as climate change impacts accelerate, creating buffers around gulches and wetlands may prove to be protective of human life and property as we see increases in the intensity of rain events. These buffer areas, managed appropriately, can be one component of increased community resilience, an opportunity that will be lost if development activities are allowed up to the edges of these natural features, even with LIDs in the mix.

Thank you for all your efforts to plan for a better future, and mahalo for your consideration.  
Respectfully yours, Tova

PS- for your reference see below.

### Action 3.09

*Propose amendments to Maui County Code to prohibit new development within gulches, as identified in Figure 2.3 and wetlands, and implement a 100-ft buffer around gulches, wetlands and streams where no structures will be allowed, unless Low Impact Development strategies are implemented to prevent stormwater runoff.*

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**Tova Callender**

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