JOSH GREEN, M.D.
GOVERNOR

KEITH A. REGAN
ACTING LT. GOVERNOR

DEAN MINAKAMI
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
HONOLULU, HAWAII 96813
FAX: (808) 587-0600

IN REPLY REFER TO:
26:PECB/043

April 27, 2026

Ms. Mary Alice Evans, Director
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Ms. Evans:

Subject: Wailuku Mission Senior Affordable Housing Draft Environmental Assessment
2307 Main Street, Wailuku, Maui
Tax Map Key: (2) 3-4-014:005

The Hawaii Housing Finance and Development Corporation (HHFDC) hereby transmits the *Wailuku Mission Senior Affordable Housing Draft Environmental Assessment and Anticipated Finding of No Significant Impact* (DEA-FONSI) for publication in the next available edition of *The Environmental Notice*.

Submitted online is a completed Publication Form, DEA-FONSI in PDF, and an electronic copy of this letter. PBR HAWAII & Associates, Inc. is authorized to submit these documents on behalf of HHFDC as the approving agency of this project.

If there are any questions, please contact Mr. Dean Watase, Housing Planning Manager, at (808) 587-0639.

Sincerely,

Dean Minakami
Executive Director

Attachment

From: dbedt.opsd.erp@hawaii.gov
To: DBEDT OPSD Environmental Review Program
Subject: New online submission for The Environmental Notice
Date: Friday, May 1, 2026 11:00:51 AM

Action Name

Wailuku Mission Senior Affordable Housing

Type of Document/Determination

Draft environmental assessment and anticipated finding of no significant impact (DEA-AFNSI)

HRS §343-5(a) Trigger(s)

- (1) Propose the use of state or county lands or the use of state or county funds
- (4) Propose any use within any historic site as designated in the National Register or Hawai‘i Register

Judicial district

Wailuku, Maui

Tax Map Key(s) (TMK(s))

(2) 3-4-014: 005

Action type

Applicant

Other required permits and approvals

Please refer to Section 5.4 (Major Approvals and Permits) of the Draft EA.

Discretionary consent required

Section 201H-38, HRS

Agency jurisdiction

State of Hawai‘i

Approving agency

Hawai‘i Housing Finance and Development Corporation

Agency contact name

Dean Watase

Agency contact email (for info about the action)

dbedt.hhfdc.environmental@hawaii.gov

Agency contact phone

(808) 587-0639

Agency address

677 Queen Street
Suite 300
Honolulu, HI 96813
United States

Map It

Applicant

EAH Housing

Applicant contact name

Marian Gushiken

Applicant contact email

marian.gushiken@eahhousing.org

Applicant contact phone

(808) 523-8093

Applicant address

733 Bishop Street
Suite 2880
Honolulu, HI 96813
United States
Map It

Is there a consultant for this action?

Yes

Consultant

PBR HAWAII & Associates, Inc.

Consultant contact name

Bradley Furuya

Consultant contact email

bfuruya@pbrhawaii.com

Consultant contact phone

(808) 521-5631

Consultant address

1001 Bishop Street
Suite 650
Honolulu, HI 96813
United States
Map It

Action summary

The Project will provide independent-living senior affordable housing on the 2.66-acre Mission Grounds site in a culturally and historically appropriate manner, with the objective of helping to address critical community needs. The Project proposes: 1) 84 affordable rental homes for seniors (age 62+) who earn 60 percent or less of the Area Median Income (AMI) in three, two-story buildings; 2) one resident manager unit; 3) 42 off-street parking stalls; 4) rehabilitation of the Alexander House to serve as a multipurpose center; 5) rehabilitation of the Baybrook House to serve as an on-site management office; and 6) complementary landscaping and communal outdoor amenities.

Reasons supporting determination

Please refer to Section 7.1 (Significance Criteria) of the Draft EA.

Attached documents (signed agency letter & EA/EIS)

- Wailuku-Mission-Senior-Affordable-Housing-Draft-EA-AFONSI_ADA1.pdf
- Transmittal-Letter_ADA1.pdf

Action location map

- Wailuku_Mission_Grounds_Action_Location_Boundary1.zip

Compliance certification (HRS §368-1.5):

The authorized individual listed below certifies that documents submitted are unlocked, searchable, and compliant with the Hawaii Electronic Information Technology Disability Access Standards (including, but not limited to transcripts, captions, and other descriptions accompanying audio/video files). The individual acknowledges that the submitter retains the responsibility for compliance after documents have been published and any compliance queries will be directed back to the agency and/or applicant.

Authorized individual

Bradley Furuya

Authorized individual email

bfuruya@pbrhawaii.com

Authorized individual phone

(808) 521-5631

Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

Wailuku Mission Senior Affordable Housing

(TMK: (2) 3-4-014: 005)

Draft Environmental Assessment / Anticipated Finding of No Significant Impact

Applicant:
EAH Housing (in partnership with Wailuku Union Church)

EAH HOUSING
A roof is just the beginning

Wailuku Union Church

Approving Agency:
Hawai'i Housing Finance and Development Corporation

Prepared by:
PBR HAWAII

PBR HAWAII
& ASSOCIATES, INC.

MAY 2026

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Wailuku Mission Senior Affordable Housing

(TMK: (2) 3-4-014: 005)

Draft Environmental Assessment / Anticipated Finding of No Significant Impact

Applicant:
EAH Housing (in partnership with Wailuku Union Church)

Approving Agency:
Hawai'i Housing Finance and Development Corporation

Prepared by:
PBR HAWAII

MAY 2026

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LIST OF ACRONYMS AND ABBREVIATIONS

The following is a list of terms, abbreviations, and acronyms used in this document.

A	
AAA	American Automobile Association
ABCA	Analysis of Brownfields Cleanup Alternative
ACM	Asbestos-containing materials
ADA	Americans with Disabilities Act
AFDC	Aid to Families with Dependent Children
AIS	Archaeological Inventory Survey
AMI	Area Medium Income
AMSL	Above Mean Sea Level
ATA	Austin, Tsutsumi & Associates, Inc.
B	
BMP	Best Management Practices
C	
CFR	Code of Federal Regulations
cfs	Cubic feet per second
CIA	Cultural Impact Assessment
CPTED	Crime Prevention Through Environmental Design
CWRM	Commission on Water Resource Management
CZM	Coastal Zone Management
D	
DBEDT	State of Hawai‘i Department of Business, Economic Development & Tourism
DEM	County of Maui Department of Environmental Management
DLNR	State of Hawai‘i Department of Land & Natural Resources
DOH	State of Hawai‘i Department of Health
DPR	County of Maui Department of Parks and Recreation
DPW	County of Maui Department of Public Works
DSL	Digital Subscriber Line
DU	Decision Unit
DWS	County of Maui Department of Water Supply
E	
EA	Environmental Assessment
EAL	Environmental Action Level
EIS	Environmental Impact Statements
EPA	United States Environmental Protection Agency
ERP	State of Hawai‘i Office of Planning and Sustainable Development, Environmental Review Program
ESA	Environmental Site Assessment
F	
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
G	
GHGs	Greenhouse gases
gpd	Gallons Per Day
GPR	Ground Penetrating Radar
H	

HAR	Hawai‘i Administrative Rules
HDOT	State of Hawai‘i Department of Transportation
HEER	Hazard Evaluation and Emergency Response
HEROS	HUD Environmental Review Online System
HHFDC	Hawai‘i Housing Finance and Development Corporation
HICRIS	Hawai‘i Cultural Resource Information System
HI-EMA	State of Hawai‘i Emergency Management Agency
HRS	Hawai‘i Revised Statutes
HSPLS	Hawai‘i State Public Library System
HUD	US Department of Housing and Urban Development
I	
IBC	International Building Code
ITE	Institute of Transportation Engineers
L	
LBP	Lead-based paint
LED	Light-emitting diode
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	Level of Service
M	
MAPPS	Maui Automated Planning and Permitting System
MASON	MASON Architects, Inc.
MCC	Maui County Code
MDOT	County of Maui Department of Transportation
MECo	Maui Electric Company
MEMA	Maui Emergency Management Agency
MEO	Maui Economic Opportunity, Inc.
MGD	Million Gallons Per Day
MH	Manholes
mph	Miles per hour
N	
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
P	
PCB	Polychlorinated Biphenyl
PER	Preliminary Engineering Report
PVC	Polyvinyl Chloride
R	
REC	Recognized Environmental Conditions
RLS	Reconnaissance Level Survey
S	
SLs	Screening Levels
SLR	Sea Level Rise
SLR-XA	Sea Level Rise Exposure Area
SHPD	State Historic Preservation Division
SIHP	State Inventory of Historic Places
SMA	Special Management Area
T	
TAM	Technical Assistance Memorandum
TIAR	Traffic Impact Analysis Report
TMK	Tax Map Key

	TSM	Transportation Systems Management
U		
	UH	University of Hawai‘i
	UIC	Underground Injection Control
	U.S.	United States
	USFWS	United States Fish and Wildlife Service
	USGBC	U.S. Green Building Council
V		
	VOC	Volatile Organic Compounds
W		
	WKCP	Wailuku-Kahului Community Plan
	WUC	Wailuku Union Church
	WvB	Wailuku silty clay

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1 INTRODUCTION

This Environmental Assessment (EA) is prepared in accordance with Chapter 343, Hawai‘i Revised Statutes (HRS) and Chapter 11-200.1, Hawai‘i Administrative Rules (HAR) for the Wailuku Mission Senior Affordable Housing Project (the Project). This EA contains information in satisfaction of the requirements under Chapter 11-200.1, HAR for an EA.

1.1 BACKGROUND

As one of the oldest church congregations in Hawai‘i, Wailuku Union Church (WUC) has served as a place of worship and hub of social activity in the community for over 150 years. Throughout this time, WUC has been closely associated with the original Mission Grounds site (Tax Map Key (TMK): (2) 3-4-014: 005) between Main Street and Aupuni Street (hereafter referred to as the Project site).

The Mission Grounds were established through a Royal Patent grant to the American Board of Commissioners for Foreign Missions and were subsequently held by the Hawaiian Evangelical Association of Congregational Christian Churches, organizations with which WUC has historical ties. WUC assumed direct ownership of the Project site in 1957.

This site is one of the only large, undeveloped properties in central Wailuku in close proximity to social services, medical offices, churches, the library, banks, shops, and public transportation.

1.2 SUMMARY

The Project will provide independent-living senior affordable housing on the 2.66-acre Mission Grounds site in a culturally and historically appropriate manner, with the objective of helping to address critical community needs. The Project proposes: 1) 84 affordable rental homes for seniors (age 62+) who earn 60 percent or less of the Area Median Income (AMI) in three, two-story buildings; 2) one resident manager unit; 3) 42 off-street parking stalls; 4) rehabilitation of the Alexander House to serve as a multipurpose center; 5) rehabilitation of the Baybrook House to serve as an on-site management office; and 6) complementary landscaping and communal outdoor amenities.

Project Name:	Wailuku Mission Senior Affordable Housing
Location:	2307 Main Street in Wailuku, Maui (Figure 1)
Judicial District:	Wailuku
Tax Map Key (TMK):	(2) 3-4-014: 005 (Figure 2)
Approving Agency:	Hawai‘i Housing Finance and Development Corporation (HHFDC)
Landowner:	Wailuku Union Church (WUC)
Applicant:	EAH Housing
Existing Uses:	Residential, office, and open space (Figure 3 and Figure 4)

Proposed Action:	EAH Housing, in partnership with WUC, is proposing to provide 84 affordable rental homes for seniors (age 62+) who earn 60 percent or less of the AMI, and one resident manager unit at the Mission Grounds. The Project will also include 42 off-street parking stalls; rehabilitation of the Alexander House to serve as a multipurpose center; rehabilitation of the Baybrook House to serve as an on-site management office; and complementary landscaping and communal outdoor amenities. See Figure 5 (Conceptual Site Plan & Landscape Plan).
Project Site Land Area:	2.66 acres or 115,845 square feet
Land Use Designations:	• State Land Use: Urban (Figure 6) • Outside of the Special Management Area (SMA) (Figure 7) • *Maui Island Plan*: within the Urban Growth Boundary, not within Protection Areas (Figure 8) • *Wailuku-Kahului Community Plan* (WKCP): Public/Quasi-Public (P) (Figure 9) • County Zoning: Historic District No. 3 (Figure 10) Appendix A is the County of Maui Land Use Designation form for the Project site (TMK 3-4-014: 005)
Permits/Approvals Required:	Hawai‘i Housing Finance and Development Corporation (HHFDC) • Chapter 343, HRS Compliance State Historic Preservation Review • Chapter 6E, HRS State of Hawai‘i Department of Health (DOH) • National Pollutant Discharge Elimination System (NPDES) • Construction Noise Permit Maui County Cultural Resources Commission • Cultural resources review County of Maui Department of Public Works • Building Permits • Grading and Grubbing Permits • Driveway Permit • Roadway Permit • Electrical Permit • Plumbing Permit County of Maui Department of Water Supply • Water Service Request Maui County Council • Section 201H-38, HRS
Anticipated Determination:	Finding of No Significant Impact (FONSI)



Path: Q:\Maui\Wailuku Mission Grounds Affordable Housing\GIS\Project\Location Map\Location Map.aprx

Legend

Property



DATE: 1/19/2026

Figure 1: Location Map
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

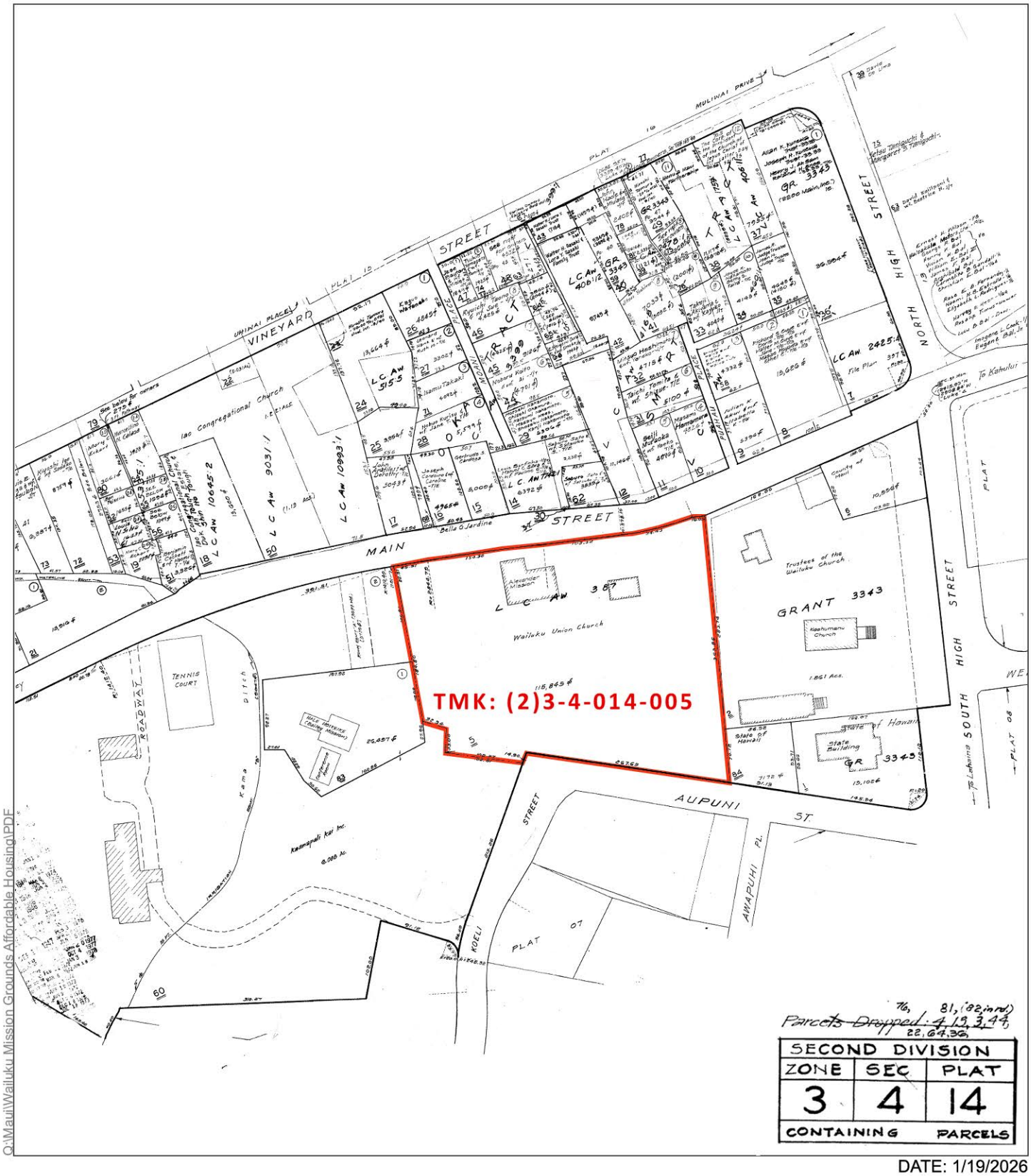
North — Linear Scale (feet)

0 750 1500

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2024. Google Earth, 2025

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



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DATE: 1/19/2026

LEGEND

Property

Figure 2:
Tax Map
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

Source: Tax Maps Bureau, 1934

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

PBR HAWAII & ASSOCIATES, INC.



Q:\Maui\Wailuku Mission Grounds Affordable Housing\PDF

LEGEND

Property

Figure 3:
Aerial Photo

DATE: 1/19/2026

Wailuku Mission Senior Affordable Housing

EAH Housing

Island of Maui

North

Linear Scale (feet)

0 75 150

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui 2024. Google Earth, 2025.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

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1.View from the southeastern corner of the Project site, looking northwest.



2.View from the northeastern corner of the Project site, looking southwest.



3.View from the southern boundary of the Project site, near Aupuni Street, looking northeast.



4.View of the Alexander House, looking north.



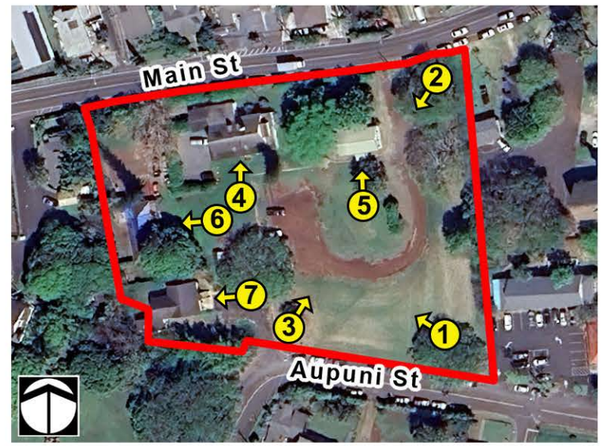
5.View of the Baybrook House, looking north.



6.View of the Iao House, looking west.



7.View of the Kennan House, looking west.



LEGEND

Property

Figure 4:
Existing Site Photographs

DATE: 1/19/2026

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

PBR HAWAII & ASSOCIATES, INC.

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Figure 5:
Conceptual Site & Landscape Plan
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet) 0 20 40 80

PBR HAWAII & ASSOCIATES, INC.

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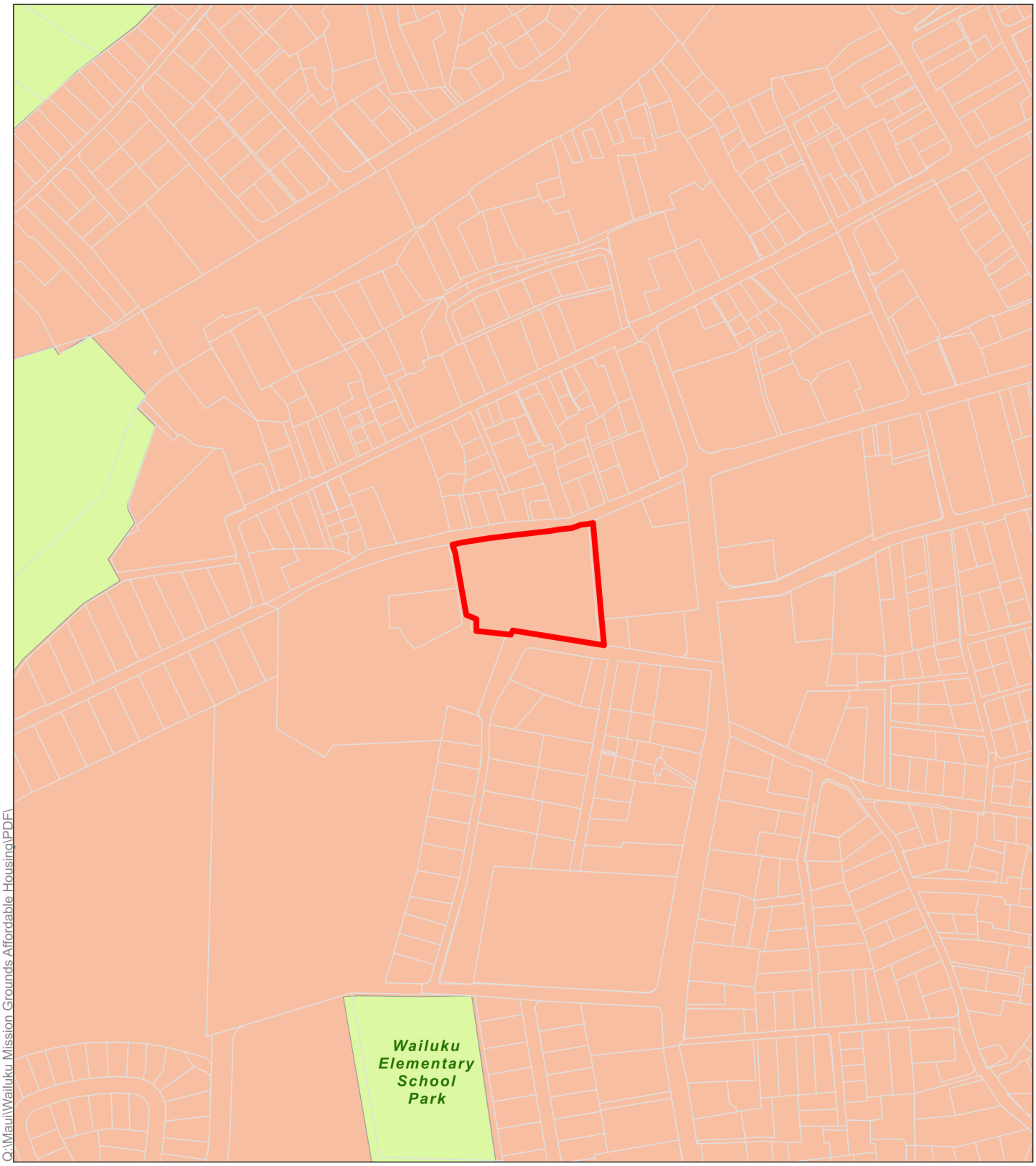

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LEGEND

- Property
- TMK Boundaries

State Land Use Districts

- Agricultural
- Urban

DATE: 4/22/2026

Figure 6:

State Land Use Districts

Wailuku Mission Senior Affordable Housing

EAH Housing

Island of Maui

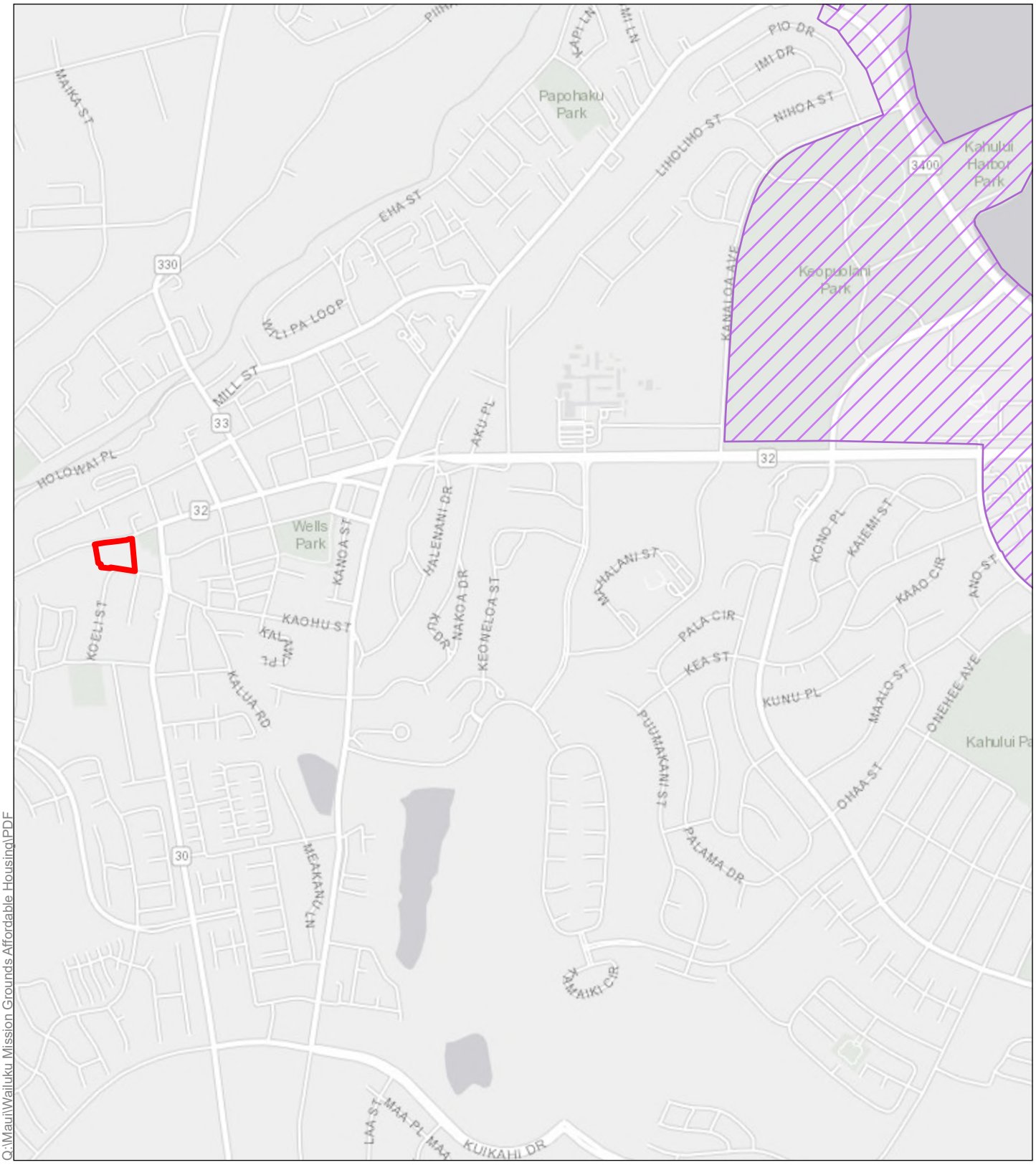
North

Linear Scale (feet)

0 200 400

Source: State Land Use Commission, 2020. County of Maui, 2024. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



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LEGEND

- Property
- Special Management Area

DATE: 4/22/2026

Figure 7:
Special Management Area

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

Linear Scale (feet)

0 750 1500

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2022. ESRI Online Basemap.

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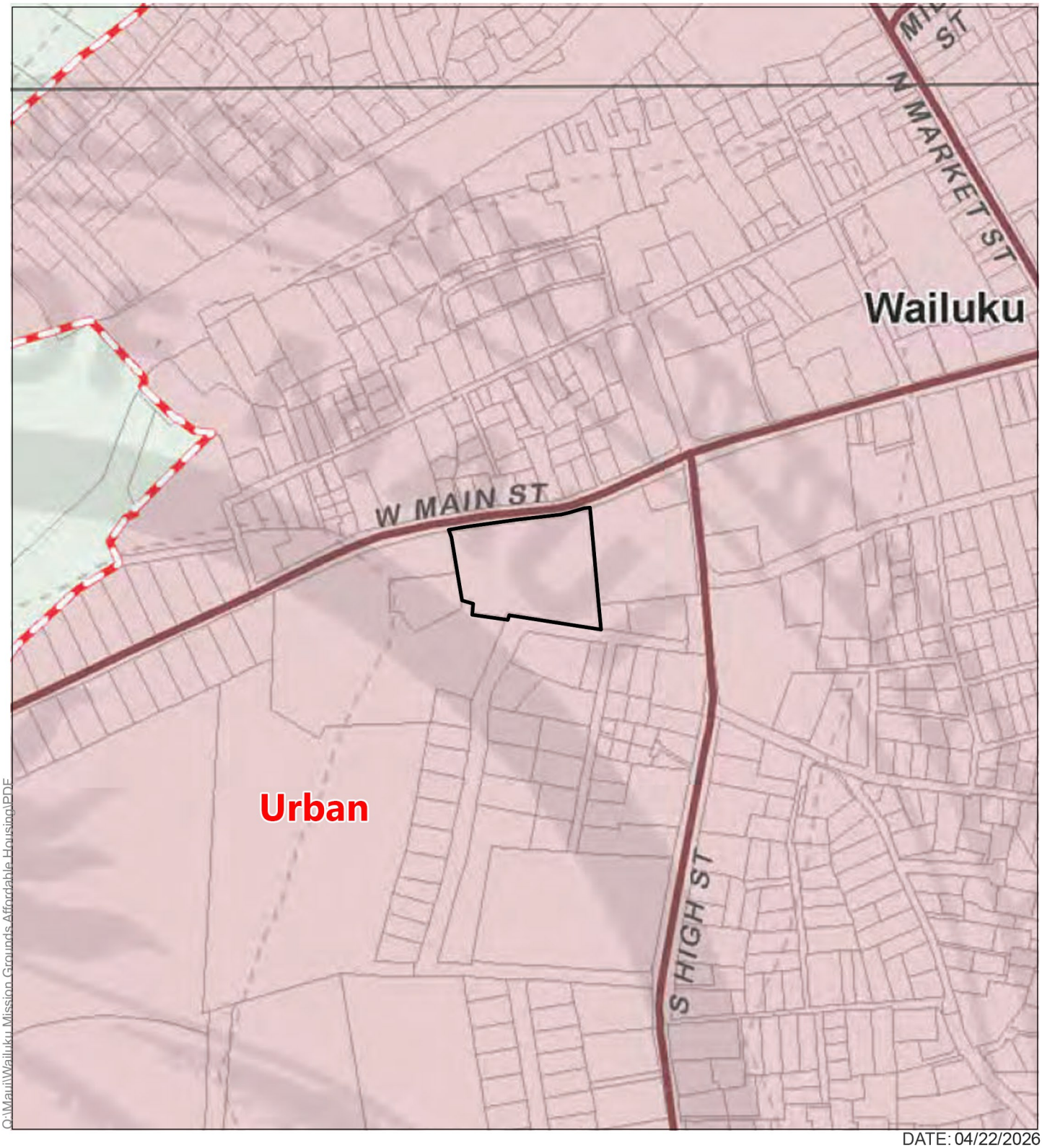

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DATE: 04/22/2026

LEGEND

Property

Growth Boundaries

Urban

Small Town

Rural

Reference

Primary Roads

2011 Parcels

100 Ft. Contours

Figure 8:
Maui Island Plan

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

Linear Scale (feet)

0 200 400

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2020 and 2012 (Maui Island Plan). ESRI Online Basemap.

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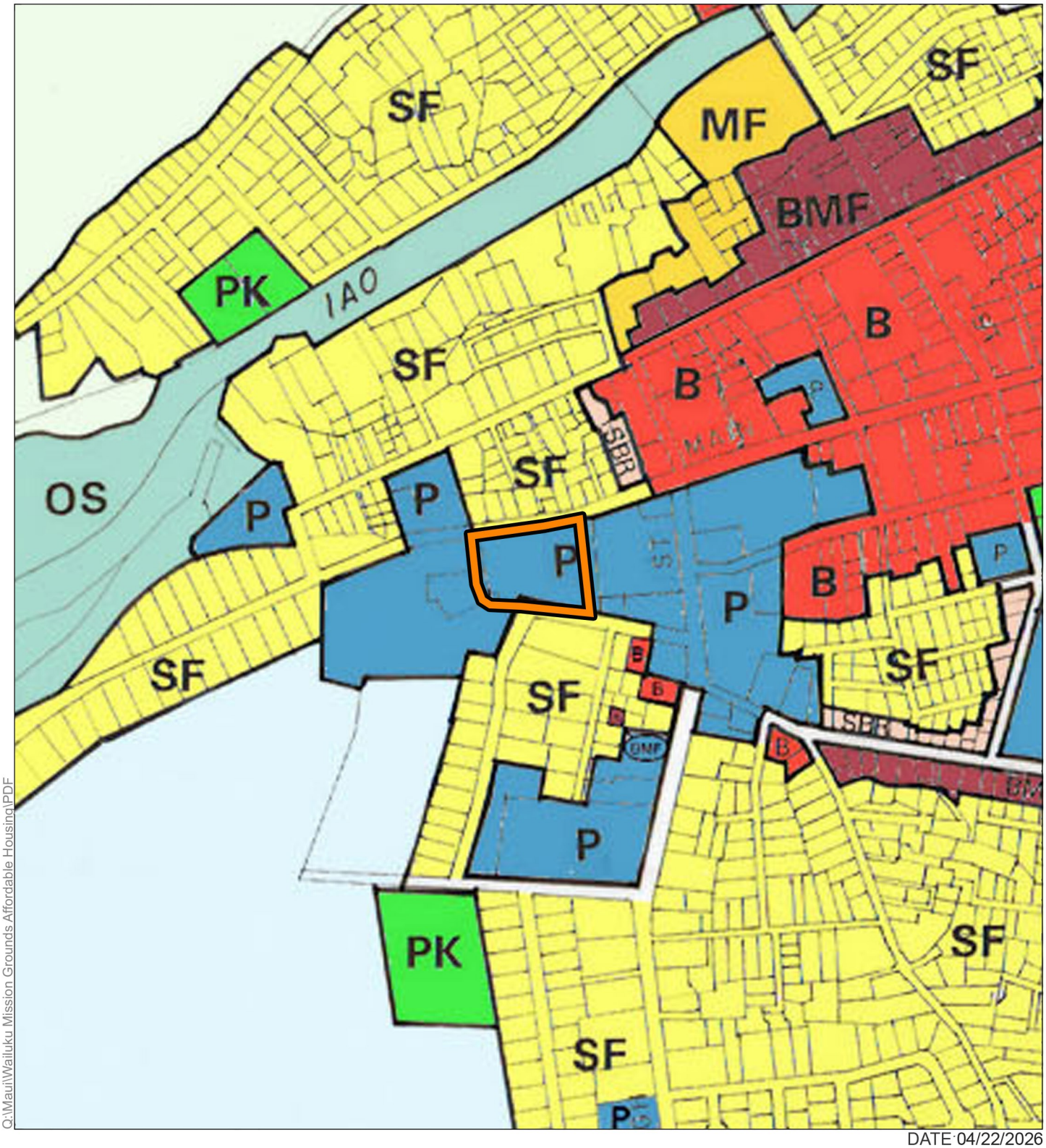

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DATE 04/22/2026

LEGEND

Property

AG	Agriculture
SF	Single Family Residential
MF	Multi-Family Residential
B	Business/Commercial
BMF	Business/Multi-Family
SBR	Service Business Residential
P	Public/Quasi-Public
PK	Park (GC) Golf Course
OS	Open Space

Figure 9:
Wailuku-Kahului Community Plan
Wailuku Mission Senior Affordable Housing

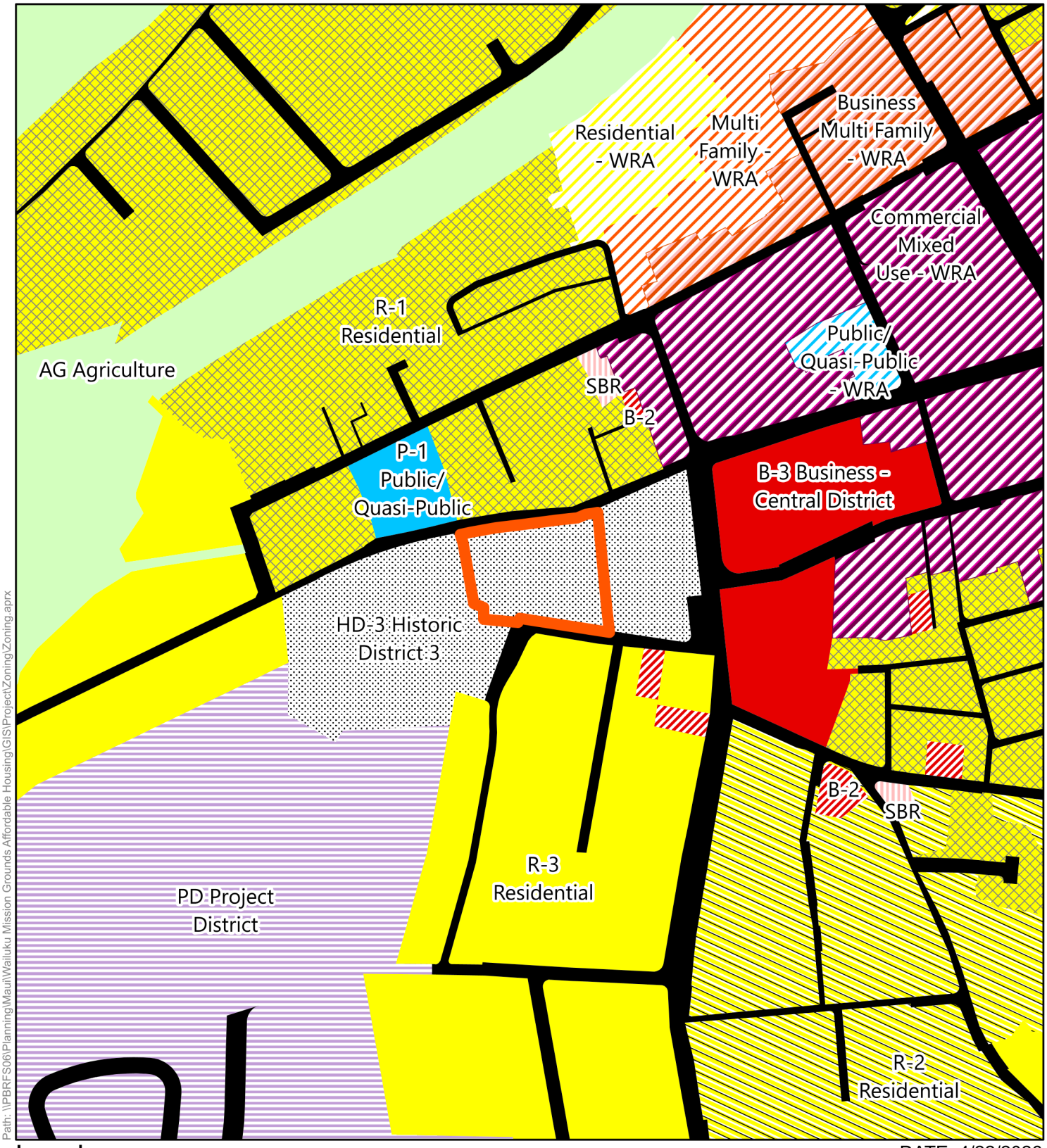
EAH Housing — Island of Maui

North

Linear Scale (feet)
0 250 500

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2002 & 2020.
Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



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Legend

- Property
- HD-3 Historic District 3
- R-1 Residential
- R-2 Residential
- R-3 Residential
- Residential - MRA
- Multi Family - MRA
- B-2 Business-Community
- B-3 Business-Central
- Commercial Mixed Use - MRA
- Business Multi Family - MRA
- SBR Service Business Residential
- AG Agriculture
- PD Project District
- P-1 Public/Quasi-Public
- Public/Quasi Public - MRA
- (road)

DATE: 4/22/2026

Figure 10:
County Zoning
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet) 0 200 400

Source: County of Maui, 2023.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

1.3 LOCATION

The Mission Grounds is at 2307 Main Street, between Main Street to the north and Aupuni Street to the south, in Wailuku, Maui (Figure 1). Uses on site include offices (within the Alexander House and the Baybrook House), two single-family homes, and open grounds, some of which are used for parking. The Project site is on TMK (2) 3-4-014: 005 (Figure 2), which is owned by WUC.

The Project site is within Historic District No. 3. The Maui County Historic Districts Ordinance[1] that established Historic District No. 3 in 1970 and states "The purpose of this district is to preserve and protect the several well-preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of Maui County."

1.4 SURROUNDING LAND USES

The Project site is bounded by:

- **North:** Main Street;
- **South:** Aupuni Street;
- **East:** the grounds of Ka'ahumanu Church; and
- **West:** the Maui Historical Society.

Generally, the site is surrounded by single-family residences. Other significant uses in the area include 'Īao United Church of Christ, One Main Plaza office building, the State Building, the Wailuku Courthouse, Kalana O Maui (Maui County Building), the Wailuku Public Library, and the WUC.

1.5 LAND OWNERSHIP

The WUC is the recorded fee owner of the Project site, which is identified as TMK 3-4-014: 005.

1.6 IDENTIFICATION OF THE APPLICANT

The applicant, EAH Housing, has a purchase and sale agreement with the landowner, WUC.

Contact: Marian Gushiken
Vice President, Real Estate Development – Hawai'i
EAH Housing
1001 Bishop Street, Suite 2880
Honolulu, Hawai'i 96813

1.7 IDENTIFICATION OF THE APPROVING AGENCY

The approving agency is the Hawai'i Housing Finance and Development Corporation.

Contact: Hawai'i Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813
Phone: (808) 587-0639
Email: dbedt.hhfdc.environmental@hawaii.gov

[1] Section 19.50.030, MCC

1.8 IDENTIFICATION OF ENVIRONMENTAL CONSULTANT

The environmental consultant is PBR HAWAII & Associates, Inc. dba PBR HAWAII.

Contact: PBR HAWAII & Associates, Inc.
ATTN: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, Hawai‘i 96813
Phone: (808) 521-5631
Fax: (808) 523-1402
Email: bfuruya@pbrhawaii.com

1.9 COMPLIANCE WITH STATE OF HAWAI‘I ENVIRONMENTAL LAWS

Preparation of this EA is in accordance with the provisions of Chapter 343, HRS and Chapter 11-200.1, HAR pertaining to EAs. Section 343-5, HRS establishes nine “triggers.” The preparation of an EA is required because the Project is proposing the use of buildings listed on the Hawai‘i Register of Historic Places and may involve the use of state and county funds and land.

The purpose of the environmental review process under Chapter 343, HRS, is to integrate the review of environmental concerns with existing planning processes of the State and counties, and to ensure that environmental concerns are given appropriate consideration in decision-making alongside economic and technical considerations (Section 343-1, HRS; Section 11-200.1-1, HAR).

An EA is an analytical and informational document; it does not constitute an approval of the proposed action (i.e., the Project). Acceptance of a final EA and issuance of a FONSI by the approving agency (i.e., HHFDC) fulfills the Chapter 343, HRS environmental review requirement as a prerequisite to other required project approvals; it does not independently authorize project implementation.

Based on the Significance Criteria set forth in Section 11-200.1-13, HAR, in most instances, an action shall be determined to have a significant effect on the environment if it may:

1) Irrevocably commit a natural, cultural, or historic resource;
2) Curtail the range of beneficial uses of the environment;
3) Conflict with the State's environmental policies or long-term environmental goals established by law;
4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;
5) Have a substantial adverse effect on public health;
6) Involve adverse secondary impacts, such as population changes or effects on public facilities;
7) Involve a substantial degradation of environmental quality;
8) Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;
9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;
10) Have a substantial adverse effect on air or water quality or ambient noise levels;
11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise (SLR) exposure

area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

12) Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies; or
13) Require substantial energy consumption or emit substantial greenhouse gases (GHGs). Discussion on each of these is provided throughout the document to support an anticipated FONSI.

2 DESCRIPTION

This section provides background information and a general description of the Project.

2.1 BACKGROUND INFORMATION

2.1.1 Historic District No. 3

The Project site is within Historic District No. 3. The Maui County Historic Districts Ordinance (Section 19.50.030, Maui County Code (MCC)) that established Historic District No. 3 in 1970 states "The purpose of this district is to preserve and protect the several well-preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of Maui County."

The 1969 Wailuku Historic District Map (Figure 11), identifies all structures in Historic District No. 3 as "Historic Structures." However, Section 19.50.030, MCC, only identifies the following as historic structures and sites in Historic District No. 3: Kaʻahumanu Church, Alexander House, the two buildings known as Hale Hōʻikeʻike, or Bailey House and annex, and Kama Ditch and aqueduct. Only Alexander House is within the Project site. Figure 12 shows Historic District No. 3 existing conditions, including the historic structures and sites designated under Section 19.50.030, MCC and structures that have been demolished since 1969. Figure 13 shows Historic District No. 3 with the Project.

2.1.2 Wailuku Union Church

WUC was chartered in 1867 as the Union Protestant Church of Wailuku. As one of the oldest church congregations in Hawaiʻi, WUC has served as a place of worship and hub of social activity in the community for over 150 years. In addition to the church site, WUC has been closely associated with the Mission Grounds between Main Street and Aupuni Street.

The Mission Grounds were established through a Royal Patent grant to the American Board of Commissioners for Foreign Missions and were subsequently held by the Hawaiian Evangelical Association of Congregational Christian Churches, organizations with which WUC has historical ties. WUC assumed direct ownership of the Project site in 1957.

This Project site is currently one of the only large, undeveloped tracts of land in central Wailuku and is accessible on foot, within a 3-block radius, to social services agencies, public transportation, medical facilities, churches, schools, the library, and several retail stores.

In addition to providing spiritual inspiration and a place of worship for residents of Maui, the leadership and congregation of WUC recognizes the importance of supporting the community through the provision of affordable housing and related community-oriented uses.

As stated on WUC's website:

> *"The development of the property will enable WUC to carry out its social justice (pono) mission as well as create a steady, self-sustaining income stream of revenue for years to come. We see this development as helping several underserved, disadvantaged groups: low-income local people, native Hawaiians, emerging Micronesian and Samoan churches, nonprofit groups, and differently-*

abled children and their families. Our Project would assist everyone in the community from the 6-month-old to the 96-year-old and is WUC's response to the theological question: WHO IS MY NEIGHBOR (the Good Samaritan parable, Luke 10:25–37.)"

WUC's mission has evolved to embody its longstanding commitment to the people of Maui by providing this valuable property to help address the shortage of affordable rental housing dedicated to seniors.

2.1.3 Location Analysis

The Project offers significant location advantages for independent-living senior affordable housing, addressing transportation accessibility challenges that affect quality of life and financial sustainability for older adults on fixed incomes. Specifically targeting seniors age 62 and older earning 60 percent or less of AMI, the Project site reduces car dependency as driving ability declines, provides proximate access to medical and essential services, and minimizes transportation costs that can consume substantial portions of retirement income. The Maui County's Fare-Free Transit Program for seniors 55 and older further enhances the location's advantages by eliminating transit costs entirely.

For seniors living on Social Security and modest pensions—typically $25,000 to $35,000 annually (U.S. Census Bureau, 2023)—transportation costs significantly impact financial stability. Research shows that 3.6 million Americans annually miss medical appointments due to transportation barriers (Transportation Research Board, 2005). In car-dependent locations, vehicle ownership can consume 30 to 40 percent of a senior's annual income based on American Automobile Association (AAA) cost estimates applied to Hawai‘i fuel prices (AAA, 2024); (DBEDT, 2024). The Project location enables seniors to reduce or eliminate vehicle ownership while maintaining access to essential services.

A senior household with a $30,000 annual income living at the Project site can achieve transportation cost savings of $9,500 to $10,500 annually compared to car-dependent locations, given Maui County's Fare-Free Transit Program for seniors 55 and older. This location enables short bus access to Maui Memorial Medical Center (approximately 0.8-1.0 miles), essential services via walking or free Maui Bus transit, and reduced combined housing plus transportation cost burden from 70-80 percent of income at peripheral locations to approximately 32 percent at the Project site, well below the Center for Neighborhood Technology's recommended 45 percent threshold (CNT, 2022). In addition to access to Maui Memorial Medical Center, the Project site is within one mile of a variety of healthcare services in Downtown Wailuku, including primary care, specialist, dental, and pharmacy services.

Transit accessibility supports mobility for seniors who choose not to or no longer drive. The Maui Bus Wailuku Loop Route #1 provides hourly service seven days weekly from 6:30 AM to 8:30 PM, with stops within 0.1 miles of the Project site (County of Maui Department of Transportation, 2024). Maui County implemented a Fare-Free Transit Program in March 2024 for seniors age 55 and older—riders simply show valid photo ID with birthdate to ride at no cost (County of Maui, 2024). This represents zero annual transportation cost for basic mobility compared to vehicle ownership costs of $10,000 to $11,000 annually. National data shows that as seniors age, car ownership declines: 83 percent of those aged 65-74 drive, compared to 68 percent aged 75-84 and 45 percent aged 85 and up (Collia, 2003).

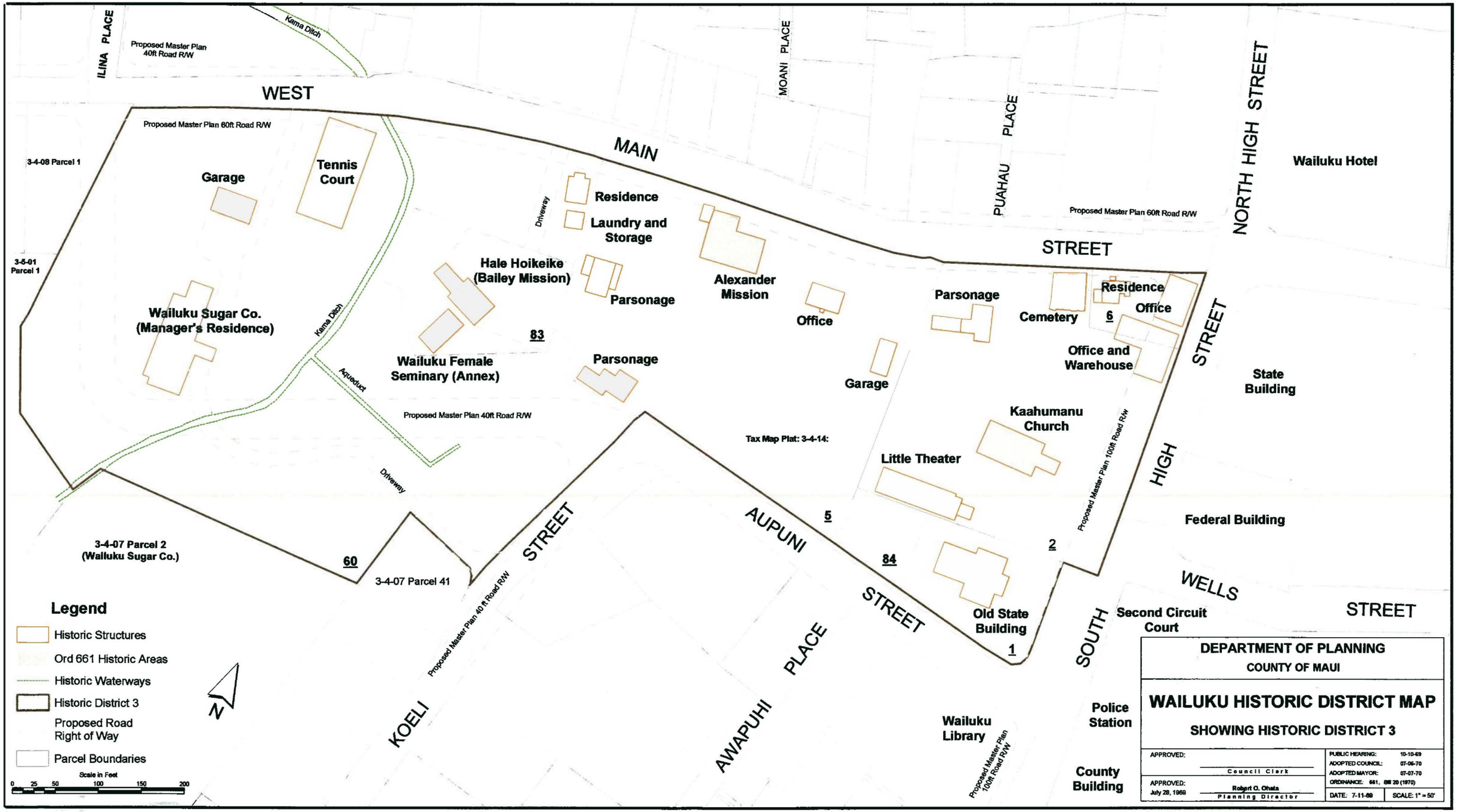

Figure 11:
1969 Historic District No. 3 Map
Wailuku Mission Senior Affordable Housing

Island of Maui

North

Not to Scale

PBR HAWAII & ASSOCIATES, INC.

Source: https://www.mauicounty.gov/DocumentCenter/View/8695/Historic-District-3-Wailuku-Map?bidId=

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LEGEND

- Historic District No. 3
- Historic structures and sites designated in the Historic District No. 3 ordinance (§19.50.030, MCC)
- Historic structures and waterways shown on the Wailuku Historic District Map (Dated 7-11-1969)
- Demolished Structures
- Project Site

One Main Plaza
PUAHA'U PL
Residence
Office
State Office Building
Office & Warehouse
WEST MAIN St
Parsonage
Cemetery
Alexander Mission
Office
Residence
Laundry & Storage
Parsonage
Garage
Ka'ahumano Church
SOUTH HIGH ST
Tennis Court
Hale Hō'ike'ike (Bailey Mission)
Parsonage
Little Theater
Old State Building
WELLS St
Garage
Kama Ditch
Wailuku Female Seminary (Annex)
Kalana O Maui (Maui County Building)
Wailuku Sugar Co. (Manager's Residence)
Aqueduct
AUPUNI ST
Wailuku Public Library
Kalana Pakui Building
KOELI ST
'AWAPUHI PL

Figure 12: 04/22/2026

Historic District No. 3 Existing Conditions

Wailuku Mission Senior Affordable Housing

Island of Maui

North

Linear Scale (in feet)

0 50 100 200

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LEGEND

- Historic District No. 3
- Historic structures and sites designated in the Historic District No. 3 ordinance (§19.50.030, MCC)
- Historic structures and waterways shown on the Wailuku Historic District Map (Dated 7-11-1969)
- Demolished Structures
- Project Site

One Main Plaza
PUAHAU PL
Residence
Office
State Office Building
Office & Warehouse
WEST MAIN St
Parsonage
Cemetery
Alexander Mission
Office
Residence
Laundry & Storage
Ka'ahumano Church
SOUTH HIGH ST
Tennis Court
Hale Hō'ike'ike (Bailey Mission)
Little Theater
Old State Building
WELLS St
Garage
Kama Ditch
Wailuku Female Seminary (Annex)
Wailuku Sugar Co. (Manager's Residence)
Aqueduct
AUPUNI ST
Kalana O Maui (Maui County Building)
Wailuku Public Library
Kalana Pakui Building
KOELI ST
'AWAPUHI PL

Figure 13 : 04/22/2026

Historic District No. 3 with Project

Wailuku Mission Senior Affordable Housing

Island of Maui

North

Linear Scale (in feet)

0 50 100 200

PBR HAWAII & ASSOCIATES, INC.

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For seniors who cannot access fixed-route buses due to mobility limitations, the Maui Bus ADA complementary paratransit service provides door-to-door transportation, requiring only Americans with Disabilities Act (ADA) certification. Additionally, the County partners with Maui Economic Opportunity, Inc. (MEO) to provide specialized transportation services including the Senior Transportation Program, which offers low-cost rides specifically for seniors aged 60 and older to medical appointments, shopping, and other essential destinations, with sliding scale fees based on ability to pay and some trips available at no cost for those who qualify. Kaunoa Senior Services — a division of the County of Maui Department of Human Concerns—provides an assisted transportation program offering free or donation-based transportation to medical appointments, shopping, and social activities, for seniors 60 and older. Nā Hoaloha provides specialized non-emergency medical transportation for seniors and people with disabilities, focusing on getting riders to critical healthcare appointments at minimal or no cost based on financial need. Finally, Da Bee is a free shuttle offering three service routes throughout Wailuku on weekdays between 6:00 AM and 6:00 PM. Conveniently for Project residents, all routes stop at the corner of Main Street and High Street. Together, these services create a robust safety net ensuring that seniors can maintain independence, access healthcare, purchase groceries, and participate in community life without owning a private vehicle.

The County of Maui Office on Aging—0.15 miles from the Project site at 95 Mahalani Street—provides senior services including case management, congregate meals, exercise programs, and home and community-based service coordination (County of Maui Office on Aging, 2024). This proximity facilitates service delivery efficiency and enables residents to access support by walking rather than arranging transportation.

Research demonstrates that social isolation in seniors presents health risks equivalent to smoking 15 cigarettes daily, with 50 percent increased dementia risk and 29 percent increased heart disease risk (National Academies of Sciences, Engineering, and Medicine, 2020). Location-efficient housing that maintains social connectivity as mobility declines produces measurable health benefits. Walkable downtown environments and transit access support continued community participation for seniors who no longer drive.

Transportation cost analysis shows the Project site enables housing plus transportation burdens of 45-50 percent of income compared to 65-75 percent at peripheral locations for seniors earning 30-50 percent of AMI. This difference affects financial sustainability for households on fixed incomes. Vehicle elimination becomes feasible for residents able to meet daily needs through walking and transit, particularly those without family care obligations requiring regular distant travel.

This location analysis indicates that Downtown Wailuku provides superior location efficiency for senior affordable housing compared to available Maui alternatives. The combination of medical facility proximity, transit access, walkable services, and senior service coordination creates conditions supporting successful aging in place.

2.2 PURPOSE AND NEED

The purpose of the Wailuku Mission Senior Affordable Housing Project is to address Maui County's critical shortage of affordable housing for low-income seniors by providing 84 permanently affordable rental units in Wailuku for independent-living residents age 62 and older who earn 60 percent or less of the AMI. The proposed action also includes the rehabilitation of two historically significant buildings on the Project site—

the Alexander House, to be rehabilitated as a multipurpose community center, and the Baybrook House, to be rehabilitated as an on-site management office—preserving their historic character while returning them to active community use consistent with the purpose of Historic District No. 3.

Maui County faces an acute affordable housing crisis that disproportionately affects seniors on fixed incomes. In 2024, the median monthly rent in Wailuku was $3,014, while the median monthly rent in Maui was $3,384 (SMS Research & Marketing Services, Inc., 2024). These market rents are unaffordable for low-income seniors. HHFDC guidelines establish that seniors at 60 percent AMI can afford maximum rents of $1,414 for a studio and $1,515 for a one-bedroom unit (HHFDC, 2025)—less than half of actual Wailuku market rents.

The 2024 Hawai‘i Housing Planning Study identified Maui County as needing 14,987 total housing units through 2027 to accommodate forecasted demand. Of these units, 2,343 are identified as needed multifamily rental units and of this total, over 70 percent are required to serve households in the 60 percent and below AMI range (SMS Research & Marketing Services, Inc., 2024).

Maui’s housing stock has declined over the past five years, while demand has intensified (UHERO, 2025). With housing production in the 2020s on pace to be the lowest since the 1940s and only 17 multifamily permits issued in Maui County in 2024 (UHERO, 2025), the supply of affordable housing continues to shrink. The August 2023 Lahaina wildfires displaced over 5,000 people (UHERO, 2025), further straining an already critical housing shortage.

Coming changes in the demographics of the senior population will further drive housing need. Hawai‘i has the fastest aging population in the country and Maui will see a notable increase in individuals in the older adult range (aged 60+), forecasted to grow from 28 percent in 2025 to over 30 percent of the overall population that is forecasted to reach over 200,000 county residents. Additionally, while Hawai‘i is identified as having the highest life expectancy of any state at birth (80.7 years), Department of Business, Economic Development & Tourism (DBEDT) estimates a rapid increase in the population of those age 85 and older starting in 2030 as healthcare advances continue to increase life expectancy. DBEDT’s projections anticipate that by year 2040, one in four elderly residents will be age 85 or older (County of Maui Office on Aging, 2024). This rapidly aging population requires affordable housing options that support independent living and aging in place.

Seniors on fixed incomes are particularly vulnerable in Maui’s rental market, where 28 percent of households are severely cost-burdened, spending more than half their income on housing (UHERO, 2025). Research demonstrates that when housing supply expands, more stable prices and improved affordability follow (UHERO, 2025). The Project directly addresses this need by adding 84 units of permanently affordable independent-living senior housing to Wailuku’s housing stock.

The Project’s location in central Wailuku—within walking distance of medical services, social service agencies, public transit, and government offices—makes the Mission Grounds site particularly well suited to serve the target population of low-income seniors, for whom proximity to essential services and freedom from car dependency are critical to long-term financial stability and quality of life.

2.3 SUPPORTIVE COMMUNITY COMMENTS

During the pre-assessment consultation process, several community members and organizations expressed strong support for the Project, citing compelling reasons centered on addressing critical housing needs while respecting the area's historic character.

The most frequently cited reason for support is the urgent need for senior affordable housing in central Wailuku. The Wailuku Community Association emphasized that "there is a critical shortage of senior housing in our area, and this project directly addresses that need." The Hawai'i State Public Library System (HSPLS) Wailuku Branch echoed this, noting that "housing for elderly is eminent." Multiple commenters highlighted the Project's ideal central location near civic offices, medical services, public amenities, and the Wailuku Public Library, making it particularly suitable for seniors seeking walkable access to essential services.

A strong theme throughout the comments is the Project's role in enabling seniors to age in place within their community. The Wailuku Community Association noted that as families reach a point where yard work and home upkeep become difficult, "having the option to transition into a more manageable and supportive living environment—without leaving the neighborhood they've called home for decades—is essential." Community member and business owner Kristin Holmes connected this to broader community values, observing that walkable neighborhoods like this one were simply "a way of life" for previous generations and that "these are the kinds of livable, walkable communities we need to recreate for current and future families."

The Project's thoughtful integration of historic preservation received significant praise. Kristin Holmes expressed particular appreciation that "the historic Alexander House and Baybrook House are planned to be restored and thoughtfully integrated into the overall design of the project," calling them "architectural treasures" and "cultural touchstones that help tell the story of Wailuku's past." She characterized the preservation approach as "a meaningful approach that reflects a true understanding of place." The Wailuku Community Association similarly noted that the project "respects the historical and cultural significance of the area and complements its surroundings."

Several commenters highlighted the Project's compatibility with Wailuku's character and appropriate scale. The HSPLS Wailuku Branch found the "location and size (84 units) is appropriate and comparable to other apartment complexes or low-rise condos in the area." The Wailuku Community Association praised the Project as a "thoughtful, well-designed development" that "enhances—not detracts from—our unique town character," calling it "a forward-thinking, respectful, and necessary addition to our town."

The Project's potential for fostering intergenerational connections also garnered support, with the Wailuku Community Association noting that proximity to Imua Family Services' Discovery Garden "offers a special opportunity for intergenerational connection between kūpuna and keiki—something that strengthens the social fabric of our community." Imua Family Services itself expressed unequivocal support for the Project.

Finally, multiple commenters viewed the Project as a model for future development. Holmes stated it "can serve as a model for how affordable housing and preservation can go hand in hand," while the Wailuku Community Association concluded that "it is a model of how we can plan for the future while preserving the heart of our community."

2.4 PROJECT DESCRIPTION

The Project will redevelop the 2.66-acre Mission Grounds site in a culturally and historically appropriate manner, with the objective of helping to address critical community needs. Its central location in Wailuku—near social services, medical facilities, public transportation, the library, and neighborhood retail—makes it well suited for senior affordable housing. Proximity to essential services and transit can reduce social isolation, lessen residents' reliance on private vehicles, and lower combined housing and transportation cost burdens.

The documented shortage of affordable rental housing for seniors in Maui County, and WUC's longstanding commitment to serving the community, informed the decision to redevelop the property for senior affordable housing. Pre-assessment consultation included supportive comments from nearby residents, community organizations, and agencies, as well as concerns from neighbors and preservation advocates regarding parking, historic district compatibility, and other details; these concerns are addressed in detail in the relevant chapters of this EA.

Residential Buildings

The Project provides 84 senior affordable rental units in three new two-story residential buildings. The buildings contain a mix of studio units and one-bedroom units. All 84 units will be rented to independent-living senior households aged 62 years or older with incomes at or below 60 percent of the AMI. One building contains resident manager unit, for a total of 85 units across the three buildings. Each building includes elevators and laundry facilities. Total gross floor area across all three buildings is approximately 51,549 square feet.

Historic Structure Rehabilitation

The Alexander House and Baybrook House—both listed on the State Register of Historic Places and submitted for listing on the National Register of Historic Places—will be rehabilitated and adaptively reused as resident amenities. The Alexander House will serve as the Project's multipurpose community center. The Baybrook House will serve as the on-site property management office.

Rehabilitation of both structures will follow the Secretary of the Interior's Standards for Rehabilitation to preserve their character-defining features. EAH Housing is working with historic architect MASON Architects, Inc. (MASON) on the rehabilitation approach.

Two other existing structures on the Project site—the Kennan House (1928) and the ʻĪao House (1963)—are proposed for demolition to accommodate the new residential buildings. A reconnaissance level survey (RLS) by MASON 2025 found the ʻĪao House ineligible for the historic register and the Kennan House a contributing element to Historic District No. 3 but not individually eligible for listing.

See Section 4.7 (Visual Resources) for detailed discussion of archaeological and historic resources, impacts, and mitigation.

Architectural Design

The three residential buildings reach a maximum height of approximately 28 feet, similar in scale to Alexander House and below the 35-foot height limit for two-story structures in Historic District No. 3. The buildings are sited in a slightly offset, north-south orientation behind Alexander House and Baybrook House, maintaining sight lines to the historic structures from Main Street and Aupuni Street. The three new

buildings are setback approximately 60 feet from Alexander House and Baybrook House, and observe the required 15-foot front yard setback and 10-foot rear and side yard setbacks. Ground disturbance is limited by use of shallow slab-on-grade foundations, and buildings are nestled into the slope to further reduce their apparent height relative to the sloping grade.

The architectural character of the new buildings is designed to be compatible with the historic structures and the Historic District while being clearly distinguishable as new construction. The long building facades are divided into three sections by subtle massing offsets in plan and elevation, reducing apparent scale. The first floor is slightly recessed from the second, creating a modest cantilevered appearance. The first floor is clad in dark brown composite siding; the second floor uses board and batten composite siding. Roof forms are hipped. Materials are composite wood and metal finished in a natural brown-grey color palette, without reflective or glossy finishes. The Project does not use European or Asian architectural styles, excessive decoration, flat-roofed modernist forms, or large areas of reflective materials.

See Section 4.7 (Visual Resources) for a detailed discussion of Historic District No. 3 compatibility standards and the Project's compliance with applicable MCC provisions.

Parking and Access

The Project includes 42 off-street parking stalls in two parking areas, both accessed from Main Street. The west parking area, near Alexander House, provides 17 stalls and a drop-off/pick-up area designed for circular vehicle flow. The east parking area, near Baybrook House, provides 25 stalls and a drop-off/pick-up turnaround area. The parking ratio of 42 stalls for 85 units reflects the Project's location in central Wailuku, with free Maui Bus service for seniors and proximity to essential services, which supports reduced vehicle ownership among the senior affordable housing residents. Furthermore, EAH will provide resident selection preference for seniors who do not own a vehicle to reduce the need for off-street parking.

There is no vehicle, pedestrian, or bicycle access from Aupuni Street; a 6-foot perimeter fence along Aupuni Street limits access to a locked pedestrian gate for emergency access and egress, as requested by the County of Maui Department of Fire and Public Safety.

A proposed pedestrian connection through the Ka‘ahumanu Church property to High Street is under discussion with the Church to improve pedestrian connectivity from the Project site to bus stops and Wailuku services.

See Section 4.3 (Transportation) for a detailed discussion of parking, transportation demand, and pedestrian and transit access.

Landscaping and Open Space

Landscaping is designed to retain the park-like character of the site and provide outdoor amenities for residents. Existing specimen trees will be retained where feasible. Open spaces between new buildings are oriented to preserve views of Alexander House and Baybrook House from the public rights-of-way. Landscaped amenities include:

- Pathways with ADA-accessible ramps linking buildings and common areas
- Resident seating and gathering areas with benches and tables for social activities
- Community gardens with raised garden beds
- Dog run with fence enclosure

- Trees and shrubs, including canopy trees, palms, groundcovers, and hedges using native or indigenous plant species (or a combination of both) where feasible, as required by Section 15-307-27(9), HAR
- Perimeter fencing to limit unauthorized access and increase security

See Figure 5 for the Conceptual Site and Landscape Plan. See Appendix B for conceptual architectural plans, including elevations, floor plans, and renderings. See Appendix C for the landscape plan and proposed plant palette.

Infrastructure and Utilities

The Project includes new on-site water, wastewater, storm drainage, and electrical and telecommunications infrastructure. New connections to County water and sewer mains, an on-site storm drainage system, and electrical and telecommunications distribution will be installed to serve the three residential buildings and the rehabilitated historic structures.

See Section 4.8 (Infrastructure and Utilities) for discussion of infrastructure systems, capacity, and mitigation measures.

Sustainability/LEED

The Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing, as administered by the U.S. Green Building Council (USGBC). The Project targets a minimum 30 percent reduction in energy consumption compared to a baseline standard building design. The following features will be incorporated where feasible:

Site and Landscaping

- Community connectivity and proximity to public transit
- On-site permanent stormwater infiltration system
- Non-toxic pest control measures for termite protection
- Low Impact Development (LID) features, including surface bioretention planters to manage runoff and prevent off-site overflows

Water Efficiency

- Separate water meters for landscape and buildings
- High-efficiency plumbing fixtures, including WaterSense-labeled ultra-low-flow fixtures and toilets
- Efficient irrigation systems, such as drip irrigation and moisture sensors

Energy Efficiency

- Energy-efficient appliances and light-emitting diode (LED) lighting throughout
- Well-insulated walls and roofs to reduce energy use
- Solar thermal water heating
- Whole-building energy metering with unit submeters
- Large operable windows for natural ventilation

Materials and Resources

- Sustainable, non-tropical wood materials
- Water-resistant flooring and mold-resistant drywall in wet areas
- Optimized framing to reduce material waste

Indoor Air Quality

- Proper ventilation systems for fresh air circulation
- Energy Star exhaust fans in kitchens and bathrooms
- Carbon monoxide monitors in all units
- Low volatile organic compounds (VOC) paints, adhesives, flooring, and insulation

Resident Services

While the Project is for independent-living senior households, EAH Housing will implement its resident services initiative, StayWell!, at the Project to support residents in maintaining stable housing and promoting positive health outcomes. EAH Housing has implemented this program at other affordable housing projects in Hawai‘i to the benefit of residents. Project staff will include a dedicated on-site Resident Services Coordinator who serves as the primary contact for residents seeking support and services, using a harm-reduction and trauma-informed approach tailored to senior residents' needs.

The Resident Services Coordinator provides compassionate, individualized, and voluntary services designed to help residents meet their goals. Working collaboratively with property management, community providers, and residents, the Resident Services Coordinator prioritizes keeping residents housed by connecting them with essential resources, including benefits assistance, healthcare access, and other support services.

The Resident Services Coordinator implements programs addressing seniors' specific needs, including community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. The Resident Services Coordinator also assists residents in navigating benefits and support services, all designed to promote overall health, wellness, and community connectedness among residents.

2.5 ESTIMATED CONSTRUCTION COST AND IMPLEMENTATION TIMEFRAME

Construction is expected to commence once plans and permit applications are approved. The Project is expected to break ground in 2028 and finish construction in 2030. The estimated construction cost for the Project is approximately $64 million.

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3 DESCRIPTION OF THE NATURAL ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES

3.1 CLIMATE

Existing Conditions

Wailuku is on the leeward side of West Maui's Kahalawai volcano. Mean monthly rainfall at the site ranges from a low of 12.3 mm (0.5 inches) in June to 126.3 mm (5.0 inches) in January (University of Hawai'i at Mānoa Geography Department, 2014). Temperatures are typically mild and uniform, with the monthly average temperatures in Wailuku ranging from 68 degrees to 80 degrees Fahrenheit (University of Hawai'i at Mānoa Geography Department, 2014). Trade winds vary from 12 to 36 miles per hour (mph). The average annual percentage of humidity is 73 percent. On average August is the most humid month, and January is the least humid month.

Potential Impacts and Mitigation Measures

The Project is not expected to have a significant impact on the region's climate, and no mitigation measures are warranted or planned. The Project architect and engineer are designing the Project to meet the USGBC's LEED Certification for multifamily housing to help mitigate the facility's potential impact on climate change.

In addition, the Project will include large operable windows for natural ventilation and energy efficiency measures. Notable sustainability design features include solar water heating, low-VOC paint, energy-efficient lighting, and drought-tolerant and native or indigenous plant species.

Under the No Action Alternative, there would be no impact on the region's climate as the Project would not be built.

3.2 TOPOGRAPHY

Existing Conditions

Site topography is generally sloping from west to east with an average slope of seven percent. The highest point is approximately 388 feet above mean sea level (AMSL) along Main Street and the lowest is roughly 355 feet AMSL at the southern end of the site along Aupuni Street (Figure 14).

Potential Impacts and Mitigation Measures

Grading will be necessary to accommodate Project buildings, landscaping, resident common areas, and site drainage requirements. Project improvements include an on-site storm drainage system consisting of underground chambers beneath the parking areas and on-grade retention basins between the new apartment buildings. Section 4.8.3 (Drainage System) contains a discussion of the proposed drainage system.

The Project requires extensive grading across most of the site where new buildings will be located. In addition to grading for building pads, grading is necessary to create on-grade retention basins between buildings to meet stormwater management requirements. The extent of grading is driven by several constraining factors:

- County Stormwater Retention Requirements: Stringent County regulations require extensive detention basin volume to manage stormwater runoff from the developed site.
- Soil Percolation Rate: The site's soil percolation characteristics limit the effectiveness of alternative drainage approaches and necessitate larger retention areas.
- Cost Constraints: While underground storage tanks beneath the parking lot will augment detention basin capacity, cost considerations limit the extent to which underground storage can reduce the footprint of surface retention basins.

These constraints limit opportunities to minimize grading through alternative approaches such as increased use of retaining walls or alternative drainage configurations. Walkways between buildings and parking areas will follow the natural topography where feasible. Open spaces between new buildings will preserve views of Alexander House and Baybrook House from public rights-of-way.

Construction activities will comply with all applicable Federal, State, and County regulations and rules for erosion and dust control. Appropriate engineering, design, and construction measures will be undertaken to minimize potential erosion due to grading of soils during construction in conformance with Chapter 20.08, MCC and the recommendations of the civil engineer. On-site fill will be used wherever possible. Erosion and dust control will adhere to the Erosion Control Plan approved by the County of Maui.

Grading will follow Best Management Practices (BMP) as prescribed in a forthcoming NPDES permit. The contractor will submit a site-specific construction BMP Plan to the DOH before grading commences. BMP minimizes erosion and the discharge of other pollutants may include use of silt fences, sediment traps, and diversion swales.

The No Action Alternative would not involve construction or ground-disturbing activities that have the potential to affect topography other than routine maintenance of the existing Mission Grounds site.

3.3 SOILS

Existing Conditions

The *Soil Survey of Islands of Kaua'i, O'ahu, Maui, Moloka'i, and Lāna'i, State of Hawai'i*, (U. S. Department of Agriculture Soil Conservation Service, 1972), classifies the soil within the site as Wailuku silty clay, 3 to 7 percent slope (WvB) (Figure 15). Wailuku soils are on alluvial fans, formed in alluvium weathered from basic igneous rocks. This soil series is characterized as reddish-brown, with moderate permeability, slow runoff, and the erosion hazard is slight. The site is unclassified per Agricultural Lands of Importance to the State of Hawai'i and per Land Study Bureau classification.

Potential Impacts and Mitigation Measures

Construction of the Project will require land disturbance, including grading and foundation work. Impacts include the potential for soil erosion and the generation of dust during construction.

Construction activities will comply with all applicable Federal, State, and County regulations and rules for erosion and dust control. Appropriate engineering, design, and construction measures will be undertaken to minimize potential erosion due to grading of soils during construction in conformance with Chapter 20.08, MCC and the recommendations of the civil engineer. On-site fill will be used wherever possible. Erosion and dust control will adhere to the Erosion Control Plan approved by the County of Maui.



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LEGEND

- Property
- 2ft Contours
- 10ft Contours

Figure 14:
Topography

DATE: 4/22/2026

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

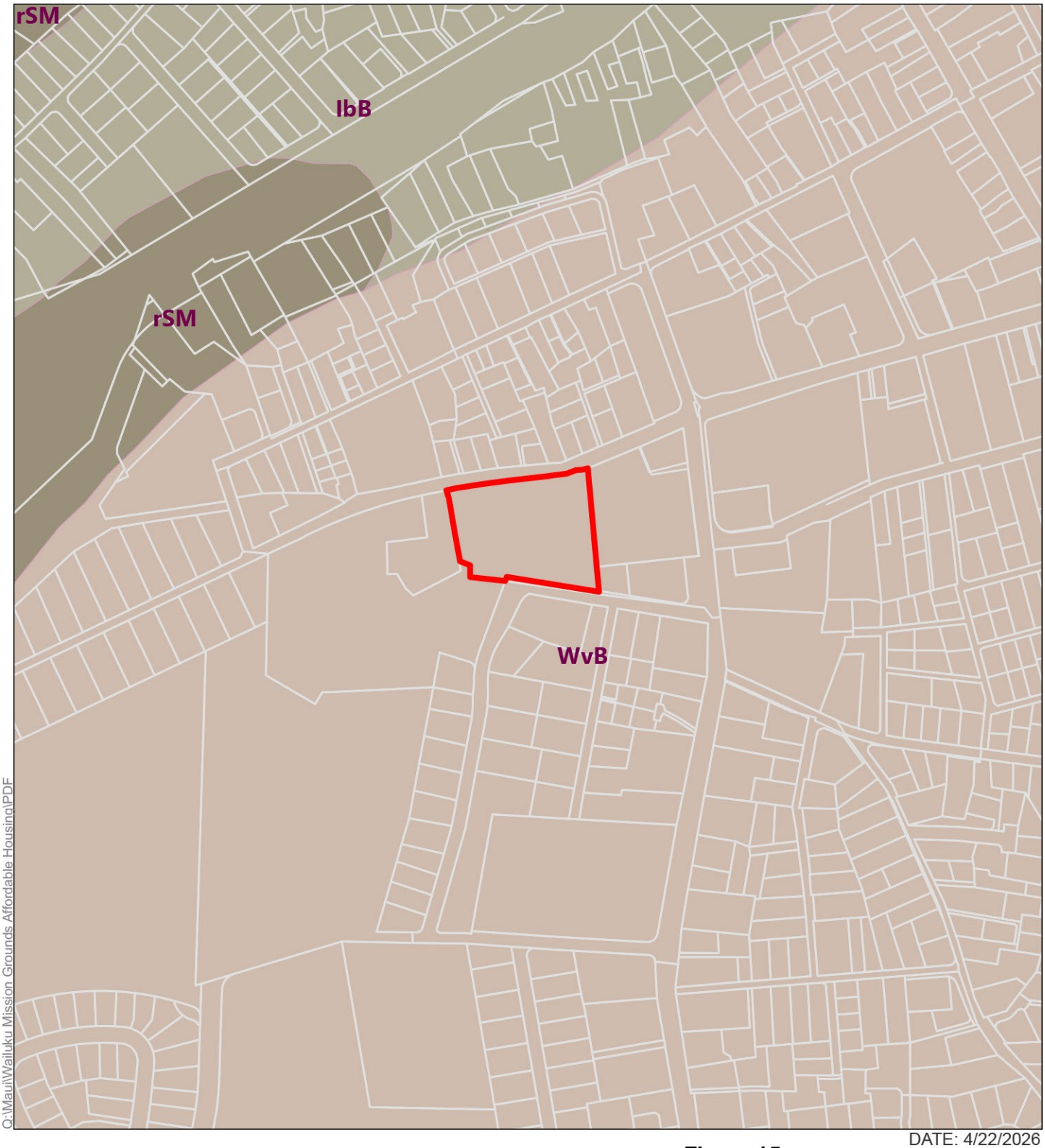
Linear Scale (feet)

0 75 150

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui 2024 & 2019.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



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DATE: 4/22/2026

LEGEND

- Property
- TMK Boundaries

NRCS Soil Classification

- IbB: Iao cobbly silty clay, 3 to 7 percent slopes
- WvB: Wailuku silty clay, 3 to 7 percent slopes
- rSM: Stony alluvial land

Figure 15:
Natural Resources Conservation Service Soil Survey

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet) 0 200 400

PBR HAWAII & ASSOCIATES, INC.

Source: NRCS, 2020. County of Maui, 2024. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

Grading will follow BMP as prescribed in a forthcoming NPDES permit. The contractor will submit a site-specific construction BMP Plan to the DOH before grading commences. BMP minimize erosion and the discharge of other pollutants may include the use of silt fences, sediment traps, and diversion swales. After construction, the establishment of permanent landscaping will provide long-term erosion control. Reclaimed water will be investigated for use in dust control as appropriate.

The No Action Alternative would not involve construction or ground-disturbing activities that have the potential to affect soils beyond ongoing maintenance of the existing Mission Grounds site.

3.4 HYDROLOGY

The Project site is above the ʻĪao Aquifer, which covers approximately 15,808 acres below the West Maui Mountains. The ʻĪao Aquifer is the main source of domestic water for the Wailuku area and provides most of the County's water supply for the entire island annually (U.S. Geological Survey, 2001). The ʻĪao Aquifer area reaches a maximum elevation of approximately 5,788 feet AMSL at the Puʻu Kukui summit, which has an average rainfall of approximately 386.5 inches per year. The aquifer area's rainfall decreases as it moves away from the mountain, with a mean annual rainfall near the shoreline of approximately 30 inches or less. ʻĪao and Waiehu streams drain the aquifer area.

A watershed area captures rainfall and atmospheric moisture from the air and allows the water to drip slowly into underground aquifers or enter stream channels and eventually the ocean. Thus, watershed health has a direct impact on the quality of surface water, groundwater, and nearshore marine water. This section provides an analysis of the ʻĪao Aquifer area as it relates to these water resources.

3.4.1 Surface Water

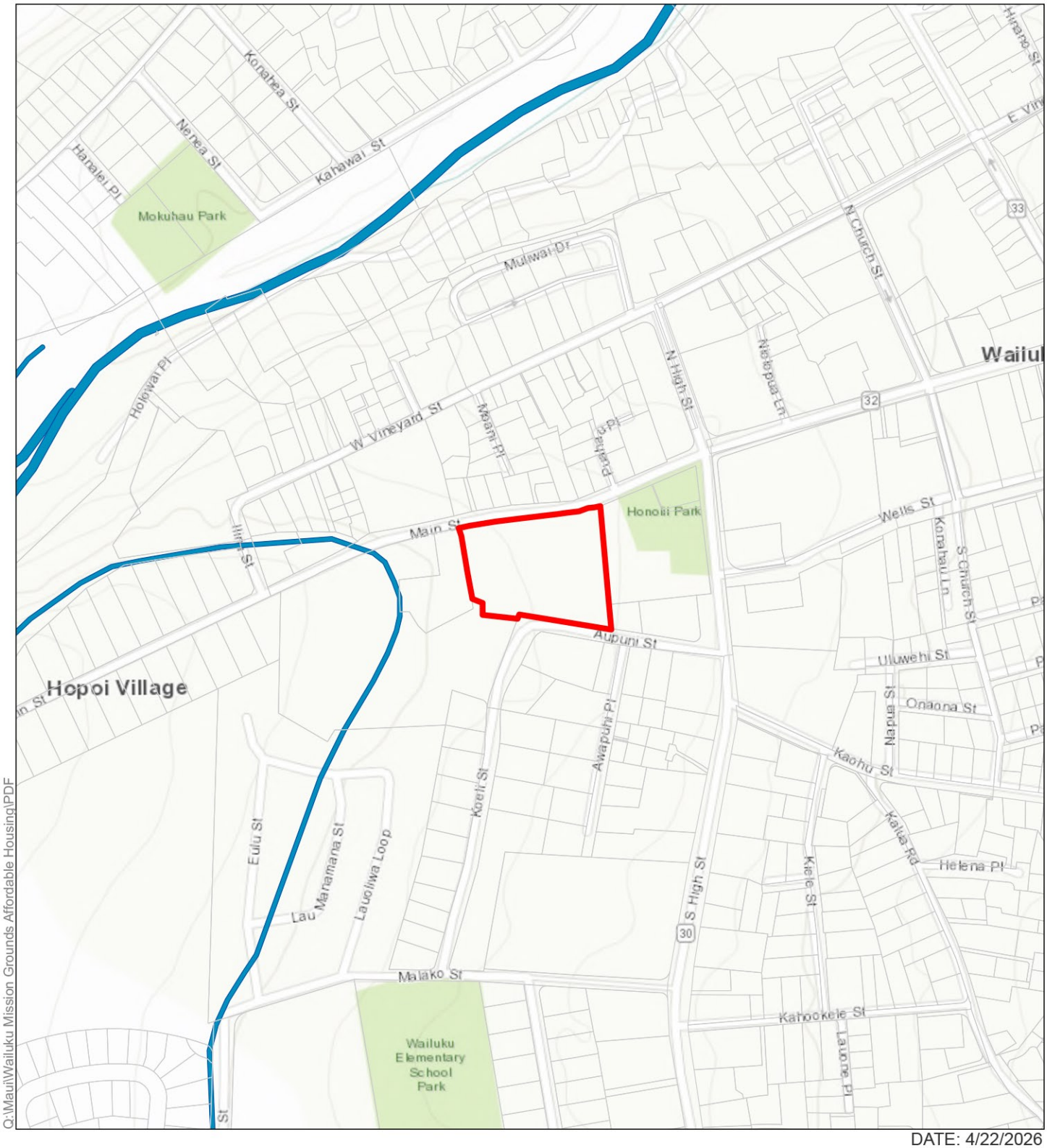
Existing Conditions

Water in the ʻĪao Aquifer flows down radially from the summit, which created the deep valleys of the West Maui Mountains. Springs, tunnel water, and streams in the ʻĪao Aquifer are also diverted by ditches that were constructed in the 1900s during the growth of the sugarcane industry in Maui.

There are no surface water bodies on the Project site. The closest body of water is a riverine that runs approximately 200 feet west of the western boundary of the Project site (Figure 16). An existing rock retaining wall borders the east edge of the Project site, generally directing stormwater runoff toward Main Street and Aupuni Street. An on-site storm drainage system consisting of 6-inch to 12-inch High-Density Polyethylene piping, grated drain inlets, underground chambers, and on-grade retention basins will collect runoff from the site prior to discharge toward Main Street and Aupuni Street following existing drainage patterns.

Potential Impacts and Mitigation Measures

The Project is not anticipated to have a significant adverse impact on surface water resources. There are no perennial streams or wetlands on or near the site. Post-construction discharge will be mitigated by proposed landscaping and biofiltration improvements on site. For more information on the drainage system, see Section 4.8.3 (Drainage System) of this EA.



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LEGEND

Property

Wetlands

Riverine

Figure 16:
Wetlands

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

Linear Scale (feet)

0 200 400

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2024.USFWS National Wetland Inventory, 2023. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

In the long term, to minimize/eliminate the Project's contribution to the region's cumulative non-point source pollution, LID will ensure stormwater quality/quantity is not increased or degraded. LID will serve to both minimize the volume of water running off the site as well as allowing sediment and other pollutants to settle out before infiltration into the ground. Permanent landscaping will also mitigate downslope surface water resources by allowing runoff to be captured on site and infiltrate into the ground. A system of grated drain inlets, underground chambers, and on-grade basins will further help to catch rainwater on site.

The No Action Alternative would not impact existing surface water resources.

3.4.2 Groundwater

Existing Conditions

The movement of water in the 'Īao Aquifer's fresh groundwater system generally begins with infiltration of rainfall and water vapor at dike-impounded water in the mountains and continues through the lower freshwater-lens system in perennial streams such as Waihe'e River and 'Īao River. It then eventually flows out to the ocean.

Potable water for Wailuku is supplied by the Department of Water Supply (DWS) Central Maui Water System, which draws water from the 'Īao and Waihe'e Aquifers. The Īao and Waihe'e Aquifer Systems are adjacent to each other and extend from the summit of the West Maui Mountains down to Wailuku and stretches north to Kahakuloa. As of July 21, 2003, the 'Īao Aquifer was designated as a groundwater management area by the State Commission on Water Resource Management (CWRM).

There are no surface water bodies, waterways, or wetlands on the Project site. The closest body of water is a riverine that runs approximately 200 feet west of the western boundary of the Project site (Figure 16).

The Project site is mauka of the Underground Injection Control (UIC) Line in this area of Maui. Therefore, the parcel overlies ground water considered to be a potential source of drinking water (EKNA Services, Inc., 2017).

Potential Impacts and Mitigation Measures

The Project is not anticipated to have a significant adverse impact on groundwater quality. No long-term uses that could contaminate groundwater are expected to be developed as part of the Project. The Project will be designed to meet all County and State drainage standards. See additional information in Section 4.8.3 (Drainage System) of this EA.

The Project will incorporate water-saving fixtures such as low-flow plumbing fixtures, drought-tolerant and native or indigenous plant species, and surface bioretention planters to manage runoff and prevent off-site overflows. The Project will rely upon potable water furnished by the DWS Central Maui Water System. The DWS determines whether sufficient water is available for use without adversely impacting the integrity of the aquifer. For more information on the Project's proposed water system, see Section 4.8.1 (Water System) of this EA.

The No Action Alternative would not impact existing groundwater resources.

3.4.3 Marine Waters

Existing Conditions

The Project site is in central Wailuku, over 1.8 miles from the nearest shoreline. The site is not adjacent to or in the vicinity of marine and coastal resources.

Potential Impacts and Mitigation Measures

The Project is not expected to have a significant impact on marine water quality. During construction, BMPs for managing stormwater and erosion control will be employed to avoid temporary inputs of sediment and pollutants to marine waters.

The discharge of pollutants from point sources is regulated through the NPDES. An NPDES permit will be obtained specifying measures to prevent stormwater discharges from affecting coastal water quality. BMPs shall be incorporated during construction to prevent stormwater discharges from affecting coastal water quality. BMPs such as permanent landscaping and drainage infrastructure shall be incorporated into the design to limit post-construction levels of erosion. Construction and operations of the Project will comply with all Federal, State, and County requirements regarding non-point source pollution.

The No Action Alternative would not impact marine and coastal resources as the Project would not be built and the Project site is over 1.8 miles from the nearest shoreline.

3.5 NATURAL HAZARDS

Natural hazards like flooding, tsunami inundation, hurricanes, and tropical storms have historically impacted the Hawaiian Islands. Climate change will also impact the Islands, as will the related SLR.

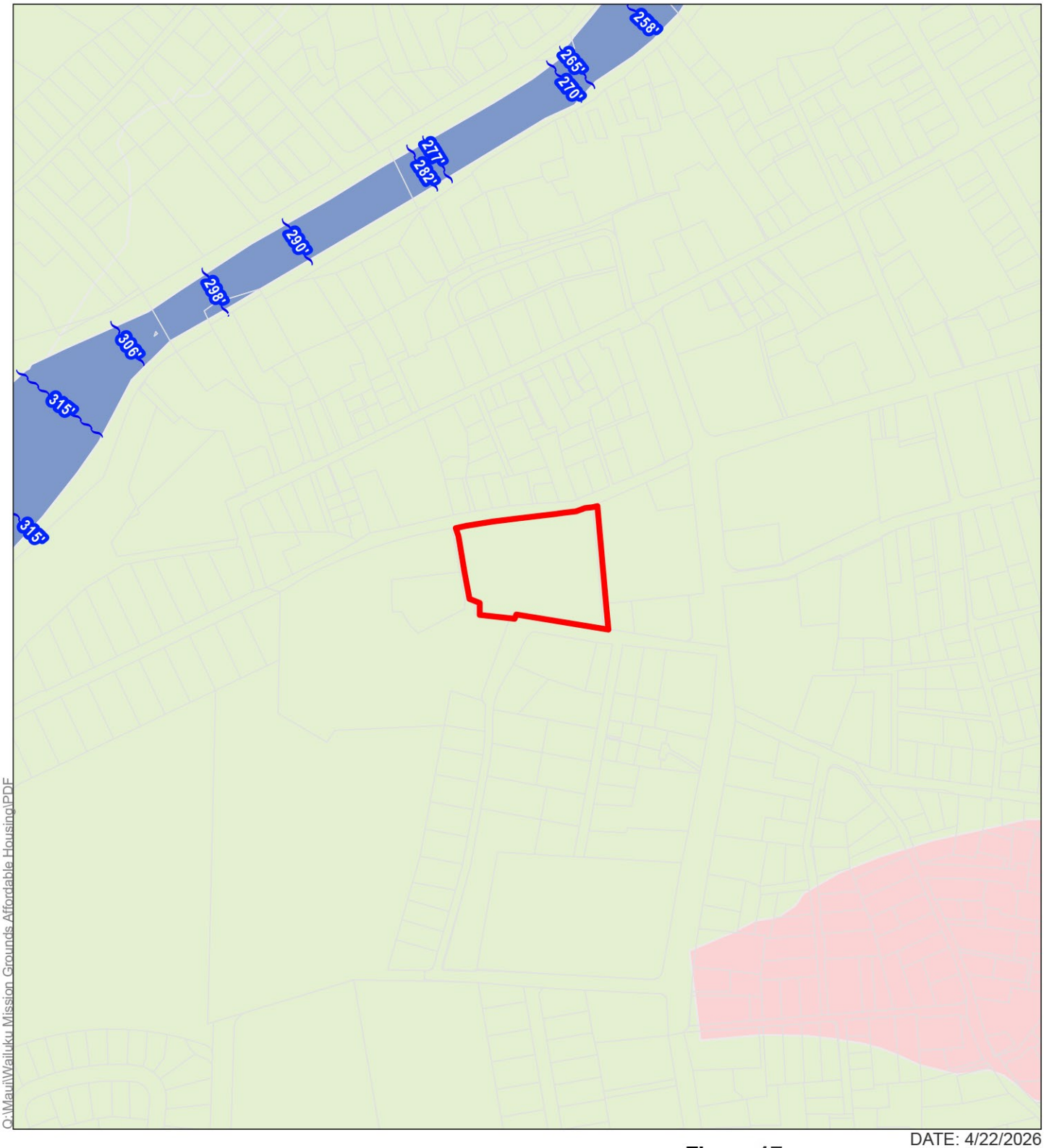
The State of Hawai‘i Emergency Management Agency (HI-EMA) operates a system of emergency sirens throughout the State to alert the public of emergencies and natural hazards, particularly tsunamis and hurricanes.

Impacts from natural hazards can be further mitigated by adherence to appropriate emergency measures as determined by HI-EMA and the Maui Emergency Management Agency (MEMA). This section provides an analysis of the Project’s vulnerability to such hazards and its ability to withstand them and protect the community during potential events.

3.5.1 Flood

Existing Conditions

The Federal Emergency Management Agency (FEMA) publishes flood information in the form of Flood Insurance Rate Maps (FIRM) used by government and insurance agencies to determine the relative potential for damage during flood events. The FIRM shows the entire site is in Zone X, areas outside the 0.2 percent annual chance floodplain (Figure 17). Areas within Zone X are not within a Special Flood Hazard Area.



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LEGEND

- Property
- Base Flood Elevation (BFE) Line

Flood Hazard Areas

- AO: 1%-Annual-Chance Flood, Flood Depths of 1-3ft, Average Depths Determined
- AEF: Floodway Areas in AE
- X: Outside 0.2%-Annual-Chance Floodplain

Figure 17:
Federal Emergency Management Agency Flood Insurance Rate Map
Wailuku Mission Senior Affordable Housing

EAH Housing
Island of Maui
North
Linear Scale (feet)
0 200 400

PBR HAWAII & ASSOCIATES, INC.

Source: FEMA, 2024. County of Maui, 2024. ESRI Online Basemap.
Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

Potential Hazards and Mitigation Measures

The Project is not anticipated to increase the site's exposure to flooding. Project site improvements will meet County code requirements to avoid adverse flood hazards to adjacent or downstream properties. See Section 4.8.3. (Drainage System) and Appendix D (Preliminary Engineering Report) for more information regarding drainage and drainage improvements.

The No Action Alternative would not have a discernable impact on the susceptibility of the Project site to flood hazards.

3.5.2 Tsunami

Existing Conditions

Since the early 1800s, approximately 50 tsunamis have inundated the State of Hawai'i's shores, including the 1946 tsunami that hit Hāna Bay, and the 2011 tsunami that pushed debris and flood waters into Kahului. The most recent tsunami to impact Maui occurred on March 11, 2011, following an 8.9-magnitude earthquake in Japan. Damage was done to low-laying properties along Pu'unēnē Avenue and Kahului Beach Road.

The Project site is not in or near the tsunami and extreme tsunami evacuation zones (Figure 18). The base tsunami evacuation zone extends to the University of Hawai'i (UH) Maui College near South Wākea Avenue. The extreme tsunami evacuation zone extends to approximately the mauka edge of Keōpūolani Park, roughly 1.2 miles away from the Project site. The Project site is approximately 1.8 miles from the shoreline and approximately 355 feet AMSL.

Potential Hazards and Mitigation Measures

The Project will not exacerbate any tsunami hazard conditions. No potential impacts from tsunamis are anticipated and thus, no mitigation measures are proposed.

The No Action Alternative would not have a discernable impact on the susceptibility of the Project site to tsunami hazard conditions.

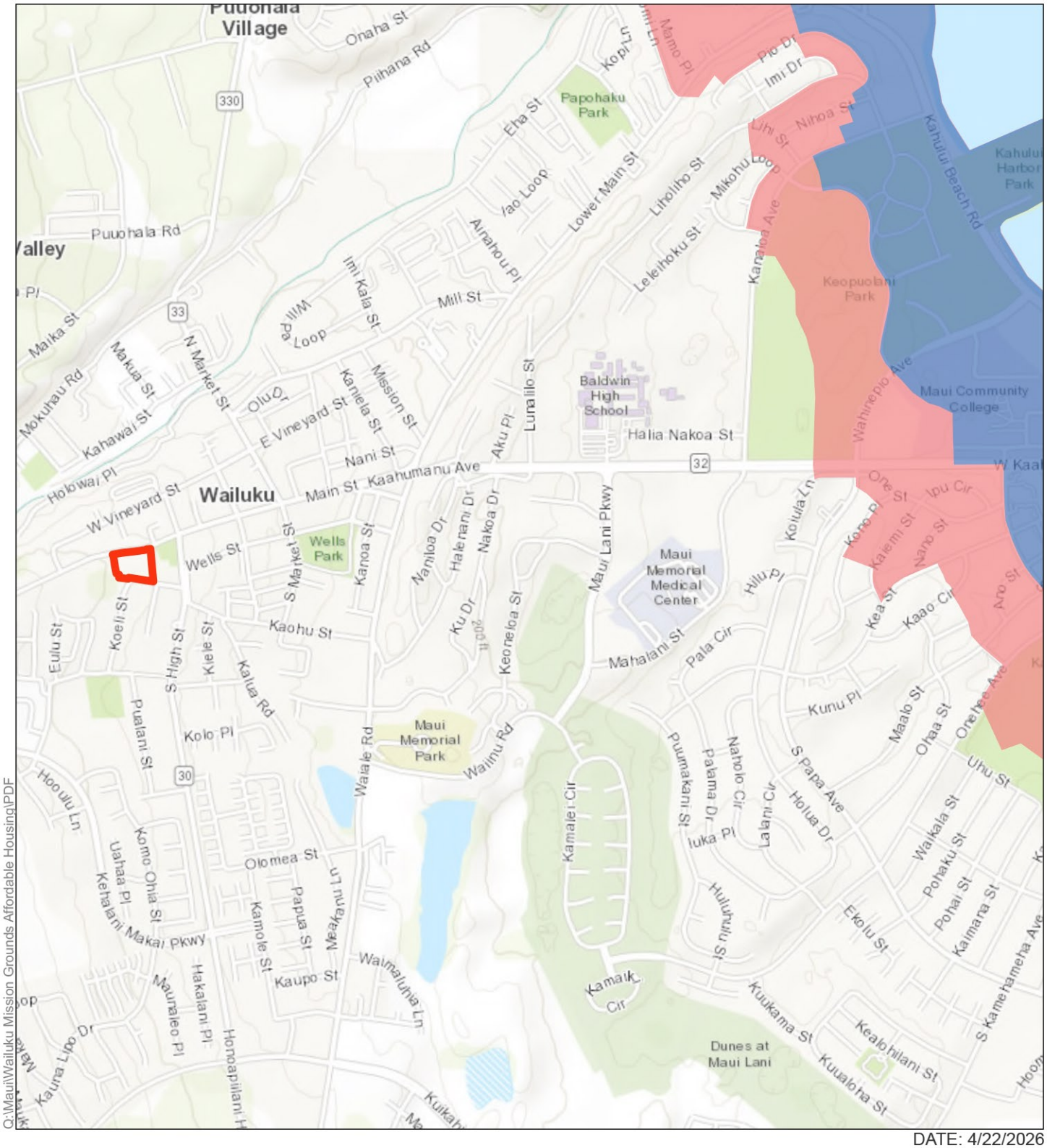
3.5.3 Hurricanes and Tropical Storms

Existing Conditions

Hurricanes and tropical storms have struck all major islands in the Hawaiian Island chain since the beginning of history. The first officially recognized hurricane in Hawaiian waters was Hurricane Hiki in August of 1950. Since 1982, four devastating hurricanes have impacted Hawai'i—Hurricane 'Iwa in 1982, Hurricane 'Iniki in 1992, Hurricane Iselle in 2014, and Hurricane Lane in 2018. While it is difficult to predict these natural occurrences, it is reasonable to assume that future events could occur.

Potential Impacts and Mitigation Measures

The Project will not exacerbate any hazardous conditions related to hurricanes and tropical storms. The Project site is in FIRM Zone X, areas outside the 0.2 percent annual chance floodplain (Figure 17). The Project site is also approximately 1.8 miles from the shoreline and approximately 360 feet AMSL.



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LEGEND

- Property
- Tsunami Evacuation Zone
- Extreme Tsunami Evacuation Zone

Figure 18:
Tsunami Evacuation Zones
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet) 0 750 1500

PBR HAWAII & ASSOCIATES, INC.

Source: County of Maui, 2013 & 2016. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

Nevertheless, to mitigate potential hazards from hurricanes, structural elements in the Project will be designed in accordance with the 2018 International Building Code (IBC), as amended by the State of Hawai‘i Building Code and further amended by the Maui County Building Code (Chapter 16.26C, MCC). These adopted codes establish the minimum design criteria necessary to address potential damage from seismic and hurricane forces.

The No Action Alternative would not have a discernable impact on the susceptibility of the Project site to hazardous conditions from hurricanes and tropical storms.

3.5.4 Sea Level Rise and Climate Change

SLR is one of many growing concerns associated with global climate change and can be especially taxing on the limited resources of island ecosystems. Coastal areas are extremely vulnerable to SLR, which poses a threat to the long-term safety and operation of drinking water, wastewater, and stormwater infrastructure for cities and communities in coastal regions. In addition, changing climate patterns, extreme weather events, and SLR can affect the climate patterns, magnitude of wind, flood, and rain impacts, and storm surges in coastal regions (Hawai‘i Climate Mitigation and Adaptation Commission, 2021).

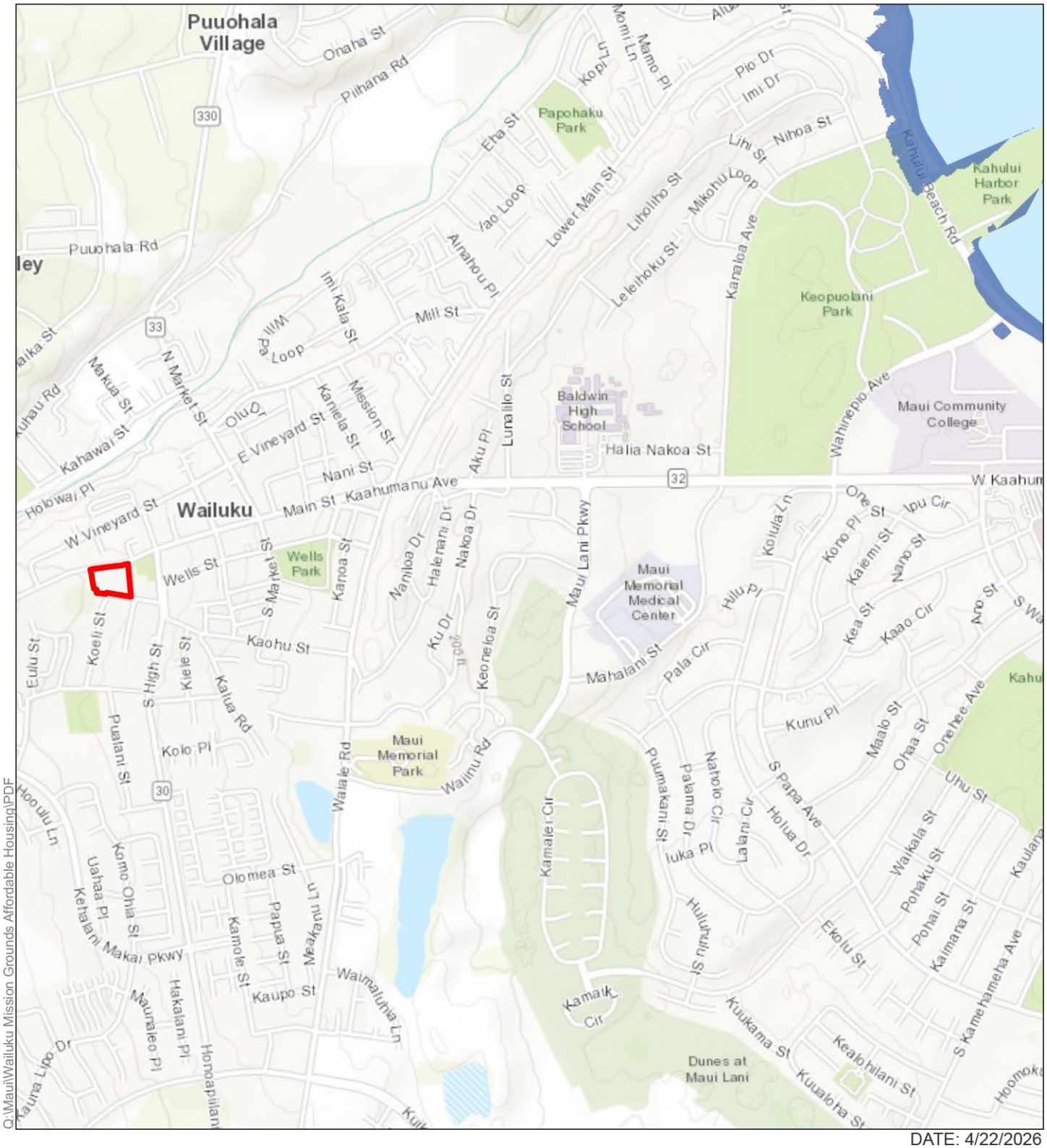
The greatest immediate threats to Project from SLR and climate change include increased intensity of weather patterns, hurricanes, flooding events, and damage to structures and vital infrastructure serving the Project site. While it cannot be known for certain how the area will be affected by SLR and climate change in the future, scientific models for potential climate change factors have been considered for the location of the Project site.

The UH Sea Grant program adopted one meter (3.2 feet) of SLR by 2050 as the most likely scenario for expected SLR for the Hawaiian Islands based on the best available science. Maui County formally accepted a one meter of SLR by 2050 in a proclamation by Mayor Arakawa in February 2018. The proclamation acknowledges the Sea Level Rise Exposure Area (SLR-XA) model of 3.2 feet and directs County Departments to use one meter of SLR in plans, programs, and capital improvement decisions. Figure 19 shows this inundation in the SLR-XA map for 3.2 feet of SLR. (Hawai‘i Climate Mitigation and Adaptation Commission, 2021).

Potential Impacts and Mitigation Measures

At 355 feet AMSL, the site elevation is high enough that direct inundation due to the projected SLR is not anticipated to directly affect the Project in the next 80 years. Adaptation and resiliency measures should be considered for improving the safety of future users and longevity of the proposed facilities, landscaped areas, and essential infrastructure serving the Project, such as water, sewer, electrical, drainage, and roadways as secondary impacts from global climate change, such as extreme weather events or worsening SLR may still impact the Project. The Project is most at risk of damage from extreme weather events and the loss of service to critical infrastructure. The Project, including all structures, landscaping, and vital infrastructure, should be designed to withstand water inundation and extreme weather events wherever feasible.

As shown in the SLR-XA map (Figure 19), the Project is over 1.8 miles inland and is not in an area at risk in the 3.2-foot SLR inundation scenario.



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LEGEND

- Property
- Sea Level Rise Exposure Area (3.2 ft Scenario)

Figure 19:
Sea Level Rise Exposure Area
Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North

Linear Scale (feet)
0 750 1500

Source: University of Hawaii Coastal Geology Group & Tetra Tech, Inc., 2017. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

PBR HAWAII & ASSOCIATES, INC.

The No Action Alternative would not have a discernable impact on the susceptibility of the Project site to SLR as the Project site is not in an area at risk in the 3.2-foot SLR inundation scenario.

3.6 FLORA AND FAUNA

Existing Conditions

The Project site has been disturbed from its original natural environmental conditions for over a century. According to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map, within the Project site, there are no wetlands or open bodies of water (Figure 16), although there is a riverine that runs approximately 200 feet west of the western boundary of the Project site. There is no critical habitat for endangered or threatened species within the vicinity of the Project site (Figure 20).

When construction of the Project is complete and permanent landscaping is installed, it is possible that the State-listed Hawaiian Hoary Bat or ʻŌpeʻapeʻa (*Lasiurus cinereus semotus*) could potentially occur at or in the vicinity of the Project site, especially in woody vegetation. In addition, native seabirds such as the ʻuaʻu kani (wedge-tailed shearwaters, *Ardenna pacifica, Puffinus pacificus*) and the endangered ʻuaʻu (Hawaiian petrels, *Pterodroma sandwichensis*) may fly over the Project site between their upland burrows and the sea.

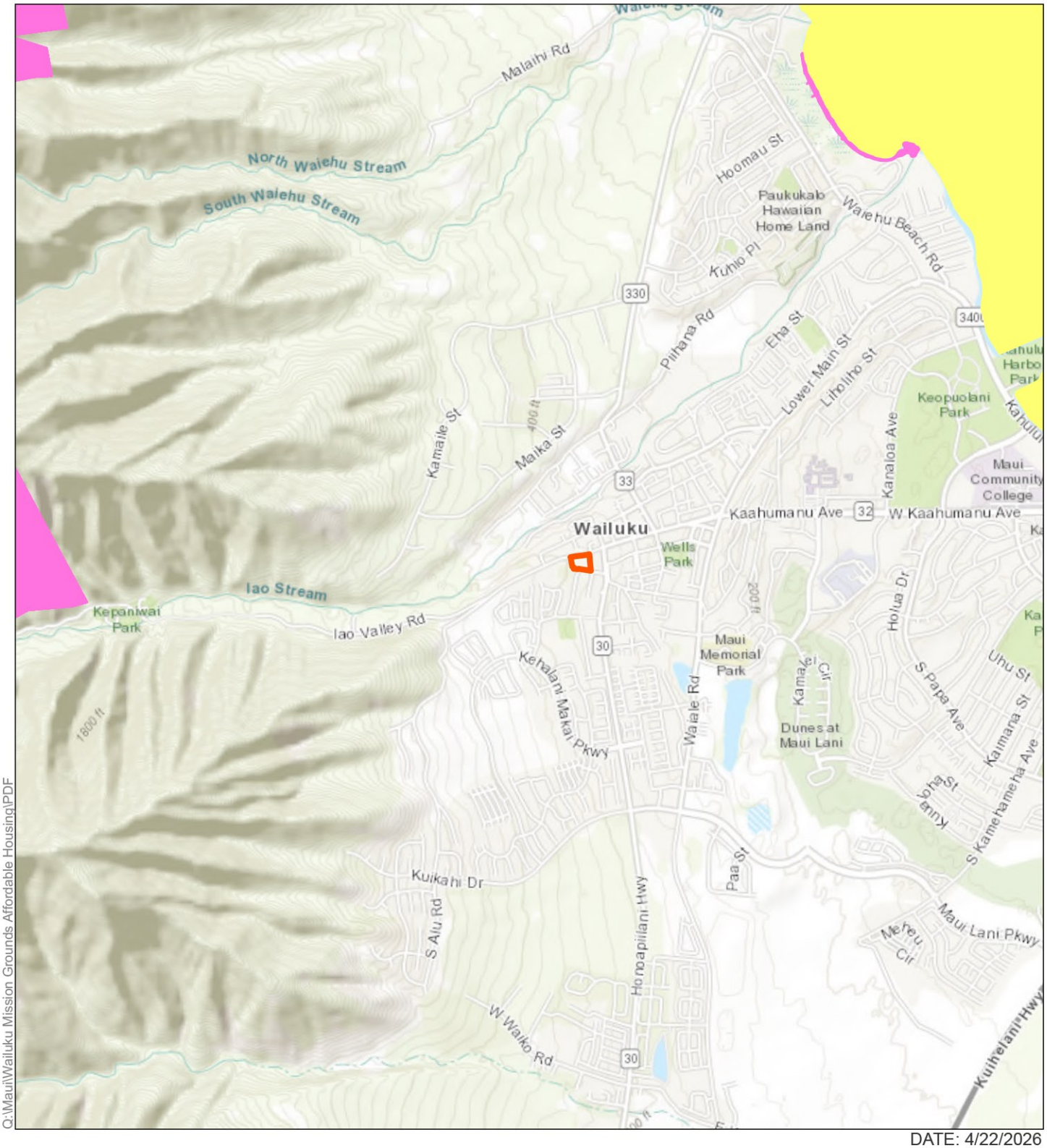
Potential Impacts and Mitigation Measures

To avoid and minimize impacts to the endangered ʻŌpeʻapeʻa, no barbed wire is proposed for the Project, including during construction. Woody plants greater than 15 feet tall will not be disturbed, removed, or trimmed during the birthing and pup-rearing season (June 1 through September 15).

To avoid impacts to native seabirds, all outdoor lighting will be fully shielded in compliance with Chapter 20.35, MCC, which provides standards to limit degradation of the night visual environment by minimizing light glare, pollution, and trespass through regulation of the type and use of outdoor lighting. Nighttime construction (if necessary) that requires outdoor lighting will be avoided during the seabird fledging season (September 15 through December 15) and, if needed, will only use fully shielded, downward-facing seabird-friendly lighting. If Nēnē are observed within the Project area, especially during Nēnē breeding season (September through April), all construction work will cease, and a biologist familiar with Nēnē nesting behavior will be contacted to survey for nests in and around the Project area.

Plant and soil movement will be minimized where possible between worksites for construction activities and excess soil and debris will be removed from all equipment, materials, and personnel to avoid the risk of spreading invasive species. Native plants will be incorporated into the Project's landscaping, particularly those that are adapted to the area's climatic conditions. No invasive plants will be planted within the Project site.

The No Action Alternative would not involve construction or ground-disturbing activities that have the potential to affect biological resources other than routine maintenance of the existing Mission Grounds site.



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DATE: 4/22/2026

LEGEND

- Property
- USFWS Animals, Insects, and Plants Critical Habitat
- NOAA Hawaiian Monk Seal Critical Habitat

Figure 20:
Critical Habitat

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet)

0 1500 3000

PBR HAWAII & ASSOCIATES, INC.

Source: USFWS, 2024. NOAA, 2022. ESRI Online Basemap.

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

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4 DESCRIPTION OF THE HUMAN ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES

This section describes the existing conditions of the human environment, potential impacts of the Project, and the preliminary mitigation measures to minimize any impacts.

4.1 ARCHAEOLOGICAL AND HISTORIC RESOURCES

Existing Conditions and Historic Background

The Project site is in the ʻili kūpono of Peʻepeʻe, Wailuku Ahupuaʻa, Wailuku Moku, Maui Mokupuni. The Wailuku Ahupuaʻa stretches from ʻĪao Valley down to Kahului Bay between Paukūkalo and Kapukaulua, which made up almost half of the historic boundaries of the Wailuku Moku, or "district." Wailuku has a significant history for the early days of Hawaiʻi as a place where chiefs were buried, and many historic battles took place.

The core of Wailuku was ʻĪao Valley and its associated dunes to the north and south sides of the ʻĪao River. The environmental conditions of the lower ʻĪao Valley were ideal for the natural growth Maui's religious and political center; the soils of the lower valley supported agriculture, a consistent water supply came from the ʻĪao River, and the proximity of Kahului Bay provided easy access to essential marine resources. The culmination of these factors during the time of Piʻilani (around 1600 AD) established Wailuku as Maui's center for religious and political power. The high chief Piʻilani unified the Maui districts through warfare, which each succeeding generation of chiefs also struggled through to secure their political dominance of Maui Island. Warfare increased even more toward the late pre-contact period as chiefs from Maui, Oʻahu, and Hawaiʻi sought political and military dominance. Intense warfare was an integral part of the political landscape all the way through the late 1700s during the reign of the last powerful chief of Maui, Kahekili. By 1790, Kamehameha the Great moved in on Kahekili's political domain. With the help of muskets and cannons provided by contact with foreigners, Kamehameha defeated the Maui ruler in ʻĪao Valley.

The early period of sugar production that began in the early 1800s sparked a collaboration between Kamehameha III and foreign influences and started the sugar plantation era that continued into the middle of the twentieth century. The increase in sugar production also brought a need for irrigation and labor, which further altered the traditional landscape of Wailuku. Ditches were dug stretching for miles to transport water from deep in the mountains to the plantations within the Kahului isthmus. The sugar plantation era continued to thrive through the nineteenth and twentieth centuries. Wailuku Sugar Company eventually closed in 1988 after hitting peak production in the 1970s, with other sugar companies following a similar trend.

During the latter years of the monarchy and early years of the territory, Wailuku Town became the financial and political center of the island, which included the establishment of Maui's County seat in Wailuku in 1905. Further growth of the businesses and legacies started by former sugar plantation workers continued throughout the twentieth century.

The Project site is within Historic District No. 3. The Maui County Historic Districts Ordinance (Section 19.50.030, MCC) that established Historic District No. 3 in 1970 states "The purpose of this district is to

preserve and protect the several well-preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of Maui County."

The 1969 Wailuku Historic District Map (Figure 11), identifies all structures in Historic District No. 3 as "Historic Structures." However, Section 19.50.030, MCC, only identifies the following as historic structures and sites in Historic District No. 3: Kaʻahumanu Church, Alexander House, the two buildings known as Hale Hōʻikeʻike, or Bailey House and annex, and Kama Ditch and aqueduct. Only Alexander House is within the Project site. Figure 12 shows Historic District No. 3 existing conditions, including the historic structures and sites designated under Section 19.50.030, MCC and structures that have been demolished since 1969. Figure 13 shows Historic District No. 3 with the Project.

MASON prepared an RLS of the WUC Mission Grounds. This survey was prepared in response to the State Historic Preservation Division (SHPD) Section 6E-42, HRS review of the Project (Hawaiʻi Cultural Resource Information System (HICRIS) Project Number 2018PR26759) and request for an RLS. MASON surveyed the Mission Grounds primary buildings and structures [TMK: (2) 3-4-014:005], Historic District No. 3 buildings and structures, and the buildings and structures within an approximate 150-foot radius surrounding the WUC Mission Grounds. These buildings and structures were then evaluated against Section 13-275-6, HAR Significance Criteria a-d. Of the four buildings within the Project area (Alexander House, Baybrook House, Kennen House and ʻĪao Parsonage), three were evaluated as significant and one (the ʻĪao Parsonage) does not meet the HAR Significance Criteria.

During the pre-assessment consultation process, the Historic Hawaiʻi Foundation provided additional information about WUC and the Project site:

> *For over 150 years, Wailuku Union Church has served as a place of worship and hub of social activity in the community and continues to fulfill this vital role today as one of Hawaiʻi's oldest church congregations. In addition to its church site, the Church owns the property between Main Street and Aupuni Street referred to as the Mission Grounds.*
>
> *In 1970, the County of Maui designated the area between Main Street and Aupuni Street from South High Street to the westerly boundary of the Wailuku Sugar Manager's property as Historic District No. 3. "The purpose of this district is to preserve and protect the several well preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of Maui county."*
>
> *"The historic district ordinance identifies the following historic properties: the 1830-1850 Bailey House (also known as Hale Hōʻikeʻike), and the 1837 former Wailuku Female Seminary dining hall (identified in the ordinance as the Bailey House Annex), the 1836 Alexander House, and the 1876 Kaʻahumanu Church. The thread that binds these properties is their association with Protestant missionaries who arrived in Hawaiʻi from New England in 1820 and established an official mission station in Wailuku as early as 1832. While not explicitly named in the ordinance, the district also includes: several plantation-era dwellings associated with the Alexander and Bailey houses and Kaʻahumanu Church; a 1974 canoe hale and restroom building associated with the Bailey House; an early twentieth century hall associated with Kaʻahumanu Church; the 1931 Territorial Office Building; a cemetery; and several other historic properties."*
>
> *Also located in the Historic District is the Kama ʻAuwai, an important Hawaiian irrigation system which predates the establishment of the mission grounds. " ʻAuwai employed throughout Hawaiʻi to carry water from streams to loʻi and varied in length and width. Larger ʻauwai were often named*

after an aliʻi nui (as was the case for Kama ʻAuwai) or the land with which they were most closely associated.

Several properties in this district are also listed in the National Register of Historic Places, including Kaʻahumanu Church, Bailey House (also known as Hale Hōʻikeʻike), and the Territorial Office Building.

Previous Archaeological Findings

Cultural Surveys Hawaiʻi prepared a Draft Archaeological Inventory Survey (AIS) Report in November 2014 for the proposed Maui County Employee Parking Lot Project, which comprised roughly the eastern third (0.96 acres) of the 2.66-acre Mission Grounds site. AIS fieldwork included a full pedestrian survey and 14 shovel probes that were manually excavated. The Draft AIS Report identified four historic properties that were recommended as eligible for listing on the State Register of Historic Places, including three boundary walls (State Inventory of Historic Places (SIHP) 50-50-04-8018, 8019, and 8020) and a cultural material scatter (SIHP 50-50-04-8021). The Draft AIS Report found that the project was not anticipated to have an adverse effect on the three boundary walls. However, the project may have the potential for effect on potentially significant information that may be present at existing grade for SIHP 50-50-04-8021.

Although the Maui County Employee Parking Lot Project did not proceed further, and the Draft AIS Report was not finalized, the findings of the Draft AIS Report and SHPD's recommendations may help to inform the scope of fieldwork that may be required for the Project, particularly the number and location of controlled subsurface excavations that may be required by SHPD.

To minimize unnecessary ground disturbances, Cultural Surveys Hawaiʻi conducted a ground penetrating radar (GPR) survey for the Project site (Appendix E). The GPR survey was conducted as a preliminary study to potentially identify subsurface anomalies within the accessible portions of the project area. This GPR survey is intended to assist in the determination of whether an AIS is required for the Project.

If an AIS is required, this GPR survey may be useful to determine the scope of the AIS fieldwork for this project, specifically the number and location of controlled subsurface excavations that may be required by the SHPD to fulfill the requirements of Section 13-13-276, HAR (identify, document, and assess significance of any historic properties).

The GPR survey identified six subsurface anomalies within the survey area. Five of these anomalies were identified as rectangular or linear objects that were easily distinguished from the surrounding soil matrix. No other information could be determined about these five subsurface anomalies other than an approximate depth. The sixth subsurface anomaly was identified as a possible filled ditch based on surface evidence of a noticeable swale that extended from a possible buried culvert. None of the six anomalies could be correlated with objects or structures depicted on historic maps of the area.

In addition to the six subsurface anomalies, the GPR survey identified seven sections of buried metal pipes that may relate to active or abandoned utilities. The changes in soil compaction of the two dirt/gravel access roads within the survey area were also observed in the GPR data.

Cultural Surveys Hawaiʻi transmitted a copy of the GPR survey to SHPD for its review and comments (HICRIS Project Number 2018PR26759). By a letter dated April 30, 2018, SHPD provided the following comments: "The results presented in the report provide information about the location and depth of six

anomalies. The survey helps to establish the probability of encountering buried archaeological features across the project area. Once the relevant permit application and design plans are forwarded to SHPD for review, recommendations will be better informed." Appendix F contains the SHPD letter.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, several community members and organizations raised concerns about the Project's location within Historic District No. 3 and potential effects on historic resources. Commenters emphasized that Historic District No. 3 is the last remaining intact historic district in Maui County. While commenters supported the rehabilitation and adaptive use of the Alexander House and Baybrook House, concerns were raised regarding potential adverse effects from the proposed type and intensity of new construction in a historic district characterized by viewsheds, open space, and mature trees.

Compliance with MCC

Commenters noted that multifamily housing is not a by-right use in Historic District No. 3 and that Residential Planned Developments must meet specific building height and spacing regulations under Section 19.52.100, MCC. Concerns were raised that the pre-assessment consultation materials did not provide sufficient detail to demonstrate how the Project would meet regulatory restrictions for Historic District No. 3, including required setbacks of at least 100 feet for two-story buildings and 60 feet for one-story buildings from designated historic structures. Commenters requested that the Draft EA provide detailed information on how the site plan, landscape plan, elevations, architectural footprint, scale, height, style, materials, detailing, and other plan components will be consistent and compatible with historic district character and the regulations developed to protect it.

Density and Scale

Without reviewing a complete set of Project plans, commenters expressed concern that applying the required setback and spacing requirements of Historic District No. 3 would result in inappropriate intensity and scale of development for the historic district.

Historic Setting and Open Space

Concerns were raised about converting the Historic District's open park-like setting around multiple National Register and locally-designated historic properties into private residential space. Commenters stated this would be inappropriate and would compromise the public open-space character that contributes to Historic District No. 3's historical significance. Commenters also stated that the Project could separate historic structures—including the oldest missionary church, parsonage, cemetery, and Territorial Courthouse from the Bailey Mission and seminary annex—thereby disrupting the historical context of the "Mission Grounds" within Historic District No. 3.

Architectural Compatibility

Comments emphasized that new construction within Historic District No. 3 must meet the Secretary of the Interior's standards for infill construction, as required by MCC. Commenters noted that contributing buildings must not be isolated from one another by new construction and that new construction visible and in close proximity to historic buildings must be subordinate to those buildings. Concerns were expressed that architectural design must be compatible with the graceful New England missionary style that characterizes existing historic structures in the district, rather than appearing modern or out of character.

Tree Preservation

Commenters highlighted that MCC requires preservation of significant trees deemed invaluable to the historical setting of the district and expressed concern about how many trees would be affected by proposed buildings and site modifications.

Review Process

Comments emphasized the importance of following all applicable rules for Historic District No. 3, including review and approval by the Maui County Cultural Resources Commission, and stated that affordable housing exemptions should not be used to avoid historic district requirements or other State and County regulations.

As the Project is in Historic District No. 3 (Figure 11), Section 19.50.030, MCC is the applicable MCC code section. Section 19.52.010.D, MCC provides guidance on the appropriate architectural styles in Historic District No. 3. Section 19.52.100, MCC provides the land use and development standards that apply to Historic District No. 3.

As described below, the Project complies with the applicable portions of Sections 19.52.010, MCC:

A. *The exterior of all new buildings constructed within a historic district shall be constructed to meet the Secretary of the United States Department of the Interior's standards for infill construction, and shall reflect the architectural style of the district so as not to impair the value of other buildings, structures, or parks in the immediate vicinity in order that the general character of the district shall not be injured.*

The reference to the Secretary of the United States Department of the Interior's Standards for infill construction is not entirely clear as the Secretary of the Interior's Standards for the Treatment of Historic Properties most likely refers to the Secretary of the Interior's Standards for Rehabilitation—codified in 36 Code of Federal Regulations (CFR) Part 67—which are regulatory for the Federal Historic Preservation Tax Incentives program, and are the "Standards" most often used by states, counties, and cities nationwide to provide direction in making appropriate choices in planning the repairs, alterations, and additions that are part of a rehabilitation project and evaluating potential impacts to historic resources.

Separate from the Secretary of the Interior's Standards for Rehabilitation, the Secretary of the Interior's Standards for the Treatment of Historic Properties offers four sets of guidelines—Preservation, Rehabilitation, Restoration, and Reconstruction—that apply the Standards and describe specific treatments that do and do not meet the Standards. Notably, the Secretary of the Interior's Standards for the Treatment of Historic Properties does not offer a specific set of guidelines for infill construction. Assuming that Section 19.52.010, MCC is referring to the Secretary of the Interior's Standards for Rehabilitation, the most applicable language regarding new construction comes from Standards 9 and 10:

9. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

As shown in Figure 5, the Project includes three, two-story rectangular-shaped structures totaling approximately 51,549 square feet. The three structures will be behind the existing primary structures on the Project site—Alexander House and Baybrook House—by roughly 60 feet. The placement of the structures also observes the required 15-foot front yard setback and 10-foot rear and side yard setbacks. To preserve open space and sightlines from Main Street to Aupuni Street, the structures are sited in a slightly offset, north-south orientation. The long facades are broken into three distinct sections using subtle massing offsets in plan and elevation view. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding. Appendix B (Conceptual Architectural Plans) contains elevations that illustrate the massing offsets.

The Project's use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings' size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3. Moreover, as new structures are carefully sited, oriented, and set back from Alexander House and Baybrook House, they respect and preserve the historic setting and view planes of the Project site.

The Project is designed to be compatible with the surrounding historic structures on the Project site and Historic District No. 3. The Project will rehabilitate the two more notable primary structures on the Project site, Alexander House and Baybrook House, both of which are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Both the Alexander House and Baybrook House are also identified as "Historic Structures" on the Wailuku Historic District map (dated July 11, 1969).[2] Alexander House is proposed to be used as a multipurpose center and Baybrook House is proposed to be used as management offices. EAH Housing is working carefully with their historic architect, MASON, to preserve the character-defining features of both historic structures while adaptively reusing both structures as on-site resident amenities.

The two structures that are proposed to be removed—Kennan House and ʻĪao Parsonage—were evaluated in a RLS performed by MASON (Appendix G). Although found to be a contributing element to Historic District No. 3 and identified as a "Historic Structure" on the Wailuku Historic District Map (dated July 11, 1969), Kennan House, constructed in 1928, was found to be ineligible for listing as an individual resource as it has fallen into a state of disrepair. Therefore, any restoration or rehabilitation efforts would be extremely costly and time-consuming. For safety reasons, Kennan House is currently vacant and unused. The Project's introduction of affordable housing, replacing the uninhabitable Kennan House, provides a net positive outcome for the Wailuku community.

Kennan House is set back approximately 200 feet from Main Street and historically functioned as an accessory structure (pastor's residence) to the WUC Grounds. Kennan House's historic accessory use is

[2] Wailuku Historic District Map (dated July 11, 1969), identifies all structures in Historic District No. 3 as "Historic Structures". However, Section 19.50.030, MCC, only identifies the following as historic structures and sites in Historic District No. 3: Kaʻahumanu Church, Alexander House, the two buildings known as Hale Hōʻikeʻike, or Bailey House and annex, and Kama ditch and aqueduct. Only Alexander House is within the Project site.

reflected in its diminutive size; use of simple materials and design; orientation toward the center of the Project site; and placement toward the rear of the lot (Main Street is considered the primary frontage). Except when viewed at a distance from Aupuni Street, it is largely screened from view from public rights-of-way by mature trees. As such, the removal of Kennan House would not constitute a significant loss of historic materials or character to the Church Grounds or Historic District No. 3. Any loss of historic materials would be largely offset by the Project's substantial contribution of affordable housing.

'Īao House was not found to be eligible for listing in the National or State Registers of Historic Places as it does not possess sufficient architectural significance or character. The Project will rehabilitate the two more notable primary structures on the Project site, Alexander House and Baybrook House. Alexander House is proposed to be used as a multipurpose center and Baybrook House is proposed to be used as management offices.

As shown in Figure 5, the three new structures are in a largely undeveloped portion of the Project site and are sited in a way that preserves open space and sightlines. Therefore, should the new structures be removed in the future, the essential form and integrity of the historic property and its environment would not be impaired.

B. New buildings constructed within a County historic district and the Lahaina Historic District (National Historic Landmark) shall not substantially impair the public view plane, including public view planes from the ocean.

The Project does not substantially impair the public view plane, including view planes from the ocean. As shown in Figure 5, buildings are carefully sited in a way to maintain existing views and open space across the Project site. As the Project site is in a highly urbanized area, almost two miles from the ocean, there are no existing public views of the ocean to preserve.

D. For historic district no. 3, all new buildings or structures shall be of an architectural style compatible with the architectural styles of those historic buildings listed in section 19.50.030 of this title. The architectural style shall not be limited to any particular style or styles; however, certain architectural styles and certain architectural elements that shall not be allowed in historic district no. 3 are as follows:

a. European and Asian styles in general;
b. Excessively decorated styles;
c. Flat-roofed, modernistic styles;
d. Styles, forms, colors, and lighting that are gaudy; and
e. Large areas of reflective materials such as glass and aluminum, unless completely in the shade at all times. Visible alternative energy systems may be allowed with the approval of the cultural resources commission.

The three new residential buildings are not easily defined by a single architectural style. Rather, they contain certain architectural elements that may be associated with different architectural styles. For example, the board and batten siding on second floors is commonly associated with Hawai'i plantation style and Victorian style homes, American Colonial style cottages, and farmhouses. Board and batten siding can be found on the Baybrook House and several other structures in the Wailuku Historic Civic District, including 207 'Awapuhi Place and 2333 Aupuni Street. At the same time, the Project's hipped roof forms are

reminiscent of nearby historic structures including the Wailuku Female Seminary Dining Hall, Wailuku Plantation Manager's House and Garage, the Territorial Building, and the Wailuku Public Library. The buildings' cantilevered second floors are reminiscent of a Mid-Century Modern architectural style, popular in Hawai'i's post-war/Statehood era. The proposed structures do not contain architectural features in European or Asian styles. The proposed architectural elements, such as windows and siding, are simple, and not overly decorative. Materials are simple wood, metal, or composite, finished in a natural brown-grey color palette. No reflective or glossy materials/finishes are proposed.

According to Section 19.52.100.B, MCC, the following uses are allowed in Historic District No. 3 with written approval of the Cultural Resources Commission:

1. *"Museums, art galleries, and book or gift stores; provided, that the use is operated as an accessory to the exhibit and display of the historic structures designated in section 19.50.030;*
2. *Day care centers, nurseries, preschools, kindergartens;*
3. *Cultural societies, clubs, or fraternal organizations;*
4. *Off-street parking areas; provided, that none shall abut any public street;*
5. *Residential planned developments; and*
6. *Other uses that will enhance the historical and cultural nature of this district."*

The Project includes 85 homes (as a Residential Planned Development) and accompanying off-street parking. Pursuant to Section 19.52.100.B, MCC, these uses require approval from the Cultural Resources Commission. The applicant intends to seek an exemption from the requirements of Section 19.52.100.B, MCC, pursuant to Section 201H-38, HRS. However, the applicant intends to present the Project to the Cultural Resources Commission and seek their input. The Project meets all other regulations of Historic District No. 3 set forth by Section 19.52.100, MCC.

The applicant also intends to seek an exemption from the requirements of Section 19.52.100.C, MCC, pursuant to Section 201H-38, HRS. Section 19.52.100.C, MCC, requires new, two-story buildings to be separated from historic buildings by at least 100 feet. As proposed, the three new buildings are set approximately 60 feet from the historic Alexander House and Baybrook House.

The Project site does not contain any exceptional trees as defined in the MCC. The Project site contains 16 mature trees that will be removed and four mature trees that will be preserved. To complement these trees and enhance the park-like setting of Historic District No. 3, the Project will incorporate landscaping with Native Hawaiian plants and 54 new trees. Additionally, the Project will include resident garden areas and outdoor gathering spaces to foster interaction among residents, while promoting sustainable, local food production. Approximately 70 percent of the Project site will be retained as open space.

Although archaeological and historic resources are not expected to be encountered upon ground disturbance, the applicant will consult with SHPD to satisfy the requirements of Chapter 6E, HRS. Furthermore, in the event that cultural or archaeological resources are discovered during ground-disturbing activity associated with the Project, work will cease in the area of the discovery and SHPD will be contacted pursuant to Section 13-280-3, HAR.

Prior to submitting for a grading permit, additional subsurface testing will be performed to further evaluate the potential archaeological resources that may be present on the Project site The results and analysis of subsurface testing will be documented in an AIS that follows Chapter 13-276, HAR. The AIS will be transmitted to SHPD for its review, comment, and approval.

Under the No Action Alternative, existing historic structures would continue to be leased to tenants while naturally deteriorating in their current state. Notably, WUC would not have the financial resources to appropriately rehabilitate the structures according to the Secretary of the Interior's Standards for Rehabilitation. Eventually, the historic structures would be deemed unsafe for residential or commercial use and would have to be demolished. Additionally, new construction would not occur on the Mission Grounds site and it would continue to function as open space in Historic District No. 3. However, with diminishing financial means, WUC may not be able to maintain the Mission Grounds and vegetation may become overgrown.

4.2 CULTURAL RESOURCES

A Cultural Impact Assessment (CIA) was prepared by the County of Maui for The Hālau of ʻŌiwi Art Final EA/FONSI (County of Maui, 2023). The Hālau of ʻŌiwi Art is a few blocks away from the Project site at 30 North Church Street (TMK (2) 3-4-013: 051). Therefore, the CIA's background information and historical findings are generally applicable to the Project. According to the CIA, the word Wailuku literally translates into the "waters that destroy," and is the name of one of the four *wai*, or waters, of Nāwaiʻehā—Wailuku, Waikapū, Waiehu and Waiheʻe (Pata & Pimentel, 2022). Wailuku also became the name for the district and was inspired by the great battle that occurred there between ʻAʻapueo and the owls and Kapoi, his wife, and Chief Kanēnēnuiakawaikalu and his army. Pata and Pimentel recount "Ka Moʻolelo Kaʻao o ka Hoʻouka Kaua o nā Pueo, a Luku ʻia nā Kānaka me nā Aliʻi o Maui [The Historic Tale about the Waging of War by the Owls, and How the People and Chiefs of Maui were Destroyed]:"

> *It is said that the owls all arrived on the night of Kāne. They were encamped everywhere. The battle was launched in Wailuku at the dawning of Lono. Nothing can compare to the tremendous nature of this war waged between the owls, the commoners, and chiefs and there were many human deaths at Nā Wai ʻEhā. And indeed Kapoi and his wife were killed. Because of this destruction caused by the owls, this area is called Wailuku (Waters that Destroy) today. Concerning the darkening of the sun on this day because of the great number of owls that filled the sky, it is also said that this is the reason that the name Malu-a-ka-hēkuawa (The Shading of the High Cliffside Valleys) was first coined until this day.*

The region was therefore called Wailuku for centuries before the bloody battle of Kepaniwai in 1790 (Pata & Pimentel, 2022). In the naming of this war, Maluakahēkuawa, Pata and Pimentel note that "the kupuna embedded environmental observations into this *kaʻao* (legend) which served to alert their descendants of what to expect should they witness similar phenomena occurring in the sky."

> *The sky turned black with owls which stormed mercilessly down upon the people, slaughtering them all. The vivid depiction of this scene perhaps records a type of "hundred year flood." Caused by certain Kona weather systems which approach from the Ukumehame side of the mountain, the thick clouds darken the sky and obscure the high cliffside valleys in the region. The ensuing deadly storm is powerful enough to wash settlements and people away.* (Pata & Pimentel, 2022)

Modern Day Wailuku Town

Interviews captured in the CIA with Mrs. Wallette Pellegrino and Kumu Hula, Hōkūlani Holt, PhD, and Clare Apana revealed the convenience and diversity of businesses and activities in Wailuku during their youth. Mrs. Pellegrino shared:

> *Wailuku, in my opinion, was a complete town. You really did not have to go beyond the confines of Wailuku to do everything. I mean, if you look at our historical places, there's so many churches – big and small. … All of your doctors, dentists, …Maui Dry Goods and Grocery Limited, which is, again, where Hoapili Hale is. …also a car dealership, a stationery store, photography, and home goods. If you wanted to build a house, you go to Maui Dry Goods construction, whatever.*

Kumu Holt:

> *Within my lifetime – Wailuku was "the town." Kahului, not so much. Wailuku was "the town." Wailuku was where the bank, and the stores, and the school, Kahului yes, but Wailuku definitely was the center of government, the center of where you went to see your friends, to walk down Market Street, there were the stores, the Kress Store, the Ikeda Clothing – all of those things which the community – would have the theaters – so, where the community would come and circle.* (County of Maui, 2023)

Cultural Practices in Modern Day Wailuku

Despite all the challenges Native Hawaiians have historically faced, continuity in various Hawaiian cultural practices has existed within the 21 *'ili* of the report scope zone, and immediate vicinity beyond, from ancient times until the present. These include: 'Ohana living preferences; Hawaiian Kingdom holiday observations; observation of the 1893 Overthrow of the Hawaiian Kingdom; observation of State holidays that honor past *ali'i* and/or their actions; formal preservation and transmission of Hawaiian history; Hawaiian language church services and hymns; instruction through the medium of Hawaiian language; Hawaiian naming practices; transmission and presentations of formal and informal Hula; Hula competitions; various types of ceremonies; trainings in various types of ceremonial practices; traditional healing practices; *ho'oponopono* (traditional mediation) practices; *'aha'aina* and *lū'au* celebrations; Hawaiian music presentations and concerts; training in music and/or chant; *haku mele* (lyric/music composition); cross- and intergenerational transmission of cultural *mo'olelo*; intergenerational transmission of family histories; *lei* making; traditional fiber arts practices; featherwork; stone and wood working; traditional forms of farming and gardening; *kilo* (culture-based environmental observations) practices; *Makahiki* sports; access of the Wailuku River for recreation and fishing; traditional foods and forms of food preparation; Hawaiian culture-based rallies and demonstrations; *iwi kūpuna* protection and advocacy Hawaiian language courses; Hawaiian Studies courses; contemporary design and tailoring of Hawaiian attire; Aloha Festivals events; and, May Day performances.

Although the Project site is in Historic District No. 3, there are no active cultural sites, practices, or resources, on the Project site.

Potential Impacts and Mitigation Measures

As active cultural practices or cultural resources are not conducted or found within the Project site, impacts related to cultural practices and cultural resources are not expected. Nevertheless, the Project is designed to minimize the visual impact of the proposed density within the context of Historic District No. 3 and retain approximately 70 percent of the Project site as open space. The three new, two-story residential buildings will be set back approximately 60 feet from Alexander House and Baybrook House, respectively. Additionally, buildings will be spaced to retain open space and sightlines from Main Street to Aupuni Street. Native Hawaiian plants will be appropriately incorporated into landscaping wherever possible.

The facades of the new residential buildings will be broken into three distinct sections using subtle massing offsets in plan and elevation view. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding. The use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings' size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3.

Under the No Action Alternative, new construction would not occur and the historic integrity of Historic District No. 3 would be maintained. However, in the long term, without the financial resources to appropriately rehabilitate the existing historic structures according to the Secretary of the Interior's Standards for Rehabilitation, the historic structures would continue to deteriorate and eventually may be demolished due to a lack of structural integrity. Similarly, the landscaping of the Mission Grounds would become overgrown as WUC would not have the financial means to maintain the site.

4.3 TRANSPORTATION

Austin, Tsutsumi & Associates, Inc. (ATA) prepared a Traffic Impact Analysis Report (TIAR) to evaluate the potential traffic impacts resulting from the Project. Key conclusions from the TIAR are summarized below. Appendix H contains the complete TIAR.

4.3.1 Roadways and Traffic

Existing Traffic Conditions

Existing roadways in the vicinity of the Project include:

High Street, a north-south, two-way, two-lane, County roadway that begins to the north at its intersection with Vineyard Street and continues southward until its intersection with Keanu Street, where it transitions to Honoapi‘ilani Highway. The posted speed limit is 20 mph.

Main Street, an east-west, two-way, two-lane roadway that provides connectivity to commercial areas in Wailuku. Main Street begins to the east at its intersection with Lower Main Street and Ka‘ahumanu Avenue and continues westward where it splits into ‘Īao Valley Road and West Alu Road. Along Main Street in the vicinity of the Project, marked curbside parking is available. The posted speed limit is 20 mph.

Aupuni Street, an east-west, two-way, two-lane roadway that begins to the east at its intersection with High Street and transitions to southbound Koeli Street to the west. Marked parking stalls are along both sides of the roadway in the vicinity of the Project. There is no posted speed limit.

Wells Street, an east-west, two-way, two-lane roadway that begins to the east at its intersection with Wai‘ale Road and terminates to the west at its intersection with High Street. Wells Street provides access to many local businesses as well as access to Wells Park. Marked street parking is available along both sides of the roadway. The posted speed limit is 20 mph.

Kaohu Street, an east-west, two-way, two-lane roadway that begins to the east at its intersection with Wai‘ale Road and terminates to the west at its intersection with High Street. Kaohu Street provides

residential access, as well as access to ʻĪao School. Sharrows, raised crosswalks, and marked street parking are available along the roadway. The posted speed limit is 20 mph.

Malako Street, an east-west, two-way, two-lane roadway that begins to the east at its intersection with High Street and terminates to the west at its intersection with Lau Oliwa Loop.

Malako Street, which provides residential access and access to Wailuku Elementary School. Speed bumps, crosswalks, and unmarked street parking are available along the roadway. There is no posted speed limit.

Based on the proximity to the Project site, the TIAR analyzed seven intersections:

- High Street & Main Street (signalized)
- High Street & Wells Street (unsignalized)
- High Street & Aupuni Street (unsignalized)
- High Street & Kaohu Street (unsignalized)
- High Street & Malako Street (unsignalized)
- Main Street & Project Driveway East (unsignalized)
- Main Street & Project Driveway West (unsignalized)

Based on the traffic count data the TIAR determined the:

- AM peak hour of traffic occurs between 7:00 AM – 8:00 AM; and
- PM peak hour of traffic occurs between 3:45 PM – 4:45 PM.

The morning peak-hour traffic conditions are heavily influenced by Wailuku Elementary School drop-off operations, which occur between 7:00 AM and 8:00 AM and directly overlap with the AM peak hour.

The school's traffic circulation plan converts streets around campus, including Malako Street and Koeli Street, into one-way roads during drop-off and pick-up periods. Parents turn off High Street onto Malako Street for drop-offs at assigned gates along Malako Street and Koeli Street, then use Aupuni Street to return to High Street.

During the AM peak hour, a police officer is stationed at the unsignalized High Street/Aupuni Street intersection starting around 7:25 AM to assist heavy volumes of school traffic in turning onto High Street, while a crossing guard is stationed at the High Street/Malako Street intersection to facilitate pedestrian crossings across High Street.

The interruptions to mainline High Street traffic caused by the police officer directing traffic at High Street/Aupuni Street result in southbound queues that spill back through the Main Street intersection and sometimes block turning and through movements onto southbound High Street. The interruptions to mainline High Street traffic caused by the police officer directing traffic at High Street/Aupuni Street result in southbound queues that spill back through the Main Street intersection and sometimes block turning and through movements onto southbound High Street.

When movements onto southbound High Street are blocked, the westbound left-turn movement at the High Street/Main Street intersection spills out of the left-turn pocket and blocks access to the eastbound shared through/right-turn lane. In the northbound direction, the queue from the High Street/Aupuni Street

intersection extends back through the Malako Street intersection to Kehalani Mauka Parkway at its maximum extent. These congestive conditions dissipate by 8:00 AM after school operations conclude.

During the PM peak hour, the flow along High Street in both the northbound and southbound directions is generally acceptable, with temporary queues periodically forming due to pedestrian crossings and vehicles turning along mainline High Street stopping in the single travel lane to yield to oncoming traffic. Field observations also noted that mainline High Street traffic sometimes stops in the travel lane to yield to vehicles on minor streets, which contributes to some instances of congestion along High Street. Overall, these queues clear quickly as pedestrian crossings are completed and turning vehicles can complete their movements.

The TIAR analysis shows that all movements at all study intersections operate at Level of Service (LOS) D or better across both peak hours, with two notable exceptions:

- The westbound approach at the High Street/Wells Street intersection operates at LOS E during the PM peak hour, and
- The westbound left-turn movement at the High Street/Kaohu Street intersection operates at LOS F during the AM peak hour and LOS E during the PM peak hour.

However, the interruptions in flow along High Street result in variability in throughput that causes queue spillback and worsens actual operating conditions beyond what the LOS analysis indicates.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, several neighbors and government agencies (State of Hawai‘i Department of Transportation (HDOT) and County of Maui Department of Transportation (MDOT)) expressed concerns about the Project’s impacts on neighboring roads and traffic.

Neighbors noted that the neighborhood is already extremely congested during weekday mornings and afternoons during school drop-off and pick-up hours when the traffic officer manages traffic at the High Street/Aupuni Street intersection. Concerns were raised that the addition of Project-related traffic, during construction and operation, would exacerbate existing congestion problems for residents, employees, visitors, and emergency vehicles. Aupuni Street was specifically identified as too narrow to accommodate additional vehicle traffic from the Project.

There will be no Project access from Aupuni Street. The Project includes a fence along Aupuni Street to ensure that all vehicles, pedestrians, and bicycles can only access the Project from Main Street. The fence along Aupuni Street will include a locked gate for pedestrian emergency access as requested by the County of Maui Department of Fire and Public Safety.

<u>Ambient Traffic Growth and Background Developments (without the Project)</u>
The TIAR includes projections for Base Year 2028 traffic conditions (without the Project) developed based on ambient regional growth (approximately 0.9 percent per year along Main Street and 1.0 percent per year along High Street) and 18 background development projects in various stages of development. The combination of ambient growth and background developments is anticipated to increase traffic by approximately 19 percent in each direction along Main Street and 28 percent in each direction along High Street by 2028. With this increased traffic volume, the congestive conditions along High Street observed during existing conditions are expected to continue and intensify. Several intersections will experience

worsening operations, with movements at High Street/Wells Street, High Street/Kaohu Street, and High Street/Malako Street deteriorating to LOS E or F conditions during peak hours. This Base Year 2028 scenario provides the baseline for evaluating the Project's incremental traffic impacts.

Future Conditions with the Project

Using trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, the Project is anticipated to generate 51 total trips during the AM peak hour (12 entering and 39 exiting) and 60 total trips during the PM peak hour (38 entering and 22 exiting). To be conservative, trip rates for multifamily housing (non-age-restricted) were used instead of lower rates typically associated with senior affordable multifamily housing.

Regionally, the majority of Project trips will route to and from the Kahului-Wailuku areas and will add approximately 8 to 22 vehicles per direction along Main Street and 3 to 11 vehicles per direction along High Street. This corresponds to an approximately 13 percent increase in traffic along Main Street and a 0.9 percent increase along High Street compared to existing conditions.

With the addition of Project-generated trips, operations at all study intersections are anticipated to remain similar to Base Year 2028 (without the Project) conditions. All movements at the unsignalized project driveways along Main Street are expected to operate at LOS A. The analysis demonstrates that Project-generated traffic will not substantially affect Levels of Service on the study roadways or at the study intersections. The Project's contribution to traffic volumes is minimal compared to the background growth and other development projects anticipated by 2028, and the Project does not cause any intersection movements to worsen from Base Year to Future Year conditions.

Recommendations and Supporting Rationale

Since Project-generated traffic is not anticipated to substantially affect LOS on the study roadways, the TIAR does not recommend any capacity-related roadway improvements as a direct result of the Project. The Project generates only 51 to 60 trips during peak hours, representing a minimal 0.9 percent increase on High Street, which is the more constrained corridor in the study area. The 13 percent increase on Main Street is moderate and does not substantially affect operations. No study intersection movements worsen from exiting conditions to future conditions with the Project due to Project traffic, and both Project driveways along Main Street will operate at acceptable levels.

In summary, the Project will generate minimal traffic impacts, with only 51 to 60 peak-hour trips that represent less than 1.0 percent increase on the primary study corridor of High Street. Background regional growth and other developments will create more significant traffic impacts in the area by 2028, but the addition of the Project will not materially worsen those conditions. The Project's traffic impacts are de minimis and do not warrant roadway capacity improvements. Noise, dust, and debris control strategies are in place, including the use of dust suppression methods and adherence to noise regulations. Equipment and materials will be stored in designated areas away from the neighboring residential areas to reduce visual and physical disruption during non-working hours.

During construction, mitigation measures should be taken to maintain continuity of vehicular traffic in the Project area. Construction hours should avoid the AM peak hour (7:00 AM to 8:00 AM) and the PM peak hour (3:45 PM to 4:45 PM) when feasible due to greater impacts on congestion. To minimize impacts on business/restaurants, construction hours should also consider avoiding the weekday midday peak hour of traffic generally from 12:00 PM to 1:00 PM.

As discussed in Section 4.3.3 (Transit Facilities) below, Project residents may use the Maui Bus system due to its affordability (free for riders age 55 and older) and proximity of routes and stops to the Project site. Additionally, an on-site EAH Resident Services Coordinator will assist residents with determining eligibility for MEO Human Services transportation services, such as the ADA Paratransit program for residents with disabilities. EAH Housing will also give preference to senior applicants who do not own a personal vehicle. For these reasons, impacts on roadways and traffic are not expected to be significant.

As evaluated in Appendix H, the Project's turnaround, drop-off, and pick-up areas provide adequate access for emergency vehicles. The turnaround, drop-off, and pick-up areas will also allow families, friends, and ride-share services to drop-off and pick-up residents. Paved driveways on Main Street facilitate easy access to Main Street, the primary east-west vehicle corridor in Wailuku. In this way, evacuation from the Project site will actually be improved relative to the existing conditions of the Project site.

4.3.2 Pedestrian Facilities

Existing Conditions

There are no sidewalks adjacent to the Project site on Main Street or Aupuni Street. There are sidewalks along the east side of High Street in the vicinity of the Project. East of High Street there are sidewalks along both sides of Main Street, Wells Street, and Kaohu Street.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, several neighbors expressed concerns about inadequate pedestrian infrastructure, including the absence of sidewalks on portions of High Street, Main Street, and Aupuni Street near the Project site. Specific concerns included a lack of safe pedestrian connections from the Project site to High Street and difficulty for seniors navigating existing crosswalks where traffic often fails to yield. MDOT recommended advanced communication with the County of Maui Department of Public Works (DPW), Maui Metropolitan Planning Organization, and HDOT to coordinate opportunities for shared infrastructure improvements.

To address neighbors' concerns about parking and pedestrian access along Aupuni Street, the Project design does not enable vehicle, pedestrian, or bicycle access from Aupuni Street into the Project site. The Project includes a fence along Aupuni Street to ensure that all vehicles, pedestrians, and bicycles can only access the Project from Main Street. The fence along Aupuni Street will include a locked pedestrian gate for emergency access/egress requested by the County of Maui Department of Fire and Public Safety. In the event of an emergency, the County of Maui Department of Fire and Public Safety explained they would cut the lock on the gate.

The lack of sidewalks along Main Street west of High Street and along the west side of High Street present unique challenges because these streets also form the boundaries of Historic District No. 3. Along Main Street, in front of the Project site to High Street, there are historic rock walls resulting in limited—to no —right-of-way that can accommodate sidewalks in front of the rock walls without eliminating on-street parking. As the rock walls are within Historic District No. 3, removing them for a wider right-of-way is not a realistic option. Utility poles along Main Street may also pose an obstacle to providing sidewalks.

To provide better pedestrian connectivity from the Project site to High Street, EAH Housing and WUC are working closely with Ka‘ahumanu Church to explore the possibility of an internal shared walkway from the east end of the Project site through the Ka‘ahumanu Church property to High Street. This walkway would significantly enhance pedestrian connectivity from the Project site to Wailuku town and the bus stops on High Street and Wells Streets. This internal shared walkway would provide a safe alternative route for Project residents who are not comfortable walking along the unimproved portions of Main Street. Notably, this internal pedestrian walkway would not result in the loss of existing street parking along Main Street.

Project parking areas will include drop-off/pick-up areas to facilitate safe, comfortable, and convenient drop-offs/pick-ups. EAH Housing and its transportation consultant, ATA, will work with MDOT and MEO to evaluate ongoing accessibility needs for senior residents.

The *Central Maui Pedestrian & Bicycle Master Plan for 2030*, does not include plans for pedestrian and bicycle improvements to Main Street and Aupuni Street, fronting the Project site. The plan also does not mention specific pedestrian improvements along the west side of High Street. However, the plan’s vision statement for Wailuku says:

> *By 2030 Wailuku will be a pedestrian and bicycle friendly community. Because of its unique historic buildings, charm and livability, Wailuku Town is a popular place for residents of all ages to live.*
>
> *Within the Town’s civic and commercial districts – along High, Main, Vineyard, Church, Kaohu and Wells Streets – walking is the preferred mode of transportation for short trips. Residents who live and work in Wailuku walk between home and work because the town offers a safe and pleasant pedestrian experience.*

In addition, other County policies and planning efforts—including the County’s Complete Streets policy, the *I Mua Central Maui Transportation Study*, and Downtown Wailuku revitalization concepts—support and may lead to future pedestrian/bicycle upgrades in and around Wailuku; current project development such as the ‘Imi Kala Street Extension (connecting to Lower Main Street) likewise aims to expand multimodal access consistent with these goals.

During construction, existing pedestrian routes should be maintained with proper lighting, advance warning signs, flaggers, speed limits and delineation along the impacted roadways to help the public negotiate travel through the construction area.

The Project allows residents the convenience of close proximity to various destinations in and around Wailuku. However, based on feedback from the community, the Project will not have vehicle or pedestrian access along Aupuni Street. Therefore, any public pedestrian infrastructure improvements would likely occur on Main Street and High Street.

EAH Housing and ATA will also work with DPW to ensure site access and utility work complement nearby capital improvement projects, including those in the Transportation Improvement Program. EAH Housing will communicate with the Maui Metropolitan Planning Organization and HDOT to avoid construction conflicts and leverage opportunities for shared infrastructure improvements.

The No Action Alternative would not impact pedestrian facilities as the Project would not be built.

4.3.3 Transit Facilities

Existing Conditions

The Maui Bus system is free for riders age 55 and older. The Maui Bus system offers several routes that connect the major areas in Maui. There are several routes in the Project vicinity:

- Wailuku Loop Routes 1 and 2 serves a number of locations throughout Waiʻale, Waikapū and Wailuku. Near the Project, the stop along High Street serves Routes 1 and 2.
- Lahaina Islander Route 20 serves a number of locations from Kahului and Wailuku to Lahaina. Near the Project, both stops – along High Street and Wells Street serve this route.

In the vicinity of the Project, the nearest bus stop is along High Street, across the street from Honoliʻi Park, approximately 550 feet from the Project East Driveway. However, because there are no sidewalks fronting the Project site on Main Street or Aupuni Street, or on the west side of High Street, pedestrian connectivity from the Project site to the bus stop on High Street can be difficult.

Potential Impacts and Mitigation Measures

The Project is not anticipated to impact transit service. However, during construction, bus transit routes should be maintained with proper detours, lighting and flaggers provided to coordinate safe movement through the area. As the Maui Bus system is free for riders age 55 and older, during operation, Project residents may frequently use the Maui Bus routes that are proximate to the Project site. Additionally, an on-site EAH Resident Services Coordinator will assist residents with determining eligibility for MEO Human Services transportation services, such as the ADA Paratransit program for residents with disabilities.

The No Action Alternative would not impact transit facilities. Existing transit systems would continue to operate.

4.3.4 Bicycle Facilities

Existing Conditions

There are no striped bike lanes on Main Street, High Street, or Aupuni Street in the vicinity of the Project.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, MDOT recommended the inclusion of on-site bicycle facilities and an analysis of existing bicycle infrastructure along Aupuni Street or Main Street to safely access the Project site.

The Project is not anticipated to impact bicyclists, except possibly during construction. During construction, Main Street and Aupuni Street should be maintained with proper detours, lighting and flaggers provided to coordinate safe movement through the area.

HDOT published *Bike Plan Hawaii*, which outlines the State's plans to accommodate and promote bicycling and its existing and future bicycle facilities. In the vicinity of the Project, the following locations provide existing bike facilities:

- Kahekili Highway between Waiehu Beach Road and Pi‘ihana Road,
- Ka‘ahumanu Avenue from Lunalilo Street, through to Hāna Highway.

The Bike Plan Hawaii Master Plan identifies the following locations as future signed-shared roadways in the vicinity of the Project:

- High Street between Honoapi‘ilani Highway and Main Street,
- Main Street between High Street and Main Street,
- Market Street between Main Street and Kahekili Highway.

The *Central Maui Pedestrian & Bicycle Master Plan for 2030* focuses on the Wailuku core which excludes areas west of High Street and therefore the plan does not map ped/bike improvements west of High Street, nor side-specific upgrades on High Street's west side. However, the County's Complete Streets policy, the *I Mua Central Maui Transportation Study*, and Downtown Wailuku revitalization concepts collectively support future multimodal improvements in the area.

The Project includes bicycle storage with space for up to 10 bikes in the renovated Alexander House bike room.

The No Action Alternative would not impact bicycle facilities.

4.3.5 Parking

Existing Conditions

There are three existing driveway entrances into the Project site: an asphalt-concrete paved entry from the western side of Main Street; a dirt-gravel entry from the eastern side of Main Street; and an asphalt-concrete paved entry from Aupuni Street. The Project site currently provides parking for approximately 10 vehicles, though parking areas are unpaved and unmarked so the actual number of cars parking on site may vary.

Potential Impacts and Mitigation Measures

The Project is designed to prioritize safe, low-speed circulation, universal accessibility, and reduced reliance on personal vehicles.

The Project includes approximately 42 parking stalls in two locations. Both parking areas will be accessed from Main Street in the approximate location of existing unpaved driveways. The west parking area (near Alexander House) will provide 17 parking spaces and a drop-off/pick-up area. It is designed with circular vehicle flow, allowing vehicles to enter, circle around parking spaces, and then exit. The east parking area (near Baybrook House) will provide 25 parking spaces and a drop-off/pick-up turnaround area, to facilitate safe, comfortable, and convenient drop-offs/pick-ups.

There will be no Project access from Aupuni Street. The Project includes a fence along Aupuni Street to ensure that all vehicles, pedestrians, and bicycles can only access the Project from Main Street. The fence along Aupuni Street will include a pedestrian locked gate for emergency access/egress requested by the County of Maui Department of Fire and Public Safety. In the event of an emergency, the County of Maui Department of Fire and Public Safety explained they would cut the lock on the gate.

During the pre-assessment consultation process, multiple residents and neighbors expressed concerns that the Project's parking ratio of 42 off-street parking stalls for 85 residential units would be insufficient for the needs of residents, visitors, caregivers, and staff. Commenters noted that many seniors aged 62 and older continue to drive and own vehicles, and that seniors without cars would still require visits from caregivers, family members, and friends.

Several commenters emphasized that the surrounding neighborhood already experiences parking constraints due to existing demand from Wailuku Elementary School, County employees, library patrons, and nearby businesses. Neighbors expressed concern that inadequate on-site parking would result in overflow parking onto surrounding residential streets, including Aupuni Street, ʻAwapuhi Place, and Koeli Street, which would significantly impact the quiet residential character of the neighborhood.

Rationale for Location-Efficient Design

The Project parking approach reflects a strategic decision to prioritize the specific needs and economic realities of the senior affordable housing population. The Project's location in central Wailuku addresses critical challenges that severely impact low-income seniors: declining driving ability with age, the need for transit and proximity to essential services, and unsustainable transportation cost burdens on fixed incomes.

Declining Driving Ability with Age

As seniors age, driving ability naturally declines due to vision changes, slower reaction times, and medical conditions. National data shows that car ownership declines progressively with age: 83 percent of those aged 65-74 drive, compared to 68 percent aged 75-84 and 45 percent aged 85 and up. The Project's central location enables residents to maintain independence and access essential services as driving becomes unsafe or impossible—an outcome that cannot be achieved in car-dependent peripheral locations.

Transportation Cost Burdens on Fixed Incomes

For seniors living on Social Security and modest pensions, typically $25,000 to $35,000 annually, transportation costs represent one of the most severe financial burdens. According to AAA estimates applied to Hawai‘i fuel prices, vehicle ownership and operation costs range from $8,000 to $11,000 annually (AAA, 2024). For a senior household with a $30,000 annual income, vehicle costs can consume 27-37 percent of total income. When combined with affordable housing rent (typically 30 percent of income), total housing plus transportation costs can reach 57-67 percent of income—an unsustainable burden.

A senior household at the Project site can achieve transportation cost savings of $9,500 to $10,500 annually compared to car-dependent locations, given Maui County's Fare-Free Transit Program for seniors 55 and older. The location enables reduced combined housing plus transportation cost burden from 70-80 percent of income at peripheral locations to approximately 32 percent at the Project site, well below the Center for Neighborhood Technology's recommended 45 percent threshold. This 20-30 percent income difference translates to $500 to $750 monthly savings that can instead cover food, medications, utilities, and emergency expenses.

Access to Essential Services Without a Vehicle

The Project site is in close proximity to essential services. The site is close to healthcare services in Downtown Wailuku, such as primary care, specialist, dental, and pharmacy services. Maui Memorial Medical Center is approximately 1.1 miles away with access available via free Maui Bus service. The Maui County Office on Aging is just 0.15 miles from the Project site.

The Wailuku Loop bus routes provide hourly service seven days weekly from 6:30 AM to 8:30 PM, with stops within 0.1 miles of the Project site. The Project's proximity to government offices, banking, shops, and restaurants further reduces the need for vehicle trips.

Location Efficiency vs. Additional Parking Trade-offs

Several commenters requested additional on-site parking to match the unit count; however, this presents a conflict with other community priorities. Providing substantially more parking would require significant portions of planned landscaped open space to be paved surfaces, eliminating areas for trees and historic-appropriate landscaping, and creating expanses of asphalt fundamentally incompatible with the character of Historic District No. 3.

The Project design prioritizes historic character, open space, and architectural compatibility over conventional parking ratios specifically because the senior-focused, transit-oriented nature of the Project enables dramatically lower parking demand than conventional residential development.

Parking Demand Management Strategies

The TIAR includes parking demand management strategies appropriate for this independent-living senior affordable housing development. These strategies leverage the senior-focused nature of the Project and the urban location:

- On-Site Transportation Amenities:
  - On-site pick-up/drop-off areas will accommodate families, friends, and ride-share services to pick-up and drop-off residents
  - Parking spaces may be dedicated for car-sharing services such as Zipcar, Hui, or similar programs
- Tenant Selection and Support:
  - EAH Housing will give resident selection preference to seniors who do not own a car during the initial lease-up and operational phases of the Project to mitigate off-street parking demand
  - On-site social services staff (the Resident Services Coordinator) will assist residents with determining eligibility for MEO Human Services transportation services, such as the ADA Paratransit program for residents with disabilities
- Location Advantages:
  - The Project is in proximity to government offices, services, shops, and restaurants, reducing the need for vehicle trips
  - Maui Bus service is available free of charge for seniors 55 years of age and older, providing convenient access to destinations throughout the region
  - The nearest bus stop is along High Street near the intersection with Main Street
- Operational Considerations:
  - Employee parking (except for the on-site property manager) may be provided off site to maximize on-site parking availability for residents

Comparative Parking Demand Analysis

National parking studies of senior affordable housing demonstrate average parking demand ratios of 0.4 to 0.6 spaces per unit—consistent with the Project's proposed 0.5 ratio. These empirical studies account for resident vehicles, visitors, and staff parking combined.

Conclusion
MDOT affirmed in their pre-assessment consultation comments that the Project supports low-vehicle households and transit-friendly living. The TIAR concludes that these parking management strategies are appropriate for this independent-living senior affordable housing project and will help minimize vehicle ownership rates and associated parking demand, thereby reducing potential impacts to neighborhood street parking.

Under the No Action Alternative, 42 parking spaces and drop-off/pick-up areas would not be provided on site. Tenants and their visitors would continue to park private vehicles on vegetated areas of the Project site and on surrounding public streets.

4.4 NOISE

Existing Conditions

The Project area is currently exposed to varying daytime and nighttime ambient noise levels, typical of an urban environment, surrounded by streets and residential areas.

Although the Project is outside the 55 Day-Night Sound Level noise contour on the 1996 HDOT-Airports Noise Exposure Map for Kahului Airport, single-event noise from aircraft operations may be audible at the Project site.

Potential Impacts and Mitigation Measures

Regarding construction noise, the loudest noise sources will likely be earth-moving equipment and will comply with DOH noise regulations, and a construction noise permit is expected to be required. Noise from construction will be short-term and since the buildings involve smaller structures, it is anticipated to be for a shorter duration. Nighttime construction is not currently expected, but if nighttime construction is performed, a noise variance will also be required from DOH.

The Project will not produce any new or different noise impacts as a result of increased traffic in the area. Overall noise level increases due to the Project are expected to be imperceptible.

The Project will not produce any new or different noise impacts as a result of stationary mechanical equipment. During operation, noise generated from any stationary mechanical equipment on the Project site will comply with DOH property line noise regulations.

The No Action Alternative would not impact noise conditions.

4.5 AIR QUALITY

Existing Conditions

Air quality refers to the presence or absence of pollutants in the atmosphere. It is the combined result of the natural background and emissions from many pollution sources. In general, air quality in Wailuku is considered good. There are no point sources of airborne emissions in the immediate vicinity of the site. Non-point sources of emissions (e.g., automobiles) are not significant enough to generate a high

concentration of pollutants. The high air quality can also be attributed to the region's consistent exposure to wind, which quickly disperses concentrations of emissions.

The State of Hawai'i operates a statewide network of air quality monitoring stations, and the closest DOH monitoring station to the Project site is 1.4 miles southeast in Kahului. Federal and State environmental health standards pertaining to outdoor air quality are typically met in the State due to prevalent trade winds and the lack of major stationary sources of pollutant emissions. Based on the air quality data provided by the DOH monitoring station website, the Kahului station's air quality index is typically under 50 (Good per U.S. Environmental Protection Agency (EPA) Air Quality Index), and air pollutant concentration is typically less than 11.0 µg/m3 (State of Hawai'i Department of Health, 2022).

Potential Impacts and Mitigation Measures

The impact of land development activities on air quality in a proposed development's locale differs by project phase (site preparation, construction, occupancy) and project type. The Project is not anticipated to significantly impact local air quality. Air impacts attributed to the Project could include dust and diesel exhaust generated by short-term construction-related activities. Site work, such as grading and building construction, could generate airborne particulate. All construction activities will comply with the County Grading Ordinance, the recommendations of the geotechnical engineer, and the DOH requirements, including Section 11-60.1-33, HAR on fugitive dust. Standard dust control measures such as regular watering, sprinkling, and the installation of dust screens will be implemented to minimize the potential impact from wind-blown emissions and will adhere to the Erosion Control Plan approved by the County.

In the long term, the small amount of traffic generated by the Project may result in a slight increase in the volume of traffic in the region, which would increase vehicular emissions such as carbon monoxide. However, this increase is not expected to be significant when compared to the overall number of vehicles in Wailuku and in consideration of the existing high air quality ambient conditions. In addition, motorized vehicles are increasingly becoming more fuel efficient and emit less or no carbon monoxide.

The No Action Alternative would not impact air quality on or near the Project site.

4.6 HAZARDOUS MATERIALS

Existing Conditions

A Phase I and Phase II Environmental Site Assessment (ESA) Targeted Brownfields Assessment Report was conducted for the Project site by Tetra Tech, Inc. (Tetra Tech). A Phase II ESA by Tetra Tech and Toeroek Associates (Toeroek) was performed, the purpose of which was to: (1) confirm the presence or absence of the recognized environmental conditions (REC) identified during the Phase I ESA; and (2) acquire information regarding the nature of contamination (if present) and risks posed by that contamination that would support informed business decisions about the Project site.

The Phase I ESA identified asbestos-containing material (ACM) and lead-based paint (LBP) as environmental concerns to the Project site. Given the age of the site structures, ACM and LBP may have been used in the construction or renovation of the structures.

During the preparation of the Phase II ESA, surface soil sampling was conducted. Additionally, Toeroek collected samples of suspect ACM, verified quantities of confirmed ACM, and identified and quantified

areas of LBP and polychlorinated biphenyl (PCB) in caulk. Based on the review of analytical data, Toeroek found that:

- **Site Buildings:** The hazardous building materials survey documented the presence of ACM in the ʻĪao Parsonage and Alexander House. The hazardous building materials survey documented the presence of LBP in building materials in the Kennan House, Alexander House, and Baybrook House. No PCB in caulk were found on the site.

- **Building Drip Lines:** Heptachlor epoxide was the only pesticide detected above a DOH Hazard Evaluation and Emergency Response (HEER) environmental action level (EAL) for unrestricted soil, and only in samples collected from the Baybrook House drip line decision unit (DU). In addition, lead was detected above the DOH HEER EAL for unrestricted soil in samples collected from the Alexander House, Baybrook House, and Kennan House DUs.

- **Open Area DUs:** Pesticides and arsenic were not detected above the DOH HEER EAL for unrestricted soil in any sample collected from open area DUs.

Potential Impacts and Mitigation Measures

Surface soils that contain lead and heptachlor epoxide at concentrations above DOH HEER EALs for unrestricted soil could require removal or capping to prevent exposure or release and to mitigate potential impacts on human health. Additionally, if soil is excavated for off-site disposal, waste disposal testing is required.

The DOH HEER office will be notified of any Project-related demolition activities. The buildings were constructed before the 1960s when termiticide was heavily used in the building foundations and underneath the building slabs. Sampling will be required by DOH to determine the lateral and vertical extent of contamination underneath the buildings. Additionally, DOH recommends additional sampling within 3 feet of the perimeter of the buildings to be demolished. Excavated soil to be disposed of at a landfill should follow landfill requirements.

Sampling is recommended at least 0 to 6 inches and 6 to 12 inches below ground surface within the footprint of each building if the buildings are to be demolished. Each building footprint should be considered a separate DU. If a building addition is made to a structure, the addition should be considered a separate DU. Additionally, if soils are excavated for off-site disposal, waste disposal testing is required.

Building materials containing ACM and LBP may require proper abatement before any building renovation or demolition activities. Per DOH asbestos material regulations, when a building is renovated for reuse or demolished, a qualified contractor should remove and properly dispose of building materials that contain ACM above one percent asbestos. Likewise, for LBP, defined as paint containing more than 5,000 ppm of lead by U.S. Department of Housing and Urban Development (HUD) (2012), DOH, and EPA regulations (40 CFR Part 745 – Lead-Based Paint Poisoning Prevention in Certain Residential Structures), a qualified contractor should remove and properly dispose of building materials that contain LBP. In the interim, these materials should be inspected regularly to ensure they are not chipping, flaking, disintegrating, or otherwise becoming friable or more mobile. If canec board material is removed, appropriate work practices and limiting exposures per DOH HEER (2018) guidelines are recommended.

An Analysis of Brownfields Cleanup Alternative (ABCA) was prepared to evaluate cleanup alternatives required to address the constituents reported above screening levels (SLs) in surface soil and ACM and LBP abatement at the existing structures.

The No Action Alternative would not introduce new hazardous materials to the Project site and existing hazardous materials would not be remediated or removed.

4.7 VISUAL RESOURCES

Existing Conditions

Visual corridors are open areas that provide unobstructed views from distant vantage points. Wailuku has views of the West Maui Mountains, Haleakalā, and the Pacific Ocean from certain vantage points. On either side of the Project site are Main Street and Aupuni Street, both of which provide unobstructed view corridors towards the West Maui Mountains in the westerly direction. In the easterly direction, Main Street provides views towards the coastline, while Aupuni Street provides views towards Haleakalā. The site is unique as it contains historical buildings in a setting that does not obstruct views towards the West Maui Mountains, the Kahului coastline or Haleakalā. The streetscapes opposite the Project site (on Main Street and Aupuni Street) are reflective of single-family homes fronting both streets. There are no unique scenic resources or views identified for the site on any State or County plans.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, several neighbors and the Historic Hawai‘i Foundation noted the importance of preserving the Project site’s visual resources, including landscaped open space, trees, and street views.

The Project minimizes the visual impact of the proposed density within the context of Historic District No. 3 and retains approximately 70 percent of the Project site as open space.

The three new, two-story residential buildings will be set back approximately 60 feet from Alexander House and Baybrook House, respectively. The new buildings will also be at a lower elevation than Alexander House and Baybrook House, ensuring these buildings are prominent. Additionally, new buildings will be spaced to preserve existing open space and sightlines from Main Street to Aupuni Street.

The facades of the new residential buildings will be broken into three distinct sections using subtle massing offsets in plan and elevation view. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding.

The Project’s use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings’ size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3. In this way, the Project is consistent with Standard 9 of The Secretary of the Interior’s Standards for Rehabilitation. None of the buildings will impact public views toward the West Maui Mountains, the coastline or Haleakalā from Main Street and Aupuni Street.

See Section 5.3.5 (Historic District No. 3) below for a discussion of how the Project complies with Section 19.52.100, C., MCC regulations for Historic District No. 3.

The No Action Alternative would not involve the construction of new buildings or the removal of existing buildings. As such existing structures would remain in their current state and existing visual resources would not be affected.

4.8 INFRASTRUCTURE AND UTILITIES

This section discusses the Project's infrastructure and utility improvements. Goto Engineering LLC prepared a Preliminary Engineering Report (PER) for the Project. The PER addresses existing site conditions and the Project's water, wastewater, and drainage improvements and is summarized below. Appendix D contains the complete PER.

During the pre-assessment consultation process, several neighbors expressed concerns about the capacity of Wailuku's existing infrastructure to support the Project. These commenters also requested an assessment of capacity limits and necessary upgrades to avoid overburdening existing infrastructure.

4.8.1 Water System

Existing Conditions

The DWS provides water service to the Project site. According to DWS, the major source of water for the Central Maui area is the ʻĪao Aquifer with a sustainable yield of 20 million gallons per day (MGD). During the pre-assessment consultation process, DWS noted that the three-year demand projection for the Central Maui system is currently between 98 percent and 100 percent of the system's maximum reliable capacity.

Based on the DWS Fire Protection Water Distribution Map, Wailuku Town (dated February 28, 2000), the Project site is serviced by the 3 million-gallon ʻĪao Tank (tank elevation of 507.0 feet) and an associated distribution system. The distribution infrastructure consists of an 18-inch water main along Main Street and a 6-inch water main along Aupuni and Koeli Streets.

According to DWS records, the Project site is currently serviced by two water meters: (1) a 1-inch water meter (M/N: 200258398) on Aupuni Street, and (2) a 5/8-inch water meter (M/N: 19787692) on Main Street.

Existing fire hydrant assemblies in the vicinity of the Project site include: 1) FH#57 along Main Street at the northeasterly corner of the Project site; 2) FH#50 at the intersection of Aupuni Street and ʻAwapuhi Place; and 3) FH#49 at the transition from Aupuni Street to Koeli Street.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, a few commenters wondered about the capacity of existing water infrastructure to accommodate the Project. Additionally, DWS provided information on the source of water, projected water availability, and recommendations for conserving and reusing water.

According to the PER, the Project is anticipated to consume approximately 47,600 gallons per day (gpd), while peak flow is estimated at 142,800 gpd. A Reservation of Available Service Capacity will be submitted to DWS to confirm the existing water system can accommodate the Project.

The Project will include a new 3-inch DWS compound meter with 4-inch reduced pressure backflow preventer along Main Street. An on-site system consisting of 4-inch polyvinyl chloride (PVC) piping, gate valves, and air relief valves will connect the meter to each of the three new residential buildings. The existing 5/8-inch meter on Main Street and 1-inch meter on Aupuni Street will be cut and plugged at the main.

The Project will incorporate water-saving fixtures such as low-flow plumbing fixtures and surface bioretention planters to manage runoff and prevent off-site overflows. Additionally, native and drought-tolerant plants will be incorporated into the Project's landscaping, particularly those that are adapted to the area's climatic conditions. The Project will minimize any water waste by incorporating the features recommended by DWS. The Project is not expected to include new ornamental water features such as ponds or fountains.

For fire protection, the Project will include a 6-inch DWS detector check meter automatic fire sprinkler system served by the existing main along Main Street. An on-site system consisting of 6-inch PVC piping, gate valves, and air relief valves will connect the meter to each of the three residential buildings. All fire protection requirements are anticipated to be met by the existing roads and fire hydrants surrounding the Project site, in addition to fire sprinkler systems within each building. All water system improvements will follow DWS and Department of Fire and Public Safety standards.

Under the No Action Alternative, water infrastructure would continue to provide water to the Project site at its current level of demand.

4.8.2 Wastewater System

Existing Conditions

The Project site is served by the municipal sewer system owned by the County of Maui and maintained by the Department of Environmental Management (DEM), Wastewater Reclamation Division. The Project site is serviced by existing sewer laterals along Main Street and Aupuni Street. The municipal sewer system along Main Street consists of 6-inch and 8-inch sewer mains, sewer manholes (MH) (MH#8 and MH#12), and sewer laterals. The municipal sewer system along Aupuni Street consists of a 6-inch sewer main, sewer manholes (MH#7 and MH#11), and sewer laterals.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, DEM requested a discussion of wastewater infrastructure and compliance requirements, including: estimated wastewater flow rates; proposed point of connection to the County sewer system; confirmation of a sewer service manhole at the property line; plans for managing non-contact cooling water and condensates prohibited from discharge into the sewer system; and compliance with County Pretreatment Program requirements such as grease interceptors and sand/lint traps for laundry facilities.

The Project will include an on-site sanitary sewer network consisting of 6-inch gravity PVC piping, concrete manholes, and cleanout risers, connecting each of the three new residential buildings to the 6-inch Aupuni Street main. The connection to the main will be made via a "doghouse" manhole to maintain existing flow within the main without disruption. A maintenance-access manhole will also be installed at

the property line per County requirements. All sanitary sewer system improvements will follow County standards.

The Project's air conditioning system will include a catchment system that captures condensation and directs it to the on-site drainage system. Condensation from air conditioning and other excess water will not be discharged into the sewer system.

The Project will comply with applicable County Pretreatment Program requirements. As the Project does not include a community kitchen, grease interceptors are not proposed. Lint traps will be installed in communal laundry facilities of the new residential buildings. Maintenance staff will regularly clean lint traps.

A Process Request Checklist was submitted to DEM on October 30, 2024, through the Maui Automated Planning and Permitting System (MAPPS) to confirm the existing sanitary sewer system can accommodate the Project. As of March 2026, DEM did not provide a response. The estimated average wastewater flow generated by the Project is based on Wastewater Flow Standards dated February 2006 is 23,715 gpd.

Under the No Action Alternative, existing wastewater infrastructure would continue to serve the Project site at its current level of capacity.

4.8.3 Drainage System

Existing Conditions

There are no known catch basins, grated drain inlets or underground pipe systems directly fronting the Project site on either Main Street or Aupuni Street. However, an existing catch basin drain is at the Main Street and High Street corner, and an existing drain inlet is at the Aupuni Street and High Street corner. In general, water sheet flows from east to west across the Project site before being directed to Main Street and High Street by an existing stone retaining wall along the west end of the Project site.

Based on hydrologic analysis per the County of Maui Storm Drainage Standards dated July 14, 1995, the existing site generates a peak flow 4.77 cubic feet per second (cfs) and 0.20 acre-feet in volume for a 50-year 1-hour design storm event.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, MDOT recommended that transportation infrastructure account for climate adaptation, including stormwater management around drop-off areas and shaded pedestrian paths.

An on-site storm drainage system consisting of 6-inch to 12-inch High-Density Polyethylene piping, grated drain inlets, underground chambers, and on-grade retention basins will collect runoff from the site prior to discharge toward Main Street and Aupuni Street following existing drainage patterns.

There will be a 1-acre increase in impervious area resulting from the proposed development compared to that of the existing conditions. Based on hydrologic analysis per the County of Maui Storm Drainage Standards, the proposed site generates a peak flow 7.48 cfs and 0.32 acre-feet in volume for a 50-year 1-hour design storm event.

The County of Maui requires any increase in proposed runoff compared to existing conditions be retained on site per a 50-year 1-hour design storm event. The required water quality volume calculated according to the County of Maui Storm Water Quality Standards dated November 9, 2012, is 0.101-acre-feet. The underground chambers under the paved parking areas and the on-grade retention basins in landscaped areas will capture the 0.16-acre-feet of increase in runoff between the existing and proposed conditions prior to discharging to Main Street and Aupuni Street without exceeding the runoff rates and volumes of the existing drainage patterns. It is intended the chambers will be StormTech half-domed shaped system surrounded by aggregate on all sides, or an equivalent product. A series of 3 feet by 4 feet chambers are proposed beneath the northwest parking lot and a series of 6 feet by 4 feet chambers are proposed beneath the northeast parking lot. The on-grade retention basins will be between each building.

Under the No Action Alternative, the existing drainage infrastructure would continue to serve the Project site at its current level of capacity.

4.8.4 Solid Waste

Existing Conditions

The DEM, Solid Waste Division, operates and maintains, either by County personnel or by contracted services, all solid waste collection and disposal facilities on the island. Solid waste generated in the Wailuku-Kahului region is transported to the Central Maui Landfill in Puʻunēnē, four miles southeast of the Kahului Airport on Pūlehu Road. The Central Maui Landfill receives approximately 500 tons of solid waste per day.

Potential Impacts and Mitigation Measures

During construction, solid waste generation should be relatively modest since development is proposed on portions of the site that are open. The applicant will require salvage/recycling per State and County requirements. State requirements include salvaging and recycling as much nonhazardous construction waste as possible, including but not limited to green waste, asphalt, concrete, masonry, wood, and other building materials, as well as site clearing waste, including miscellaneous construction materials, soil, and rock. Contractor(s) for the Project shall apply to the Central Maui Landfill to dispose of construction and/or demolition waste.

When construction is complete, the Project will generate solid waste related to the operations of senior affordable housing. On-site property managers will work with DEM, Solid Waste Division on a plan that will investigate recycling options and coordinate with the design team to incorporate appropriate facilities into the Project to help with anticipated operations and mitigate pest concerns between pickups. All non-recyclable waste will be collected by contracted services and transported to the Central Maui Landfill or other services for appropriate disposal.

Under the No Action Alternative, construction waste would not be generated and solid waste would continue to be collected and disposed of at the Central Maui Landfill in Puʻunēnē,

4.8.5 Electrical and Communication Systems

Existing Conditions

Maui Electric Company's (MECo) Mā'alaea Power Plant serves the Wailuku-Kahului region. MECo is a subsidiary of the Hawaiian Electric Company. MECo infrastructure includes overhead lines along Main and Aupuni Streets on joint use utility poles.

Hawaiian Telcom provides telephone and DSL services to the Wailuku area. Hawaiian Telcom's existing telephone plant serving the area has sufficient capacity to service the Project. Existing telephone facilities in this area are overhead and follow the MECo overhead lines.

Spectrum is a cable television provider in Maui and also provides telephone and Internet connection services. Existing Spectrum facilities are overhead and follow those of MECo and Hawaiian Telcom.

Along Main and Aupuni Streets there are overhead utility services mounted on joint poles. The services include: MECo 12kV and secondary circuits, Hawaiian Telcom, and Spectrum.

Potential Impacts and Mitigation Measures

Off-site Electrical and Telecommunications

During the pre-assessment consultation process, Spectrum confirmed that the Project will not impact their existing cable plant. In a letter dated, January 14, 2025, Spectrum confirmed that their equipment and facilities are able to serve the Project site.

During the pre-assessment consultation process, Hawaiian Telcom confirmed that their telecommunications facilities run overhead on the north side of Main Street with no underground facilities entering the Project site. However, Hawaiian Telcom noted that service poles on or near the property are owned by the Hawaiian Electric Company. In a letter dated, February 19, 2025, Hawaiian Telcom confirmed that their equipment and facilities are able to serve the Project site.

During the pre-assessment consultation process, the Hawaiian Electric Company (the parent company of MECo) had no objections to the Project and recommended they be advised of anticipated electrical loads and a Project timeline. In a letter dated, February 24, 2026, the Hawaiian Electric Company confirmed that they are able to provide electrical service to the Project site in accordance with their tariffs on file with the Hawai'i Public Utilities Commission.

The Project will provide electric, telephone, and cable service for residents and property management staff. The applicant and its engineering consultant (Goto Engineering LLC) will work closely with Spectrum, Hawaiian Telcom, and the Hawaiian Electric Company to arrange for connections to their existing nearby service lines and facilities in the most efficient way possible.

Easements, right-of-entry, and joint development documents may be required for and in favor of the MECo for their overhead and underground facilities proposed on the project's property. Additional research needs to occur to determine if existing utilities have a right-of-entry in place for MECo. Services connections are proposed to be taken from Aupuni Street.

The proposed improvements are not expected to have significant impacts on MECo, Spectrum, and Hawaiian Telcom. Coordination will be done with MECo, Spectrum, and Hawaiian Telcom to provide the

necessary infrastructure to meet their requirements to serve the project and to minimize disruptions to the surrounding community. Infrastructure for MECo, Spectrum, and Hawaiian Telcom will be constructed, after which the utility providers will install their cables and equipment. The PER contains the recommended electrical and communication system improvements for the Project.

Under the No Action Alternative, existing off-site electrical and telecommunications facilities would not be affected.

On-site Electrical and Telecommunications

Underground site power distribution infrastructure will be provided from a nearby MECo handhole. All underground conduits will be scheduled 40 PVC in 3-inch concrete jackets. Primary ducts from the MECo handhole will be routed to a pad-mounted switch and transformer, which will provide power to the buildings at utilization voltage.

Underground site distribution infrastructure will be designed to existing Hawaiian Telcom and Spectrum Cable infrastructure. All underground conduits will be scheduled 40 PVC in 3-inch concrete jackets. Utility conduits will be stubbed up at a fire-rated plywood backboard in the main electrical room. Each building will need separate MECo meters installed. The Project will include energy-efficient lighting and mechanical systems and target a minimum 30 percent reduction in energy consumption compared to the baseline standard building design.

Under the No Action Alternative, existing on-site electrical and telecommunications facilities would continue to serve the Project site.

4.8.6 Gas

Existing Conditions

During the pre-assessment consultation process, Hawai‘i Gas determined that the area around the Project site is clear of gas utility facilities.

Potential Impacts and Mitigation Measures

As the Project will not include any gas service, no gas-related impacts are expected, and corresponding mitigation measures are not required.

The No Action Alternative would not affect gas infrastructure.

4.9 SOCIO-ECONOMIC CHARACTERISTICS

4.9.1 Population

Existing Conditions

Per the County’s *Maui Island Plan*, the Wailuku-Kahului area is the economic and population center of Maui. The 1990s brought increases in trade, transportation, utilities, and government jobs and the area is forecast to grow faster than other parts of the island. Wailuku-Kahului is expected to maintain its status as home to more than a third of Maui’s households (County of Maui Planning Department, 2012). Based on data from the *State of Hawai‘i Data Book*, the resident population in the Wailuku Judicial District has nearly

doubled over the last forty years and has increased its proportion of the Maui County total population to just over 50 percent (see Table 4-1).

Table 4-1: Wailuku District and Maui County Resident Populations, 1990 – 2020

Year	Wailuku District	Maui County	Wailuku Percentage of Maui County	Wailuku Percent Change
1990	45,685	100,504	45.5 percent	-
2000	61,346	128,241	47.8 percent	34.2 percent
2010	78,110	154,924	50.4 percent	27.3 percent
2020	83,777	164,836	50.8 percent	7.3 percent
				(DBEDT, 2022)

Potential Impacts and Mitigation Measures

The Project is intended for independent-living senior households already residing on Maui, which aligns with EAH Housing's experience across its Maui portfolio. As such, the Project is not anticipated to have a significant impact on the population of the Wailuku District and Maui County. Instead, the Project would support the existing population by providing affordable housing in the most populated district in Maui County.

Under the No Action Alternative, 84 affordable rental homes for low-income seniors (age 62 or older, earning 60 percent or less of the AMI) would not be built in a central, service-rich urban location. There would continue to be a critical shortage of affordable rental housing for low-income seniors on Maui. The No Action Alternative would not impact existing population.

4.9.2 Economy

Existing Conditions

The Wailuku economy was previously based on the agriculture industry dating back to the 1800s. Since then, Wailuku has become a center of business with residential communities and commercial opportunities anchoring the town as the center of the island's economy and government. Since the downturn of the sugar industry, current-day Wailuku has become economically supported by government offices, small professional offices and businesses, restaurants, and medical facilities.

Potential Impacts and Mitigation Measures

The Project is not expected to have a significant adverse impact on the local or State economy. Project construction will generate local construction employment (up to 120 jobs), as well as construction spending (for construction materials. As a result, during the construction period, the Project will generate general excise taxes and income taxes, both of which will contribute to the State's revenue. Once completed, employees and businesses associated with the operation of the Project will generate both income and general excise taxes.

Under the No Action Alternative, local construction jobs, general excise tax, and income tax would not be generated. Additionally, construction-related spending would not occur. Existing commercial tenants would continue to operate in the Alexander House and Baybrook House, respectively.

4.10 PUBLIC SERVICES AND FACILITIES

4.10.1 Recreational Facilities

Existing Conditions

The closest recreational facilities to the Project are Wailuku Elementary School Park and Kehalani Mauka Park, which are south (along Koeli Street) less than 1,120 feet away. Generally, Koeli Street (and Aupuni Street) do not include sidewalks except where Koeli Street fronts the Wailuku Elementary School campus. There are several regional parks and recreational spaces in Wailuku and Kahului, including the War Memorial Sports Complex, Keōpūolani Regional Park, Kahului Community Center Park, and ʻĪao Valley State Park. The Kanahā Pond State Wildlife Sanctuary is in the Wailuku-Kahului region, approximately 2.8 miles from the site. This 143-acre wetland is a waterfowl sanctuary that is home to three endangered Hawaiian bird species.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, the County of Maui Department of Parks and Recreation (DPR) indicated that an exemption from Section 18.16.320, MCC, will be provided after submittal of a fully executed residential workforce housing agreement with the County of Maui Department of Housing.

The applicant intends to seek certain exemptions from the MCC, which the Maui County Council has the authority to approve pursuant to Section 201H-38(a)(1)(c), HRS. Regarding parks and playgrounds, the applicant will apply for an exemption from Section 18.16.320, MCC, Parks and Playgrounds, to exempt the Project from park dedication requirements and assessment fees. Even with an exemption from Section 18.16.320, MCC, the Project is not expected to negatively affect existing recreational facilities.

The Alexander House will be rehabilitated to serve as a multipurpose center, which will include a fitness room for residents. In this way, the Project will provide convenient on-site access to recreational facilities, while not negatively impacting recreational facilities in the Wailuku-Kahului region.

Additionally, EAH Housing's on-site Resident Services Coordinator will implement programs addressing seniors' specific needs, including community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. The Resident Services Coordinator will also assist residents in navigating benefits and support services designed to promote overall health, wellness, and community connectedness among residents.

The No Action Alternative would not build a fitness room for Project residents and an on-site Resident Services Coordinator would not be able to provide seniors with critical services catering to their specific needs. The No Action Alternative would not impact existing recreational facilities.

4.10.2 Police, Fire, and Medical Services

Existing Conditions

<u>Police Protection</u>
The County's main police station is the Wailuku Police Station at 55 Mahalani Street. This police station is approximately 1.5 miles or approximately five minutes east of the Project site.

Fire Protection

The closest fire station to the site is the County of Maui Department of Fire and Public Safety Wailuku Fire Station, at 21 Kinipōpō Street, which is approximately two minutes or 0.5 miles east of the Project site. The Project includes fire sprinklers to meet fire safety requirements.

On October 7, 2025, the EAH Housing met with Lieutenant Conrad Guerrero of the County of Maui Department of Fire and Public Safety to receive feedback on the Project's design. As requested by the County of Maui Department of Fire and Public Safety, the proposed fence along Aupuni Street will include a locked pedestrian gate for emergency access/egress. In the event of an emergency the Department of Fire and Public Safety explained they would cut the lock on the gate. Fire truck access to the site is possible from Aupuni Street, but access to the Project will be from two driveways along Main Street. Fire emergency access/egress will be compliant with the County of Maui Department of Fire and Public Safety and the MCC Fire Code.

Medical Services

Maui's only hospital with acute care is Maui Memorial Medical Center. It is in Wailuku, roughly 1.6 miles east of the Project, and also includes general and emergency care services. This 231-bed facility has a team of over 1,300 caregivers and includes outpatient services. It is part of Maui Health with locations throughout Maui County. Other medical clinics and offices within Wailuku and Kahului include Maui Medical Group, Maui Medical Kahului, and Kaiser Permanente Maui Lani.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, neighbors expressed concern about emergency vehicle access to the Project site given existing traffic congestion. There is also concern that increasing the number of residents in the area could lead to an increase in crime. Commenters also recommended designing amenities to assist first responders, such as easily accessible building layouts, clear and visible labeled entrances, building numbers, apartment numbers, and directional signage to help first responders quickly locate where help is needed. Comments noted that having on-site support staff who can assist first responders with initial assessment and guidance can significantly improve response efficiency, which is vital for the safety and well-being of senior residents.

During the pre-assessment consultation process, the County of Maui, Police Department noted public safety concerns related to traffic and pedestrian safety, noting that the area is already congested during school hours and increased population and vehicle use may worsen traffic congestion. The County of Maui, Police Department also recommended exploring alternative access points to reduce reliance on Main, High, and Aupuni Streets, and recommended applying Crime Prevention Through Environmental Design (CPTED) principles, including proper lighting, clear sightlines, controlled access, and visible public areas to deter criminal activity.

The Project is intended to provide affordable rental housing to independent-living senior households already living on Maui. As such, the Project is not anticipated to significantly increase population or the demand on existing public services.

As the Project site is bounded by Main Street to the north, Aupuni Street to the south, and private property to the east and west, the Project must be accessed via either Main Street or Aupuni Street. In consulting with the Project's traffic engineer (ATA), Main Street was determined to be the preferred location for

vehicle access to the Project site as it would have a lesser traffic impact compared to a driveway on Aupuni Street and allow more affordable housing to be provided on the Project site.

EAH Housing and WUC are also working closely with Kaʻahumanu Church to explore the possibility of an internal shared walkway from the east end of the Project site through the Kaʻahumanu Church property that would provide pedestrian access from the Project site to High Street. This walkway would significantly enhance pedestrian connectivity from the Project site to Wailuku town and the bus stop on High Street and provide an alternative route for pedestrians who are not comfortable walking along unimproved portions of Main Street. Notably, this internal pedestrian walkway would not result in the loss of existing street parking.

As described in Section 4.3 (Transportation), the Project will not have a significant impact on traffic conditions in the surrounding area relative to present-day conditions. This is primarily because there are two existing driveways in the approximate location of the proposed driveway that currently provide vehicle access to the Project site.

As suggested, the Project will incorporate the following CPTED features:

- Appropriate exterior and parking area LED lighting where feasible;
- Community garden, dog run, and seating and gathering areas that are visible from Main Street, Aupuni Street, and parking areas to provide "eyes on the street" monitoring;
- Low-growing plants and well-spaced trees to preserve open sightlines; and
- Perimeter fences to discourage unauthorized access and increase security.

There may be occasional and unavoidable demands for police, fire, and medical services associated with the Project. However, it is anticipated that the Project will not adversely affect these existing services. As requested by the County of Maui Department of Fire and Public Safety, the proposed fence along Aupuni Street will include a locked pedestrian gate for emergency access/egress. In the event of an emergency, the Department of Fire and Public Safety explained they would cut the lock on the gate.

The No Action Alternative would not impact existing police, fire, or medical services. Without the Project, CPTED features and a potential walking path through the Kaʻahumanu Church property would not be incorporated.

4.10.3 Schools

Existing Conditions

Public Schools in Wailuku include Wailuku Elementary (grades K–5), Waiheʻe Elementary (grades K–5), Puʻu Kukui Elementary (grades K–5), ʻĪao Intermediate (grades 6–8), and H.P. Baldwin High School (grades K–12). Maui High School (grades 9–12) is nearby, in Kahului.

Saint Anthony School (preschool through grade 12) is a private school approximately a mile away from The Project site. Victory Christian Academy (K–12) is a private school in the region, to the northeast of the site near Kahului Harbor.

UH Maui College is in Kahului and offers bachelor's and master's degree programs.

Potential Impacts and Mitigation Measures

The Project will not have a significant impact on public school facilities. The Project is an age-restricted affordable rental community serving independent-living senior households whose household members must be 62 years of age or older, so no school-age children will be residing on the premises. Furthermore, the Project is intended for independent-living senior households already residing on Maui, consistent with EAH Housing's experience that most residents at its Maui properties were already living in the County prior to occupancy. Therefore, the Project will not generate new enrollment demand on State of Hawai'i Department of Education school facilities in the area.

The No Action Alternative would not impact existing public or private schools.

4.10.4 Other Public Services and Facilities

In addition to those discussed above, the Project site is within a three-block radius to a range of State and County government offices and public facilities, including the Wailuku Public Library at the corner of Aupuni Street and High Street.

Potential Impacts and Mitigation Measures

During the pre-assessment consultation process, a commenter inquired about opportunities for community connection between seniors and the nearby preschool and elementary school. Comments noted that having dedicated space for intergenerational interactions is vital for the development and well-being of both seniors and children.

Although programming for residents has not been finalized, the Project includes rehabilitation of the Alexander House into a multipurpose center with a lounge, computer lab, library, meeting room, kitchen, fitness room, and bike room. These on-site amenities, along with community gardening spaces and outdoor gathering areas, provide a convenient and safe environment for residents and their guests to socialize, recreate, work, and gather.

The No Action Alternative would not impact other public services or facilities.

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5 LAND USE CONFORMANCE, POLICIES, AND CONTROLS

The processing of various permits and approvals are prerequisites to the creation of the Project. Relevant Federal, State of Hawai‘i and County of Maui land use plans, policies, and ordinances are described below.

5.1 FEDERAL

5.1.1 National Environmental Policy Act (NEPA)

Because the Project may receive federal funding from the HUD, environmental review. If HUD funding sought compliance under the National Environmental Policy Act (NEPA) is required. HUD's environmental reviews are processed per Title 24 of the CFR Part 58 where a local jurisdiction such as the County of Maui assumes HUD's environmental responsibilities. Part 58 reviews are online at the HUD Environmental Review Online System (HEROS) website and therefore will be submitted and processed separately from this Chapter 343, HRS EA.

5.1.2 Federal Aviation Administration (FAA) - Federal Regulation Title 14 Part 77

During the pre-assessment consultation process, HDOT noted the Project is approximately 3.01 miles from Kahului Airport and advised review of the Technical Assistance Memorandum (TAM) for guidance on development within 5 miles of State airports. HDOT indicated that FAA Form 7460-1 Notice of Proposed Construction or Alteration is required for construction within 20,000 feet of the airport that exceeds a 100:1 surface, including construction equipment and crane heights. HDOT also advised that residents should be aware of potential noise, fumes, smoke, vibrations, and odors from aircraft operations. If solar photovoltaic systems are installed, HDOT noted requirements for glint and glare analysis and potential radio frequency interference mitigation to avoid hazardous conditions for pilots.

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for:

- Evaluating the effect of the construction or alteration on operating procedures.
- Determining the potential hazardous effect of the proposed construction on air navigation.
- Identifying mitigating measures to enhance safe air navigation.
- Charting of new objects.

Development activities will be undertaken in a manner to avoid impacts on Kahului Airport operations. Notification allows the FAA to identify potential aeronautical hazards in advance thus preventing or minimizing the adverse impacts to the safe and efficient use of navigable airspace. Per the online Notice Criteria Tool, due to the location of the Project within five miles of an airport, the FAA requests that the applicant submit a Notice of Construction or Alteration for review by the FAA, per FAA Form 7460-1, to ensure the Project does not negatively affect Kahului Airport operations. This form must be submitted at least 45 days before the start date of the proposed construction or alteration, or the date an application for a construction permit is filed, whichever is earliest. The Project will continue coordination with local and regional FAA offices, as well as HDOT-Airports representatives, to ensure compliance with Federal and State avigation requirements.

EAH Housing acknowledges potential noise from aircraft operations due to the proximity to Kahului Airport. EAH Housing also acknowledges the potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the Project site.

For any PV system that may be installed, the Project design team will specify non-glint and non-glare solar panels, follow FAA guidance, prepare a glint and glare analysis, and file FAA Form 7460-1 for proposed PV system. When received, EAH Housing will provide a copy of the FAA determination to the HDOT-Airports Planning Section. EAH Housing acknowledges that if it is determined that its PV array creates hazardous conditions for pilots, it will take immediate action to mitigate the situation.

5.2 STATE OF HAWAIʻI

5.2.1 State Environmental Review Law (Chapter 343, Hawaiʻi Revised Statutes)

Preparation of this EA is in accordance with the provisions of Chapter 343, HRS and Chapter 11-200.1, HAR pertaining to EAs. Section 343-5, HRS establishes nine "triggers." The preparation of an EA is required because the Project is proposing the use of buildings listed on Hawaiʻi Register of Historic Places and may involve the use of state and county funds. The purpose of the environmental review process and the informational nature of an EA, including the distinction between acceptance of a final EA and approval of the proposed action (i.e., the Project), are discussed in Section 1.9 of this EA.

5.2.2 State Land Use Law (Chapter 205, Hawaiʻi Revised Statutes)

The State Land Use Law (Chapter 205, HRS) establishes the State Land Use Commission and authorizes this body to designate all lands in the State into one of four districts: Urban, Rural, Agricultural, or Conservation. The Project site is within the State Land Use Urban District (Figure 6). The Project is consistent with the Urban designation of the site, which is described as lands characterized by "city-like" concentrations of people, structures, and services.

5.2.3 Hawaiʻi Coastal Zone Management Program (Chapter 205A, Hawaiʻi Revised Statutes)

Hawaiʻi's Coastal Zone Management (CZM) Program, adopted as Chapter 205A, HRS, provides a basis for protecting, restoring, and responsibly developing coastal communities and resources. The objectives and policies of the CZM Program encompass broad concerns such as impact on recreational resources, historic and archaeological resources, coastal scenic resources and open space, coastal ecosystems, coastal hazards, and the management of development. Each of the counties in Hawaiʻi have adopted SMA regulations in which a proposed development's consistency with the objectives and policies of the CZM program are evaluated through the SMA permitting process. The Project site is outside of Maui County's designated SMA (Figure 7). As the entire State is within the CZM area, the Project is consistent with the objectives and policies of the CZM program as discussed below.

Table 5-1: Coastal Zone Management Act, Chapter 205A, HRS

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	S	N/S	N/A
Recreational Resources			
(b) Objective: (A) Provide coastal recreational opportunities accessible to the public.			
(c) Policies:			
(A) Improve coordination and funding of coastal recreational planning and management; and			X
(B) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:			X
(i) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;			X
(ii) Requiring restoration of coastal resources that have significant recreational and ecosystem value, including but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes, when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable;			X
(iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;			X
(iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;			X
(v) Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;			X
(vi) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;	X		
(vii) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and			X
(viii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting that dedication against the requirements of section 46-6.			X
Discussion: The Project, in central Wailuku, is approximately 1.8 miles inland from the nearest shoreline and does not involve coastal recreational resources, shoreline parks, beach areas, or access to coastal waters. Policies (A) and (B)(i)–(v), (vii)–(viii) are not applicable to the Project. Policy (B)(vi), which calls for adopting water quality standards and regulating point and non-point sources of pollution to protect the recreational value of coastal waters, is applicable and is supported. The Project will obtain an NPDES permit and implement construction-phase BMP to control stormwater runoff and prevent pollutants from entering waterways. Post-construction, the Project's on-site drainage system—including bioretention planters, underground stormwater chambers beneath the parking areas, and on-grade retention basins—will manage runoff and protect the quality of downstream waters.			
Historic Resources			
(b) Objective: (A) Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.			

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(c) Policies:			
(A) Identify and analyze significant archaeological resources;	X		
(B) Maximize information retention through preservation of remains and artifacts or salvage operations; and	X		
(C) Support state goals for protection, restoration, interpretation, and display of historic resources.	X		
Discussion: The Project site is within Historic District No. 3 in central Wailuku. Policies (A), (B), and (C) are applicable and supported. MASON prepared an RLS of the Mission Grounds in response to the SHPD's Section 6E-42, HRS review (HICRIS Project Number 2018PR26759), fulfilling Policy (A) to identify and analyze significant archaeological resources. MASON evaluated the four buildings on the Project site—Alexander House, Baybrook House, Kennan House, and ʻĪao Parsonage—against the Section 13-275-6, HAR Significance Criteria. Alexander House and Baybrook House were found to be significant, while the Kennan House was a contributing element but not an individually eligible resource, and the ʻĪao Parsonage was found to not meet the HAR Significance Criteria. Cultural Surveys Hawaiʻi conducted a GPR survey to identify subsurface anomalies and help determine if an AIS is required. SHPD reviewed the GPR results and indicated further recommendations will be provided once permit applications and design plans are submitted, supporting Policy (B) to maximize information retention. Consistent with Policy (C), the Project will rehabilitate Alexander House (as a multipurpose center) and Baybrook House (as a management office) in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. The Project is consistent with the objectives and policies of this section. For additional information regarding: Archaeological and Historic Resources see Section 4.1, Cultural Resources Section 4.2.			
Scenic and Open Space Resources			
(b) Objective: (A) Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open-space resources.			
(c) Policies:			
(A) Identify valued scenic resources in the coastal zone management area;			X
(B) Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;	X		
(C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and			X
(D) Encourage those developments that are not coastal dependent to locate in inland areas.	X		
Discussion: The Project is approximately 1.8 miles inland from the nearest shoreline and is not a coastal-dependent development. Policies (A) and (C), which concern identifying and preserving shoreline scenic resources and open space, are not applicable to the Project. Policies (B) and (D) are applicable and supported. Policy (B) calls for ensuring new developments are compatible with their visual environment and minimize alteration of existing public views. The Project retains approximately 70 percent of the Project site as open space, sets new buildings back approximately 60 feet from Alexander House and Baybrook House, and spaces the three new two-story residential buildings to preserve sightlines from Main Street to Aupuni Street. The new buildings will not impact public views toward the West Maui Mountains, the coastline, or Haleakalā from Main Street or Aupuni			

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Street. The new buildings are compatible in massing, scale, and roof form with adjacent historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. Policy (D) encourages non-coastal-dependent developments to locate in inland areas; the Project is an affordable senior housing project sited in central Wailuku, consistent with this policy.			
Coastal Ecosystems			
(b) Objective: (A) Protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes, from disruption and minimize adverse impacts on all coastal ecosystems.			
(c) Policies:			
(A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;			X
(B) Improve the technical basis for natural resource management;			X
(C) Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;			X
(D) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and			X
(E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.	X		
Discussion: The Project site is approximately 1.8 miles from the nearest shoreline and does not involve, and will not directly impact, coastal ecosystems such as reefs, beaches, or dunes. Policies (A) through (D), which concern stewardship of marine and coastal resources, natural resource management, preservation of coastal ecosystems, and regulation of stream diversions, are not applicable to this inland Project. Policy (E), which calls for promoting water quality planning and implementing point and non-point source pollution control measures, is applicable and supported. The Project will obtain an NPDES permit requiring BMP during construction to minimize soil erosion and pollutant discharges. Post-construction, the Project incorporates LID features—including bioretention planters, underground stormwater chambers beneath parking areas, and on-grade retention basins—to manage runoff and protect the quality of downstream waters, consistent with Policy (E).			
Economic Uses			
(b) Objective: (A) Provide public or private facilities and improvements important to the State's economy in suitable locations.			
(c) Policies:			
(A) Concentrate coastal dependent development in appropriate areas;			X
(B) Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and			X
(C) Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:			
• Use of designated locations is not feasible;			X

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
• Adverse environmental effects and risks from coastal hazards are minimized; and			X
• The development is important to the State's economy.			X
Discussion: The Project is not a coastal-dependent or coastal-related development. It is an affordable senior housing project in central Wailuku approximately 1.8 miles inland from the shoreline. Policies (A) and (B), which concern concentrating and siting coastal-dependent development, and Policy (C)(i)–(iii), which address when coastal development outside designated areas may be permitted, are not applicable to the Project.			
Coastal Hazards			
(b) Objective: (A) Reduce hazard to life and property from coastal hazards.			
(c) Policies:			
(A) Develop and communicate adequate information about the risks of coastal hazards;			X
(B) Control development, including planning and zoning control, in areas subject to coastal hazards;			X
(C) Ensure that developments comply with requirements of the National Flood Insurance Program; and			X
(D) Prevent coastal flooding from inland projects.	X		
Discussion: The Project site is approximately 1.8 miles from the nearest shoreline at an elevation of approximately 355 to 388 feet AMSL, well above any coastal hazard zones. The Project site is in FEMA Flood Insurance Rate Map Zone X, which is outside the 0.2 percent annual chance floodplain and is not within a Special Flood Hazard Area. The site is not within the tsunami or extreme tsunami evacuation zones. The SLR-XA map for the 3.2-foot SLR scenario confirms the Project site is not at risk of inundation. Policies (A) through (D), which concern communicating coastal hazard risk, controlling development in coastal hazard areas, National Flood Insurance Program compliance, and preventing coastal flooding from inland projects, are not applicable to this inland project. Regarding Policy (D), the Project's drainage system is designed to meet County stormwater management requirements so as not to create adverse flood conditions on adjacent or downstream properties.			
Managing Development			
(b) Objective: (A) Improve the development review process, communication, and public participation in the management of coastal resources and hazards.			
(c) Policies:			
1.0 Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;			X
2.0 Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and			X
3.0 Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.	X		
Discussion: The Project site is approximately 1.8 miles inland from the nearest shoreline and is outside the SMA. Policies (5) and (6), which concern existing coastal zone law and facilitating timely processing of coastal development permits, are not applicable to this inland project.			

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Policy (7), which calls for communicating the potential short- and long-term impacts of proposed significant coastal developments to facilitate public participation, is applicable and supported. This Draft EA fulfills that purpose: pre-assessment consultation comments were solicited and received from State and County agencies, neighbors, and the public, and those comments are incorporated into this Draft EA and reproduced in Appendix I. The Draft EA will be published in the State Environmental Review Program's (ERP) Environmental Notice, providing an additional public comment period for agencies and the public to review and comment on the Project's potential impacts and proposed mitigation measures.			
Public Participation			
(b) Objective: (A) Stimulate public awareness, education, and participation in coastal management.			
(c) Policies:			
(A) Promote public involvement in coastal zone management processes;	X		
(B) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and			X
(C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.			X
Discussion: The Project is not in the SMA and does not directly involve coastal management issues. Policies (B) and (C), which concern disseminating coastal management information through educational materials and workshops and organizing coastal-issue mediations, are not applicable to this inland project. Policy (A), which calls for promoting public involvement in CZM processes, is applicable and supported. Pre-assessment consultation comments were solicited and received from State and County agencies, neighbors, and the public, and those comments are incorporated into this Draft EA and reproduced in Appendix I. The Draft EA will be published in the ERP Environmental Notice, affording opportunity for public comment by agencies and the public on the Project and this Draft EA.			
Beach Protection			
(b) Objective: (A) Protect beaches and coastal dunes for: (i) Public use and recreation; (ii) The benefit of coastal ecosystems; and (iii) Use as natural buffers against coastal hazards (iv) Coordinate and fund beach management and protection			
(c) Policies:			
1. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;			X
2. Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;			X
3. Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;			X
4. Minimize grading of and damage to coastal dunes;			X

COASTAL ZONE MANAGEMENT ACT, SECTION 205A-2, HRS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
5. Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and			X
6. Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor; and			X
Discussion: The Project site is approximately 1.8 miles inland from the nearest shoreline at an elevation of approximately 355 feet AMSL. The Project does not involve beaches, coastal dunes, shoreline setbacks, shoreline hardening structures, or beach transit corridors. Policies 1 through 6 of this section are not applicable to the Project.			
Marine and Coastal Resources;			
(b) Objective: (A) Promote the protection, use, and development of marine and coastal resources to assure their sustainability.			
(c) Policies:			
(A) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;			X
(B) Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;			X
(C) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;			X
(D) Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and			X
(E) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.			X
Discussion: The Project site is approximately 1.8 miles inland from the nearest shoreline and is not adjacent to or in the vicinity of marine or coastal resources. The Project will not directly impact marine or coastal resources. Policies (A) through (E) of this section are not applicable to the Project.			

5.2.4 Hawai‘i State Plan, Chapter 226, Hawai‘i Revised Statutes

The Hawai‘i State Plan (Chapter 226, HRS) sets forth the goals, objectives, policies, and priority guidelines for growth, development, and allocation of limited resources throughout the State. It contains diverse policies and objectives on topics of state interest including but not limited to, the economy, agriculture, the visitor industry, federal expenditure, the physical environment, facility systems, socio-cultural advancement, and sustainability.

The State Plan is divided into three parts, Part I (Overall Theme, Goals and Policies); Part II (Planning, Coordination, and Implementation); and Part III (Priority Guidelines). Part II elements of the State Plan pertain primarily to the administrative structure and implementation process of the Plan. As such, comments regarding the applicability of Part II to the Project are not appropriate and are therefore not included. Parts I and III are provided in matrix format below and the checked boxes indicate whether the individual objectives and policies are supported, not supported, or not applicable.

Applicable objectives, policies, and priority guidelines of the Hawai‘i State Plan are discussed below.

Table 5-2: Hawai‘i State Plan, Chapter 226, HRS – Part I

HAWAI‘I STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	S	N/S	N/A
HRS § 226-1: Findings and Purpose			
HRS § 226-2: Definitions			
HRS § 226-3: Overall Theme			
Hawai‘i’s people, as both individuals and groups, generally accept and live by a number of principles or values which are an integral part of society. This concept is the unifying theme of the State Plan. The following principles or values are established as the overall theme of the Hawai‘i State Plan: *(1) Individual and family self-sufficiency refers to the rights of people to maintain as much self-reliance as possible. It is an expression of the value of independence, in other words, being able to freely pursue personal interests and goals. Self-sufficiency means that individuals and families can express and maintain their own self-interest so long as that self-interest does not adversely affect the general welfare. Individual freedom and individual achievement are possible only by reason of other people in society, the institutions, arrangements, and customs that they maintain, and the rights and responsibilities that they sanction.* *(2) Social and economic mobility refers to the right of individuals to choose and to have the opportunities for choice available to them. It is a corollary to self-sufficiency. Social and economic mobility means that opportunities and incentives are available for people to seek out their own levels of social and economic fulfillment.* *(3) Community or social well-being is a value that encompasses many things. In essence, it refers to healthy social, economic, and physical environments that benefit the community as a whole. A sense of social responsibility, of caring for others and for the well-being of our community and of participating in social and political life, are important aspects of this concept. It further implies the aloha spirit--attitudes of tolerance, respect, cooperation, and unselfish giving, within which Hawai‘i’s society can progress.* *One of the basic functions of our society is to enhance the ability of individuals and groups to pursue their goals freely, to satisfy basic needs and to secure desired socio-economic levels. The elements of choice and mobility within society’s legal framework are fundamental rights. Society’s role is to encourage conditions within which individuals and groups can approach their desired levels of self-reliance and self-determination. This enables people to gain confidence and self-esteem; citizens contribute more when they possess such qualities in a free and open society.* *Government promotes citizen freedom, self-reliance, self-determination, social and civic responsibility and goals achievement by keeping order, by increasing cooperation among many diverse individuals and groups, and by fostering social and civic responsibilities that affect the general welfare. The greater the number and activities of individuals and groups, the more complex the government’s role becomes. The function of government, however, is to assist citizens in attaining their goals. Government provides for meaningful participation by the people in decision-making and for effective access to authority as well as an equitable sharing of benefits. Citizens have a responsibility to work with their government to contribute to society's improvement. They must also conduct their activities within an agreed-upon legal system that protects human rights.*			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES **(**Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Discussion: The Project embodies WUC's longstanding commitment to the Wailuku community by providing the Mission Grounds site to help address the critical shortage of affordable housing on Maui. Located on an underutilized urban site close to Wailuku's social services, medical offices, public transit, and retail establishments, the Project supports healthy social, economic, and civic well-being. EAH Housing's on-site Resident Services Coordinator will implement programs addressing seniors' specific needs, including community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. In this way, the Project promotes individual and family self-sufficiency, aging in place, community well-being, and social and civic responsibility consistent with the Overall Theme of the Hawaiʻi State Plan.			
HRS § 226-4: State Goals.			
In order to ensure, for present and future generations, those elements of choice and mobility that ensure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve: *(4) A strong, viable economy, characterized by stability, diversity and growth that enables fulfillment of the needs and expectations of Hawaii's present and future generations.* *(5) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.* *(6) Physical, social and economic well-being, for individuals and families in Hawaii, that nourishes a sense of community responsibility, of caring and of participation in community life.*			
Discussion: The Project directly supports the State goal of achieving physical, social, and economic well-being for individuals and families in Hawaiʻi. By providing 84 affordable rental homes for low-income seniors (age 62 or older, earning 60 percent or less of the AMI) in a central, service-rich urban location, the Project promotes greater economic stability by easing one of the largest cost burdens senior households face in Hawaiʻi – housing, allowing more of their typically fixed incomes for other necessities such as food and healthcare. The Project promotes a sense of community responsibility and participation in community life. The Project also supports the goal of a desired physical environment by concentrating new development within an existing urban area, reducing pressure on sensitive natural areas elsewhere on Maui.			
HRS § 226-5: Objectives and policies for population.			
(a) Objective: *It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic and social objectives contained in this chapter.*			
(b) Policies: *To achieve the population objective, it shall be the policy of this State to:*			
(1) Manage population growth statewide in a manner that provides increased opportunities for Hawaii's people to pursue their physical, social and economic aspirations while recognizing the unique needs of each County.			X
(2) Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.			X
(3) Promote increased opportunities for Hawaii's people to pursue their socio-economic aspirations throughout the islands.	X		
(4) Encourage research activities and public awareness programs to foster an understanding of Hawaii's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii's population.			X

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(5) Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among the states, provided that such actions do not prevent the reunion of immediate family members.			X
(6) Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			X
(7) Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.			X
Discussion: The Project will not influence population growth patterns and is unlikely to attract new residents from outside of the State or County. The Project is intended for independent-living senior households already residing on Maui, which aligns with EAH Housing's experience across its Maui portfolio. As such, the Project serves the existing senior population by addressing a critical housing need rather than stimulating new population growth.			
HRS § 226-6: Objectives and policies for the economy in general.			
(a) Objectives: *Planning for the State's economy in general shall be directed toward achievement of the following objectives:*			
(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.			X
(b) Policies: *To achieve the general economic objectives, it shall be the policy of this State to:*			
(1) Promote and encourage entrepreneurship within Hawaii by residents and nonresidents of the State.			X
(2) Expand Hawaii's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.			X
(3) Promote Hawaii as an attractive market for environmentally and socially sound investment activities that benefit Hawaii's people.			X
(4) Transform and maintain Hawaii as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.			X
(5) Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawaii.			X
(6) Seek broader outlets for new or expanded Hawaii business investments.			X
(7) Expand existing markets and penetrate new markets for Hawaii's products and services.			X
(8) Assure that the basic economic needs of Hawaii's people are maintained in the event of disruptions in overseas transportation.			X
(9) Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives.			X

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(10) Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawaii's small scale producers, manufacturers, and distributors.			X
(11) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.			X
(12) Encourage innovative activities that may not be labor-intensive, but may otherwise contribute to the economy of Hawaii.			X
(13) Foster greater cooperation and coordination between the government and private sectors in developing Hawaii's employment and economic growth opportunities.			X
(14) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.			X
(15) Maintain acceptable working conditions and standards for Hawaii's workers.			X
(16) Provide equal employment opportunities for all segments of Hawaii's population through affirmative action and nondiscrimination measures.			X
(17) Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(18) Encourage businesses that have favorable financial multiplier effects within Hawaii's economy, particularly with respect to emerging industries in science and technology.			X
(19) Promote and protect intangible resources in Hawaii, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.			X
(20) Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new or innovative potential growth industries in particular.			X
(21) Foster a business climate in Hawaii--including attitudes, tax and regulatory policies, and financial and technical assistance programs--that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.			X
Discussion: The Project does not have a direct relationship to the State's general economy objectives and policies. However, Project construction will generate construction employment and spending, contributing general excise taxes and income taxes to the State's revenue. The general contractor estimates that up to 120 jobs could be created during the construction phase. Once operational, employees and businesses associated with the Project will continue to contribute to tax revenues.			
HRS § 226-7: Objectives and policies for the economy - agriculture			
(a) Objectives: *Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:*			
(1) Viability of Hawaii's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawaii's strategic, economic, and social well-being.			X

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(b) Policies: *To achieve the agriculture objectives, it shall be the policy of this State to:*			
(1) Establish a clear direction for Hawaii's agriculture through stakeholder commitment and advocacy.			X
(2) Encourage agriculture by making the best use of natural resources.			X
(3) Provide the governor and the legislature with information and options needed for prudent decision making for the development of agriculture.			X
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.			X
(5) Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawaii's economy.			X
(6) Seek the enactment and retention of federal and state legislation that benefits Hawaii's agricultural industries.			X
(7) Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawaii's food producers and consumers in the State, nation, and world.			X
(8) Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			X
(9) Enhance agricultural growth by providing public incentives and encouraging private initiatives.			X
(10) Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			X
(11) Increase the attractiveness and opportunities for an agricultural education and livelihood.			X
(12) In addition to the State's priority on food, expand Hawaii's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			X
(13) Promote economically competitive activities that increase Hawaii's agricultural self-sufficiency, including the increased purchase and use of Hawaii-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D 104.			X
(14) Promote and assist in the establishment of sound financial programs for diversified agriculture.			X
(15) Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			X
(16) Facilitate the transition of agricultural lands in economically nonfeasible agricultural production to economically viable agricultural uses.			X
(17) Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko iʻa, māla, and irrigated loʻi, and growth of traditional Hawaiian crops, such as kalo, ʻuala, and ʻulu.			X
(18) Increase and develop small-scale farms.			X
Discussion: The Project has no direct relationship to the agriculture industry. The Project site is an urban infill site in Wailuku and does not involve agricultural lands or activities.			

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HRS § 226-8: Objectives and policies for the economy – visitor industry.			
(a) Objectives: *Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawaii's economy.*			
(b) Policies: *To achieve the visitor industry objective, it shall be the policy of this State to:*			
(1) Support and assist in the promotion of Hawaii's visitor attractions and facilities.			X
(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawaii's people.			X
(3) Improve the quality of existing visitor destination areas.			X
(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.			X
(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawaii's people.			X
(6) Provide opportunities for Hawaii's people to obtain job training and education that will allow for upward mobility within the visitor industry.			X
(7) Foster a recognition of the contribution of the visitor industry to Hawaii's economy and the need to perpetuate the aloha spirit.			X
(8) Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawaii's cultures and values.			X
Discussion: The Project has no direct relationship to the visitor industry. The Project is a senior affordable housing development, not a visitor facility or tourism-related use.			
HRS § 226-9: Objective and policies for the economy – federal expenditures.			
(a) Objective: *Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawaii's economy.*			
(b) Policies: *To achieve the federal expenditures objective, it shall be the policy of this State to:*			
(1) Encourage the sustained flow of federal expenditures in Hawaii that generates long-term government civilian employment.			X
(2) Promote Hawaii's supportive role in national defense.			X
(3) Promote the development of federally supported activities in Hawaii that respect state-wide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawaii's environment.			X
(4) Increase opportunities for entry and advancement of Hawaii's people into federal government service.			X
(5) Promote federal use of local commodities, services, and facilities available in Hawaii.			X
(6) Strengthen federal-state-county communication and coordination in all federal activities that affect Hawaii.			X
(7) Pursue the return of federally controlled lands in Hawaii that are not required for either the defense of the nation or for other purposes of national importance, and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.			X

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Discussion: The Project has no direct relationship to the economy, especially federal expenditures.			
HRS § 226-10: Objectives and policies for the economy – potential growth and innovative activities.			
(a) Objective: *Planning for the State's economy with regard to potential growth and innovative activities shall be directed towards achievement of the objective of development and expansion of potential growth activities that serve to increase and diversify Hawaii's economic base.*			
(b) Policies: *To achieve the potential growth and innovative activity objective, it shall be the policy of this State to:*			
(1) Facilitate investment and employment growth in economic activities that have the potential to expand and diversify Hawaii's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors;			X
(2) Facilitate investment in innovative activity that may pose risks or be less labor-intensive than other traditional business activity, but if successful, will generate revenue in Hawaii through the export of services or products or substitution of imported services or products;			X
(3) Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements;			X
(4) Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently knowledgeable, and equipped with the attitude necessary to undertake innovative activity;			X
(5) Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus;			X
(6) Expand Hawaii's capacity to attract and service international programs and activities that generate employment for Hawaii's people.			X
(7) Enhance and promote Hawaii's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts.			X
(8) Accelerate research and development of new energy- related industries based on wind, solar, ocean, and underground resources and solid waste.			X
(9) Promote Hawaii's geographic, environmental, social, and technological advantages to attract new economic activities into the State.			X
(10) Provide public incentives and encourage private initiative to attract new or innovative industries that best support Hawaii's social, economic, physical, and environmental objectives;			X
(11) Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research.			X
(12) Develop, promote, and support research and educational and training programs that will enhance Hawaii's ability to attract and develop economic activities of benefit to Hawaii.			X
(13) Foster a broader public recognition and understanding of the potential benefits of new, growth-oriented industry in Hawaii.			X

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(14) Encourage the development and implementation of joint federal and state initiatives to attract federal programs and projects that will support Hawaii's social, economic, physical, and environmental objectives.			X
(15) Increase research and development of businesses and services in the telecommunications and information industries.			X
(16) Foster the research and development of nonfossil fuel and energy efficient modes of transportation; and			X
(17) Recognize and promote health care and health care information technology as growth industries.			X
Discussion: The Project has no direct relation to "Objectives and policies for the economy – potential growth and innovative activities."			
HRS § 226-10.5: Objectives and policies for the economy – information industry			
Objective: *Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawaii as a leader in broadband and wireless communications and applications in the Pacific Region.*			
(c) Policies: *To achieve the information industry objective, it shall be the policy of this State to:*			
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawaii and between Hawaii and the world, and make high speed communication available to all residents and businesses in Hawaii;			X
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawai'i to accommodate future growth and innovation in Hawaii's economy;			X
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawaii;			X
(4) Encourage mainland- and foreign-based companies of all sizes, whether information technology-focused or not, to allow their principals, employees, or contractors to live in and work from Hawaii, using technology to communicate with their headquarters, offices, or customers located out-of-state;			X
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well- designed information industry;			X
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawaii's people;			X
(7) Provide opportunities for Hawaii's people to obtain job training and education that will allow for upward mobility within the information industry;			X
(8) Foster a recognition of the contribution of the information industry to Hawaii's economy; and			X
(9) Assist in the promotion of Hawai'i as a broker, creator, and processor of information in the Pacific.			X
Discussion: The Project has no direct relation to the State's goals on information industry.			

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HRS § 226-11: Objectives and policies for the physical environment – land-based, shoreline, and marine resources.			
Objectives: *Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of the following objectives:*			
(1) Prudent use of Hawaii's land-based, shoreline, and marine resources.			X
(2) Effective protection of Hawaii's unique and fragile environmental resources.			X
(d) Policies: *To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:*			
(1) Exercise an overall conservation ethic in the use of Hawaii's natural resources.			X
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.			X
(3) Take into account the physical attributes of areas when planning and designing activities and facilities.	X		
(4) Manage natural resources and environs to encourage their beneficial and multiple use without generating costly or irreparable environmental damage.			X
(5) Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.			X
(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawaii.			X
(7) Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			X
(8) Pursue compatible relationships among activities, facilities, and natural resources.			X
(9) Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.	X		
Discussion: As an infill development on an underutilized urban site in central Wailuku, the Project reduces development pressure on rural, agricultural, conservation, and environmentally sensitive areas. The Project design takes into account the physical attributes of the site, including topography, proximity to existing infrastructure, and the character of the surrounding Historic District No. 3. By concentrating new development within the existing urban area, the Project supports the prudent use of Hawai'i's limited land resources.			
HRS § 226-12: Objectives and policies for the physical environment – scenic, natural beauty, and historic resources.			
Objective: *Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawaii's scenic assets, natural beauty, and multi-cultural/historical resources.*			
Policies: *To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:*			
(1) Promote the preservation and restoration of significant natural and historic resources.	X		
(2) Provide incentives to maintain and enhance historic, cultural, and scenic amenities.			X
(3) Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	X		
(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawaii's ethnic and cultural heritage.	X		

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES **(**Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(5) Encourage the design of developments and activities that complement the natural beauty of the islands.	X		
Discussion: The Project minimizes the visual impact of the proposed density within the context of Historic District No. 3 and preserves the park-like setting of the Project site and surrounding Historic District. The three new, two-story residential buildings will be set back approximately 60 feet from Alexander House and Baybrook House, respectively. Additionally, buildings will be spaced to preserve approximately 70 percent of the Project site's open space, including sightlines from Main Street to Aupuni Street. Native Hawaiian plants will be appropriately incorporated into landscaping wherever possible. The long facades of the new residential buildings will be broken into three distinct sections using subtle massing offsets in plan and elevation view. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding. The Project's use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings' size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3. None of the proposed buildings will impact public views toward the West Maui Mountains, the coastline or Haleakalā from Main Street and Aupuni Street.			
HRS § 226-13: Objectives and policies for the physical environment – land, air, and water quality.			
Objectives: *Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:+*			
(1) Maintenance and pursuit of improved quality in Hawaii's land, air, and water resources.			X
(2) Greater public awareness and appreciation of Hawaii's environmental resources.			X
Policies: *To achieve the land, air, and water quality objectives, it shall be the policy of this State to:*			
(1) Foster educational activities that promote a better understanding of Hawaii's limited environmental resources.			X
(2) Promote the proper management of Hawaii's land and water resources.			X
(3) Promote effective measures to achieve desired quality in Hawaii's surface, ground, and coastal waters.			X
(4) Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawaii's people.			X
(5) Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.			X
(6) Encourage design and construction practices that enhance the physical qualities of Hawaii's communities.			X
(7) Encourage urban developments in close proximity to existing services and facilities.	X		
(8) Foster recognition of the importance and value of the land, air, and water resources to Hawaii's people, their cultures and visitors.			X

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Discussion: As an infill development within central Wailuku, the Project maximizes use of existing infrastructure and public services, reducing development pressure on rural and environmentally sensitive lands. The Project incorporates LID features, including surface bioretention planters, to manage stormwater runoff and prevent off-site overflows. Low-VOC paints, adhesives, flooring, and insulation and proper ventilation systems protect indoor air quality. The Project is sited in close proximity to existing services and facilities, consistent with the policy encouraging urban development in proximity to existing services.			
HRS § 226-14: Objective and policies for facility systems – in general			
Objective: *Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, sustainable development, climate change adaptation, sea level rise adaptation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.*			
Policies: *To achieve the general facility systems objective, it shall be the policy of this State to:*			
(1) Accommodate the needs of Hawaii's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.			X
(2) Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.			X
(3) Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.			X
(4) Pursue alternative methods of financing programs and projects and cost-saving techniques in the planning, construction, and maintenance of facility systems.			X
(5) Identify existing and planned state facilities that are vulnerable to sea level rise, flooding impacts, and natural hazards.			X
(6) Assess a range of options to mitigate the impacts of sea level rise to existing and planned state facilities.			X
Discussion: The Project has no direct relation to the State's objective and policies for facility systems. Moreover, the Project site is outside the SLR-XA.			
HRS § 226-15: Objectives and policies for facility systems – solid and liquid wastes.			
Objectives: *Planning for the State's facility systems with regard to solid and liquid wastes shall be directed towards the achievement of the following objectives:*			
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.			X
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.			X
Policies: *To achieve solid and liquid waste objectives, it shall be the policy of this State to:*			
(1) Encourage the adequate development of sewerage facilities that complement planned growth.			X
(2) Promote re-use and recycling to reduce solid and liquid wastes and employ a conservation ethic.	X		
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
Discussion: During construction, the applicant will require salvage and recycling of nonhazardous construction waste, including green waste, asphalt, concrete, masonry, wood, and other building materials, in accordance with State and County requirements. Non-			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
recyclable construction waste will be disposed of at the Central Maui Landfill. Once operational, on-site property managers will coordinate with the DEM Solid Waste Division on recycling options. Non-recyclable waste will be collected by contracted services and transported to the Central Maui Landfill. The Project also includes lint traps in communal laundry facilities and a system to capture air conditioning condensate and direct it to the on-site drainage system rather than the sanitary sewer system.			
HRS § 226-16: Objectives and policies for facility systems – water.			
Objective: *Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.*			
Policies: *To achieve the facility systems water objective, it shall be the policy of this State to:*			
(1) Coordinate development of land use activities with existing and potential water supply.	X		
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.			X
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.	X		
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.			X
(5) Support water supply services to areas experiencing critical water problems.			X
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs.			X
Discussion: The Project's water system will be designed to meet DWS and County of Maui Department of Fire and Public Safety standards. A Reservation of Available Service Capacity will be submitted to DWS to confirm the existing water system can accommodate the Project. The Project will incorporate water-saving features including low-flow plumbing fixtures and surface bioretention planters for stormwater management, consistent with DWS recommendations. Drought-tolerant and native plants will be used in landscaping to further minimize irrigation demand. Separate water meters for landscape and buildings will also be installed.			
HRS § 226-17: Objectives and policies for facility systems – transportation.			
Objective: *Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:*			
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.			X
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			X
Policies: *To achieve the transportation objectives, it shall be the policy of this State to:*			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			X
(2) Coordinate state, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;			X
(3) Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;			X
(4) Provide for improved accessibility to shipping, docking, and storage facilities;			X

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(5) Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			X
(6) Encourage transportation systems that serve to accommodate present and future development needs of communities;			X
(7) Encourage a variety of carriers to offer increased opportunities and advantages to interisland movement of people and goods;			X
(8) Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			X
(9) Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;			X
(10) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawaii's natural environment;			X
(11) Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;	X		
(12) Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and			X
(13) Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency.			X
Discussion: The Project is not directly related to the State's objectives and policies for transportation. However, the Project site in central Wailuku with easy access to public transit, employment, medical offices, schools, parks, and shopping, supports multimodal transportation options for senior residents. The Project's central location and incorporation of a no vehicle preference for applicants/residents will reduce dependence on single-occupancy vehicles and minimizes impacts to the surrounding road network.			
HRS § 226-18: Objectives and policies for facility systems – energy.			
Objectives: *Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:*			
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;			X
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawaii's dependence on imported fuels for electrical generation and ground transportation;			X
(3) Greater diversification of energy generation in the face of threats to Hawaii's energy supplies and systems;			X
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and			X
(5) Utility models that make the social and financial interests of Hawaii's utility customers a priority.			X
(e) Policy: *To achieve the energy objectives, it shall be the policy of this State to ensure the short- and long-term provision of adequate, reasonably priced, and dependable energy services to accommodate demand.*			
(f) Policies: *To further achieve the energy objectives, it shall be the policy of this State to:*			
(1) Support research and development as well as promote the use of renewable energy sources;			X

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(2) Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;			X
(3) Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;			X
(4) Promote all cost-effective conservation of power and fuel supplies through measures including:			
(A) Development of cost-effective demand-side management programs;			X
(B) Education;			X
(C) Adoption of energy-efficient practices and technologies; and			X
(D) Increasing energy efficiency and decreasing energy use in public infrastructure			X
(5) Ensure, to the extent that new supply-side resources are needed, the development or expansion of energy systems utilizes the least-cost energy supply option and maximizes efficient technologies;			X
(6) Support research, development, demonstration, and use of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			X
(7) Promote alternate fuels and transportation energy efficiency;			X
(8) Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications;			X
(9) Support actions that reduce, avoid, or sequester Hawaii's greenhouse gas emissions through agriculture and forestry initiatives.			X
(10) Provide priority handling and processing for all state and county permits required for renewable energy projects;			X
(11) Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other cost-effective renewable energy sources; and			X
(12) Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawaii.			X
Discussion: The Project has no direct relationship to the State's objective and policies energy development. However, consistent with the State's energy conservation goals, the Project is designed to achieve LEED Certified criteria for multifamily housing and includes energy-efficient LED lighting, solar thermal water heating, well-insulated walls and roofs, energy-efficient appliances, and whole-building energy metering with unit submeters.			
HRS § 226-18.5: Objectives and policies for facility systems—telecommunications.			
(a) Objective: *Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.*			
(b) Policy: *To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.*			
(c) Policies: *To further achieve the telecommunications objective, it shall be the policy of this State to:*			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(1) Facilitate research and development of telecommunications systems and resources;			X
(2) Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			X
(3) Promote efficient management and use of existing telecommunications systems and services; and			X
(4) Facilitate the development of education and training of telecommunications personnel.			X
Discussion: The Project has no direct relation to the State's objectives and policies for facility systems – telecommunications.			
HRS § 226-19: Objectives and policies for socio-cultural advancement – housing.			
Objectives: *Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:*			
(1) Greater opportunities for Hawaii's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more rental and for sale affordable housing is made available to extremely low, very low-, lower-, moderate-, and above moderate- income segments of Hawaii's population.			X
(2) The orderly development of residential areas sensitive to community needs and other land uses.			X
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawaii's people.			X
(a) Policies: *To achieve the housing objectives, it shall be the policy of this State to:*			
(1) Effectively accommodate the housing needs of Hawaii's people.	X		
(2) Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above moderate-income households.	X		
(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.	X		
(4) Promote appropriate improvement, rehabilitation, and maintenance of existing rental and for sale housing units and residential areas.			X
(5) Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.	X		
(6) Facilitate the use of available vacant, developable, and underutilized urban lands for housing.	X		
(7) Foster a variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods that reflect the culture and values of the community.			X
(8) Promote research and development of methods to reduce the cost of housing construction in Hawaii.			X
Discussion: The Project will provide 84 affordable rental homes plus one resident manager unit in three new two-story buildings for independent-living seniors aged 62 or older who earn at or below 60 percent of the AMI. In this way, the Project directly responds to the critical shortage of affordable rental housing for low-income seniors on Maui. The Project site is an underutilized urban property close to government offices, social service agencies, medical facilities, churches, public transit, the public library, and retail stores, giving senior			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
residents convenient access to the services they rely on. The Project will connect to existing sewer, water, drainage, electrical, telecommunications, and roadway infrastructure already serving the site, maximizing the benefits of the urban location while preserving undeveloped agricultural, conservation, and environmentally sensitive areas elsewhere on Maui.			
HRS § 226-20: Objectives and policies for socio-cultural advancement – health.			
Objectives: *Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:*			
(1) Fulfillment of basic individual health needs of the general public.	X		
(2) Maintenance of sanitary and environmentally healthful conditions in Hawaii's communities.	X		
(3) Elimination of health disparities by identifying and addressing social determinants of health.	X		
(b) Policies: *To achieve the health objectives, it shall be the policy of this State to:*			
(1) Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.			X
(2) Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.			X
(3) Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			X
(4) Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.	X		
(5) Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.	X		
(6) Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			X
(7) Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be reviewed every ten years and revised based on the best available epidemiological and public health data.	X		
Discussion: The Project supports the objectives and policies for socio-cultural advancement – health in several ways. EAH Housing's on-site Resident Services Coordinator will implement programs addressing seniors' specific needs, including community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. The Resident Services Coordinator will assist residents in navigating benefits and support services to promote overall health, wellness, and community connectedness. The Project site's proximity to medical offices and facilities in central Wailuku further supports residents' access to healthcare. The Project also incorporates low-VOC materials and proper ventilation systems to maintain environmentally healthful indoor conditions.			
HRS § 226-21: Objectives and policies for socio-cultural advancement – education.			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Objectives: *Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.*			
Policies: *To achieve the education objective, it shall be the policy of this State to:*			
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
(3) Provide appropriate educational opportunities for groups with special needs.			X
(4) Promote educational programs which enhance understanding of Hawaii's cultural heritage.			X
(5) Provide higher educational opportunities that enable Hawaii's people to adapt to changing employment demands.			X
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			X
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			X
(8) Emphasize quality educational programs in Hawaii's institutions to promote academic excellence.			X
(9) Support research programs and activities that enhance the education programs of the State.			X
Discussion: The Project is not directly involved with the State's objectives and policies for socio-cultural advancement – education.			
HRS § 226-22: Objective and policies for socio-cultural advancement – social services.			
Objective: *Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being.*			
Policies: *To achieve the social service objective, it shall be the policy of the State to:*			
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.			X
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.			X
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawaii's communities.			X
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.			X
(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.			X

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			X
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement - social services. However, the Project's on-site Resident Services Coordinator will connect senior residents with social services, benefits assistance, and community resources. The Project site's central Wailuku location provides residents convenient access to social service agencies in the area.			
HRS § 226-23: Objectives and policies for socio-cultural advancement – leisure.			
Objective: *Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.*			
Policies: *To achieve the leisure objective, it shall be the policy of this State to:*			
(1) Foster and preserve Hawaii's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.			X
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.			X
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.			X
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.			X
(5) Ensure opportunities for everyone to use and enjoy Hawaii's recreational resources.			X
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.			X
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawaii's people.			X
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.			X
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawaii's population to participate in the creative arts.			X
(10) Assure adequate access to significant natural and cultural resources in public ownership.			X
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement - leisure. However, the Alexander House will be rehabilitated to serve as a multipurpose center providing residents with on-site access to a lounge, computer lab, library, meeting room, kitchen, fitness room, and bike room, supporting a range of recreational and social activities for senior residents.			
HRS § 226-24: Objective and policies for socio-cultural advancement – individual rights and personal well-being.			
Objective: *Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.*			

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Policies: *To achieve the individual rights and personal well-being objective, it shall be the policy of this State to:*			
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			X
(2) Uphold and protect the national and state constitutional rights of every individual.			X
(3) Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			X
(4) Ensure equal opportunities for individual participation in society.			X
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement – individual rights and personal well-being.			
HRS § 226-25: Objectives and policies for socio-cultural advancement – culture.			
Objective: *Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawaii's people.*			
Policies: *To achieve the culture objective, it shall be the policy of this State to:*			
(1) Foster increased knowledge and understanding of Hawaii's ethnic and cultural heritages and the history of Hawaii.			X
(2) Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawaii's people and which are sensitive and responsive to family and community needs.			X
(3) Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawaii.			X
(4) Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawaii's people and visitors.			X
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement - culture. However, the Project is designed to be sensitive to and compatible with the character of Historic District No. 3, and the rehabilitation of Alexander House and Baybrook House follows the Secretary of the Interior's Standards for Rehabilitation to preserve character-defining features of both buildings.			
HRS § 226-26: Objectives and policies for socio-cultural advancement – public safety.			
Objectives: *Planning for the State's socio-cultural advancement with regard to public safety shall be directed towards the achievement of the following objectives:*			
(1) Assurance of public safety and adequate protection of life and property for all people.			X
(2) Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.			X
(3) Promotion of a sense of community responsibility for the welfare and safety of Hawaii's people.			X
(c) Policies related to public safety: *To achieve the public safety objectives, it shall be the policy of this State to:*			
(1) Ensure that public safety programs are effective and responsive to community needs.			X

HAWAIʻI STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(2) Encourage increased community awareness and participation in public safety programs.			X
(d) Policies related to criminal justice: *To further achieve public safety objectives related to criminal justice, it shall be the policy of this State to:*			
(1) Support criminal justice programs aimed at preventing and curtailing criminal activities.			X
(2) Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			X
(3) Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			X
(e) Policies related to emergency management: *To further achieve public safety objectives related to emergency management, it shall be the policy of this State to:*			
(1) Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.			X
(2) Enhance the coordination between emergency management programs throughout the State.			X
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement – public safety. The Project site is served by the Wailuku Police Station (approximately 1.5 miles away) and the Wailuku Fire Station. The Project will include perimeter fencing to discourage unauthorized access and increase security for residents.			
HRS § 226-27: Objectives and policies for socio-cultural advancement – government.			
Objectives: *Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:*			
(1) Efficient, effective, and responsive government services at all levels in the State.			X
(2) Fiscal integrity, responsibility, and efficiency in the state government and county governments.			X
(f) Policies: *To achieve the government objectives, it shall be the policy of this State to:*			
(1) Provide for necessary public goods and services not assumed by the private sector.			X
(2) Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			X
(3) Minimize the size of government to that necessary to be effective.			X
(4) Stimulate the responsibility in citizens to productively participate in government for a better Hawaii.			X
(5) Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			X
(6) Provide for a balanced fiscal budget.			X
(7) Improve the fiscal budgeting and management system of the State.			X
(8) Promote the consolidation of state and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	S	N/S	N/A
Discussion: The Project has no direct relationship to the State's objective and policies for socio-cultural advancement – government.			

Table 5-3: Hawai'i State Plan, Chapter 226, HRS - PART III

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	S	N/S	N/A
HRS § 226-101: Purpose. The purpose of this part is to establish overall priority guidelines to address areas of statewide concern.			
HRS § 226-102: Overall direction. The State shall strive to improve the quality of life for Hawaii's present and future population through the pursuit of desirable courses of action in seven major areas of statewide concern which merit priority attention: economic development, population growth and land resource management, affordable housing, crime and criminal justice, quality education, principles of sustainability, and climate change adaptation.			
HRS § 226-103: Economic priority guidelines.			
(a) Priority guidelines to stimulate economic growth and encourage business expansion and development to provide needed jobs for Hawaii's people and achieve a stable and diversified economy:			
(1) Seek a variety of means to increase the availability of investment capital for new and expanding enterprises.			X
(A) Encourage investments which:			
(i) Reflect long term commitments to the State;			X
(ii) Rely on economic linkages within the local economy;			X
(iii) Diversify the economy;			X
(iv) Reinvest in the local economy;			X
(v) Are sensitive to community needs and priorities; and			X
(vi) Demonstrate a commitment to provide management opportunities to Hawaii residents; and			X
(B) Encourage investments in innovative activities that have a nexus to the State, such as:			
(i) Present or former residents acting as entrepreneurs or principals;			X
(ii) Academic support from an institution of higher education in Hawaii;			X
(iii) Investment interest from Hawaii residents;			X
(iv) Resources unique to Hawaii that are required for innovative activity; and			X
(v) Complementary or supportive industries or government programs or projects.			X
(2) Encourage the expansion of technological research to assist industry development and support the development and commercialization of technological advancements.			X
(3) Improve the quality, accessibility, and range of services provided by government to business, including data and reference services and assistance in complying with governmental regulations.			X
(4) Seek to ensure that state business tax and labor laws and administrative policies are equitable, rational, and predictable.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(5) Streamline the processes for building and development permit and review and telecommunication infrastructure installation approval and eliminate or consolidate other burdensome or duplicative governmental requirements imposed on business, where scientific evidence indicates that public health, safety, and welfare would not be adversely affected.			X
(6) Encourage the formation of cooperatives and other favorable marketing or distribution arrangements at the regional or local level to assist Hawaii's small-scale producers, manufacturers, and distributors.			X
(7) Continue to seek legislation to protect Hawaii from transportation interruptions between Hawaii and the continental United States.			X
(8) Provide public incentives and encourage private initiative to develop and attract industries which promise long-term growth potentials and which have the following characteristics:			
(A) An industry that can take advantage of Hawaii's unique location and available physical and human resources.			X
(B) A clean industry that would have minimal adverse effects on Hawaii's environment.			X
(C) An industry that is willing to hire and train Hawaii's people to meet the industry's labor needs at all levels of employment.			X
(D) An industry that would provide reasonable income and steady employment.			X
(9) Support and encourage, through educational and technical assistance programs and other means, expanded opportunities for employee ownership and participation in Hawaii business.			X
(10) Enhance the quality of Hawaii's labor force and develop and maintain career opportunities for Hawaii's people through the following actions:			
(A) Expand vocational training in diversified agriculture, aquaculture, information industry, and other areas where growth is desired and feasible.			X
(B) Encourage more effective career counseling and guidance in high schools and post-secondary institutions to inform students of present and future career opportunities.			X
(C) Allocate educational resources to career areas where high employment is expected and where growth of new industries is desired.			X
(D) Promote career opportunities in all industries for Hawaii's people by encouraging firms doing business in the State to hire residents.			X
(E) Promote greater public and private sector cooperation in determining industrial training needs and in developing relevant curricula and on-the-job training opportunities.			X
(F) Provide retraining programs and other support services to assist entry of displaced workers into alternative employment.			X
(b) Priority guidelines to promote the economic health and quality of the visitor industry:			
(1) Promote visitor satisfaction by fostering an environment which enhances the aloha spirit and minimizes inconveniences to Hawaii's residents and visitors.			X
(2) Encourage the development and maintenance of well-designed, adequately serviced hotels and resort destination areas which are sensitive to neighboring communities and activities and which provide for adequate shoreline setbacks and beach access.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(3) Support appropriate capital improvements to enhance the quality of existing resort destination areas and provide incentives to encourage investment in upgrading, repair, and maintenance of visitor facilities.			X
(4) Encourage visitor industry practices and activities which respect, preserve, and enhance Hawaii's significant natural, scenic, historic, and cultural resources.			X
(5) Develop and maintain career opportunities in the visitor industry for Hawaii's people, with emphasis on managerial positions.			X
(6) Support and coordinate tourism promotion abroad to enhance Hawaii's share of existing and potential visitor markets.			X
(7) Maintain and encourage a more favorable resort investment climate consistent with the objectives of this chapter.			X
(8) Support law enforcement activities that provide a safer environment for both visitors and residents alike.			X
(9) Coordinate visitor industry activities and promotions to business visitors through the state network of advanced data communication techniques.			X
(c) Priority guidelines to promote the continued viability of the sugar and pineapple industries:			
(1) Provide adequate agricultural lands to support the economic viability of the sugar and pineapple industries.			X
(2) Continue efforts to maintain federal support to provide stable sugar prices high enough to allow profitable operations in Hawaii.			X
(3) Support research and development, as appropriate, to improve the quality and production of sugar and pineapple crops.			X
(d) Priority guidelines to promote the growth and development of diversified agriculture and aquaculture:			
(1) Identify, conserve, and protect agricultural and aquacultural lands of importance and initiate affirmative and comprehensive programs to promote economically productive agricultural and aquacultural uses of such lands.			X
(2) Assist in providing adequate, reasonably priced water for agricultural activities.			X
(3) Encourage public and private investment to increase water supply and to improve transmission, storage, and irrigation facilities in support of diversified agriculture and aquaculture.			X
(4) Assist in the formation and operation of production and marketing associations and cooperatives to reduce production and marketing costs.			X
(5) Encourage and assist with the development of a waterborne and airborne freight and cargo system capable of meeting the needs of Hawaii's agricultural community.			X
(6) Seek favorable freight rates for Hawaii's agricultural products from interisland and overseas transportation operators.			X
(7) Encourage the development and expansion of agricultural and aquacultural activities which offer long-term economic growth potential and employment opportunities.			X
(8) Continue the development of agricultural parks and other programs to assist small independent farmers in securing agricultural lands and loans.			X
(9) Require agricultural uses in agricultural subdivisions and closely monitor the uses in these subdivisions.			X
(10) Support the continuation of land currently in use for diversified agriculture.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(11) Encourage residents and visitors to support Hawaii's farmers by purchasing locally grown food and food products.			X
(e) Priority guidelines for water use and development:			
(1) Maintain and improve water conservation programs to reduce the overall water consumption rate.			X
(2) Encourage the improvement of irrigation technology and promote the use of non-potable water for agricultural and landscaping purposes.			X
(3) Increase the support for research and development of economically feasible alternative water sources.			X
(4) Explore alternative funding sources and approaches to support future water development programs and water system improvements.			X
(f) Priority guidelines for energy use and development:			
(1) Encourage the development, demonstration, and commercialization of renewable energy sources.			X
(2) Initiate, maintain, and improve energy conservation programs aimed at reducing energy waste and increasing public awareness of the need to conserve energy.			X
(3) Provide incentives to encourage the use of energy conserving technology in residential, industrial, and other buildings.			X
(4) Encourage the development and use of energy conserving and cost-efficient transportation systems.			X
(g) Priority guidelines to promote the development of the information industry:			
(1) Establish an information network, with an emphasis on broadband and wireless infrastructure and capability, that will serve as the foundation of and catalyst for overall economic growth and diversification in Hawaii.			X
(2) Encourage the development of services such as financial data processing, a products and services exchange, foreign language translations, telemarketing, teleconferencing, a twenty-four-hour international stock exchange, international banking, and a Pacific Rim management center.			X
(3) Encourage the development of small businesses in the information field such as software development; the development of new information systems, peripherals, and applications; data conversion and data entry services; and home or cottage services such as computer programming, secretarial, and accounting services.			X
(4) Encourage the development or expansion of educational and training opportunities for residents in the information and telecommunications fields.			X
(5) Encourage research activities, including legal research in the information and telecommunications fields.			X
(6) Support promotional activities to market Hawaii's information industry services.			X
(7) Encourage the location or co-location of telecommunication or wireless information relay facilities in the community, including public areas, where scientific evidence indicates that the public health, safety, and welfare would not be adversely affected.			X
Discussion: The Project has no direct relationship to the Hawai'i State Plan's Economic Priority Guidelines.			
HRS § 226-104: Population growth and land resources priority guidelines.			
(1) ***Priority guidelines to effect desired statewide growth and distribution:***			

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(A) Encourage planning and resource management to ensure that population growth rates throughout the State are consistent with available and planned resource capacities and reflect the needs and desires of Hawai'i's people.			X
(B) Manage a growth rate for Hawai'i's economy that will parallel future employment needs for Hawai'i's people.			X
(C) Ensure that adequate support services and facilities are provided to accommodate the desired distribution of future growth throughout the State.			X
(D) Encourage major state and federal investments and services to promote economic development and private investment to the neighbor islands, as appropriate.			X
(E) Explore the possibility of making available urban land, low-interest loans, and housing subsidies to encourage the provision of housing to support selective economic and population growth on the neighbor islands.			X
(F) Seek federal funds and other funding sources outside the State for research, program development, and training to provide future employment opportunities on the neighbor islands.			X
(G) Support the development of high technology parks on the neighbor islands.			X
*(2) **Priority guidelines for regional growth distribution and land resource utilization:***			
(1) Encourage urban growth primarily to existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditures, and away from areas where other important benefits are present, such as protection of important agricultural land or preservation of lifestyles.	X		
(2) Make available marginal or nonessential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district.			X
(3) Restrict development when drafting of water would result in exceeding the sustainable yield or in significantly diminishing the recharge capacity of any groundwater area.			X
(4) Encourage restriction of new urban development in areas where water is insufficient from any source for both agricultural and domestic use.			X
(5) In order to preserve green belts, give priority to state capital-improvement funds which encourage location of urban development within existing urban areas except where compelling public interest dictates development of a noncontiguous new urban core.			X
(6) Seek participation from the private sector for the cost of building infrastructure and utilities, and maintaining open spaces.			X
(7) Pursue rehabilitation of appropriate urban areas.			X
(8) Support the redevelopment of Kakaako into a viable residential, industrial, and commercial community.			X
(9) Direct future urban development away from critical environmental areas or impose mitigating measures so that negative impacts on the environment would be minimized.			X
(10) Identify critical environmental areas in Hawaii to include but not be limited to the following: watershed and recharge areas; wildlife habitats (on land and in the ocean); areas with endangered species of plants and wildlife; natural streams and water bodies; scenic and recreational shoreline resources; open space and natural areas; historic and cultural sites; areas particularly sensitive to reduction in water and air quality; and scenic resources.			X
(11) Identify all areas where priority should be given to preserving rural character and lifestyle.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(12) Utilize Hawaii's limited land resources wisely, providing adequate land to accommodate projected population and economic growth needs while ensuring the protection of the environment and the availability of the shoreline, conservation lands, and other limited resources for future generations.			X
(13) Protect and enhance Hawaii's shoreline, open spaces, and scenic resources.			X
Discussion: The Project site is an infill location within the urban core of Wailuku, consistent with the priority guideline to encourage urban growth primarily within existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditure. By developing on this underutilized urban site, the Project avoids development pressure on important agricultural lands, conservation areas, and other environmentally sensitive areas elsewhere on Maui.			
HRS § 226-105: Crime and criminal justice.			
Priority guidelines in the area of crime and criminal justice:			
(1) Support law enforcement activities and other criminal justice efforts that are directed to provide a safer environment.			X
(2) Target state and local resources on efforts to reduce the incidence of violent crime and on programs relating to the apprehension and prosecution of repeat offenders.			X
(3) Support community and neighborhood program initiatives that enable residents to assist law enforcement agencies in preventing criminal activities.			X
(4) Reduce overcrowding or substandard conditions in correctional facilities through a comprehensive approach among all criminal justice agencies which may include sentencing law revisions and use of alternative sanctions other than incarceration for persons who pose no danger to their community.			X
(5) Provide a range of appropriate sanctions for juvenile offenders, including community-based programs and other alternative sanctions.			X
(6) Increase public and private efforts to assist witnesses and victims of crimes and to minimize the costs of victimization.			X
Discussion: The Project has no direct relationship to the priority guidelines on crime and criminal justice. The Project site is served by the Wailuku Police Station, and the Project will include security cameras throughout the development as well as perimeter fencing to provide a secure living environment for senior residents.			
HRS § 226-106: Affordable housing.			
Priority guidelines for the provision of affordable housing:			
(1) Seek to use marginal or nonessential agricultural land, urban land, and public land to meet housing needs of extremely low-, very low-, lower-, moderate-, and above moderate-income households.	X		
(2) Encourage the use of alternative construction and development methods as a means of reducing production costs.	X		
(3) Improve information and analysis relative to land availability and suitability for housing.			X
(4) Create incentives for development which would increase home ownership and rental opportunities for Hawaii's extremely low-, very low-, lower-, and moderate-income households and residents with special needs.	X		
(5) Encourage continued support for government or private housing programs that provide low interest mortgages to Hawaii's people for the purchase of initial owner-occupied housing.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(6) Encourage public and private sector cooperation in the development of rental housing alternatives.			X
(7) Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations.			X
(8) Give higher priority to the provision of quality housing that is affordable for Hawaii's residents and less priority to development of housing intended primarily for individuals outside of Hawaii.	X		
Discussion: The Project directly supports the priority guidelines for affordable housing of (§226-106). The Project will provide 84 affordable rental homes for low-income seniors (age 62 or older, earning at or below 60 percent AMI) on an underutilized urban site, consistent with the guideline to use urban land to meet housing needs of extremely low-, very low-, lower-, and moderate-income households. The Project is designed to achieve LEED Certified criteria, which supports long-term affordability through reduced operating costs. The Project is intended for independent-living senior households on Maui, which is consistent with Priority Guideline (8) and EAH Housing's experience that most residents at its Maui properties were already living in the County prior to occupancy.			
HRS § 226-107: Quality education.			
Priority guidelines to promote quality education:			
(1) Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement;			X
(2) Continue emphasis on general education "core" requirements to provide common background to students and essential support to other university programs;			X
(3) Initiate efforts to improve the quality of education by improving the capabilities of the education work force;			X
(4) Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities;			X
(5) Increase and improve the use of information technology in education by the availability of telecommunications equipment for:			
(A) The electronic exchange of information;			X
(B) Statewide electronic mail; and			X
(C) Access to the Internet.			X
Encourage programs that increase the public's awareness and understanding of the impact of information technologies on our lives;			X
(6) Pursue the establishment of Hawaii's public and private universities and colleges as research and training centers of the Pacific;			X
(7) Develop resources and programs for early childhood education;			X
(8) Explore alternatives for funding and delivery of educational services to improve the overall quality of education; and			X
(9) Strengthen and expand educational programs and services for students with special needs.			X
Discussion: The Project has no direct relationship to the Hawai'i State Plan's Education Priority Guidelines and Principles.			

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
HRS § 226-108: Sustainability.			
Priority guidelines and principles to promote sustainability shall include:			
(1) Encouraging balanced economic, social, community, and environmental priorities;			X
(2) Encouraging planning that respects and promotes living within the natural resources and limits of the State;	X		
(3) Promoting a diversified and dynamic economy;			X
(4) Encouraging respect for the host culture;	X		
(5) Promoting decisions based on meeting the needs of the present without compromising the needs of future generations			X
(6) Considering the principles of the ahupuaa system; and			X
(7) Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawaii.			X
Discussion: The Project incorporates sustainable design features consistent with LEED Certified criteria for multifamily housing, including energy-efficient LED lighting, solar thermal water heating, well-insulated walls and roofs, low-flow plumbing fixtures, LID stormwater features, and low-VOC materials.,. The Project is sited within the existing urban area of Wailuku, consistent with the principle of living within the natural resources and limits of the State. Additionally, as a longstanding institution in the Wailuku community, WUC has a deep respect for the host culture, and the Project is designed to be compatible with and sensitive to the character of Historic District No. 3.			
HRS § 226-109: Climate change adaptation priority guidelines.			
Priority guidelines to prepare the State to address the impacts of climate change, including impacts to the areas of agriculture; conservation lands; coastal and nearshore marine areas; natural and cultural resources; education; energy; higher education; health; historic preservation; water resources; the built environment, such as housing, recreation, transportation; and the economy shall:			
(1) Ensure that Hawaii's people are educated, informed, and aware of the impacts climate change may have on their communities;			X
(2) Encourage community stewardship groups and local stakeholders to participate in planning and implementation of climate change policies;			X
(3) Invest in continued monitoring and research of Hawaii's climate and the impacts of climate change on the State;			X
(4) Consider native Hawaiian traditional knowledge and practices in planning for the impacts of climate change;			X
(5) Encourage the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change;			X
(6) Explore adaptation strategies that moderate harm or exploit beneficial opportunities in response to actual or expected climate change impacts to the natural and built environments;			X
(7) Promote sector resilience in areas such as water, roads, airports, and public health, by encouraging the identification of climate change threats, assessment of potential consequences, and evaluation of adaptation options;			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS – PART III. PRIORITY GUIDELINES (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	S	N/S	N/A
(8) Foster cross-jurisdictional collaboration between county, state, and federal agencies and partnerships between government and private entities and other nongovernmental entities, including nonprofit entities;			X
(9) Use management and implementation approaches that encourage the continual collection, evaluation, and integration of new information and strategies into new and existing practices, policies, and plans; and			X
(10) Encourage planning and management of the natural and built environments that effectively integrate climate change policy.			X
Discussion: As shown in the SLR Area map (Figure 19), the Project is over 1.8 miles inland and is not in an area at risk in the 3.2 feet SLR inundation scenario. At 355 feet AMSL, Direct inundation from projected SLR is not anticipated to affect the Project within the next 80 years. However, secondary impacts from climate change such as extreme weather events may still affect the Project and its critical infrastructure. All structures, landscaping, and vital infrastructure—including water, sewer, electrical, drainage, and roadways—should be designed to withstand water inundation and extreme weather events wherever feasible to promote long-term resilience.			

5.2.5 State Functional Plans

The Hawai'i State Plan directs State agencies to prepare functional plans for their respective program areas. There are 14 state functional plans that serve as the primary implementing vehicle for the objectives, policies, and priority guidelines of the Hawai'i State Plan. The functional plans applicability to the Project, along with each plan's applicable objectives are discussed in the matrix below.

HAWAI'I STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		S	N/S	N/A
Agriculture Functional Plan				
Objective A:	Achievement of increased agricultural production and growth through cultural and management practices.			X
Objective B:	Achievement of an orderly agricultural marketing system through product promotion and industry organization.			X
Objective C:	Achievement of increased consumption of and demand for Hawai'i's agricultural products through consumer education and product quality.			X
Objective D:	Achievement of optimal contribution by agriculture to the State's economy.			X
Objective E:	Achievement of adequate capital, and knowledge of its proper management, for agricultural development.			X
Objective F:	Achievement of increased agricultural production and growth through pest and disease controls.			X
Objective G:	Achievement of effective protection and improved quality of Hawai'i's land, water, and air.			X
Objective H:	Achievement of productive agricultural use of lands most suitable and needed for agriculture.			X
Objective I:	Achievement of efficient and equitable provision of adequate water for agricultural use.			X
Objective J:	Achievement of maximum degree of public understanding and support of agriculture in Hawai'i.			X

HAWAIʻI STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		**S**	**N/S**	**N/A**
Objective K:	Achievement of adequate supply of properly trained labor for agricultural needs.			X
Objective L:	Achievement of adequate transportation services and facilities to meet agricultural needs.			X
Objective M:	Achievement of adequate support services and infrastructure to meet agricultural needs.			X
Discussion: The objectives of the Agriculture Functional Plan are not applicable as the Project does not involve agricultural uses or activities, and the Project site is in the State Urban District and zoned Historic District No. 3.				
Conservation Lands Functional Plan				
Objective IA:	Establishment of data bases for inventories of existing lands and resources.			X
Objective IB:	Establishment of criteria for management of land and natural resources.			X
Objective IIA:	Establishment of plans for natural resources and land management.			X
Objective IIB:	Protection of fragile or rare natural resources.			X
Objective IIC:	Enhancement of natural resources.			X
Objective IID:	Appropriate development of natural resources.			X
Objective IIE:	Promotion and marketing of appropriate natural resources designated for commercial development.			X
Objective IIF:	Increase enforcement of land and natural resource use laws and regulations.			X
Objective IIIA:	Develop and implement conservation education programs for the general public and visitors.			X
Objective IIIB:	Increase access to land and natural resource data by the public and increase cooperation between agencies by making access to land and natural resource information more efficient.			X
Discussion: The objectives of the Conservation Lands Functional Plan are not applicable to the Project. The Project site is in the State Urban District and is not within the State Conservation District. The Project will not impact State conservation lands.				
Education Functional Plan				
Objective A (1):	**Academic Excellence.** Emphasize quality educational programs in Hawaiʻi's institutions to promote academic excellence.			X
Objective A (2):	**Basic Skills.** Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning. Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement.			X
Objective A (3):	**Education Workforce.** Initiate efforts to improve the quality of education by improving the capabilities of the education workforce.			X
Objective A (4):	**Services and Facilities.** Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
Objective B (1):	**Alternatives for Funding and Delivery.** Explore alternatives for funding and delivery of educational services to improve the overall quality of education.			X

HAWAI'I STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Objective B (2): Autonomy and flexibility. Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities.			X
Objective B (3): Increased Use of Technology. Increase and improve the use information technology in education and encourage programs which increase the public's awareness and understanding of the impact of information technologies on our lives.			X
Objective B (4): Personal Development. Support education programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
Objective B (5): Students with Special Needs. Provide appropriate educational opportunities for groups with special needs.			X
Objective C (1): Early Childhood Education. Develop resources and programs for early childhood education.			X
Objective C (2): Hawai'i's Cultural Heritage. Promote educational programs which enhance understanding of Hawai'i's cultural heritage.			X
Objective C (3): Research Programs and [Communication] Activities. Support research programs and activities that enhance the education programs of the State.			X
Discussion: The objectives of the Education Functional Plan are not applicable to the Project. The Project is a senior affordable housing project and does not involve State educational programs, facilities, or services.			
Employment Functional Plan			
Objective A: Improve the qualifications of entry-level workers and their transition to employment.			X
Objective B: Develop and deliver education, training and related services to ensure and maintain a quality and competitive workforce.			X
Objective C: Improve labor exchange.			X
Objective D: Improve the quality of life for workers and families.			X
Objective E: Improve planning of economic development, employment and training activities.			X
Discussion: The focus of the Project is the provision of affordable housing and does not focus on the workforce training aspects of the state Employment Functional Plan. However, providing new affordable housing can indirectly improve the quality of life for workers and families.			
Energy Functional Plan			
Objective A: Moderate the growth in energy demand through conservation and energy efficiency.			X
Objective B: Displace oil and fossil fuels through alternate and renewable energy resources.			X
Objective C: Promote energy education and legislation.			X
Objective D: Support and develop an integrated approach to energy development and management.			X
Objective E: Ensure State's abilities to implement energy emergency actions immediately in event of fuel supply disruptions. Ensure essential public			X

HAWAI'I STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		**S**	**N/S**	**N/A**
	services are maintained and provisions are made to alleviate economic and personal hardships which may arise.			
Discussion: The Project is designed to meet LEED Certified criteria for multifamily housing and incorporates energy efficiency features including energy-efficient appliances and LED lighting, well-insulated walls and roofs, solar thermal water heating, and whole-building energy metering with unit submeters. The Project site is near essential services, including government offices, medical facilities, shopping, and the Maui Bus Wailuku Loop Route, reducing reliance on private motorized vehicles. These features support the objectives of the Energy Functional Plan by moderating energy demand and supporting renewable energy use.				
Health Functional Plan				
Objective 1:	Health promotion and disease prevention. Reduction in the incidence, morbidity and mortality associated with preventable and controllable conditions.			X
Objective 2:	Prevention and control of communicable diseases. Reduction in the incidence, morbidity, and mortality associated with infectious and communicable diseases.			X
Objective 3:	Health needs of special populations with impaired access to health care. Increased availability and accessibility of health services for groups with impaired access to health care programs.	X		
Objective 4:	Community hospitals system. Development of a community hospital system which is innovative, responsive and supplies high-quality care to the constituencies it serves.			X
Objective 5:	Environmental programs to protect and enhance the environment. Continued development of new environmental protection and health services programs to protect, monitor, and enhance the quality of life in Hawai'i.			X
Objective 6:	DOH leadership. To improve the Department of Health's ability to meet the public health need of the State of Hawai'i in the most appropriate, beneficial and economical way possible.			X
Discussion: Most objectives of the Health Functional Plan are not directly applicable to the Project. However, Objective 3 is relevant. The Project's on-site Resident Services Coordinator will implement EAH Housing's StayWell! program, which addresses seniors' specific needs through community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. The Resident Services Coordinator will also assist residents in navigating benefits and support services designed to promote overall health, wellness, and community connectedness. Additionally, the Project site is near medical facilities and essential services, and the Maui Bus Wailuku Loop Route provides free transit access for residents aged 55 and older.				
Higher Education Functional Plan				
Objective A:	A number and variety of postsecondary education institutions sufficient to provide the diverse range of programs required to satisfy individual and societal needs and interests.			X
Objective B:	The highest level of quality, commensurate with its mission and objectives, of each educational, research, and public service program offered in Hawaii by an institution of higher education.			X
Objective C:	Provide appropriate educational opportunities for all who are willing and able to benefit from postsecondary education.			X

HAWAIʻI STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		**S**	**N/S**	**N/A**
Objective D:	Provide financing for postsecondary education programs sufficient to ensure adequate diversity, high quality, and wide accessibility.			X
Objective E:	Increase program effectiveness and efficiency through better coordination of educational resources.			X
Discussion:. The objectives of the Higher Education Functional Plan are not applicable to the Project. The Project is a senior affordable housing project and does not involve postsecondary education programs, institutions, or financing.				
Historic Preservation Functional Plan				
Objective A:	Identification of historic properties.	X		
Objective B:	Protection of historic properties.	X		
Objective C:	Management and treatment of historic properties.	X		
Objective D:	Provision of adequate facilities to preserve historic resources.			X
Objective E:	The establishment of programs to collect and conserve historic records, artifacts, and oral histories and to document and perpetuate traditional arts, skills, and culture.			X
Objective F:	Provision of better access to historic information.			X
Objective G:	Enhancement of skills and knowledge needed to preserve historical resources.			X
Discussion: The Project site is within Wailuku's Historic District No. 3 and contains historic structures listed on the Hawaiʻi State Register of Historic Places. MASON prepared a RLS of the Mission Grounds. The RLS identified and evaluated historic properties on the Project site and within the surrounding Historic District No. 3. Of the four buildings on the Project site, two were evaluated as significant. Kennan House was a contributing element to Historic District No. 3 but not individually eligible, and ʻĪao House was not eligible. The Project will rehabilitate the Alexander House as a multipurpose center and the Baybrook House as management offices, following the Secretary of the Interior's Standards for Rehabilitation to preserve character-defining features of both buildings. New residential buildings are carefully sited and designed to be compatible with the massing, scale, and architectural character of the historic district, consistent with Objectives A, B, and C of this plan. For additional information regarding the AIS and CIA for this Project, please see Sections 4.1 (Archaeological and Historic Resources) and 4.2 (Cultural Resources).				
Housing Functional Plan				
Objective A:	Increase and sustain the supply of permanent rental housing that is affordable and accessible to Hawaiʻi residents, particularly those with incomes at or below 80 percent AMI. Attain the legislative goal of 22,500 rental housing units by 2026.	X		
Objective B:	Increase the homeownership rate.			X
Objective C:	Address barriers to residential development			X
Objective D:	Maintain a statewide housing data system for use by public and private agencies engaged in the provision of housing.			X
Discussion: The Project directly supports Objective A by providing 84 affordable rental homes and one resident manager unit (85 units total) for seniors aged 62 and older with incomes at or below 60 percent of the AMI. The Project will provide a mix of 41 studio and 43 one-bedroom units in three new two-story buildings, helping to address the critical shortage of affordable rental housing in Maui. The Project site is currently developed but underutilized, and the Project will connect to existing sewer, water, drainage, electrical, telecommunications,				

HAWAI'I STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		**S**	**N/S**	**N/A**
and roadway infrastructure serving the site, thereby maximizing the use of the Project's urban location while conserving undeveloped land elsewhere.				
Human Services Functional Plan				
Objective A:	To sustain and improve current elder abuse and neglect services.			X
Objective B:	To increase cost-effective, high quality home and community-based services.			X
Objective C:	To increase home-based services to keep children in their homes and to increase placement resources for those children who must be temporarily or permanently removed from their homes, due to abuse or neglect.			X
Objective D:	To address factors that contribute to child abuse and other forms of family violence.			X
Objective E:	To provide affordable, accessible, and quality child care.			X
Objective F:	To maximize efforts of self-sufficiency through provision of transitional medical care service.			X
Objective G:	To provide AFDC recipients with a viable opportunity to become independent of the welfare system.			X
Objective H:	To facilitate client access to human services.			X
Objective I:	To eliminate organizational barriers which limit client access to human services.			X
Discussion: The objectives of the Human Services Functional Plan are not directly applicable to the Project. The Project provides senior affordable housing and does not directly provide human services programs. However, EAH Housing's on-site Resident Services Coordinator will connect residents with community services and benefits, indirectly supporting residents' access to available services.				
Recreation Functional Plan				
Objective I.A:	Address the problem of saturation of the capacity of beach parks and nearshore waters.			X
Objective I.B:	Reduce the incidence of ocean recreation accidents.			X
Objective I.C:	Resolve conflicts between different activities at heavily used ocean recreation areas.			X
Objective I.D:	Provide adequate boating facilities. Balance the demand for boating facilities against the need to protect the marine environment from potential adverse impacts.			X
Objective II.A:	Plan, develop, and promote recreational activities and facilities in mauka and other areas to provide a wide range of alternatives.			X
Objective II.B:	Meet special recreation needs of the elderly, the disabled, woman, single-parent families, immigrants, and other groups.			X
Objective II.C:	Improve and expand the provision of recreation facilities in urban areas and local communities.			X
Objective III.A:	Prevent the loss of access to shoreline and upland recreation areas due to new developments.			X
Objective III.B:	Resolve the problem of landowner liability that seriously hampers public access over private lands.			X
Objective III.C:	Increase access to State Forest Reserve lands over federal property, leased State lands, and other government lands.			X

HAWAIʻI STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Objective III.D: Acquire, develop, and manage additional public access ways.			X
Objective IV.A: Promote a conservation ethic in the use of Hawaiʻi's recreational resources.			X
Objective IV.B: Prevent degradation of the marine environment.			X
Objective IV.C: Improve the State's enforcement capabilities.			X
Objective IV.D: Mitigate adverse impacts of tour helicopters on the quality of recreational experiences in wilderness areas.			X
Objective V.A: Properly maintain existing parks and recreation areas.			X
Objective V.B: Promote interagency coordination and cooperation to facilitate sharing of resources, joint development efforts, clarification of responsibilities and jurisdictions, and improvements in enforcement capabilities.			X
Objective V.C: Assure adequate support for priority outdoor recreation programs and facilities.			X
Objective VI.A: Increase recreational access and opportunities in Hawaiʻi's wetlands.			X
Objective VI.B: Develop an adequate information base to assist the County planning departments and other regulatory agencies in make decisions regarding wetlands.			X
Objective VI.C: Assure the protection of the most valuable wetlands in the state.			X
Discussion: The objectives of the Recreation Functional Plan are not applicable to the Project. The Project is a senior affordable housing development in an inland urban setting approximately 1.8 miles from the ocean. The Project does not involve coastal, ocean, or wetland recreation facilities and will not affect access to shoreline or recreation areas. The Project site is within walking distance of Wailuku Elementary School Park and Kehalani Mauka Park, providing residents with convenient access to existing public recreational space.			
Tourism Functional Plan			
Objective I.A: Development, implementation and maintenance of policies and actions which support the steady and balanced growth of the visitor industry.			X
Objective II.A: Development and maintenance of well-designed visitor facilities and related developments which are sensitive to the environment, sensitive to neighboring communities and activities, and adequately serviced by infrastructure and support services.			X
Objective III.A: Enhancement of respect and regard for the fragile resources which comprise Hawaii's natural and cultural environment. Increased preservation and maintenance efforts.			X
Objective IV.A: Support of Hawaiʻi's diverse range of lifestyles and natural environment.			X
Objective IV.B: Achievement of mutual appreciation among residents, visitors, and the visitor industry.			X
Objective V.A: Development of a productive workforce to maintain a high-quality visitor industry.			X
Objective V.B: Enhancement of career and employment opportunities in the visitor industry.			X
Objective VI.A: Maintenance of a high customer awareness of Hawaiʻi as a visitor destination in specific desired market segments.			X
Discussion: The objectives of the Tourism Functional Plan are not applicable to the Project. The Project provides senior affordable housing and does not involve visitor industry facilities, programs, or activities.			

HAWAI'I STATE FUNCTIONAL PLANS (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)		**S**	**N/S**	**N/A**
Transportation Functional Plan				
Objective I.A:	Expansion of the transportation system.			X
Objective I.B:	Reduction of travel demand through zoning and decentralization initiatives.			X
Objective I.C:	Management of existing transportation systems through a program of transportation systems management (TSM).			X
Objective I.D:	Identification and reservation of lands and rights-of-way required for future transportation improvements.			X
Objective I.E:	Planning and designing State highways to enhance inter-regional mobility.			X
Objective I.F:	Improving and enhancing transportation safety.			X
Objective I.G:	Improved transportation maintenance programs.			X
Objective I.H:	Ensure that transportation facilities are accessible to people with disabilities.			X
Objective II.A:	Development of a transportation infrastructure that supports economic development initiatives.			X
Objective III.B:	Expansion of revenue bases for transportation improvements.			X
Objective IV.A:	Providing educational programs.			X
Discussion: The objectives of the Transportation Functional Plan are not directly applicable to the Project. The Project does not propose changes to the regional transportation system. However, the Project's central location in Wailuku Town supports reduced transportation demand. The Project site near government offices, medical facilities, social service agencies, a public library, shops, and the Maui Bus Wailuku Loop Route, which provides hourly free transit service. These characteristics may allow many senior residents to meet daily needs without a private vehicle, reducing vehicle miles traveled and associated transportation costs.				
Water Resources Development Functional Plan				
Objective A:	Enunciate State water policy and improve management framework.			X
Objective B:	Maintain the long-term availability of freshwater supplies, giving consideration to the accommodation of important environmental values.			X
Objective C:	Improve management of floodplains.			X
Objective D:	Assure adequate municipal water supplies for planned urban growth.			X
Objective E:	Assure the availability of adequate water for agriculture.			X
Objective F:	Encourage and coordinate with other water programs the development of self-supplied industrial water and the production of water-based energy.			X
Objective G:	Provide for the protection and enhancement of Hawai'i's freshwater and estuarine environment.			X
Objective H:	Improve State grant and loan procedures for water program and projects.			X
Objective I:	Pursue water resources data collection and research to meet changing needs.			X
Discussion: The Project is not directly related to the above objectives for the Water Resources Development Functional Plan but will be designed with low-flow fixtures.				

5.2.6 State of Hawai‘i Environmental Policy and Guidelines

The State of Hawai‘i Environmental Policy, established primarily under Chapter 344, HRS (State Environmental Policy) and Chapter 343, HRS (Environmental Impact Statements (EIS), mandates the consideration of environmental, economic, and cultural impacts for proposed projects.

Chapter 344, HRS established Hawai‘i’s Environmental Policy to encourage the conservation of its natural resources and the enhancement of its quality of life. Specific policy guidelines are set forth for implementation by state and county agencies in their planning and decision-making.

Chapter 343, HRS provides the statutory basis for developing and processing EAs and EISs. It requires that systematic consideration be given to the environmental and social consequences (in addition to the economic consequences) of proposed state, county or private actions.

State Environmental Policy, Chapter 344, Hawai‘i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Environmental Policy			
§344-3 Environmental policy. It shall be the policy of the State, through its programs, authorities, and resources to:			
(1) Conserve the natural resources, so that land, water, mineral, visual, air and other natural resources are protected by controlling pollution, by preserving or augmenting natural resources, and by safeguarding the State’s unique natural environmental characteristics in a manner which will foster and promote the general welfare, create and maintain conditions under which humanity and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of the people of Hawaii.	X		
(2) Enhance the quality of life by:			
(A) Setting population limits so that the interaction between the natural and artificial environments and the population is mutually beneficial;			X
(B) Creating opportunities for the residents of Hawaii to improve their quality of life through diverse economic activities which are stable and in balance with the physical and social environments;	X		
(C) Establishing communities which provide a sense of identity, wise use of land, efficient transportation, and aesthetic and social satisfaction in harmony with the natural environment which is uniquely Hawaiian; and	X		
(D) Establishing a commitment on the part of each person to protect and enhance Hawaii’s environment and reduce the drain on nonrenewable resources.	X		
Discussion: The Project is consistent with the environmental policies of §344-3, HRS. Located on a previously developed, 2.66-acre site in the State Urban Land Use District in central Wailuku, the Project concentrates development on an already urbanized, underutilized site rather than on productive agricultural, conservation, or other environmentally sensitive lands, directly supporting the conservation of natural resources and fulfilling the social and economic requirements of Hawai‘i’s people (Policy 1). The Project will provide 84 affordable senior rental units and one resident manager unit, directly addressing the critical shortage of affordable housing for low-income seniors on Maui. Sustainable design features—including solar water heating, energy-efficient lighting, and high-efficiency plumbing fixtures—minimize resource consumption and support long-term environmental stewardship. The Project is designed to meet LEED Certified criteria for multifamily housing, promoting economic opportunities in balance with the physical and social environments (Policy 2B).			

State Environmental Policy, Chapter 344, Hawai'i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
The design reflects and respects the historic and cultural character of Wailuku and Historic District No. 3, contributing to a livable and architecturally cohesive community (Policy 2C). The Project's landscaping plan incorporates native or indigenous plants where feasible, and community gardens are provided as on-site amenities, reflecting a commitment to protect and enhance Hawai'i's environment (Policy 2D).			
Guidelines			
§344-4 Guidelines. In pursuance of the state policy to conserve the natural resources and enhance the quality of life, all agencies, in the development of programs, shall, insofar as practicable, consider the following guidelines			
(1) Population.			
(A) Recognize population impact as a major factor in environmental degradation and adopt guidelines to alleviate this impact and minimize future degradation;	X		
(B) Recognize optimum population levels for counties and districts within the State, keeping in mind that these will change with technology and circumstance, and adopt guidelines to limit population to the levels determined.	X		
Discussion: The Project is not a major population-generating action. The 84 senior affordable rental units (plus one resident manager unit) are intended to serve seniors aged 62 and older who are already living in or near Wailuku, with household incomes at or below 60 percent of the AMI. The Project is intended for independent-living senior households on Maui, consistent with EAH Housing's experience that most residents at its Maui properties were already living in the County prior to occupancy. Therefore, the Project is not anticipated to significantly increase the population of the Wailuku District or Maui County (Guideline 1A). Rather, it serves an existing segment of the population that is currently underserved. The Project is consistent with Wailuku-Kahului's role as the economic and population center of Maui and supports County housing goals by providing affordable housing in an urbanized area of Wailuku (Guideline 1B).			
(2) Land, water, mineral, visual, air, and other natural resources.			
(A) Encourage management practices which conserve and fully utilize all-natural resources;	X		
(B) Promote irrigation and waste water management practices which conserve and fully utilize vital water resources;	X		
(C) Promote the recycling of waste water;	X		
(D) Encourage management practices which conserve and protect watersheds and water sources, forest, and open space areas;	X		X
(E) Establish and maintain natural area preserves, wildlife preserves, forest reserves, marine preserves, and unique ecological preserves;			X
(F) Maintain an integrated system of state land use planning which coordinates the state and county general plans;	X	X	
(G) Promote the optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling so that all our wastes become utilized.	X		
Discussion: The Project site is already developed and within the State Urban Land Use District. Development will occur on a previously disturbed site and will not affect productive agricultural lands, watersheds, forest reserves, or conservation lands (Guidelines 2D and 2E are not applicable to this Project). The Project supports the integrated state land use planning system by being consistent with the State Urban Land Use District designation, the Maui Island Plan Urban Growth			

State Environmental Policy, Chapter 344, Hawai‘i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
Boundary, the Public/Quasi-Public designation of the WKCP, and Historic District No. 3 zoning (Guideline 2F). As described in Section 5.3.3 (Wailuku-Kahului Community Plan), the applicant intends to seek an exemption from the Public/Quasi-Public designation of the WKCP to allow for the proposed multifamily residential use. As described in Sections 5.3.4 (County Zoning) and 5.3.5 (Historic District No. 3), the Project largely complies with the appliable use requirements and development standards of the Historic District No. 3 zoning district, however, the applicant also intends to seek an exemption from the requirement of Section 19.52.100.C, MCC, regarding spacing from historic buildings, pursuant to Section 201H-38, HRS. The Project will connect to existing municipal water, wastewater, and drainage infrastructure, minimizing the need for new off-site infrastructure (Guideline 2A). LID features—including on-site stormwater infiltration chambers, bioretention planters, and high-efficiency plumbing fixtures—conserve water resources (Guidelines 2B and 2C). During construction, the applicant will require salvage and recycling of nonhazardous construction waste, including green waste, asphalt, concrete, masonry, and wood. During operations, the on-site property managers will work with the DEM Solid Waste Division to investigate recycling options and incorporate appropriate facilities (Guideline 2G).			
(3) Flora and fauna.			
(A) Protect endangered species of indigenous plants and animals and introduce new plants or animals only upon assurance of negligible ecological hazard;	X		
(B) Foster the planting of native as well as other trees, shrubs, and flowering plants compatible to the enhancement of our environment.	X		
Discussion: The Project site has been disturbed from its original natural conditions for over a century and contains no critical habitat for threatened or endangered species. However, the State-listed Hawaiian Hoary Bat (‘Ōpe‘ape‘a) and native seabirds—including the wedge-tailed shearwater (‘ua‘u kani) and the endangered Hawaiian petrel (‘ua‘u)—may potentially occur at or fly over the Project site. To avoid and minimize impacts to the ‘Ōpe‘ape‘a, no barbed wire is proposed for the Project, and woody plants greater than 15 feet tall will not be disturbed, removed, or trimmed during the birthing and pup-rearing season (June 1 through September 15). All outdoor lighting will be fully shielded and downward-facing to protect seabirds. Nighttime construction will avoid the seabird fledgling season (September 15 through December 15) and, if necessary, will use only fully shielded, downward-facing seabird-friendly lighting. If Nēnē are observed in the Project area during their breeding season (September through April), all construction work will cease and a biologist will be contacted (Guideline 3A). Native and indigenous plant species will be incorporated into the landscaping where feasible, consistent with HAR §15-307-27(9), and no invasive plants will be introduced to the site (Guideline 3B).			
(4) Parks, recreation, and open space.			
(A) Establish, preserve and maintain scenic, historic, cultural, park and recreation areas, including the shorelines, for public recreational, educational, and scientific uses;	X		
(B) Protect the shorelines of the State from encroachment of artificial improvements, structures, and activities;			X
(C) Promote open space in view of its natural beauty not only as a natural resource but as an ennobling, living environment for its people.	X		
Discussion: The Project does not directly affect shoreline areas or beach parks; Guideline 4B (shoreline protection) is not applicable as the Project site is approximately two miles from the ocean. The Project does preserve approximately 70 percent of the 2.66-acre site as open			

State Environmental Policy, Chapter 344, Hawai'i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
space, maintaining the open, park-like character of the Mission Grounds that is important to the Wailuku community and Historic District No. 3 (Guideline 4C). Outdoor amenities tailored to senior residents—including seating and gathering areas, community gardens, and ADA-accessible pathways—are incorporated into the landscaping plan. The Project also contributes to preserving scenic views from Main Street and Aupuni Street toward the West Maui Mountains, the coastline, and Haleakalā, and supports the preservation of the historically and culturally significant Mission Grounds (Guideline 4A).			
(5) Economic development.			
(A) Encourage industries in Hawaii which would be in harmony with our environment;	X		
(B) Promote and foster the agricultural industry of the State; and preserve and conserve productive agricultural lands;			X
(C) Encourage federal activities in Hawaii to protect the environment;	X		
(D) Encourage all industries including the fishing, aquaculture, oceanography, recreation, and forest products industries to protect the environment;			X
(E) Establish visitor destination areas with planning controls which shall include but not be limited to the number of rooms;			X
(F) Promote and foster the aquaculture industry of the State; and preserve and conserve productive aqua cultural lands.			X
Discussion: The Project is not an agricultural, aquaculture, tourism, or visitor industry development; therefore, Guidelines 5B, 5D, 5E, and 5F are not applicable. The Project supports economic development in harmony with the environment by providing affordable senior housing on a previously developed urban infill site. Project construction will generate local construction employment (up to 120 jobs) and spending, contributing general excise tax and income tax revenue to the State and County. Once complete, the Project's ongoing operations will generate additional tax contributions (Guideline 5A). The Project is anticipated to receive federal financing through housing programs; EAH Housing will coordinate with the applicable federal agencies to ensure compliance with all applicable environmental requirements (Guideline 5C).			
(6) Transportation.			
(A) Encourage transportation systems in harmony with the lifestyle of the people and environment of the State;	X		
(B) Adopt guidelines to alleviate environmental degradation caused by motor vehicles;	X		
(C) Encourage public and private vehicles and transportation systems to conserve energy, reduce pollution emission, including noise, and provide safe and convenient accommodations for their users.	X		
Discussion: The Project is in central Wailuku, within walking distance of existing Maui Bus transit stops and near shops, restaurants, government offices, medical services, churches, schools, and public transportation. Locating senior affordable housing in a transit-accessible urban area reduces residents' dependence on private vehicles and supports a transportation system in harmony with the environment and the community. This objective will be further reinforced by the incorporation of a rental preference for households who do not own vehicles (Guideline 6A).			

State Environmental Policy, Chapter 344, Hawai'i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
The TIAR found that the Project will not significantly worsen traffic operations at the study intersections. The Project incorporates pedestrian amenities, including ADA-accessible pathways and designated pick-up/drop-off areas. The Project's urban infill location is consistent with efforts to reduce vehicle miles traveled and alleviate environmental degradation from motor vehicles (Guidelines 6B and 6C).			
(7) Energy.			
(A) Encourage the efficient use of energy resources.	X		
Discussion: The Project is designed to achieve LEED Certified criteria for multifamily housing and be as energy efficient as possible. Sustainable design features include energy-efficient LED lighting, Energy Star exhaust fans, well-insulated walls and roofs, solar thermal water heating, whole-building energy metering with unit submeters, and large operable windows for natural ventilation. The Project targets a minimum 30 percent reduction in energy consumption compared to a baseline standard building design (Guideline 7A).			
(8) Community life and housing.			
(A) Foster lifestyles compatible with the environment; preserve the variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods which reflect the culture and mores of the community;	X		
(B) Develop communities which provide a sense of identity and social satisfaction in harmony with the environment and provide internal opportunities for shopping, employment, education, and recreation;	X		
(C) Encourage the reduction of environmental pollution which may degrade a community;	X		
(D) Foster safe, sanitary, and decent homes;	X		
(E) Recognize community appearances as major economic and aesthetic assets of the counties and the State; encourage green belts, plantings, and landscape plans and designs in urban areas; and preserve and promote mountain-to-ocean vistas.	X		
Discussion: The Project directly advances the community life and housing guidelines of §344-4(8). By providing 84 affordable senior rental units in a historically and culturally significant setting in Wailuku, the Project fosters housing compatible with the environment and preserves the variety of lifestyles traditional to Hawai'i (Guideline 8A). As an infill development is near shopping, employment opportunities, medical services, educational institutions, libraries, public transportation, and recreational opportunities, the Project creates a community that provides a strong sense of identity and social satisfaction (Guideline 8B). Low-VOC paints, adhesives, flooring, and insulation, together with proper ventilation systems and carbon monoxide monitors in all units, reduce indoor environmental pollution and promote safe, sanitary, and decent homes for senior residents (Guidelines 8C and 8D). The Project design—with hipped roofs, board and batten siding, and simple earth-tone materials—reflects and respects the architectural character of Historic District No. 3. Approximately 70 percent of the site is retained as open space with landscaped walkways, community gardens, and native plantings, contributing to the aesthetic quality of the neighborhood and preserving mountain-to-ocean vistas from Main Street and Aupuni Street (Guideline 8E).			

State Environmental Policy, Chapter 344, Hawai'i Revised Statutes (Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable)	**S**	**N/S**	**N/A**
(9) Education and culture.			
(A) Foster culture and the arts and promote their linkage to the enhancement of the environment;	X		
(B) Encourage both formal and informal environmental education to all age groups.	X		
Discussion: The Project contributes to the preservation and adaptive reuse of two historically significant structures—Alexander House and Baybrook House—both of which are listed on the Hawai'i Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Their rehabilitation as a multipurpose center (with lounge, computer lab, library, meeting room, kitchen, fitness room, and bike room) and a management office fosters a connection between the built environment, history, culture, and the arts (Guideline 9A). The preparation of an RLS, an AIS, and a CIA for the Project supports public awareness and education about the historic and cultural significance of the Wailuku Mission Grounds (Guideline 9B).			
(10) Citizen participation.			
(A) Encourage all individuals in the State to adopt a moral ethic to respect the natural environment; to reduce waste and excessive consumption; and to fulfill the responsibility as trustees of the environment for the present and succeeding generations; and	X		
(B) Provide for expanding citizen participation in the decision-making process so it continually embraces more citizens and more issues.	X		
Discussion: The applicant originally presented the Project at an informational community meeting in August 2024. In response to community feedback, the Project's architectural design and parking were modified. Subsequently, in July 2025, the Project was presented again to the surrounding Wailuku community and further design and parking refinements were made. The applicant also performed public engagement through a pre-assessment consultation process conducted from June 12 to July 11, 2025. Agencies, organizations, neighbors, and members of the public with a potential interest in the Project were invited to provide input, and written comments and responses are included in Appendix I of this Draft EA. Community feedback gathered during this process was considered in refining the Project's design, landscaping, parking, and traffic management plans, consistent with the principle of expanding citizen participation in the decision-making process (Guideline 10B). EAH Housing's commitment to sustainable design—including LEED Certification, use of native plants, construction waste recycling, energy efficiency, and LID—reflects a responsibility to reduce waste and protect Hawai'i's environment for current and future generations (Guideline 10A).			

5.3 COUNTY OF MAUI

County-specific land use plans and ordinances pertaining to the Project include the C*ountywide Policy Plan,* the *Maui Island Plan*, the *Wailuku-Kahului Community Plan*, County Zoning (Title 19, MCC), and Historic District No. 3 (Section 19.50.030, MCC).

5.3.1 Countywide Policy Plan

The *Countywide Policy Plan* acts as an over-arching values statement and provides a policy framework for the *Maui Island Plan* and Community Plans. It is the first component of the decennial General Plan update.

The *Countywide Policy Plan* provides broad goals, objectives, policies, and implementing actions that portray the desired direction of the County's future.

Key strategies of the *Countywide Policy Plan* applicable to the Project are: "E. Expand Housing Opportunities for Residents" and "J. Promote Sustainable Land Use and Growth Management." The goals, objectives, and policies directly applicable to the Project include the following:

E. Expand Housing Opportunities for Residents
Goal: *Quality, island-appropriate housing will be available to all residents.*

Objective:
1: Reduce the affordable housing deficit for residents.

Policies:

- *(a) Ensure that an adequate and permanent supply of affordable housing, both new and existing units, is made available for purchase or rental to our resident and/or workforce population, with special emphasis on providing housing for low- to moderate-income families, and ensure that all affordable housing remains affordable in perpetuity.*
- *(b) Seek innovative ways to lower housing costs without compromising the quality of our island lifestyle.*
- *(c) Seek innovative methods to secure land for the development of low- and moderate-income housing.*
- *(e) Provide for a range of senior-citizen and special needs housing choices on each island that affordably facilitates a continuum of care and services.*
- *(k) Ensure residents are given priority to obtain affordable housing units developed in their communities, consistent with all applicable regulations.*
- *(I) Establish pricing for affordable housing that is more reflective of Maui County's workforce than the United States Housing and Urban Development's median-income estimates for Maui County.*
- *(m) Develop neighborhoods with a mixture of accessible and integrated community facilities and services.*
- *(q) Support the opportunity to age in place by providing accessible and appropriately designed residential units.*

Objective:
2: Increase the mix of housing types in towns and neighborhoods to promote sustainable land use planning, expand consumer choice, and protect the County's rural and smalltown character.

Policies:

- *(d) Promote infill housing in urban areas at scales that capitalize on existing infrastructure, lower development costs, and are consistent with existing or desired patterns of development.*

Objective:
3: Increase and maintain the affordable housing inventory.

Policies:

(b) Prioritize available infrastructure capacity for affordable housing.
(e) Develop public-private and nonprofit partnerships that facilitate the construction of quality affordable housing.
(f) Streamline the review process for high-quality, affordable housing developments that implement the goals, objectives, and policies of the General Plan.
(g) Minimize the intrusion of housing on prime, productive, and potentially productive agricultural lands and regionally valuable agricultural lands.

Discussion: The Project directly addresses the *Countywide Policy Plan* strategy to Expand Housing Opportunities for Residents and the related goal, objectives, and policies.

Consistent with Objective 1:

- Policy (a), the Project will provide 84 permanently affordable rental homes for independent-living seniors (age 62+) earning 60 percent or less of the AMI, with affordability maintained in perpetuity as required by the applicable funding programs. All 84 units will be available to resident seniors in the Wailuku community.
- Policies (b) and (c), EAH Housing is an experienced nonprofit developer of affordable housing in Hawai‘i and, in partnership with WUC, is using an underutilized, church-owned site in central Wailuku rather than acquiring new or undeveloped land.
- Policy (e), the Project is dedicated exclusively to senior housing for residents aged 62 and older and includes on-site services through EAH Housing’s Resident Services Coordinator to support aging in place.
- Policy (k), the Project is intended for independent-living senior households on Maui, consistent with EAH Housing's experience that most residents at its Maui properties were already living in the County prior to occupancy.
- Policy (m), the Project includes a rehabilitated Alexander House serving as a multipurpose center with a lounge, computer lab, library, meeting room, kitchen, fitness room, and bike room, providing accessible community facilities on site.
- Policy (q), the Project is designed to support aging in place for senior residents, with ADA-accessible pathways, elevators in all residential buildings, and on-site Resident Services Coordinator.

Consistent with Objective 2:

- Policy (d), the Project is an infill development on a 2.66-acre underutilized site in central Wailuku that capitalizes on existing sewer, water, drainage, electrical, telecommunications, and roadway infrastructure that already serves the site. The three new two-story residential buildings are designed in a style and scale compatible with the surrounding neighborhood and Historic District No. 3, while providing 84 much-needed affordable senior rental units.

Consistent with Objective 3:

- Policies (b) and (e), the Project maximizes use of the site's existing infrastructure capacity by connecting to existing public water, sewer, and drainage systems, reducing the need for new off-site infrastructure investment.
- Policy (f), the Project is seeking streamlined review under Section 201H-38, HRS, which provides an expedited process for qualifying affordable housing projects.
- Policy (g), the Project is on an underutilized urban site within the State Urban Land Use District and does not intrude upon prime, productive, or potentially productive agricultural lands or regionally valuable agricultural lands.

J. Promote Sustainable Land Use and Growth Management

Goal: *Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.*

Objective

1: Improve land use management and implement a directed-growth strategy.

Policies:

(b.) Direct urban and rural growth to designated areas.

(e) Encourage redevelopment and infill in existing communities on lands intended for urban use to protect productive farmland and open-space resources.

(f) Direct new development in and around communities with existing infrastructure and service capacity, and protect natural, scenic, shoreline, and cultural resources.

Discussion: The Project directly addresses the *Countywide Policy Plan* strategy to Promote Sustainable Land Use and Growth Management and related goals, objectives, and policies.

Consistent with Objective 1:

- Policy (b), the Project is within the State Urban Land Use District and the Maui Island Plan Urban Growth Boundary, directing growth to a designated urban area.
- Policy (e), the Project is an infill development on an underutilized site in central Wailuku. The Mission Grounds site is currently developed with two historic buildings, two single-family homes, and open grounds partially used for parking. The Project maximizes the use of existing urban infrastructure while avoiding productive farmland and open-space resources.
- Policy (f), the Project is in central Wailuku with direct access to existing public infrastructure—including water, sewer, drainage, and roadway systems—as well as community services including transit, healthcare, civic offices, and the Wailuku Public Library. Development is concentrated on an already-disturbed urban site, and scenic, cultural, and natural resources are protected through rehabilitation of Alexander House and Baybrook House and retention of approximately 70 percent of the site as open space.

5.3.2 Maui Island Plan

The *Maui Island Plan* provides direction for future growth, the economy, and social and environmental decisions on the island through 2030. It is the second component of the decennial General Plan update the *Maui Island Plan* establishes a vision, founded on core values that break down into goals, objectives,

policies, and actions. The *Maui Island Plan* also identifies and addresses key environmental, housing, and economic development issues relevant to Maui's current and future generations.

In addition, *Maui Island Plan* establishes a Directed Growth Strategy, which identifies areas appropriate for future urbanization and revitalization. The Project site is within the Directed Growth Urban Growth Boundary in the Wailuku-Kahului region. Refer to Figure 8. The Urban Growth Boundary allows infill and revitalization opportunities and encourages "new urbanism" and "neo-traditional design" techniques.

The *Maui Island Plan* lists auto dependency and traffic congestion and lack of housing choices, and revitalization of Wailuku's Civic Center District as challenges specific to the Wailuku area. Specifically, the Plan cites "significant opportunities to develop housing on vacant or underutilized lands currently entitled for development."

The following goals, objectives, and policies of the *Maui Island Plan* are directly applicable to the Project.

Goal: Maui will have safe, decent, appropriate, and affordable housing for all residents developed in a way that contributes to strong neighborhoods and a thriving island community.

Objective 1: *More livable communities that provide for a mix of housing types, land uses, income levels, and age.*

Policies:

5.1.1.a. Promote livable communities (compact/walkable/bikeable, access to transit) that provide for a mix of housing types and land uses, including parks, open space, and recreational areas.

5.1.1.d. Provide incentives for the rehabilitation or adaptive reuse of historic structures to facilitate more housing choices.

5.1.1.e. Use planning and regulatory approaches to provide higher housing densities.

Objective 3: *Provide affordable housing, rental or in fee, to the broad spectrum of our island community*

Policies:

5.1.3.b. Seek to have ownership of affordable for-sale and rental housing vested in a non-profit community land trust, or other qualified housing provider, committed to keeping such housing affordable in perpetuity.

5.1.3.c Facilitate the use of public lands in urban areas that are suitable for affordable housing

Objective 6: *Reduce the cost to developers of providing housing that is affordable to families with household incomes 160 percent and below of annual median income.*

Policies:

5.1.6.a. Support fast-track processing procedures for the following housing-related entitlements: affordable housing projects/units; indigenous Hawaiian housing/units; and special-needs housing units (seniors, disabled, homeless, etc.).

Discussion: The Project is consistent with the Maui Island Plan's Goal for safe, decent, appropriate, and affordable housing for all residents.

Consistent with Objective 1:

- Policy 5.1.1.a, the Project site is accessible to social services agencies, public transportation, medical facilities, churches, schools, a public library, and retail stores, creating a compact and walkable living environment for senior residents. The Project site is served by the Maui Bus Wailuku Loop Route #1 with stops within 0.1 miles, and Maui County's Fare-Free Transit Program for seniors 55 and older eliminates transit costs for Project residents.
- Policy 5.1.1.d, the Project includes the rehabilitation and adaptive reuse of Alexander House (converted to a multipurpose center) and Baybrook House (converted to an on-site management office), which are both listed on the State Register of Historic Places. The rehabilitation of these structures will follow the Secretary of the Interior's Standards for Rehabilitation.
- Policy 5.1.1.e, the Project provides three new two-story residential buildings with 84 senior affordable rental units on an underutilized 2.66-acre site within the Urban Growth Boundary of the Directed Growth Maps in the Wailuku-Kahului region.
- Policy 5.1.1.e, the Project provides 84 senior affordable rental units in three new two-story residential buildings on an underutilized 2.66-acre site within the Urban Growth Boundary of the Directed Growth Maps in the Wailuku-Kahului region.

Consistent with Objective 3:

- Policy 5.1.3.b, EAH Housing is an experienced nonprofit affordable housing developer in Hawai‘i, managing over 3,700 units in 40 properties statewide. Once built, EAH Housing will manage and operate the Project with a team of skilled service providers and property managers.
- Policy 5.1.3.c, the Project utilizes a church-owned site designated as Public/Quasi-Public by the WKCP that is well-served by existing infrastructure and services to support senior affordable housing.

Consistent with Objective 6:

- Policy 5.1.6.a, the Project is seeking streamlined review under Section 201H-38, HRS, which provides fast-track processing for qualifying affordable housing and special-needs housing projects, including senior affordable housing.

5.3.3 Wailuku-Kahului Community Plan

The WKCP is one of nine community plans developed to address the unique aspects of each region. The WKCP Land Use Map (Figure 9) designates the site Public/Quasi-Public (P). The WKCP goals and policies relevant to the Project are provided below.

ECONOMIC ACTIVITY

GOAL: A stable and viable economy that provides opportunities for growth and diversification to meet long-term community and regional needs and in a manner that promotes agricultural activity and preserves agricultural lands and open space resources.

Policies:

(2) Support the revitalization of the Wailuku commercial core and adjacent areas by expanding the range of commercial services; improving circulation and parking; enhancing and maintaining the town's existing character through the establishment of a Wailuku Town design district; redevelopment of the Wailuku Municipal Parking Lot with emphasis on additional public parking; establishing urban design guidelines; and providing opportunities for new residential uses. Improve Wailuku's image and level of service as a commercial center for the region's population. A combination of redevelopment and rehabilitation actions is necessary to meet the needs of a growing center.

Discussion: The Project is consistent with this goal and policy. The Project redevelops an underutilized site within walking distance of the Wailuku commercial core and Civic Center with 84 affordable senior rental homes and a multipurpose community center, contributing to new residential uses in the area, consistent with Policy (2). By increasing the permanent resident population of seniors within walking distance of Wailuku Town, the Project supports Wailuku's viability as a center of services for the region's population. The rehabilitation of Alexander House and Baybrook House also contributes to the preservation and enhancement of Historic District No. 3.

CULTURAL RESOURCES

GOAL: Identification, protection, preservation, enhancement, and where appropriate, use of cultural practices and sites, historic sites and structures, and cultural landscapes and view planes that: 1. Provide a sense of history and define a sense of place for the Wailuku-Kahului region;

Policies:

(1) Preserve the character and integrity of historic sites in the Wailuku-Kahului region.

(4) Ensure that the proposed projects are compatible with neighboring historic, cultural, and archaeological sites or districts. Such projects should be reviewed by the Cultural Resources Commission, where appropriate

Discussion: The Project is consistent with this WKCP goal and applicable policies.

Consistent with Policy (1), the Project preserves the character and integrity of historic sites on the Project site by rehabilitating Alexander House into a multipurpose center and Baybrook House into an on-site management office. Both buildings are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Rehabilitation will follow the Secretary of the Interior's Standards for Rehabilitation to preserve the character-defining features of each structure.

The Project's three new residential buildings are set back approximately 60 feet from Alexander House and Baybrook House, and their size, scale, massing, and roof forms are compatible with the surrounding historic structures in Historic District No. 3. Native Hawaiian plants will be incorporated into landscaping where feasible, and the Project will retain approximately 70 percent of the site as open space, preserving the open, park-like character of the Mission Grounds.

Consistent with Policy (4), the Project is within Historic District No. 3, and the Maui County Cultural Resources Commission will have the opportunity to comment on the Project. However, the applicant intends to seek an exemption from the requirements of Section 19.52.100.B, MCC—which requires the Cultural Resources Commission to approve a Residential Planned Development—pursuant to Section 201H-38, HRS.

HOUSING

GOAL: A sufficient supply and choice of attractive, sanitary and affordable housing accommodations for the broad cross section of residents, including the elderly.

Policies:

(3) Seek alternative residential growth areas within the planning region, with high priority given to the Wailuku and Kahului areas. This action should recognize that crucial issues of maintaining important agricultural lands, achieving efficient patterns of growth, and providing adequate housing supply and choice of price and location must be addressed and resolved.

(4) Encourage the creation of elderly housing communities in various parts of the region that address the range of specialized needs for this population group.

(6) Coordinate the planning, design and construction of public infrastructure improvements with major residential projects that have an affordable housing component.

(8) Promote efficient housing designs in order to reduce residential home energy and water consumption.

Discussion: The Project is consistent with the WKCP Housing Goal and applicable policies.

Consistent with the Housing Goal, Policy (3), the Project develops 84 affordable rental homes for seniors on an underutilized site in central Wailuku, providing affordable housing within an identified high-priority area.

Consistent with the Housing Goal, Policy (4), the Project is dedicated entirely to affordable housing for independent-living residents aged 62 and older earning 60 percent or less of AMI, directly addressing the specialized housing needs of this population group. Project staff will include a dedicated on-site Resident Services Coordinator who implements programs addressing seniors' specific needs, including community gatherings to reduce social isolation, physical activity programs appropriate for seniors' abilities, and coordination of healthcare and mental health services. The Resident Services Coordinator also assists residents in navigating benefits and support services, all designed to promote overall health, wellness, and community connectedness among residents.

Consistent with the Housing Goal, Policy (6), the Project will connect to existing public water, sewer, drainage, electrical, and roadway infrastructure that serves the site. As such, the applicant has been actively coordinating with the appropriate County agencies, including DWS, DEM, DPW, MDOT, and the Hawaiian Electric Company.

Consistent with the Housing Goal, Policy (8), the Project is designed to meet LEED Certified criteria for multifamily housing and will incorporate water-saving fixtures (low-flow plumbing and efficient

irrigation), solar thermal water heating, energy-efficient appliances and LED lighting, and well-insulated walls and roofs to reduce energy and water consumption.

LAND USE

GOAL: An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of residents and visitors in a manner that provides for the social and economic well-being of residents and the preservation and enhancement of the region's environmental resources and traditional towns and villages.

Policies:

(10) All zoning applications and/or proposed land uses and developments shall conform with the planned use designations, as specified in the adopted Community Plan Land Use Map, and be consistent with the Community Plan policies.

(13.b) Wailuku Historic District: Protection of this complex of historic structures in a park setting will continue under the provisions of the current Community Plan.

Discussion: The Project is largely consistent with the WKCP Land Use Goal and applicable policies.

Consistent with the Land Use Goal, Policy (10), the Project is within the State Urban Land Use District and the Maui Island Plan Urban Growth Boundary. The WKCP designates the Project site Public/Quasi-Public (P). Suggested uses in the Public/Quasi-Public category include schools, libraries, fire/police stations, government buildings, public utilities, hospitals, churches, cemeteries, and community centers. The proposed multifamily residential use is not a listed use; accordingly, the applicant intends to seek an exemption from the Public/Quasi-Public designation, pursuant to Section 201H-38, HRS, to allow for the proposed senior affordable housing.

Consistent with the Land Use Goal, Policy (13.b), the Project preserves the historic character of the Wailuku Historic District by rehabilitating Alexander House and Baybrook House in accordance with the Secretary of the Interior's Standards for Rehabilitation, and by designing new residential buildings at a scale and massing compatible with surrounding historic structures.

As described in Sections 5.3.4 (County Zoning) and 5.3.5 (Historic District No. 3), the Project largely complies with the appliable use requirements and development standards of the Historic District No. 3 zoning district. The Project is designed to minimize the visual impact of the proposed density within the context of Historic District No. 3 and retain approximately 70 percent of the Project site as open space. The three new, two-story residential buildings will be set back approximately 60 feet from Alexander House and Baybrook House, respectively. Additionally, buildings will be spaced to retain open space and sightlines from Main Street to Aupuni Street. The applicant intends to seek an exemption from the requirement of Section 19.52.100.C, MCC regarding spacing from historic buildings, pursuant to Section 201H-38, HRS.

INFRASTRUCTRE

GOAL: Timely and environmentally sound planning, development and maintenance of infrastructure systems which serve to protect and preserve the safety and health of the region's residents, commuters

and visitors through the provision of clean water, effective waste disposal and drainage systems, and efficient transportation systems which meet the needs of the community.

Water and Utilities

Objectives and Policies:

(1) Coordinate water system improvement plans with growth areas to ensure adequate supply and a program to replace deteriorating portions of the distribution system. Future growth should be phased to be in concert with the service capacity of the water system.

Liquid and Solid Waste

Objectives and Policies:

(1) Coordinate sewer system improvement plans with future growth requirements, as defined in the Community Plan.

Drainage

Objectives and Policies:

(1) Ensure that storm water run-off and siltation from proposed development will not adversely affect the marine environment and nearshore and offshore water quality. 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.

Energy

Objectives and Policies:

(1) Promote the use of alternative energy sources, such as biomass, wind and solar.

(4) Reduce domestic energy consumption.

(6) Encourage energy efficient building design and site development practices.

(7) Support energy conservation measures, including the use of solar heating and photovoltaic systems, in conjunction with urban uses.

Discussion: The Project connects to existing public infrastructure and is designed to minimize impacts on public systems, consistent with the WKCP Infrastructure Goal. The Project will connect to existing sewer, water, drainage, electrical, telecommunications, and roadway infrastructure that currently serve the Project site. In this way, the Project maximizes the Project's urban location, while preserving undeveloped, productive agricultural, conservation, and other environmentally sensitive areas elsewhere.

Consistent with the Water and Utilities Objective and Policy (1), the Project will connect to the DWS system via a new 3-inch compound water meter on Main Street. The Project's estimated water demand is approximately 47,600 gallons per day, and a Reservation of Available Service Capacity will be submitted to DWS to confirm system capacity.

Consistent with the Liquid and Solid Waste Objective and Policy (1), the Project will construct an on-site sanitary sewer network connecting to the existing 6-inch Aupuni Street sewer main, and all sewer system improvements will follow County standards.

Consistent with the Drainage Objective and Policy (1), the Project will construct an on-site storm drainage system—consisting of underground chambers and on-grade retention basins—that retains the increase in runoff on site for the 50-year, 1-hour design storm event, preventing adverse impacts to the marine environment and coastal waters. LID features, including surface bioretention planters, will further manage runoff and support groundwater infiltration.

Consistent with the Energy Objective and Policies (1), (4), (6), and (7), the Project is designed to target LEED Certification and will incorporate solar thermal water heating, energy-efficient appliances and LED lighting, well-insulated walls and roofs, and whole-building energy metering. These measures promote alternative energy use, reduce domestic energy consumption, and encourage energy-efficient building design.

URBAN DESIGN

GOAL: An attractive and functionally integrated urban environment that enhances neighborhood character, promotes quality design, defines a unified landscape planting and beautification theme along major public roads and highways, watercourses and at major public facilities, and recognizes the historic importance and traditions of the region.

Objectives and Policies for the Wailuku-Kahului Region in General:

(1) Maintain a design quality for commercial and public projects and large-scale master planned developments.
(4) Use native Hawaiian plants for landscape planting in public projects to the extent practicable.
(9) Save and incorporate healthy mature trees in the landscape planting plans of subdivisions, roads and other developments.

Objectives and Policies for Wailuku Town:

(3) Circulation and Parking
b. Maintain the existing character of streets in the commercial core along Vineyard, Market, Central and Main Streets.
(4) Building Form and Character
c. Utilize architectural treatments such as facade and roof modulation to break up the mass and reduce the apparent size of the buildings.

Discussion: The Project supports the WKCP Urban Design Goal by designing new construction that is compatible with and respectful of the historic and park-like character of Historic District No. 3.

Consistent with the Urban Design Goal:

- Policy (1) for the Wailuku-Kahului Region, the Project will rehabilitate the Alexander House as a multipurpose center and the Baybrook House as management offices, following the Secretary of the Interior's Standards for Rehabilitation to preserve character-defining features of both buildings.
- Policy (4) for the Wailuku-Kahului Region, Native Hawaiian plants will be incorporated into landscaping wherever feasible. No invasive plants will be planted within the Project site.

- Policy (9) for the Wailuku-Kahului Region, healthy mature trees on site will be evaluated for incorporation into the landscape design.
- Policy (4)(c) for Wailuku Town, the Project's three new residential buildings are designed with massing offsets in plan and elevation to break up long facades into three distinct sections, reducing the apparent mass and scale of the buildings. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding. The Project's use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings' size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3. This design approach is consistent with the Urban Design Goal, Policy (4)(c) for Wailuku Town.
- Policy (3)(b) for Wailuku Town, the Project's three new two-story residential buildings are set back approximately 60 feet from Alexander House and Baybrook House, preserving existing open space and sightlines from Main Street to Aupuni Street.
- Policy (3)(b) for Wailuku Town, regarding maintenance of street character in the commercial core, the Project does not alter the existing Main Street streetscape.

5.3.4 County Zoning

Title 19, MCC is the Maui County zoning code. It includes allowable land uses and development standards for the zoning districts established by the zoning code.

Discussion: The Project is within the Historic District No. 3 zoning district (Figure 10). As discussed below, the Project will conform to the appliable use requirements and development standards of the Historic District No. 3 zoning district, or will seek relief from such requirements and standards via exemptions pursuant to Section 201H-38, HRS.

5.3.5 Historic District No. 3

Chapter 19.50, MCC establishes the three historic districts in Maui County. The purpose of Maui's Historic Districts is to "promote the economic, cultural and general welfare of the people of the county and to insure the harmonious, orderly and efficient growth and development of the county, it is deemed essential by the county council that the qualities relating to the history and culture of the county be preserved, thereby creating attractions for visitors and residents alike."

As the Project is in Historic District No. 3 (see Figure 11, Figure 12, and Figure 13), Section 19.50.030, MCC is the applicable MCC code section. Section 19.52.010.D, MCC provides guidance on the appropriate architectural styles in Historic District No. 3. Section 19.52.100, MCC provides the land use and development standards that apply to Historic District No. 3.

Discussion: As described below, the Project complies with the applicable portions of Sections 19.52.010 and 19.52.100, MCC.

C. The exterior of all new buildings constructed within a historic district shall be constructed to meet the Secretary of the United States Department of the Interior's standards for infill construction, and shall reflect the architectural style of the district so as not to impair the value of other buildings,

> *structures, or parks in the immediate vicinity in order that the general character of the district shall not be injured.*

The reference to the Secretary of the United States Department of the Interior's Standards for infill construction is not entirely clear as the Secretary of the Interior's Standards for the Treatment of Historic Properties offers four sets of guidelines—Preservation, Rehabilitation, Restoration, and Reconstruction—but does not offer a specific set of guidelines for infill construction. Instead, Rehabilitation Guideline 9 and 10 offer guidance on new construction by stating:

The reference to the Secretary of the United States Department of the Interior's Standards for infill construction is not entirely clear as the Secretary of the Interior's Standards for the Treatment of Historic Properties most likely refers to the Secretary of the Interior's Standards for Rehabilitation—codified in 36 CFR Part 67—which are regulatory for the Federal Historic Preservation Tax Incentives program, and are the "Standards" most often used by states, counties, and cities nationwide to provide direction in making appropriate choices in planning the repairs, alterations, and additions that are part of a rehabilitation project and evaluating potential impacts to historic resources.

Separate from the Secretary of the Interior's Standards for Rehabilitation, the Secretary of the Interior's Standards for the Treatment of Historic Properties offers four sets of guidelines—Preservation, Rehabilitation, Restoration, and Reconstruction—that apply the Standards and describe specific treatments that do and do not meet the Standards. Notably, the Secretary of the Interior's Standards for the Treatment of Historic Properties does not offer a specific set of guidelines for infill construction. Assuming that Section 19.52.010, MCC is referring to the Secretary of the Interior's Standards for Rehabilitation, the most applicable language regarding new construction comes from Standards 9 and 10:

> *9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*
>
> *10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

As shown in Figure 5, the Project includes three, two-story rectangular-shaped structures totaling approximately 51,549 square feet. However, approximately 70 percent of the Project site will remain as open space. The three structures will be behind the existing primary structures on the Project site—Alexander House and Baybrook House—by roughly 60 feet. The placement of the structures also observes the required 15-foot front yard setback and 10-foot rear and side yard setbacks. To preserve open space and sightlines from Main Street to Aupuni Street, the structures are sited in a slightly offset, north-south orientation. The long facades are broken into three distinct sections using subtle massing offsets in plan and elevation view. To provide vertical differentiation between floors, the first floor is slightly recessed from the second, offering a modest cantilevered appearance. The first floor is also clad in a dark brown composite siding, while the second floor has board and batten composite siding. Appendix B (Conceptual Architectural Plans) contains elevations that illustrate the massing offsets.

The Project's use of contemporary materials, windows, and fenestration patterns clearly distinguishes the new construction from existing historic structures. At the same time, the new buildings' size, scale, massing, and roof forms are compatible with historic structures, thereby protecting the historic integrity of Historic District No. 3. Moreover, as new structures are carefully sited, oriented, and set back from Alexander House and Baybrook House, they respect and preserve the historic setting and view planes of the Project site.

The Project is designed to be compatible with the surrounding historic structures on the Project site and Historic District No. 3. The Project will rehabilitate the two more notable primary structures on the Project site, Alexander House and Baybrook House, both of which are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Both the Alexander House and Baybrook House are also identified as "Historic Structures" on the 1969 Wailuku Historic District Map (dated July 11, 1969).[3] Alexander House is proposed to be used as a multipurpose center and Baybrook House is proposed to be used as management offices. EAH Housing is working carefully with their historic architect, MASON, to preserve the character-defining features of both historic structures while adaptively reusing both structures as on-site resident amenities.

The two structures that are proposed to be removed—Kennan House and ʻĪao Parsonage—were evaluated in a RLS performed by MASON (Appendix G). Although found to be a contributing element to Historic District No. 3 and identified as a "Historic Structure" on the Wailuku Historic District map (dated July 11, 1969), Kennan House, constructed in 1928, was found to be ineligible for listing as an individual resource as it has fallen into a state of disrepair. Therefore, any restoration or rehabilitation efforts would be extremely costly and time-consuming. For safety reasons, Kennan House is currently vacant and unused. The Project's introduction of affordable housing, replacing the uninhabitable Kennan House, provides a net positive outcome for the Wailuku community.

Kennan House is set back approximately 200 feet from Main Street and historically functioned as an accessory structure (pastor's residence) to the WUC Grounds. Kennan House's historic accessory use is reflected in its diminutive size; use of simple materials and design; orientation toward the center of the Project site; and placement toward the rear of the lot (Main Street is considered the primary frontage). Except when viewed at a distance from Aupuni Street, it is largely screened from view from public rights-of-way by mature trees. As such, the removal of Kennan House would not constitute a significant loss of historic materials or character to the Church Grounds or Historic District No. 3. Any loss of historic materials would be largely offset by the Project's substantial contribution of affordable housing.

ʻĪao House was not found to be eligible for listing in the National or State Registers of Historic Places as it does not possess sufficient architectural significance or character. The Project will rehabilitate the two more notable primary structures on the Project site, Alexander House and Baybrook House. Alexander House is proposed to be used as a multipurpose center and Baybrook House is proposed to be used as management offices.

[3] The 1969 Wailuku Historic District Map (Figure 11), identifies all structures in Historic District No. 3 as "Historic Structures". However, Section 19.50.030, MCC, only identifies the following as historic structures and sites in Historic District No. 3: Kaʻahumanu Church, Alexander House, the two buildings known as Hale Hōʻikeʻike, or Bailey House and annex, and Kama ditch and aqueduct. Only Alexander House is within the Project site. Figure 12 shows Historic District No. 3 existing conditions, including the historic structures and sites designated under Section 19.50.030, MCC and structures that have been demolished since 1969. Figure 13 shows Historic District No. 3 with the Project.

As shown in Figure 5, the three new structures are in a largely undeveloped portion of the Project site and are sited in a way that preserves open space and sightlines. Therefore, should the new structures be removed in the future, the essential form and integrity of the historic property and its environment would not be impaired.

D. New buildings constructed within a County historic district and the Lahaina Historic District (National Historic Landmark) shall not substantially impair the public view plane, including public view planes from the ocean.

The Project does not substantially impair the public view plane, including view planes from the ocean. As shown in Figure 5, buildings are carefully sited in a way to maintain existing views and open space across the Project site. As the Project site is in a highly urbanized area, almost two miles from the ocean, there are no existing public views of the ocean to preserve.

D. For historic district no. 3, all new buildings or structures shall be of an architectural style compatible with the architectural styles of those historic buildings listed in section 19.50.030 of this title. The architectural style shall not be limited to any particular style or styles; however, certain architectural styles and certain architectural elements that shall not be allowed in historic district no. 3 are as follows:

a. European and Asian styles in general;
b. Excessively decorated styles;
c. Flat-roofed, modernistic styles;
d. Styles, forms, colors, and lighting that are gaudy; and
e. Large areas of reflective materials such as glass and aluminum, unless completely in the shade at all times. Visible alternative energy systems may be allowed with the approval of the cultural resources commission.

The three new residential buildings are not easily defined by a single architectural style. Rather, they contain certain architectural elements that may be associated with different architectural styles. For example, the board and batten siding on second floors is commonly associated with Victorian style homes, American Colonial style cottages, and farmhouses. Board and batten siding can be found on the Baybrook House and several other structures in the Wailuku Historic Civic District, including 207 ‘Awapuhi Place and 2333 Aupuni Street. At the same time, the Project’s hipped roof forms are reminiscent of nearby historic structures including the Wailuku Female Seminary Dining Hall, Wailuku Plantation Manager’s House and Garage, the Territorial Building, and the Wailuku Public Library. The buildings’ cantilevered second floors are reminiscent of a Mid-Century Modern architectural style, popular in Hawai‘i’s post-war/Statehood era. The proposed structures do not contain architectural features in European or Asian styles. The proposed architectural elements, such as windows and siding, are simple and not overly decorative. Materials are simple wood, metal, or composite, finished in a natural brown-grey color palette. No reflective or glossy materials/finishes are proposed.

According to Section 19.52.100.B, MCC, the following uses are allowed in Historic District No. 3 with written approval of the Cultural Resources Commission:

7. “Museums, art galleries, and book or gift stores; provided, that the use is operated as an accessory to the exhibit and display of the historic structures designated in section 19.50.030;

8. *Day care centers, nurseries, preschools, kindergartens;*
9. *Cultural societies, clubs, or fraternal organizations;*
10. *Off-street parking areas; provided, that none shall abut any public street;*
11. *Residential planned developments; and*
12. *Other uses that will enhance the historical and cultural nature of this district."*

The Project includes 85 units (as a Residential Planned Development) and accompanying off-street parking. Pursuant to Section 19.52.100.B, MCC, these uses require approval from the Cultural Resources Commission. The applicant intends to seek an exemption from the requirements of Section 19.52.100.B, MCC, pursuant to Section 201H-38, HRS. However, the applicant intends to make a presentation to the Cultural Resources Commission to seek their input on the Project.

The applicant also intends to seek an exemption from the requirements of Section 19.52.100.C, MCC, pursuant to Section 201H-38, HRS. Section 19.52.100.C, MCC, requires new, two-story buildings to be separated from historic buildings by at least 100 feet. As proposed, the three new buildings are approximately 60 feet from the historic Alexander and Baybrook Houses.

The Project meets all other regulations of Historic District No. 3 set forth by Section 19.52.100, MCC.

5.4 MAJOR APPROVALS AND PERMITS

A listing of anticipated permits and approvals required for the Project is presented below:

Table 5-4: Permits and Approvals

Permit/Approval	Responsible Agency
Chapter 343, HRS Compliance	HHFDC
Chapter 6E, HRS	Department of Land and Natural Resources State Historic Preservation Division
National Pollutant Discharge Elimination System (NPDES) Permit	State Department of Health
Construction Noise Permit	
Cultural Resources Review	Maui County Cultural Resources Commission
Building Permit	County of Maui, Department of Public Works
Grading and Grubbing Permit	
Driveway Permit	
Roadway Permit	
Electrical Permit	
Plumbing Permit	
Water Service Request	County of Maui Department of Water Supply
Section 201H-38, HRS	Maui County Council

6 ALTERNATIVES

This section identifies and evaluates a range of alternatives that could meet the purpose, need, and avoid, reduce, or minimize adverse environmental effects. Consistent with Section 11-200.1-18(d)(7), HAR, alternatives considered include the No Action Alternative, alternative locations (Alternative sites), full demolition (Full Demolition for Maximum Housing), and alternative concepts for the Project site. The reference point to compare alternatives is the "No Action" alternative.

6.1 NO ACTION ALTERNATIVE

Under the "No Action" Alternative, no development would occur on the Project site. The affordable rental apartments would not be constructed, and no affordable housing units would be added to Wailuku's housing stock. The site (one of the few large, underutilized parcels in central Wailuku with direct proximity to medical services, social service agencies, and public transit) would remain as is while documented demand for affordable senior housing continues to intensify.

In 2024, the median monthly rent in Wailuku was $3,014 and the median monthly rent across Maui County was $3,384 (SMS Research & Marketing Services, Inc., 2024), far exceeding the maximum rents affordable to households at 60 percent of AMI under HHFDC guidelines ($1,414 for a studio; $1,515 for a one-bedroom unit). The 2024 Hawai‘i Housing Planning Study identified Maui County as needing 14,987 total housing units through 2027, with more than 70 percent of required multifamily rental units needed to serve households at or below 60 percent AMI. With housing production on pace to be the lowest since the 1940s, this need would remain unaddressed.

The No Action Alternative would also leave unaddressed the condition of the two historic structures that are an integral component of the Project. The Alexander House and Baybrook House are both listed on the State Register of Historic Places and have been nominated for listing on the National Register of Historic Places. The Project would rehabilitate the Alexander House as a multipurpose community center and the Baybrook House as an on-site management office, preserving their historic character while extending their operational lifespan. Without the organizational capacity and revenue stream provided by a functioning affordable housing development, no mechanism exists to fund this rehabilitation, and both structures would remain without the active stewardship the Project is designed to provide.

For these reasons, the "No Action" Alternative would not fulfill the purpose and need described in Section 2.2 (Purpose and Need), would not achieve the affordable housing objectives of the *Countywide Policy Plan* and the *Maui Island Plan*, and would not provide the stewardship necessary to preserve the historic character of Alexander House and Baybrook House. This alternative has been eliminated from further consideration.

6.2 ALTERNATIVE SITES

No alternative site in Wailuku or Central Maui was identified that could satisfy the combined locational, programmatic, and site-control requirements of the Project. The Wailuku commercial core and adjacent areas, which includes the Project site, have been identified by County plans, including the WKCP, for improvements and developments to meet County plans, objectives, and goals for Wailuku.

As documented in Section 2.1.3 (Location Analysis), senior affordable housing requires a fundamentally different set of locational criteria than general multifamily residential development. Seniors at or below 60 percent AMI face compounding challenges: declining driving ability with age, fixed incomes that cannot sustain both housing and transportation costs, and dependence on accessible healthcare and social services. The Project site's location in central Wailuku directly addresses these needs—with free (for seniors aged 55 and older) Maui Bus service stops within 0.1 miles, healthcare services nearby, and the County of Maui Office on Aging just 0.15 miles away.

As Section 2.1.3 documents, the Project site enables a combined housing plus transportation cost burden of approximately 32 percent of income—well below the Center for Neighborhood Technology's recommended 45 percent threshold—compared to 70–80 percent of income at car-dependent peripheral locations in Maui County. No peripheral or suburban site in Central Maui can offer this level of location efficiency for the senior affordable population the Project is designed to serve.

An equally determinative constraint is site control. The Project site is Church-owned land made available by WUC specifically to enable affordable housing development consistent with the Church's mission. WUC does not own suitable land in other locations and therefore cannot offer an alternative site for this purpose.

For these reasons, an alternative site was not pursued.

6.3 FULL DEMOLITION FOR MAXIMUM HOUSING ALTERNATIVE

This alternative was considered to evaluate whether clearing the entire Project site of all four existing structures (Alexander House, Baybrook House, Kennan House, and ʻĪao Parsonage) would allow a larger or more efficiently configured senior affordable housing development than subsequent alternatives discussed below and the Project. Removing Alexander House and Baybrook House, which occupy the front portion of the parcel along Main Street, would open additional buildable area that could accommodate more residential units and additional parking. Any additional units would still be subject to the required front yard, side, and rear yard setbacks under Maui County Zoning and the 35-foot height limit for two-story structures in Historic District No. 3.

This alternative was rejected because demolition of Alexander House and Baybrook House would cause significant, irreversible harm to identified historic resources and would likely face insurmountable regulatory barriers. Both structures are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Demolition of a State Register-listed structure constitutes the irrevocable commitment of a historic resource, which is a significance criterion under §11-200.1-13(b)(1), HAR. Alexander House is one of the historic structures and sites declared under Section 19.50.030, MCC that Historic District No. 3 was established to protect. Baybrook House is within the district but is not among the structures named in that section. Under Sections 19.52.020 and 19.52.050, MCC, the Director of DPW shall not approve a demolition permit within a historic district without a letter of approval from the Cultural Resources Commission, and the Cultural Resources Commission shall not issue such approval except under three narrow circumstances, none of which Alexander House would satisfy. Demolition would also be incompatible with the Secretary of the Interior's Standards for Rehabilitation, which govern SHPD's review of the Project under Chapter 6E, HRS, and would jeopardize the competitive affordable housing financing on which the Project's viability depends.

As described in Section 2.2 (Purpose and Need), rehabilitation of Alexander House and Baybrook House is an integral component of the proposed action. A project that demolishes both State Register-listed structures cannot fulfill the Project's purpose and need. This alternative has therefore been eliminated from further consideration.

6.4 ALTERNATIVE CONCEPTS FOR THE PROJECT SITE

Three alternative concepts for the Project site were considered:

1. Townhomes (20), preschool, and community center
2. Medium density (46 units)
3. Alternative design (84 units)

These alternative concepts and their differences are described below. Figure 21 illustrates the different alternatives and how the Project evolved to its current design and programing.

6.4.1 Alternative 1: Townhomes (20), Preschool, and Community Center

Program and Land Uses

One of the earliest concepts for the Mission Grounds site proposed a low-density suburban development consisting of 20 townhouse residential units, a stand-alone preschool, and a community center. The residential program included 15 one-bedroom units at approximately 481 square feet each and 5 two-bedroom units at approximately 650 square feet each, for a total residential floor area of approximately 10,465 square feet across three buildings. In addition to the residential component, the concept included a 4,155-square-foot preschool designed to serve up to 35 children across infant/toddler, preschool, and mixed-age classrooms, and a 3,700-square-foot community center containing a kitchen, meeting rooms, restrooms, and storage. Total programmed floor area across all uses was approximately 18,300 square feet.

Architectural Style and Character

The plan drawings, prepared by DWL Architecture dated March 2018, describe the architectural style explicitly as "Hawaiian Island Mission Style." Building components included shake-style cement roof tile, board and batten siding, double-hung divided-light windows with wide wood trim and sills, corner trim, metal gutters and downspouts, and cement plaster with rough finish at the ground level. The preschool and community center buildings featured similar design vocabulary: steeply pitched roofs with double fascia, lava rock bases, and divided-light windows with wood trim. Maximum proposed roof heights were labeled at approximately 23 feet 10 inches for the community center and preschool structures, and 28 feet 1 inch for the two-story residential buildings.

This architectural character was an early attempt to reference the New England Congregationalist missionary buildings that define Historic District No. 3. However, the application of Mission-style elements to a suburban townhome typology—with attached individual units, individual entries, and a large surface parking lot—produced a development form more consistent with suburban residential subdivisions than with the open character of the Mission Grounds.

Evaluated against Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation', this alternative's residential buildings lack the compatible massing, scale, and siting necessary to protect the historic integrity of the setting. The townhome configuration, with its side-by-side attached units and

expansive surface parking lot, would have introduced a development pattern inconsistent with the historic open landscape character of the Mission Grounds and incompatible with the individual structures that define the district's architectural identity. Moreover, the removal of Baybrook House—a listed historic structure—to accommodate the parking lot would have directly conflicted with Standard 9 of the Secretary of the Interior's Standards for Rehabilitation.

Parking

This alternative provided 72 total surface parking stalls, including stalls distributed across seven separate parking areas interspersed throughout the site. The parking count was sized to serve both the residential uses (with a separate overflow parking area of 18 stalls) and the higher-turnover preschool and community center uses, which require dedicated drop-off and pick-up facilities.

The large total parking supply—72 stalls for only 20 residential units—reflects the dual demands of a preschool with scheduled AM and PM drop-off peaks and a community center with assembly uses. The resulting parking footprint dominated the site, consuming open space that contributes to the park-like setting of Historic District No. 3.

Treatment of Existing Historic Buildings

Alternative 1 proposed to retain and preserve the Alexander House. The plan shows Alexander House within its original setting near Main Street, with the residential and civic buildings sited behind and around it.

However, the Baybrook House—a historic structure now listed on the State Register of Historic Places and identified as a "Historic Structure" on the Wailuku Historic District map—would have been demolished under this alternative to accommodate on-site parking. The demolition of Baybrook House would be inconsistent with the Secretary of the Interior's Standards for Rehabilitation Standard 9, which prohibits destruction of historic materials that characterize the property, and Standard 10, which requires that new construction be undertaken such that the essential form and integrity of the historic property would remain unimpaired. Removing Baybrook House would diminish the collective historic character of the Mission Grounds compound and reduce the interpretive value of the site as a cohesive ensemble of missionary-era structures.

Amount of Housing Provided

This alternative provided only 20 affordable rental units, far short of the 84-unit target established in the Project's Purpose and Need Statement. The unit mix—15 one-bedroom units and 5 two-bedroom units—does not reflect the studio-heavy program best suited for senior households. The plans do not identify the units as age-restricted or senior-targeted; the focus of the program appears to have been on mixed community uses rather than maximizing housing output.

With only 20 housing units, this alternative would have addressed a lesser share of Maui County's documented need for senior affordable housing. The 2024 Hawai‘i Housing Planning Study identifies the need for over 1,600 affordable multifamily rental units in Maui County through 2027, of which more than 70 percent are required to serve households at or below 60 percent AMI. A 20-unit development provides only marginal relief against this documented deficit.

Open Space and Tree Impacts

The plan drawings indicate that several existing trees would be retained under this alternative, and the plan notes "existing trees to remain" along the site's eastern edge and near the residential buildings. However,

the large surface parking area—comprising approximately 72 stalls distributed across multiple lots—would have consumed a significant share of the site's open area and introduced extensive paved coverage inconsistent with the park-like character of the Mission Grounds.

Total Building Footprint and Pavement Area

The plan drawings identify the total residential floor area as approximately 10,465 square feet across three residential buildings, with the preschool at 4,155 square feet and the community center at approximately 3,700 square feet. Total enclosed building floor area is therefore approximately 18,300 square feet. The 72-stall surface parking lot, at standard stall dimensions of approximately 8.5 feet by 18 feet plus drive aisles, would have added an estimated 22,000 to 28,000 square feet of paved surface area across the site—a significant impervious footprint for a 2.66-acre parcel.

Relationship to Purpose and Need and Reason Not Carried Forward for Further Analysis

Alternative 1 was ultimately abandoned for multiple reasons, each directly tied to the Project's purpose and need. First, WUC determined that fulfilling its affordable housing mission required prioritizing rental units over other on-site amenities such as a preschool, community center, and additional parking. With only 20 units, this alternative would have failed to provide meaningful relief to Maui County's affordable housing shortage.

Second, WUC sought an architectural style more consistent with the surrounding historic residential buildings in Wailuku and Historic District No. 3. The suburban townhome typology—while incorporating Mission-style elements—did not adequately reflect the massing, scale, and siting character of the district's historic structures.

Third, the inclusion of a preschool would have generated significantly higher peak-hour traffic volumes than a residential-only use due to scheduled AM and PM drop-off and pick-up trips. The additional traffic burden was inconsistent with the centrally-located, low-traffic-impact profile that makes the Wailuku Mission Grounds site particularly well suited for senior affordable housing.

Finally, the proposed pedestrian entrance on Aupuni Street at the southeast corner of the site, may have been an issue for the surrounding community, as pedestrian access on Aupuni Street raised concerns during community meetings on later designs, which EAH Housing subsequently addressed in the Project design, which does not include pedestrian entrance on Aupuni Street.

6.4.2 Alternative 2: Medium Density (46 units)

Program and Land Uses

As the design evolved, WUC and its partners pursued a higher-density courtyard-style layout intended to provide meaningful affordable housing while preserving the historic, park-like character of the Mission Grounds. This alternative proposed 46 affordable rental housing units (29 one-bedroom and 17 two-bedroom) in two U-shaped courtyard buildings for a total gross floor area of approximately 27,685 square feet. The affordable rental housing units were not specifically targeted for seniors. The site plan called for two buildings sited at the southeast and southwest corners of the parcel, positioned as far as practicable from Alexander House.

Under this alternative, WUC would have retained ownership of the Mission Grounds and leased portions of property to EAH Housing for development and operation of the 46 affordable rental housing units. WUC

would have retained control of the Alexander House and Baybrook House and continued leasing these buildings to commercial tenants. Therefore, Alexander House and Baybrook House were not proposed to be rehabilitated under this alternative. In addition, unlike Alternative 1, this concept did not include a preschool or community center as independent program elements; the focus was on residential uses alone.

Architectural Style and Character

The design, prepared by AMA/AE Architecture dated 2020, drew inspiration from three local historic structures: Bailey House, Alexander House, and the Hale at Kepaniwai Gardens. The architect's stated intent was to minimize the visual impact of the proposed density within the context of the historic district and to preserve the "park-like" feel of the property. The two courtyard buildings were designed so that 16 of the 40 units at each building were housed within a second-floor roof volume intended to mimic the scale of a single-story residence similar to Alexander House, while keeping the building footprint to a minimum. The spatial character of the upper-level units was also described as reminiscent of upstairs attic bedrooms within the Alexander House.

The architectural approach—using a contemporary interpretation of historic roof pitch and massing to evoke the scale of nearby structures while incorporating contemporary materials and fenestration—reflects a thoughtful effort to satisfy Standard 9 of the Secretary of the Interior's Standards for Rehabilitation. The buildings were differentiated from the historic structures through contemporary materials, while attempting compatibility in scale and massing. However, as subsequently determined by the project team, the overall architectural expression did not fully achieve the compatibility and subordinance to historic structures required by the Secretary of the Interior's Standards for Rehabilitation '

The plan drawings also show that the buildings were sited to preserve several mature monkeypod trees, with shallow slab-on-grade foundations proposed to minimize ground disturbance.

Parking

Alternative 2 provided 30 surface parking stalls (including 2 ADA stalls), in two separate surface lots—18 stalls in one area and 12 stalls in another. This equates to approximately 0.65 stalls per residential unit, which is lower than the standard multifamily parking requirement under the MCC but consistent with a parking demand management approach suited to affordable housing with transit access. While the number of parking stalls was lower than Alternative 1, it was proportionally higher per unit than the subsequent Alternative 3 and the Project given the reduced unit count.

Treatment of Existing Historic Buildings

Alternative 2 represents an improvement over Alternative 1 in its treatment of historic resources. Under this alternative, both Alexander House and Baybrook House would have been retained and occupied by commercial tenants, while WUC maintained ownership of the Mission Grounds and leased portions of the property to EAH for the 46 affordable rental housing units. However, neither historic structure would have been rehabilitated as proposed under the current Project.

This approach is consistent with the general intent of Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation in that new construction would not destroy historic materials characterizing the property. The placement of the two courtyard buildings at the southeast and southwest corners of the site—as far as possible from Alexander House—also reflects an effort to preserve view planes and spatial relationships between the historic buildings.

Amount of Housing Provided

Alternative 2 provided 46 affordable rental units—a substantial increase over Alternative 1 but significantly below the 84-unit threshold identified in in Section 2.2 (Purpose and Need). The unit mix—29 one-bedroom and 17 two-bedroom units—reflects a family-oriented program rather than the studio to one-bedroom-dominant mix best suited to senior households. This unit mix may be less efficient from a per-unit cost standpoint given the larger size of two-bedroom units, further compounding the financial challenges described below.

Open Space and Tree Impacts

The design narrative for Alternative 2 emphasizes the preservation of the site's park-like character as a primary design goal. By concentrating the two buildings in the southeast and southwest corners of the 2.66-acre parcel, the design preserved a substantial central open area with sightlines toward Alexander House. The plans confirm that the buildings were sited to preserve several mature monkeypod trees on the site. Shallow slab-on-grade foundations were specified to minimize ground disturbance, including potential encounters with archaeological resources.

The total building footprint of approximately 27,685 square feet represents roughly 24 percent coverage of the 115,845-square-foot parcel (excluding drives and parking), indicating that a significant majority of the site would have remained as open space, landscaping, or paved circulation areas.

Total Building Footprint and Pavement Area

The plan drawings identify total gross square footage of approximately 27,685 square feet across the two courtyard buildings. Two surface parking areas totaling 30 stalls, at standard dimensions and including drive aisles, would add an estimated 11,000 to 14,000 square feet of additional paved area.

Relationship to Purpose and Need and Reason Not Carried Forward for Further Analysis

Alternative 2 was set aside primarily for financial reasons rather than design or compatibility concerns. As project evaluation progressed, EAH Housing and WUC determined that the 46-unit program was financially unviable on both the capital and operational sides.

Development on Maui is extraordinarily expensive due to high labor and materials costs, extended regulatory timelines, and the competitive nature of affordable housing financing. A 46-unit project generates total development costs comparable to a larger project in many categories, but spreads those costs across fewer units, resulting in higher per-unit costs and greater reliance on subsidy funding. Additionally, the fee-simple sale of the Mission Grounds site—ultimately preferred by WUC over a ground lease—added upfront expense that increased per-unit financing requirements for a smaller development.

From an operational standpoint, fixed costs associated with insurance, utilities, property management, and maintenance do not scale proportionally with unit count. A 46-unit building cannot achieve the economies of scale available to larger developments, making financial underwriting for long-term operations more difficult. EAH Housing concluded that at least 80 to 85 units are necessary to achieve viable per-unit economics for a senior affordable housing project in Wailuku.

For these reasons, EAH Housing determined that a greater number of senior rental units better serves both the financial sustainability of the project and the community's need for senior affordable housing. The design concept evolved to three linear buildings to achieve the required unit count while maintaining a compatible relationship with the historic district.

6.4.3 Alternative 3: Alternative Design (84 units)

Program and Land Uses

Alternative 3 introduced the three-linear-building design concept that forms the basis of the Project. This alternative proposed 84 affordable senior rental housing units—a mix of studios and one-bedroom units—in three new two-story buildings running generally from Main Street to Aupuni Street across the 2.66-acre site. A total gross floor area of approximately 51,765 square feet was proposed across the three buildings. In addition to the residential units, this alternative included the rehabilitation of Alexander House as a multipurpose community center and Baybrook House as a property management office.

Architectural Style and Character

The design, prepared by AMA/AE Architecture and dated 2024, drew inspiration from nearby historic buildings in Wailuku while incorporating modern materials, fenestration, and roof forms. Each of the three linear buildings was subdivided into three distinct masses in both plan and elevation, creating visual articulation along the long facades. The second-floor roof volume was designed to mimic the single-story residential scale of Alexander House and was lower in height.

The plan narrative states that "the design intent is motivated by minimizing the visual impact of the proposed density within the context of the historic district and preserve the ''park-like'' feel of the existing property." The buildings were sited to maintain sight lines from Alexander House and to preserve several mature monkeypod trees.

Measured against Standard 9 of the Secretary of the Interior's Standards for Rehabilitation, the architecture of Alternative 3 represents a noticeable improvement over Alternatives 1 and 2. The three distinct building masses per structure reduce the visual bulk of each building, and the roof form and scale are more explicitly calibrated to reference Alexander House. The use of contemporary materials and fenestration differentiates the new construction from the historic buildings, consistent with the 'Secretary of the Interior's Standards for Rehabilitation that new work be differentiated from the old. However, community feedback received during project review indicated that the design still appeared "too modern" and lacked sufficient architectural compatibility with the historic character of the district. This feedback, combined with concerns about inadequate parking, prompted EAH Housing to pursue further design revisions.

Parking

Alternative 3 provided 30 surface parking stalls (including 2 ADA stalls), arranged in two parking areas—18 stalls in one cluster near Main Street and 12 stalls in a second cluster near Aupuni Street. At 84 residential units, this represents a ratio of approximately 0.36 stalls per unit, which is lower than both the Project (0.49 stalls per unit) and Alternative 2 (0.65 stalls per unit).

The community feedback specifically identified the 30-stall parking supply as insufficient relative to the 84-unit building program. While the centrally-located and senior-focused nature of the project supports reduced parking, the degree of reduction proposed under Alternative 3 was determined to be insufficient to address resident and visitor needs, and inadequate pick-up/drop-off areas were also identified as a deficiency.

Treatment of Existing Historic Buildings

Alternative 3 retained and rehabilitated both Alexander House and Baybrook House, assigning each a specific adaptive reuse program. Alexander House was designated as the on-site community center and

Baybrook House as the property management office—the same programs carried forward into the Project. These rehabilitation uses are consistent with the purpose and intent of Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation, as they preserve the essential form and integrity of both historic properties while adaptively reusing them as functioning components of the residential development.

Kennan House (1917, contributing element to Historic District No. 3) and ʻĪao House (1963, not eligible for the historic register) were proposed for demolition under this alternative, as they are under all alternatives and the Project. The RLS performed by MASON confirms that Kennan House is not individually eligible for listing and has deteriorated to the point of uninhabitability, making retention infeasible. The loss of Kennan House is addressed by the net positive community benefit of adding 84 affordable housing units.

Amount of Housing Provided

Alternative 3 provided 84 senior affordable rental units—the same count as the Project's residential component, and consistent with the unit count established as financially viable by EAH Housing. The unit mix of studios and one-bedroom units reflects the demand profile of single-person senior households and is appropriate for the Project's target population of seniors aged 62 or older earning at or below 60 percent of AMI.

At 84 units, this alternative is more impactful in addressing the documented need for senior affordable housing than either Alternative 1 (20 units) or Alternative 2 (46 units), while achieving the economies of scale necessary for long-term financial viability.

Open Space and Tree Impacts

The three linear buildings were sited with an intent to preserve the park-like character of the Mission Grounds. The design narrative confirms that buildings were positioned to maintain sight lines from Alexander House and to preserve several mature monkeypod trees. Shallow slab-on-grade foundations were specified to minimize ground disturbance.

The total gross building footprint of approximately 51,765 square feet—roughly 45 percent of the parcel's total area—represents a more intensive coverage than Alternative 2, though the linear building configuration preserves open corridors between buildings and maintains visual connectivity across the site.

Total Building Footprint and Pavement Area

The plan drawings identify total gross building area as approximately 51,765 square feet across the three linear buildings. The 30-stall parking supply, at standard dimensions, would add an estimated 11,000 to 14,000 square feet of paved area. The total impervious surface—buildings, parking, drives, and walkways—would be somewhat lower than the Project, which includes 12 additional stalls and expanded pick-up/drop-off areas.

Relationship to Purpose and Need and Reason Not Carried Forward for Further Analysis

Alternative 3 met the Project's housing unit target and represented a significant advance in design quality over the earlier alternatives. However, it was not carried forward for further analysis for two principal reasons.

First, community feedback indicated that the architectural expression was too modern and insufficiently compatible with the historic character of Historic District No. 3. Although the design drew inspiration from

nearby historic buildings, the combination of contemporary materials, fenestration patterns, and roof forms did not achieve the level of compatibility that reviewers and community members expected for a project of this scale within the district. This feedback directly motivated a design revision to adopt a more literal historic architectural vocabulary, including the use of dark brown composite siding at the first floor, board and batten composite siding at the second floor, massing offsets in plan and elevation, and a cantilevered first-to-second-floor relationship.

Second, the 30-stall parking supply was determined to be insufficient to serve 84 residential units, particularly given the need to accommodate visitor parking, pick-up/drop-off for resident services, and accessibility requirements. The Project added 12 stalls, pick-up and drop-off areas, and additional landscaped walkways in response to this feedback.

In response to these concerns, WUC redesigned the Project into its current form, increasing parking capacity, adding designated pick-up and drop-off areas, expanding landscaped walkways, and adopting a more literal historic architectural design and still consistent with the Secretary of the Interior's Standards for Rehabilitation.

6.5 COMPARATIVE ANALYSIS

This section compares the No Action Alternative, the three site-specific design alternatives, and the Project across the key dimensions established in Section 2.2 (Purpose and Need). Table 6-1 provides a summary comparison across all site-specific design alternatives and the No Action Alternative as the required baseline reference point. Two alternatives were eliminated from detailed comparison before this analysis: alternate sites were found infeasible for the reasons documented in Section 6.2, and the Full Demolition for Maximum Housing Alternative (Section 6.3) was eliminated due to the regulatory infeasibility of demolishing State Register-listed historic resources. Neither is included in Table 6-1.

No Action Alternative as Baseline

Section 11-200.1-18(d)(7), HAR requires that alternatives analysis use the No Action Alternative as the reference point for comparing proposed actions and alternatives. The No Action Alternative—under which the site remains undeveloped and the two historic structures receive no rehabilitation—establishes the baseline environmental, social, and functional conditions against which all other alternatives are evaluated. Against this baseline, every action alternative (Alternatives 1 through 3 and the Project) represents an improvement in housing supply, historic resource stewardship, and consistency with County plans. The critical question is which action alternative best fulfills the purpose and need at the least environmental cost and greatest community benefit. Alternative sites were evaluated and found infeasible as documented in Section 6.2; accordingly, the remaining analysis focuses on the four site-specific alternatives.

Land Uses

The alternatives reflect a progressive refinement of the site's program over time. Under the No Action Alternative, the site remains undeveloped and neither affordable housing nor any other new use is established. All action alternatives introduce residential uses; Alternative 1 was the only concept to include non-residential uses—a preschool and community center—alongside residential units. While these uses would have added civic value to the site, they consumed land area and financial resources at the expense of the Project's primary mission: providing affordable housing for seniors. Alternatives 2, 3, and the Project are all residential-only in their primary program, with the latter three incorporating adaptive reuse of

Alexander House and Baybrook House as resident amenities rather than stand-alone civic facilities open to the public.

Architectural Style and Character

The No Action Alternative results in no change to the site's architectural character. The existing historic structures remain without rehabilitation, subject to continued deterioration. All four action concepts attempted to establish architectural compatibility with Historic District No. 3, but with varying degrees of success. Alternative 1's Hawaiian Island Mission Style was applied to a suburban townhome building type that was fundamentally incompatible with the scale, siting, and open-space character of the Mission Grounds. Alternative 2 introduced a more thoughtful response to the historic context—using the courtyard typology to preserve open space and referencing the roof forms of Bailey House and Alexander House—but remained more contemporary in expression than the district's prevailing character warranted. Alternative 3 moved closer to the three-building linear configuration of the Project but received community feedback that the architectural expression was too modern.

The Project directly addresses this progression by adopting contemporary materials that clearly distinguish new construction from historic structures (consistent with Standard 9 of the Secretary of the Interior's Standards for Rehabilitation), while calibrating building massing, scale, height, and roof form to be more compatible with adjacent historic structures. The use of dark brown composite siding at the first floor and board and batten siding at the second floor, combined with subtle massing offsets and a cantilevered floor-to-floor relationship, reflects a design that is differentiated from but compatible with the historic environment, consistent with both Standard 9 (new work shall be compatible with massing, size, scale, and architectural features of the historic property) and Standard 10 (new construction shall be undertaken such that the form and integrity of the historic property would remain unimpaired if the new work were removed).

Parking

The No Action Alternative results in no change to parking supply on the site. Parking supply across the alternatives ranges from 30 stalls (Alternatives 2 and 3) to 72 stalls (Alternative 1) to 42 stalls in the Project. The wide range reflects different assumptions about land use mix, unit count, and parking demand management. Alternative 1's large parking lot was driven by the dual demands of a preschool and community center, which require high-turnover parking during peak hours. Alternatives 2 and 3 provided only 30 stalls—a ratio that community feedback identified as insufficient relative to the 84-unit program of Alternative 3.

The Project's 42-stall parking supply reflects a deliberate balance between adequate resident and visitor parking and the competing priority of preserving open space compatible with the historic district character. As noted in the TIAR, providing substantially more parking would require converting significant portions of planned landscaped open space to paved surfaces, creating an impervious footprint incompatible with Historic District No. 3. The 42-stall supply, combined with pick-up/drop-off areas and on-site transportation amenities, is supported by the centrally-located, senior-focused nature of the Project, which generates significantly lower parking demand than conventional multifamily residential development.

Historic Buildings Demolished or Retained

The No Action Alternative results in the retention of all existing structures, including Alexander House and Baybrook House, but without any rehabilitation. Both buildings would remain in their deteriorating condition without the organizational capacity or revenue stream necessary to fund preservation work. This

outcome—physical retention without stewardship—does not constitute meaningful historic resource protection and leaves both State Register-listed structures at risk of further deterioration. Alternative 1 would have demolished Baybrook House—now listed on the State Register of Historic Places—to accommodate surface parking, in direct conflict with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation. Alternatives 2, 3, and the Project all retain both Alexander House and Baybrook House, though Alternative 2 does not include the rehabilitation of either building.

Alternatives 3 and the Project further advance the treatment of historic resources by assigning Alexander House and Baybrook House specific adaptive reuse programs—a multipurpose center and management office, respectively—that preserve the historic buildings as active, functioning components of the development. Rehabilitation will follow the Secretary of the Interior's Standards for Rehabilitation' to preserve character-defining features of both structures.

All alternatives propose the demolition of Kennan House and ʻĪao House, consistent with the findings of the RLS conducted by MASON. Kennan House is a contributing element to the historic district but is not individually eligible for listing and has deteriorated beyond reasonable restoration; its demolition is offset by the net positive community benefit of the affordable housing program.

Number of Housing Units Provided

The No Action Alternative provides zero housing units. It does nothing to address Maui County's documented shortage of affordable senior housing. Housing unit count is the most direct measure of each action alternative's ability to fulfill the Project's purpose and need. The progression from 20 units (Alternative 1) to 46 units (Alternative 2) to 84 and 85 units (Alternatives 3 and Project) reflects a consistent effort to maximize affordable senior housing while maintaining financial viability and compatibility with the historic district.

Only Alternatives 3 and the Project provide a unit count sufficient to serve the documented scale of Maui County's senior affordable housing shortage. At 84 affordable rental units, the Project also achieves the economies of scale necessary for long-term operational sustainability—a threshold that the 46-unit Alternative 2 failed to meet.

Open Space and Tree Impacts

The alternatives vary considerably in their treatment of open space and mature trees. Alternative 1's large surface parking lot would have consumed the greatest proportion of the site's open land area, creating expanses of asphalt incompatible with the historic landscape character. Alternative 2 preserved the most open space and the park-like character of the site by concentrating two smaller buildings in the site's corners; however, this was achieved at the cost of housing unit count and financial viability.

Alternatives 3 and the Project use the same three-linear-building configuration, which preserves open corridors between buildings and maintains visual sightlines from Main Street to Aupuni Street. The Project adds landscaped walkways, community gardens, a dog run, and seating areas that enhance the open space amenities relative to Alternative 3, while maintaining a comparable overall footprint.

All alternatives identify mature monkeypod tree retention as a design priority. The Project's site plan explicitly orients buildings to preserve trees, and landscaping is designed to retain the existing character of the site with native or indigenous plant species where feasible.

Estimated Traffic and Infrastructure Demands

The Project's TIAR establishes a traffic generation baseline of 51 peak-hour AM trips and 60 peak-hour PM trips using conservative ITE rates for non-age-restricted multifamily housing. This provides a basis for comparing the relative traffic impacts of the alternatives.

Alternative 1 would have generated substantially higher peak-hour traffic volumes than the Project due to the inclusion of a preschool. Preschool uses generate concentrated AM and PM peak trips tied to drop-off and pick-up schedules that directly coincide with AM and PM commute peaks. The addition of a community center with assembly uses would have added further peak-period demand. Based on standard ITE trip generation rates, a preschool of approximately 4,000 square feet could generate 60 to 100 or more additional peak-hour trips above the residential baseline—a meaningful burden on the surrounding street network in a constrained historic district setting.

Alternative 2, with 46 units, would have generated fewer total vehicle trips than the Project—estimated at approximately 28 to 35 peak-hour trips based on ITE rates—given its lower unit count. However, this reduced traffic impact comes at the cost of significantly fewer housing units and a financially unviable project scale.

Alternative 3, with 84 units, would have generated traffic volumes comparable to the Project. The one-unit difference between Alternative 3 and the Project is negligible from a traffic standpoint. Both alternatives generate minimal traffic impacts consistent with the TIAR's conclusion that the Project's traffic contributions are de minimis.

All alternatives would require new water and sewer infrastructure connections consistent with the existing service systems along Main Street and Aupuni Street. The PER for the Project confirms that adequate capacity exists in the existing municipal water and sewer systems to serve the development. Alternative 1's preschool use would have added water demand associated with kitchen and restroom facilities serving up to 46 children and staff, increasing utility loads modestly above residential use alone. Alternatives 2, 3, and the Project are all residential in primary program and would generate comparable utility demands proportional to their respective unit counts.

Financial Feasibility

The No Action Alternative requires no capital investment and therefore has no financing requirements, but it also generates no housing units, no stewardship of historic resources, and no community benefit. It does not satisfy the affordable housing financing goals that motivate the Project.

Among the action alternatives, financial viability is a determinative criterion. As documented in Section 6.4.2, EAH Housing concluded that at least 80 to 85 units are necessary to achieve viable per-unit economics for a senior affordable housing project in Wailuku. Alternatives 1 (20 units) and 2 (46 units) fall well below this threshold. Alternative 3 and the Project both achieve financial viability at 84 units. The Project's additional stall count and design refinements do not materially affect financial viability.

Fulfillment of Project Purpose and Need

The Project's Purpose and Need Statement establishes a clear goal: to provide 84 affordable rental apartments in Wailuku for independent-living seniors age 62 and older earning 60 percent or less of AMI, addressing Maui County's critical shortage of affordable housing for seniors on fixed incomes.

The No Action Alternative fails entirely to meet the Project's purpose and need. It provides no housing, no rehabilitation of listed historic structures, and no fulfillment of County affordable housing objectives. It is the baseline against which all other alternatives demonstrate improvement.

Alternative 1 fails to fulfill this purpose on multiple dimensions. With only 20 units, it addresses a negligible fraction of the documented affordable housing need. Its architectural form is incompatible with the historic district. The demolition of Baybrook House is inconsistent with the Secretary of the Interior's Standards for Rehabilitation. And the traffic and parking demands of the preschool and community center conflict with the low-impact, centrally located character appropriate for this site.

Alternative 2 partially fulfills the purpose and need. It retains both historic structures (without rehabilitation) and introduces a more compatible architectural approach. However, with 46 units, it falls well short of the 84-unit target and is financially unviable for long-term operations. It addresses the housing need incompletely and cannot be sustained without disproportionate per-unit subsidy.

Alternative 3 meets the housing unit target and retains and rehabilitates both historic structures. However, community feedback identified insufficient architectural compatibility with the historic district and inadequate parking supply. These deficiencies were not minor refinements—they represented substantive shortcomings to meet community preferences for development in Historic District No. 3 and the parking needs of residents and visitors.

The Project fulfills the purpose and need most completely. It provides 84 units of senior affordable housing plus one resident manager unit, achieving the scale necessary for financial viability. It rehabilitates both Alexander House and Baybrook House as active resident amenities, consistent with the Secretary of the Interior's Standards for Rehabilitation. Its architectural design achieves compatibility with the historic district while clearly differentiating new construction from existing historic structures, consistent with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation. Parking supply, pick-up/drop-off areas, and landscaped open spaces are sized appropriately for a centrally-located senior affordable housing project. For these reasons, the Project is the preferred alternative.

Table 6-1 summarizes the comparison across all alternatives.

Table 6-1: Alternatives Comparison Summary

Evaluation Factor	No Action Alternative	Alternative 1 Townhomes (20 Units), Preschool & Community Center	Alternative 2 Medium Density (46 Units)	Alternative 3 Alternative Design (84 Units)	Proposed Project (85 Units) [PREFERRED]
Primary Land Use	No development; site remains undeveloped	Residential (20 units), preschool, community center	Residential (46 units)	Residential (84 units)	Residential (85 units) with adaptive reuse of historic structures

Evaluation Factor	No Action Alternative	Alternative 1 Townhomes (20 Units), Preschool & Community Center	Alternative 2 Medium Density (46 Units)	Alternative 3 Alternative Design (84 Units)	Proposed Project (85 Units) [PREFERRED]
Senior Targeting	N/A	Not senior-targeted	Not senior-targeted	Senior-targeted (62+, ≤60 percent AMI)	Senior-targeted (62+, ≤60 percent AMI)
Housing Units	0 units	20 units (15 one-bedroom, 5 two-bedroom)	46 units (29 one-bedroom, 17 two-bedroom, incl. 1 manager unit) — not senior-targeted	84 units (studios and one-bedrooms, incl. 1 manager unit)	85 units (84 senior affordable + 1 manager unit; 41 studios, 43 one-bedrooms)
Architectural Style	No new construction; existing structures unchanged	Hawaiian Island Mission style — suburban townhomes; incompatible massing for historic district	Courtyard multifamily — U-shaped buildings echoing historic roof pitch; contemporary materials	Three linear two-story buildings; modern materials and roof forms; found incompatible by community	Three linear two-story buildings; historically compatible massing, materiality, and roof forms; differentiated first/second floors
Parking Provided	No change to existing parking	72 surface stalls (large lot dominating site)	30 surface stalls (2 ADA); ~0.65 stalls/unit	30 surface stalls (2 ADA); ~0.36 stalls/unit; found insufficient by community	42 surface stalls (2 ADA, 2 guest); 0.49 stalls/unit
Historic Buildings Stewardship	Alexander House and Baybrook House retained but not rehabilitated; no funding mechanism; continued deterioration likely	Alexander House retained; Baybrook House demolished (conflicts with Secretary's Standards)	Alexander House and Baybrook House both retained but not rehabilitated	Alexander House rehabilitated as community center; Baybrook House rehabilitated as management office	Alexander House rehabilitated as multipurpose center; Baybrook House rehabilitated as management office; rehabilitation

Evaluation Factor	No Action Alternative	Alternative 1 Townhomes (20 Units), Preschool & Community Center	Alternative 2 Medium Density (46 Units)	Alternative 3 Alternative Design (84 Units)	Proposed Project (85 Units) [PREFERRED]
					per Secretary's Standards
Open Space & Tree Impacts	No change to site; open space preserved but unimproved	Large surface parking consumes significant open space; some trees retained	Buildings concentrated in SE/SW corners to preserve park-like feel; mature monkeypod trees retained	Three linear buildings preserve some site lines; several mature trees retained; less open space than Alt. 2	Three offset linear buildings preserve sightlines; mature trees retained; landscaped walkways, gardens, dog run added
Building Footprint / Floor Area	No new construction	~18,305 sq ft total (10,465 residential + 4,140 preschool + 3,700 community center)	~27,685 sq ft gross (two courtyard buildings)	~51,765 sq ft gross (three linear buildings)	~51,549 sq ft gross (three linear buildings, 17,183 sq ft per building)
Est. Traffic Generation	No new traffic generated	Higher — preschool/ community center adds AM/PM peak trips; est. well above 51–60 peak-hour trips	Moderate — ~46 units, est. 28–35 peak-hour trips	Similar to proposed — 84 units, est. 50–59 peak-hour trips	51 AM / 60 PM peak-hour trips (per TIAR, ITE rates for multifamily, conservative)
Infrastructure Demand	No new infrastructure demand	Higher — preschool adds water, sewer, and utility loads above residential demand	Moderate — lower unit count reduces utility loads vs. proposed	Similar to proposed — same building count, comparable unit count	New site sewer, water service lateral and meter; on-site drainage retention system designed per County standards

Evaluation Factor	No Action Alternative	Alternative 1 Townhomes (20 Units), Preschool & Community Center	Alternative 2 Medium Density (46 Units)	Alternative 3 Alternative Design (84 Units)	Proposed Project (85 Units) [PREFERRED]
Financial Feasibility / Viability	No capital investment required; no housing or community benefit produced	Financially unviable — only 20 units; insufficient per-unit economics; preschool and community center divert resources from housing mission	Financially unviable — 46 units below 80–85 unit minimum for viable per-unit economics at Maui development costs	Financially viable at 84 units; meets EAH Housing per-unit economics threshold	Financially viable at 85 units; meets EAH Housing per-unit economics threshold; supports long-term operations and maintenance
Fulfillment of Purpose & Need	None — provides no housing, no historic resource rehabilitation, and no fulfillment of County plans; baseline for comparison	Poor — only 20 units; preschool/community center divert resources; no senior targeting; architecturally incompatible; Baybrook House demolished	Partial — 46 units addresses need but financially unviable; no senior targeting; no rehabilitation of historic structures	Partial — 84 units meets target; rehabilitates both historic structures; but design too modern and parking inadequate per community feedback	Full — 84 senior affordable units (+ manager unit); financially viable; historically compatible design; adequate parking; rehabilitates both historic structures

Note: Estimated traffic generation figures for Alternatives 1–3 are inferred from ITE Trip Generation Manual rates and have not been confirmed by project-specific traffic analyses for those alternatives. See text above for discussion.

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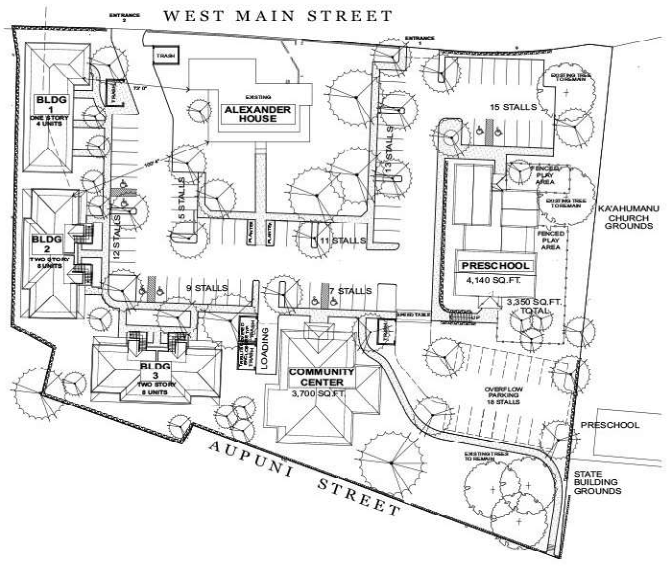



1. Townhomes (20), preschool, and community center





2. Medium density (46 units)





3. Alternative design (84 units)





4. Proposed Project

Figure 21:
Alternatives

Wailuku Mission Senior Affordable Housing

Island of Maui

PBR HAWAII
& ASSOCIATES, INC.

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7 FINDINGS AND ANTICIPATED DETERMINATION

To determine whether the Project may have a significant impact on the physical and human environment, all phases and expected consequences of the Project have been evaluated, including potential primary, secondary, short-range, long-range, and cumulative impacts. Based on this evaluation, the Proposing/Determining agency, HHFDC, is anticipated to issue a FONSI. The supporting rationale for this finding is presented in this chapter.

7.1 SIGNIFICANCE CRITERIA

Based upon the previous information presented in this document, the Project will likely have no significant environmental impacts. This determination is based upon the 13 Significance Criteria in Section 11-200.1-13, HAR, discussed below.

(1) Irrevocably commit a natural, cultural, or historic resource;

Discussion: The Project will not irrevocably commit any natural, cultural, or historic resource. The 2.66-acre Mission Grounds site has been developed for over a century; it contains no significant natural resources, wetlands, critical habitat, or Federal- or State-listed threatened or endangered species. No productive agricultural lands or conservation-classified lands are present. See Sections 3.3 (Soils), 3.4 (Hydrology), and 3.6 (Flora and Fauna) of this EA.

The most significant historic resources on the Project site are Alexander House and Baybrook House, both of which are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places. Rather than irrevocably committing these resources, the Project will rehabilitate and adaptively reuse both structures in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. Alexander House will be converted to a multipurpose community center and Baybrook House to a property management office.

Kennan House and ʻĪao Parsonage (also referred to as ʻĪao House) will be demolished. A RLS prepared by MASON evaluated both structures against Section 13-275-6, HAR Significance Criteria: Kennan House was found ineligible for individual listing on the National or State Registers due to its deteriorated condition, and ʻĪao Parsonage does not meet the HAR Significance Criteria for listing. The removal of these structures will not constitute a significant loss of historic materials or character to Historic District No. 3. See Section 4.1 (Archaeological and Historic Resources) of this EA for the full RLS discussion.

Three new two-story residential buildings will be sited in a largely undeveloped portion of the Project site and designed so that, should they be removed in the future, the essential form and integrity of the historic property and its environment would not be impaired, consistent with Standard 10 of the Secretary of the Interior's Standards for Rehabilitation.

Although archaeological resources are not expected to be encountered during ground disturbance based on previous investigations and a GPR survey, an AIS will be prepared in accordance with Chapter 13-276. The AIS will be submitted to the SHPD for review, comment, and approval. If cultural or archaeological resources are discovered during ground-disturbing activities, work will cease in the area of the discovery and SHPD will be notified pursuant to Section 13-280-3, HAR. See Section 4.1 (Archaeological and Historic Resources) for further details on archaeological and historic resources.

(2) Curtails the range of beneficial uses of the environment;

Discussion: The Project will not curtail the range of beneficial uses of the environment. The Project site is within the State Urban Land Use District and the Maui Island Plan Urban Growth Boundary—designations that reflect the site's appropriateness for urban infill development. The site has been previously developed and disturbed for over a century. No unique or significant natural resources are present on the Project site that would limit future environmental uses.

The Project will convert an underutilized site—currently occupied by aging residences, an office building, and open grounds—into 84 affordable rental homes for low-income seniors, one resident manager unit, and resident-oriented amenities. This transition represents an expansion of beneficial uses, not a curtailment. Approximately 70 percent of the Project site will be retained as open space, with ADA-accessible pathways, community gardens, resident gathering areas, and 54 new trees. Historic structures will be rehabilitated to serve residents.

No productive agricultural lands, conservation resources, or designated open-space resources will be permanently removed. The rehabilitation of Alexander House and Baybrook House will preserve and enhance the publicly visible historic character of the site. Future beneficial uses of the site—including open-space enjoyment and pedestrian access to the historic district—will be maintained. See Sections 3.6 (Flora and Fauna), 4.1 (Archaeological and Historic Resources), and 5.3.5 (Historic District No. 3) of this EA for additional details.

(3) Conflicts with the State's environmental policies or long-term environmental goals established by law;

Discussion: The Project does not conflict with the State's environmental policies or long-term environmental goals established by law. The Project is fully consistent with the two principal State environmental statutes—Chapter 343, HRS (EIS) and Chapter 344, HRS (State Environmental Policy)—and with the applicable State functional plans. This EA itself demonstrates compliance with Chapter 343, HRS.

Chapter 344, HRS directs State agencies to conserve natural resources, enhance quality of life, and concentrate development on previously developed land in a manner that protects the environment. The Project is on a 2.66-acre infill site in the State Urban Land Use District in central Wailuku that has been developed for over a century. By concentrating new housing on this underutilized urban site, the Project avoids pressure on productive agricultural lands, conservation areas, and other environmentally sensitive areas elsewhere on Maui, consistent with the conservation objectives of Section 344-3, HRS. The Project's sustainable design features—including LEED Certified criteria for multifamily housing, solar thermal water heating, energy-efficient LED lighting, high-efficiency plumbing fixtures, and LID stormwater management—reflect the State's environmental stewardship goals. See Section 5.2.6 (State of Hawai‘i Environmental Policy and Guidelines) of this EA for the full Chapter 344, HRS analysis.

All construction activities will comply with applicable State and County environmental regulations, including: Section 11-60.1-33, HAR (fugitive dust control), Chapter 11-46, HAR (community noise control), and NPDES permit requirements for stormwater management. Hazardous materials in existing structures and soils will be properly abated in accordance with DOH and EPA regulations. The Project does not affect any coastal zone resources and is outside the SMA. See Sections 4.4 (Noise), 4.5 (Air Quality),

4.6 (Hazardous Materials), 4.8.3 (Drainage System), and 5.2.3 (Hawai‘i Coastal Zone Management Program (Chapter 205A, Hawai‘i Revised Statutes)) of this EA.

The Project is also consistent with the applicable State Functional Plans, including the Historic Preservation Functional Plan (rehabilitation of Alexander House and Baybrook House in accordance with the Secretary of the Interior's Standards for Rehabilitation), the Housing Functional Plan (84 affordable units at or below 60 percent AMI), and the Health Functional Plan (on-site Resident Services Coordinator providing EAH Housing's StayWell! program to support seniors' health, wellness, and community connectedness). See Sections 5.2.4 (Hawai‘i State Plan, Chapter 226, Hawai‘i Revised Statutes) and 5.2.5 (State Functional Plans) of this EA.

(4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;

Discussion: The Project will not have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community or State. On the contrary, the Project directly addresses Maui's well-documented shortage of affordable housing for seniors—one of the most acute housing needs in the county.

The Project will provide 84 permanently affordable rental homes for seniors aged 62 and older earning 60 percent or less of the AMI, plus one resident manager unit. Rental costs in Wailuku have grown 37 percent faster than the State average over five years, and 28 percent of Maui households are severely cost-burdened (UHERO, 2025). By adding 84 units of permanently affordable senior housing in central Wailuku, the Project provides meaningful relief to seniors on fixed incomes who cannot access market-rate housing. See Section 2.2 (Purpose and Need) of this EA.

The Project site is near shops, restaurants, government services, medical facilities, religious and educational institutions, the Wailuku Public Library, and public transportation, including the Maui Bus Wailuku Loop Route #1 with stops within 0.1 miles. Maui County's Fare-Free Transit Program for seniors aged 55 and older eliminates transit costs for Project residents, supporting social welfare and community connectivity. EAH Housing will provide a dedicated on-site Resident Services Coordinator implementing its StayWell! program to support residents' health, wellness, and community connectedness. See Sections 4.3.3 (Transit Facilities) and 4.10 (Public Services and Facilities) of this EA.

Project construction will generate local construction employment (up to 120 jobs), construction spending, general excise tax revenue, and income tax revenue. Once completed, property management and resident services employment will contribute ongoing economic activity to the Wailuku community. See Section 4.9.2 (Economy) of this EA.

Regarding cultural practices, the Project site is within Wailuku's Historic District No. 3 and within the ‘ili kūpono of Pe‘epe‘e, Wailuku Ahupua‘a. A CIA prepared for the nearby The Hālau of ‘Ōiwi Art project—with findings applicable to this site—identified no active cultural sites or practices on the Project site. Pre-assessment consultation was sent to relevant organizations and State agencies. The Project's rehabilitation of Alexander House and Baybrook House honors the cultural and historical identity of Wailuku. During the pre-assessment consultation process, supportive comments were received from nearby residents, community organizations, and agencies; however, concerns were also raised by neighbors and preservation advocates regarding parking, historic district compatibility, and other details, all of which are addressed in

the relevant chapters of this EA. No adverse effects on cultural practices are anticipated. See Sections 4.2 (Cultural Resources) and 8 (Consultation) of this EA.

(5) Have a substantial adverse effect on public health;

Discussion: The Project will not have a substantial adverse effect on public health. Short-term construction activities may generate dust and noise typical of urban construction, but these effects will be temporary and mitigated through compliance with applicable regulations.

Air quality impacts during construction—primarily fugitive dust from grading and diesel exhaust from equipment—will be controlled through standard dust control measures (regular watering, sprinkling, and dust screens) and compliance with DOH requirements under Section 11-60.1-33, HAR and the County Grading Ordinance. Long-term operational air quality impacts are not expected to be significant given the Project's modest scale and the existing high ambient air quality in Wailuku. See Section 4.5 (Air Quality) of this EA.

Construction noise will comply with DOH noise regulations, and a construction noise permit will be obtained as required. Nighttime construction is not anticipated; if required, a noise variance will be obtained from DOH. During long-term Project operations, noise from stationary mechanical equipment will comply with DOH property line noise regulations under Chapter 11-46, HAR. Traffic-related noise from the Project's modest trip generation (51 AM/60 PM peak-hour trips) is expected to be imperceptible in the context of the existing urban noise environment. See Sections 4.4 (Noise) and 7.1, Criterion (10) of this EA.

Phase I and Phase II ESAs identified hazardous building materials in existing structures, including ACM in ʻĪao Parsonage and Alexander House, and LBP in Kennan House, Alexander House, and Baybrook House. Surface soils with lead and heptachlor epoxide were detected above DOH HEER EALs in samples from building drip lines. An ABCA was prepared to address these conditions. ACM and LBP will be properly abated by qualified contractors in accordance with DOH and EPA regulations prior to demolition or renovation. Soil remediation will be conducted as required by DOH HEER. The DOH HEER office will be notified of all Project-related demolition activities. These measures will protect both construction workers and future residents from hazardous material exposure. See Section 4.6 (Hazardous Materials) of this EA.

The Project will provide a safe, stable living environment for low-income seniors—a population that is particularly vulnerable to housing instability and its associated health consequences. The on-site Resident Services Coordinator will implement EAH Housing's StayWell! program, including coordination of healthcare and mental health services and community programming to reduce social isolation among senior residents.

(6) Involve adverse secondary impacts, such as population changes or effects on public facilities;

Discussion: The Project will not involve adverse secondary impacts, including significant population changes or detrimental effects on public facilities. The Project is intended for independent-living senior households already residing on Maui, which aligns with EAH Housing's experience across its Maui portfolio. Accordingly, the Project is not expected to generate new school-aged children or significantly increase the regional population. See Section 4.9.1 (Population) of this EA.

The Project adds 84 units of affordable senior rental housing to Wailuku's housing stock. It does not displace existing residents or compete with occupied affordable housing units; the Project site currently contains aging structures used as offices and residences, none of which are occupied by the Project's target population. The Project therefore relieves rather than contributes to housing market pressure on low-income seniors. See Section 2.2 (Purpose and Need) of this EA.

Although the WKCP designates the Project site as Public/Quasi-Public (P), there are no public facilities currently operating on the Project site. The Project will therefore not cause the loss of any existing public facility or use. The 85 residential units—of which 84 are affordable senior rental units and one is reserved for an on-site resident manager—will generate modest demand on public services, commensurate with typical residential infill development. The Wailuku Police Station serves the area, and the Maui Fire Department confirmed that the existing fire protection infrastructure—including fire hydrants on Main Street, at Aupuni and ʻAwapuhi Place, and at Aupuni and Koeli Streets—combined with on-site fire sprinkler systems within each residential building, will meet all fire protection requirements. See Section 4.10.2 (Police, Fire, and Medical Services) of this EA.

The Project will not have a significant impact on public school facilities. The Project is an age-restricted affordable rental community serving independent-living senior households whose household members must be 62 years of age or older, so no school-age children will be residing on the premises. Furthermore, the Project is intended for independent-living senior households already residing on Maui, consistent with EAH Housing's experience that most residents at its Maui properties were already living in the County prior to occupancy. Therefore, the Project will not generate new enrollment demand on State of Hawai‘i Department of Education school facilities in the area. See Section 4.10.3 (Schools) of this EA.

Water and wastewater infrastructure will be upgraded on site to serve the Project. The Project will submit a Reservation of Available Service Capacity to the DWS to confirm the water system can accommodate the estimated 47,600 gpd average demand. A Process Request Checklist was submitted to the DEM to confirm sewer system capacity for the estimated average wastewater flow of 23,715 gpd. The Project will implement water-saving fixtures, drought-tolerant landscaping, and efficient irrigation systems, consistent with DWS recommendations. See Sections 4.8.1 (Water System) and 4.8.2 (Wastewater System) of this EA.

Stormwater runoff increases resulting from new impervious surfaces will be fully retained on site through an engineered drainage system—including underground chambers beneath parking areas and on-grade retention basins between buildings—designed to meet County of Maui Storm Drainage Standards. Post-development runoff will not exceed pre-development rates or volumes, and no adverse secondary flooding or drainage impacts to adjacent properties are anticipated. See Section 4.8.3 (Drainage System) of this EA.

During construction, the Project will generate temporary increases in heavy vehicle traffic along Main Street from construction trucks, material deliveries, and worker commute trips. These direct, short-term impacts will be managed through construction traffic control measures, including avoidance of the AM peak hour (7:00–8:00 AM) and PM peak hour (3:45–4:45 PM) for truck deliveries and major haul operations where feasible, consistent with the TIAR's recommendations. Construction hours will also avoid the weekday midday peak period (12:00–1:00 PM) to minimize impacts on nearby businesses. Equipment and materials will be staged on site, away from neighboring residential areas. These impacts are temporary, bound by the construction period, and will not result in permanent changes to traffic conditions on the surrounding street network. See Section 4.3.1 (Roadways and Traffic) of this EA.

Once the Project is complete and occupied, it will generate ongoing vehicle trips by residents, staff, visitors, and service providers. Using conservative trip generation rates for non-age-restricted multifamily housing—rather than the lower rates typically applicable to senior affordable housing—the TIAR estimates 51 peak-hour trips during the AM peak (7:00–8:00 AM) and 60 peak-hour trips during the PM peak (3:45–4:45 PM). These trips represent a 0.9 percent increase on High Street and a 13 percent increase on Main Street relative to existing conditions. The TIAR demonstrates that the addition of Project-generated trips does not cause any study intersection movement to worsen from Base Year 2028 conditions (without the Project) to Future Year 2028 conditions (with the Project). The Project does not tip any intersection from an acceptable LOS to an unacceptable one. The long-term operational traffic impacts of the Project are therefore direct but de minimis, and not significant. All Project access is from Main Street; no vehicle, pedestrian, or bicycle access is provided from Aupuni Street, directly addressing the community concern about traffic impacts to that residential street. See Section 4.3.1 (Roadways and Traffic) of this EA and Appendix H (TIAR).

The Project is expected to generate modest additional ridership on Maui Bus Wailuku Loop Route #1. Because the Project is designed for independent-living seniors aged 62 and older and the Maui County Fare-Free Transit Program eliminates transit costs for riders age 55 and older, resident use of the Maui Bus system is anticipated to be higher than for conventional multifamily housing. However, the Project's 85 units will generate only a small increment of additional riders relative to the route's existing ridership base, and the Maui Bus system operates with sufficient capacity to absorb this demand without degradation of service. No adverse secondary impact on transit service is anticipated. See Section 4.3.3 (Transit Facilities) of this EA.

Abatement of ACM and LBP in existing structures and remediation of soils with lead and heptachlor epoxide above DOH HEER EALs will require transport and off-site disposal of hazardous building materials and contaminated soils. This off-site disposal represents a secondary effect of the proposed action. All abatement and disposal activities will be performed by qualified contractors in compliance with DOH and EPA regulations, and excavated soils designated for off-site disposal will meet landfill acceptance requirements. The quantities of materials involved are consistent with a small infill redevelopment project and do not constitute a significant adverse secondary impact. See Section 4.6 (Hazardous Materials) of this EA.

(7) Involve a substantial degradation of environmental quality;

Discussion: The Project will not involve a substantial degradation of environmental quality. Overall, the Project is expected to improve the environmental quality of the Project site through the removal of hazardous materials, implementation of LID stormwater features, and use of sustainable building practices.

Short-term construction impacts to air quality and ambient noise levels are anticipated but will be temporary and mitigated through compliance with State and County construction management requirements, including DOH fugitive dust regulations and construction noise permitting. See Sections 4.4 (Noise) and 4.5 (Air Quality) of this EA.

No significant long-term impacts to air quality, noise levels, water quality, or biological resources are expected from Project operations. The Project incorporates LID features—including surface bioretention planters, underground stormwater chambers beneath parking areas, and on-grade retention basins between buildings—to capture all increases in stormwater runoff on site and prevent off-site overflows, consistent

with County of Maui Storm Drainage and Stormwater Quality Standards. See Section 4.8.3 (Drainage System) of this EA.

The Project site contains no wetlands, critical habitat, or listed threatened or endangered species. No significant biological resources will be disturbed. Mitigation measures for potential wildlife interactions—including restrictions on tree trimming during the ʻŌpeʻapeʻa birthing season, seabird-friendly nighttime lighting protocols, and invasive species prevention measures—will be implemented. Native plants and 54 new trees will be incorporated into the landscaping. See Section 3.6 (Flora and Fauna) of this EA.

Hazardous materials in existing structures (ACM and LBP) and surface soils (lead and heptachlor epoxide above DOH HEER EALs at building drip lines) will be properly remediated in accordance with DOH requirements prior to and during construction, improving the environmental quality of the site relative to existing conditions. See Section 4.6 (Hazardous Materials) of this EA.

The Project will retain approximately 70 percent of the Project site as open space, with native plant landscaping, community gardens, and walkways that enhance the park-like character of Historic District No. 3. The Project is designed to meet LEED Certified criteria for multifamily housing, incorporating solar water heating, energy-efficient appliances and lighting, and high-efficiency plumbing fixtures.

(8) Be individually limited but cumulatively have substantial adverse effect upon the environment, or involves a commitment for larger actions;

Discussion: The Project is not individually limited but cumulatively significant, nor does it involve a commitment to larger actions. The Project is a stand-alone senior affordable housing development on an existing developed site in central Wailuku. It does not involve phased development, is not a precursor to any larger-scale actions and does not establish a precedent for development outside of existing land use designations.

The Project site is within the established State Urban District and the Maui Island Plan Urban Growth Boundary—designations intended to encourage infill and revitalization within the existing urban core. The Project's use of an underutilized infill site within this boundary is consistent with the intent of the Directed Growth Strategy established by the Maui Island Plan.

Cumulatively, the Project's impact on natural resources, infrastructure, traffic, and public facilities are modest and consistent with what would be expected for a small residential infill project of this type and scale. The TIAR prepared for the Project confirms that the Project will generate 51 AM and 60 PM peak-hour vehicle trips—an increment that does not degrade intersection levels of service in the surrounding network. The Project's engineered stormwater system is designed to ensure that post-development runoff rates and volumes do not exceed pre-development conditions, avoiding cumulative drainage impacts on downstream properties or infrastructure. See Sections 4.3.1 (Roadways and Traffic) and 4.8.3 (Drainage System) of this EA.

The Project's rehabilitation of Alexander House and Baybrook House and its compatible new construction contribute positively to the cumulative character of Historic District No. 3 by preserving significant historic resources and adding architecturally compatible buildings. The Project does not remove or diminish any resource that could trigger additional, larger-scale environmental consequences. No cumulative adverse environmental effects are anticipated.

(9) Have a substantial adverse effect on a rare, threatened, or endangered species or its habitat;

Discussion: The Project will not have a substantial adverse effect on a rare, threatened, or endangered species or their habitat. The Project site has been previously developed and disturbed for over a century. There are no wetlands, critical habitat designations, or Federal- or State-listed threatened, endangered, or candidate plant or animal species on the Project site. The USFWS National Wetlands Inventory map confirms no wetlands or open bodies of water within the site, and the USFWS Critical Habitat map confirms the absence of designated critical habitat within the vicinity (Figure 20). See Section 3.6 (Flora and Fauna) of this EA.

Three species of special concern could potentially be affected by the Project:

- ʻŌpeʻapeʻa (Hawaiian Hoary Bat, Lasiurus cinereus semotus): This federally and State-listed endangered species could potentially occur in woody vegetation at or near the Project site. To minimize potential impacts, no barbed wire is proposed, and woody plants greater than 15 feet tall will not be disturbed, removed, or trimmed during the birthing and pup-rearing season (June 1 through September 15).
- Native seabirds (ʻuaʻu kani/wedge-tailed shearwater and ʻuaʻu/Hawaiian petrel): These species may fly over the Project site between their upland burrows and the sea. All outdoor lighting will be fully shielded in compliance with Chapter 20.35, MCC (Maui outdoor lighting ordinance). Nighttime construction (if required) will avoid the seabird fledgling season (September 15 through December 15) or use fully shielded, downward-facing seabird-friendly lighting.
- Nēnē (Hawaiian Goose, Branta sandvicensis): If Nēnē are observed on the Project site, particularly during breeding season (September through April), all construction activities will cease, and a biologist familiar with Nēnē nesting behavior will survey for nests.

No invasive plant species will be planted on the Project site, and plant and soil movement will be minimized during construction to reduce the risk of spreading invasive species. Native plants, including those adapted to Wailuku's climatic conditions, will be incorporated into the Project's landscaping. With the implementation of these mitigation measures, no substantial adverse effects on any rare, threatened, or endangered species or their habitat are anticipated.

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

Air Quality: The Project will not violate any State or Federal air quality standards. Short-term, temporary air quality impacts may occur during construction due to fugitive dust from grading and diesel exhaust from earth-moving equipment. All construction activities will comply with the County Grading Ordinance and DOH requirements, including Section 11-60.1-33, HAR (fugitive dust control). Standard dust control measures—including regular watering, sprinkling, and dust screens—will be implemented, consistent with the Erosion Control Plan approved by the County of Maui. Long-term operational air quality impacts are not expected to be significant given the Project's modest scale and the existing high ambient air quality in Wailuku, where the nearest DOH monitoring station in Kahului typically records an air quality index below 50 (EPA "Good" category). See Section 4.5 (Air Quality) of this EA.

Water Quality: The Project will not violate any State or Federal water quality standards. Construction contractors will comply with non-point source prevention measures through the NPDES permit, including BMPs such as silt fences, sediment traps, and diversion swales to prevent sediment and pollutant discharge

during grading and construction. The Project's on-site stormwater drainage system—consisting of underground chambers beneath parking areas, on-grade retention basins, and bioretention planters—will capture all increases in runoff on site, consistent with County of Maui Storm Drainage Standards and Stormwater Quality Standards and will prevent pollutant-laden runoff from discharging off site. See Sections 3.4.1 (Surface Water), 3.4.2 (Groundwater), and 4.8.3 (Drainage System) of this EA.

Ambient Noise Levels: Construction noise will be temporary in nature. The loudest noise sources will likely be earth-moving equipment during site grading. All construction activities will comply with DOH noise regulations, and a construction noise permit will be obtained from DOH as required. Nighttime construction is not anticipated; if required, a noise variance will be obtained. During Project operations, noise from any stationary mechanical equipment will comply with DOH property line noise regulations under Chapter 11-46, HAR. Traffic-related noise increases resulting from the Project's modest trip generation (51 AM/60 PM peak-hour trips) are expected to be imperceptible in the context of the existing urban noise environment. See Section 4.4 (Noise) of this EA.

(11) Have a substantial adverse effect on or be likely to suffer damage by being in an environmentally sensitive area, such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

Discussion: The Project site is not in an environmentally sensitive area and will not suffer damage from natural hazards associated with such areas. The site is at an elevation of approximately 355 to 388 feet AMSL in central Wailuku, approximately 1.8 miles inland from the nearest shoreline.

Flood Zone: The entire Project site is within FEMA FIRM Zone X, which is outside the 0.2 percent annual chance floodplain and not within a Special Flood Hazard Area. The Project's on-site stormwater drainage system is designed to meet County requirements, ensuring that post-development runoff does not create adverse flood conditions on adjacent or downstream properties. See Section 3.5.1 (Flood) of this EA.

Tsunami Zone: The Project site is neither in the base tsunami nor the extreme tsunami evacuation zones. The base tsunami evacuation zone extends only to approximately the UH Maui College near South Wākea Avenue, roughly 1.2 miles from the Project site. At 355 feet AMSL and 1.8 miles from the shoreline, the site faces no credible tsunami inundation risk. See Section 3.5.2 (Tsunami) of this EA.

Sea Level Rise: The Project site is not at risk of inundation under the one-meter (3.2 foot) SLR-XA scenario formally accepted by Maui County. At 355 feet AMSL, the site is far above any projected SLR inundation scenario for the foreseeable future. See Section 3.5.4 (Sea Level Rise and Climate Change) of this EA.

Other Sensitive Areas: The Project site contains no wetlands, estuaries, fresh water bodies, or coastal waters. There are no surface water bodies on the Project site; the closest water feature is a riverine approximately 200 feet west of the site's western boundary. The site is not on a beach, erosion-prone area, or geologically hazardous land. The Project is unclassified per the Agricultural Lands of Importance to the State of Hawai‘i and is zoned within the State Urban District. The Project will comply with all applicable building codes, including the 2018 IBC as amended by the State of Hawai‘i and Maui County Building Codes, to address seismic and hurricane forces. See Sections 3.4 (Hydrology) and 3.5 (Natural Hazards) of this EA.

(12) Have a ssubstantial adverse effect on scenic vistas and viewplanes, during day or night, identified in County or State plans or studies; or,

Discussion: The Project will not have a substantial adverse effect on scenic vistas or viewplanes identified in County or State plans or studies. No unique scenic resources or views associated with the Project site are identified in any State or County plan or study. See Section 4.7 (Visual Resources) of this EA.

The Project site is bounded by Main Street to the north and Aupuni Street to the south. Both streets provide existing view corridors toward the West Maui Mountains to the west. Main Street also provides easterly views toward the coastline, and Aupuni Street provides easterly views toward Haleakalā. The three new two-story residential buildings are carefully sited, spaced, and oriented in a slightly offset, north-south configuration to preserve open space and maintain existing sightlines from Main Street to Aupuni Street. None of the new buildings will obstruct public views toward the West Maui Mountains, the coastline, or Haleakalā from Main Street or Aupuni Street.

The new buildings will be set back approximately 60 feet from Alexander House and Baybrook House and will be constructed at a lower elevation than these historic structures, ensuring that Alexander House and Baybrook House remain visually prominent on the site. Approximately 70 percent of the Project site will be retained as open space, preserving existing views to and from the Project site.

The Project's three new residential buildings are designed with massing offsets, hipped roofs, simple materials, and a natural brown-grey color palette—architectural elements compatible with the historic character of Historic District No. 3 and consistent with Standard 9 of the Secretary of the Interior's Standards for Rehabilitation. The Project does not use reflective or glossy materials. See Sections 4.7 (Visual Resources) and 5.3.5 (Historic District No. 3) of this EA.

To address nighttime visual impacts, all outdoor lighting will be fully shielded in compliance with Chapter 20.35, MCC (Maui outdoor lighting ordinance), which regulates the type and use of outdoor lighting to limit light glare, pollution, and trespass. No substantial adverse nighttime visual impacts are anticipated.

(13) Requires substantial energy consumption or emit substantial greenhouse gases.

Discussion: The Project will not require substantial energy consumption or produce substantial greenhouse gas emissions. The Project is a modest-scale residential development—three two-story buildings serving 85 households—that will not generate energy demand or greenhouse gas emissions disproportionate to its size or context within the existing urban environment of central Wailuku.

The Project is designed to meet LEED Certified criteria for multifamily housing and targets a minimum 30 percent reduction in energy consumption compared to a baseline standard building design. Key energy efficiency measures include:

- Energy-efficient appliances and LED lighting throughout all units and common areas;
- Well-insulated walls and roofs to reduce heating and cooling loads;
- Solar thermal water heating systems;
- Whole-building energy metering with unit submeters to monitor and manage consumption; and
- Energy Star exhaust fans in kitchens and bathrooms.

Water-efficiency measures—including high-efficiency plumbing fixtures, efficient drip irrigation with moisture sensors, and separate water meters for landscape and buildings—further reduce the Project's overall resource consumption. The use of solar thermal water heating reduces reliance on electrically generated hot water, directly reducing both energy consumption and associated greenhouse gas emissions.

The Project does not propose any gas service, further limiting its potential for greenhouse gas emissions from fossil fuel combustion. The Project's central location in Wailuku, with direct access to the Maui Bus Wailuku Loop Route #1 and Maui County's Fare-Free Transit Program for seniors, will reduce vehicle trips and associated vehicular emissions relative to a suburban location. See Sections 2 (Description), 3.1 (Climate), and 4.3 (Transportation) of this EA.

7.2 CUMULATIVE IMPACTS

Cumulative impacts are effects on the environment that result from the incremental contribution of a proposed action when combined with other past, present, and reasonably foreseeable future actions, regardless of who undertakes those actions. This section assesses the Project's incremental contribution to cumulative impacts across the resource areas where such effects are most relevant: traffic and transportation, water supply, wastewater and drainage infrastructure, historic district character, and affordable housing. The geographic scope and time horizon for each resource area are defined by the boundaries of the relevant system or planning context.

Secondary impacts of the Project—meaning effects caused by the Project that are later in time or farther removed in distance but still reasonably foreseeable, as defined in Section 11-200.1-2, HAR—are addressed in Section 7.1 under Criterion 6 above. This section addresses cumulative impacts specifically: the Project's incremental contribution to environmental effects when added to other past, present, and reasonably foreseeable future actions, regardless of who undertakes those actions.

As demonstrated below, the Project's incremental contribution to cumulative impacts across all resource areas does not, individually or in combination, rise to a level of significance under Section 11-200.1-13(b)(8), HAR. The Project is a stand-alone infill development on an underutilized, previously developed site within the State Urban Land Use District. It does not commit land or infrastructure in a way that would induce, enable, or accelerate larger-scale development beyond what is already anticipated under existing land use designations and the Maui Island Plan.

Traffic and Transportation

The TIAR provides the most comprehensive cumulative impact analysis in this EA. The TIAR develops a Base Year 2028 scenario that accounts for ambient regional traffic growth (approximately 0.9 percent per year along Main Street and 1.0 percent per year along High Street) plus 18 identified background development projects in various stages of approval or construction in the surrounding area. This Base Year 2028 scenario is, in substance, a cumulative impact analysis: it establishes the combined effect of all reasonably foreseeable traffic-generating actions in the study area before the Project adds a single trip.

The cumulative baseline is already stressed. The combination of ambient growth and background developments is projected to increase traffic by approximately 19 percent along Main Street and 28 percent along High Street by 2028. Several study intersections—including High Street/Wells Street, High Street/Kaohu Street, and High Street/Malako Street—are expected to deteriorate to LOS E or F during peak hours under background conditions alone, without the Project.

Against this cumulative baseline, the Project's incremental contribution is minimal. The Project will generate 51 AM peak-hour and 60 PM peak-hour trips—a 0.9 percent increase on High Street and a 13 percent increase on Main Street relative to existing conditions. Critically, the TIAR demonstrates that the addition of Project-generated trips does not cause any study intersection movement to worsen from Base Year 2028 (without the Project) to Future Year 2028 (with the Project). The Project does not tip any intersection from an acceptable LOS to an unacceptable one. The Project's contribution to cumulative traffic impacts is therefore de minimis and not cumulatively significant. See Section 4.3.1 (Roadways and Traffic) of this EA and Appendix H (TIAR).

Water Supply

Water supply is the cumulative resource area that warrants the most careful attention. The Central Maui water system draws primarily from the ʻĪao Aquifer, which has a sustainable yield of 20 MGD. During pre-assessment consultation, DWS advised that the three-year demand projection for the Central Maui system is currently between 98 percent and 100 percent of the system's maximum reliable capacity. This near-capacity condition reflects the cumulative effect of past and existing demand from residential, commercial, and other users throughout the Central Maui service area.

The Project's estimated average daily demand of approximately 47,600 gpd represents a modest increment—roughly 0.24 percent of the aquifer's sustainable yield and a proportionally small addition to the existing system load. The Project will incorporate water-saving measures—including low-flow plumbing fixtures, drought-tolerant landscaping, and efficient drip irrigation—consistent with DWS recommendations, to minimize demand. A Reservation of Available Service Capacity will be submitted to DWS to confirm that the existing water system can accommodate the Project prior to construction.

While the Central Maui system's near-capacity condition is a meaningful cumulative constraint for the region as a whole, the Project's small and water-efficient demand increment does not, by itself, push the system beyond its capacity or cause a significant adverse cumulative impact. The Project does not induce additional development or population growth beyond what is already planned within the Central Maui service area. See Section 4.8.1 (Water System) of this EA.

Wastewater and Stormwater Infrastructure

The Project will connect to the existing County of Maui municipal sewer system, generating an estimated average wastewater flow of approximately 23,715 gpd. A Process Request Checklist was submitted to the County DEM to confirm system capacity. While DEM had not provided a response as of the date of this EA, the Project's demand represents a modest addition to the Wailuku collection and treatment system. The Project does not propose any uses—such as commercial kitchens or industrial processes—that would generate unusual or high-strength wastewater loadings. Wastewater impacts are not expected to be cumulatively significant.

Regarding stormwater, the Project is designed to retain all increases in runoff on site through an engineered drainage system, ensuring that post-development runoff rates and volumes do not exceed pre-development conditions for the 50-year, 1-hour design storm event. The Project will therefore not contribute to cumulative stormwater impacts on downstream drainage infrastructure or receiving waters. See Sections 4.8.2 (Wastewater System) and 4.8.3 (Drainage System) of this EA.

Historic District Character

The Project site is within Wailuku's Historic District No. 3, a County-designated historic district that encompasses Alexander House, Kaʻahumanu Church, Bailey House (Hale Hōʻikeʻike), and other significant structures associated with the early missionary and plantation-era history of Wailuku. Cumulative impacts on the character of Historic District No. 3 must be considered in light of past changes to the district and any other known or foreseeable development within its boundaries.

The Project's cumulative contribution to the historic district is affirmatively positive. The Project will rehabilitate Alexander House and Baybrook House—both listed on the State Register of Historic Places—in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving character-defining features that might otherwise continue to deteriorate. The three new residential buildings are carefully sited, scaled, and designed with materials, massing, and roof forms compatible with the district's historic character. Approximately 70 percent of the Project site will be retained as open space, preserving the park-like setting that defines the Mission Grounds within the historic district.

By replacing uninhabitable structures with compatible new construction and rehabilitating two significant historic resources, the Project contributes positively to the cumulative preservation of Historic District No. 3's character. No known or reasonably foreseeable actions within the district would, in combination with the Project, substantially degrade the district's historic integrity. See Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of this EA.

Affordable Housing: A Positive Cumulative Effect

The Project's most significant cumulative contribution is a positive one. The 2024 Hawaiʻi Housing Planning Study identifies the need for over 1,600 affordable multifamily rental units in Maui County through 2027, more than 70 percent of which are required to serve households at or below 60 percent AMI (SMS Research & Marketing Services, Inc., 2024). The Project's 84 permanently affordable senior rental units, combined with other affordable housing projects across Maui, contribute incrementally to addressing this documented and critical shortage. The Project is part of a broader pattern of investment in affordable senior housing that, in combination, works toward closing the gap between housing supply and community need in Maui County.

Summary

The Project's incremental contribution to cumulative impacts across all resource areas is modest and, in combination with other past, present, and reasonably foreseeable future actions, does not rise to a level of significance. Traffic impacts are de minimis against an already-established cumulative baseline analyzed in the TIAR. Water demand is small and water-efficient relative to the system's sustainable yield. Wastewater and stormwater infrastructure will not be cumulatively burdened. Historic district impacts are affirmatively positive. And the Project's 84 permanently affordable senior units represent a meaningful positive cumulative contribution to addressing Maui County's most urgent housing need.

7.3 ANTICIPATED DETERMINATION

Based on the analysis presented in this EA, HHFDC, as the approving agency under Chapter 343, HRS, anticipates issuing a FONSI for the Project.

The EA evaluates all phases and expected consequences of the Project, including primary, secondary, short-range, long-range, and cumulative impacts. As demonstrated in Section 7.1 (Significance Criteria), the

Project does not meet any of the 13 significance criteria set forth in Section 11-200.1-13, HAR. The Project site is a previously developed, 2.66-acre infill parcel within the State Urban District and the Maui Island Plan Urban Growth Boundary. It contains no significant natural resources, wetlands, critical habitat, or listed threatened or endangered species. All potential construction-period impacts to air quality, noise, stormwater, and hazardous materials will be addressed through compliance with applicable Federal, State, and County regulations and project-specific mitigation measures. No significant long-term environmental impacts are anticipated from Project operations.

Importantly, the Project will preserve and rehabilitate two State Register-listed historic structures — Alexander House and Baybrook House — in accordance with the Secretary of the Interior's Standards for Rehabilitation, contributing positively to the historic character of Wailuku's Historic District No. 3. The Project will also provide 84 permanently affordable rental homes for low-income seniors, directly addressing a documented and urgent community need in Maui County.

This determination is further supported by the pre-assessment consultation and public outreach process, during which State and County agencies, community organizations, and the public provided input that was incorporated into the Project design and this EA. No comments received during that process identified potential environmental impacts of a magnitude that would require preparation of an EIS.

8 CONSULTATION

8.1 PRE-ASSESSMENT CONSULTATION

The pre-assessment consultation for the Project was conducted from June 12, 2025, to July 11, 2025, prior to the preparation of the Draft EA. The purpose of the pre-assessment consultation is to seek advice and input from public agencies with jurisdiction or expertise as well as citizen groups and individuals who reasonably may be affected by the proposed action. This process is part of the scoping process for the Draft EA. Comments and input received during this period were used to identify environmental issues and concerns to be addressed in the Draft EA.

The agencies, organizations, and individuals who were sent pre-assessment consultation letters are listed in Table 8-1. Those who provided written comments (either by printed copy or electronically) are indicated by the date of their comment in Table 8-1. Appendix I contains copies of the written comments and responses.

Table 8-1: Pre-assessment Consultation

Agencies/Organizations/Individuals	Pre-assessment consultation letter sent	If received, comment date
Environmental Review Program	X	
FEDERAL		
U.S. Army Corps of Engineers	X	
U.S. Fish and Wildlife Service	X	
STATE		
Department of Accounting and General Services	X	6/20/2025
Department of Business, Economic Development & Tourism (DBEDT)	X	
Department of Defense – Engineering Office	X	
Department of Education	X	
Department of Hawaiian Home Lands (DHHL)	X	
Department of Health (DOH)	X	
Department of Human Services	X	
Department of Land and Natural Resources (DLNR)	X	
DLNR – State Historic Preservation Division (SHPD)	X	
DLNR – Land Division, Maui District Office	X	
Department of Transportation (HDOT)	X	7/11/2025
Office of Hawaiian Affairs	X	
UH Maui College Library	X	
COUNTY OF MAUI		
Department of Housing	X	
Department of Human Concerns	X	
Department of Fire and Public Safety	X	
Department of Environmental Management	X	6/20/2025
Department of Parks and Recreation	X	7/1/2025
Department of Planning	X	
Department of Public Works (DPW)	X	
Department of Transportation (MDOT)	X	7/9/2025

Agencies/Organizations/Individuals	Pre-assessment consultation letter sent	If received, comment date
Department of Water Supply (DWS)	X	7/22/2025 (LATE)
Police Department	X	6/30/2025
ELECTED OFFICIALS		
Mayor Richard Bissen	X	
Councilmember Alice Lee	X	
State Representative Troy Hashimoto	X	
State Representative Tyson Miyake	X	
LIBRARIES		
Wailuku Public Library	X	7/10/2025
UTILITIES		
Hawaiian Electric Company	X	6/30/2025
Spectrum	X	6/17/2025
Hawaiian Telecom	X	6/17/2025
Hawai'i Gas	X	6/27/2025
CITIZEN GROUPS / INDIVIDUALS / CONSULTED PARTIES		
Historic Hawai'i Foundation	X	7/11/2025
Wailuku Community Association	X	7/2/2025
Maui Historical Society	X	
Imua Family Services	X	6/23/2025
Sana Daliva	X	
Virginia Suddath	X	7/11/2025
Ryan Hashizume	X	7/10/2025
Alan Manibog	X	
Kathleen Stout	X	
Deanne Komoda	X	
Chris Kanemura	X	
Wayne Higa	X	
Makena Sullivan	X	
Jerry and Eryn Cook	X	7/8/2025
Janis Nakamura	X	7/7/2025
Alyson Nakamura	X	7/10/2025
Kathleen Stout	X	
Kristin Holmes		7/1/2025
Jody Arthur		7/9/2025
Patricia Feiteira		7/10/2025
Lori Feiteira		7/10/2025
Jenna Sheehan		7/10/2025
Tammy Ching		7/10/2025
Ryan and Michele Murakami		7/11/2025

Agencies/Organizations/Individuals	Pre-assessment consultation letter sent	If received, comment date
Sandy Takishita		7/11/2025
Lianne Malapit		7/13/2025 (LATE)

8.2 COMMUNITY OUTREACH

In addition to the pre-assessment consultation for the Draft EA, WUC, EAH Housing and the Project consultant team conducted outreach to the community and State and County agencies over the past several years. These efforts included:

July 2021: Preliminary meeting with Attainable Housing for Maui Nui

January 2022: Preliminary community meeting

February 2022*:* Informational meeting with Mayor Victorino

February 2022: Informational meeting and consultation with Stand Up Maui Affordable Housing Committee

September 2022: Informational meeting and consultation with Maui Historical Society/Hale Hōʻikeʻike

April 2024: Meeting with County Planning Department and Department of Housing and Human Concerns

April 2024: Informational meeting with Imua Family Services

August 2024: Informational community meeting

January 2025: Informational meeting with County Department of Housing

February 2025: Informational meeting with Councilmember Tasha Kama's office

February 2025: Informational meeting with HHFDC

April 2025: Informational meeting with Councilmember Alice Lee's office

July 2025: Project update community meeting

September 2025: Informational meeting and consultation with County Department of Housing

September 2025: Informational meeting and consultation with County Department of Water Supply

October 2025: Informational meeting and consultation with County Department of Public Works

October 2025: Informational meeting and consultation with County Department of Fire and Public Safety

December 2025: Informational meeting and consultation with County Department of ʻŌiwi Resources

February 2026: Informational meeting with Councilmember Shane Sinenci's office

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Appendix A

County of Maui Land Use Designation Form

COUNTY OF MAUI
DEPARTMENT OF PLANNING
One Main Plaza Building
2200 MAIN STREET, SUITE 315
WAILUKU, HAWAII 96793

Zoning Administration and
Enforcement Division (ZAED)
Telephone: (808) 270-7253

LAND USE DESIGNATION FORM

TAX MAP KEY 2340140050000 PLAN NUMBER LUD2025-01292

PROPERTY ADDRESS 2307 W MAIN ST, WAILUKU, HI 96793

☐ Yes ☑ No **Will this Land Use Designation Form be used with a Subdivision Application?**
IF YES, answer questions A and B below and comply with instructions 2 & 3 below:
A) ☐ Yes ☑ No **Will it be processed under a consistency exemption from** Section 18.04.030(B), MCC?
IF YES, which exemption? (No. 1, 2, 3, 4 or 5) _____
B) State the purpose of subdivision and the proposed land uses (ie 1-lot into 2-lots for all land uses allowed by law):

LAND USE DISTRICTS/DESIGNATIONS (LUD) AND OTHER INFORMATION:[1]

☐ (SMA) Special Management Area

STATE DISTRICT: ☑ Urban ☐ Rural ☐ Agriculture ☐ Conservation

MAUI ISLAND PLAN
Growth Boundary:[2] ☑ Urban ☐ Small Town ☐ Rural ☐ Planned Growth Area ☐ Outside Growth Boundaries
Protected Area:[2] ☐ Preservation ☐ Park ☐ Greenbelt ☐ Greenway ☐ Sensitive Land ☑ Outside Protected Areas

COMMUNITY PLAN:[2] P-1 PUBLIC/QUASI-PUBLIC

COUNTY ZONING: HD-3 HISTORIC DISTRICT 3

OTHER/COMMENTS:

☐ (PD) Planned Development
☐ (PH) Project District
☐ See Additional Comments (Pg. 2)
☐ See Attached LUD Map

FEMA FLOOD INFORMATION: A Flood Development Permit (FDP) may be required if any portion of a parcel is designated V, VE, A, AO, AE, AH, D, or Floodway, and the project is in that portion. For more information please visit the FDP Webpage.

FLOOD HAZARD AREA ZONES[3] & BASE FLOOD ELEVATIONS: ZONE: X

☐ FEMA DESIGNATED FLOODWAY | For Flood Zone AO, FLOOD DEPTH:

☐ Wellhead Protection Overlay District — Please contact the Department of Water Supply's Water Resources and Planning Division at (808) 463-3110 to determine if a permit is necessary for work done in this area.

SUBDIVISION LAND USE CONSISTENCY: ☐ Not Consistent, (LUDs appear to have NO permitted uses in common).

_____ (Signature)

☐ Not Applicable, (Due to processing under consistency exemption No. ☐ 1, ☐ 2, ☐ 3, ☐ 4, ☐ 5).

☐ Interim Zoning, (The parcel or portion of the parcel that is zoned interim shall not be subdivided).

☐ Consistent [4], (LUDs appear to have ALL permitted uses in common).

☐ Consistent [4], upon obtaining an SMA, PD, or PH subdivision approval from Planning.

☐ Consistent [4], upon recording a permissible uses unilateral agreement processed by Public Works (See Pg. 2).

NOTES:

1) **The conditions and/or representations made in the approval of a State District Boundary Amendment, Community Plan Amendment, County Change in Zoning, SMA Permit, Planned Development, Project District and/or a previous subdivision, may affect building permits, subdivisions, and uses on the land.**
2) **Please review the Maui Island Plan and the Community Plan document for any goals, objectives, policies or actions that may affect this parcel.**
3) **Flood development permits might be required in zones X and XS for any work done in streams, gulches, low-lying areas, or any type of drainageway might require the following designations to be shown on the subdivision map: 100-year flood inundation limits; base flood elevations; drainage reserves,**
4) **Subdivisions will be further reviewed during the subdivision application process to verify consistency, unilateral agreement requirements, and the conditions associated with a unilateral agreement [Section 18.04.030.D, Maui County Code]**

REVIEWED & CONFIRMED BY:

Tiffani Nelson

Tiffani Nelson

12/30/2025

Date

For: Planning Program Administrator,

DESIGNATIONS MAY CHANGE

Appendix B

Conceptual Architectural Plans



Project Description

The Wailuku Mission Housing Project is an affordable housing project comprised of 84 independent-living senior rental housing units and one manager unit on a property at 2307 Main Street in Wailuku. The 2.66 acre property, owned by Wailuku Union Church, is bounded by Main Street to the north, and Aupuni Street to the south. It is within Historic District 3 of Maui's comprehensive zoning code. Historic structures on the site include the William and Mary Alexander House, dating to 1836; it is one of the oldest surviving structures in the State from the post-contact era.

Wailuku Union Church's intention is to partner with EAH Housing to develop, own and manage the 84 units senior affordable rental units targeting senior households (aged 62 or older). Income eligibility and corresponding rental rates are intended to target senior households at 60% Area Median Income or less. These limits will be based on HUD income limits and established by Maui County Department of Housing and the Hawaii Housing Finance and Development Corporation (HHFDC).

History / Context

The Wailuku Union Church was chartered in 1867 as the Union Protestant Church of Wailuku. As one of the oldest congregational churches in Hawaii, Wailuku Union Church (WUC) has served as a place of worship and hub of social activity in the community for nearly 150 years. In addition to providing spiritual inspiration and a place of worship for residents of Maui, the leadership and congregation of WUC have long recognized the importance of reaching out to the Maui community with social, recreational and educational programs. This 2.66-acre site is currently one of the only large undeveloped tracts of land in central Wailuku and its pre-contact and post-contact history dictates cultural and historical sensitivity in considering potential development options. The plan has evolved to embody WUC's longstanding commitment to the people of Maui by providing this valuable property to help address several critical community needs.

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AMA A/E
ARCHITECTURE / ENVIRONMENT
1050 Queen Street, Suite 203
Honolulu, HI 96814 808.428.1872

WAILUKU MISSION HOUSING

2307 Main St,
Wailuku, HI 96793
TMK: (2) 3-4-014:005

AERIAL VIEW

25 MARCH 2026

PROJECT INFO

ADDRESS	2307 MAIN STREET, WAILUKU, HI 96763
TMK	(2) 3-4-014:005
LOT AREA	115,845 SF (2.6594 AC)
COUNTY ZONING DISTRICT	HISTORIC DISTRICT NO. 3
PERMITTED USE	DWELLING, MULTIFAMILY
FLOOD ZONE	X
TSUNAMI EVACUATION ZONE	NO
DENSITY - FAR	0.4
HEIGHT LIMIT	2 STORIES: 35 FEET
	1 STORY: 25 FEET
YARD SETBACKS	FRONT YARD: 15 FEET
	SIDE/REAR YARD: 10 FEET

PARKING

STANDARD	38
ADA	2
GUEST	2
TOTAL	**42**

BUILDING CODE INFO

APPLICABLE CODE	2018 IBC
OCCUPANCY CLASSIFICATION	R-2, APARTMENT HOUSES
CONSTRUCTION TYPE	VB
SPRINKLERS	NFPA 13
PROPOSED NUMBER OF BUILDINGS	3
INFO PER BUILDING:	
MAX NUMBER OF STORIES ALLOWED	3
PROPOSED NUMBER OF STORIES	2
ALLOWABLE AREA PER STORY	21,000 SF
ACTUAL AREA PER STORY	8,671 SF
ALLOWABLE TOTAL BUILDING AREA	42,000 SF
ACTUAL TOTAL BUILDING AREA	17,183 SF
MAX HEIGHT ALLOWED	60 FEET
PROPOSED HEIGHT	28 FEET

PROJECT UNIT MIX

BUILDING 1

	UNITS/FLOOR	STUDIO'S			1 BEDROOM'S			RES SF	COMMON SPACE	TOTAL GSF
		TYPE	*COUNT*	*GSF*	*TYPE*	*COUNT*	*GSF*			
LOWER LEVEL	15	TYPICAL	8	384	TYPICAL	5	581	7,060	1,452	8,512
		ADA	1	442	ADA	1	641			
UPPER LEVEL	14	TYPICAL	5	384	TYPICAL	3	581	7,180	1,491	8,671
		TYPICAL (B)	1	442	TYPICAL(B)	5	615			
TOTAL	**29**		**15**			**14**		**14,240**	**2,943**	**17,183**

BUILDING 2

	UNITS/FLOOR	STUDIO'S			1 BEDROOM'S			2BED	RES SF	COMMON SPACE	TOTAL GSF
		TYPE	*COUNT*	*GSF*	*TYPE*	*COUNT*	*GSF*	*Manager's unit*			
LOWER LEVEL	14	TYPICAL	7	384	TYPICAL	6	581		6,815	1,697	8,512
					ADA	1	641				
UPPER LEVEL	13	TYPICAL	3	384	TYPICAL	4	581	817	7,183	1,488	8,671
		ADA	1	442	TYPICAL(B)	4	612				
TOTAL	**27**		**11**			**15**		1	**13,998**	**3,185**	**17,183**

BUILDING 3

	UNITS/FLOOR	STUDIO'S			1 BEDROOM'S			RES SF	COMMON SPACE	TOTAL GSF
		TYPE	*COUNT*	*GSF*	*TYPE*	*COUNT*	*GSF*			
LOWER LEVEL	15	TYPICAL	8	384	TYPICAL	5	581	7,060	1,452	8,512
		ADA	1	442	ADA	1	641			
UPPER LEVEL	14	TYPICAL	5	384	TYPICAL	3	581	7,180	1,491	8,671
		TYPICAL (B)	1	442	TYPICAL(B)	5	615			
TOTAL	**29**		**15**			**14**		**14,240**	**2,943**	**17,183**
BUILDINGS 1,2,3 TOTAL	**85**		**41**			**43**		**1** **42,478**	**9,071**	**51,549**

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Site Design Approach

The design intent is motivated by minimizing the visual impact of the proposed density within the context of the historic district, and preserving the “park-like” feel of the existing property. Three new buildings are sited to maintain sight lines from Alexander House. The two-story buildings include a mix of studio and 1 BR units as well as one 2BR unit for the onsite resident manager. The two-story buildings are similar in scale and lower in height to Alexander House.

Landscaping is intended to retain the existing character of the property, which is relatively subdued in character.

Ground disturbance is needed to nestle the buildings into the grade and enhance the appearance of the structures relative to the sloping grade of the site. Archaeological investigation will verify the impact on the excavation on any anticipated encounter with artifacts or remains. Shallow structural slab-on-grade foundations will minimize the extent of grade impact.

Alexander House will be rehabilitated and incorporated into the project to serve as a multipurpose center. The Baybrook house will also be rehabilitated and serve as the property management office. A reconnaissance level survey report by prepared by Mason Architects in 2025 concludes that two structures on the site are either ineligible for the historic register (Iao House, 1963), or deemed a contributing element but not an individually eligible listing (Kennan House, 1928). Both the Iao House and Kennan House are slated for demolition to accommodate the project.

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WAILUKU MISSION HOUSING

2307 Main St,
Wailuku, HI 96793
TMK: (2) 3-4-014:005

SITE PLAN RENDER

25 MARCH 2026

N



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SITE PLAN

25 MARCH 2026

N

0 5 10 20 40

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SITE PLAN - GROUND FLOORS 25 MARCH 2026

N

0 5 10 20 40

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UPPER LEVEL

LOWER LEVEL

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BUILDING 1 & 3 FLOOR PLANS 25 MARCH 2026

0 2 4 8 16FT
SCALE 1/16" = 1'-0"

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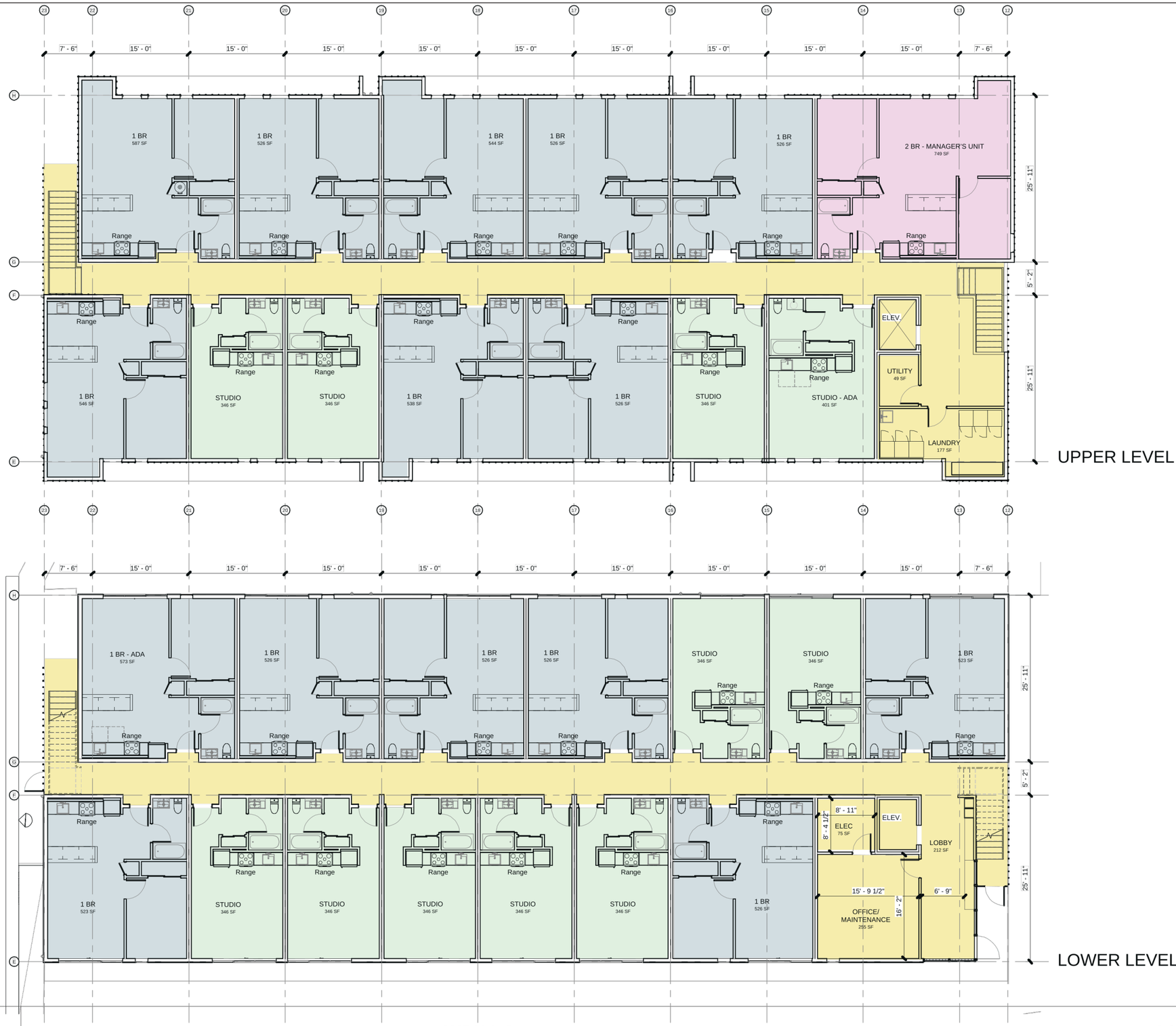

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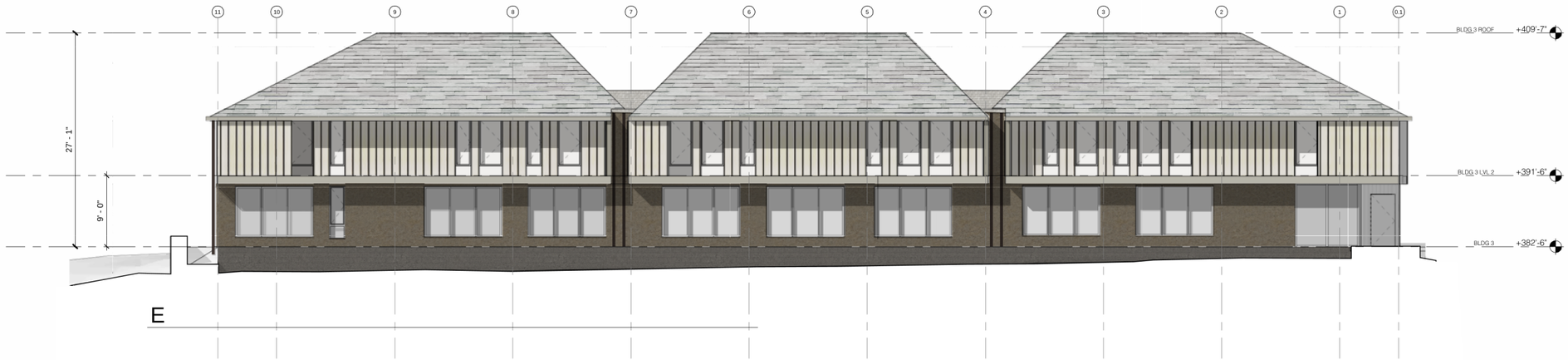
BUILDING 2 FLOOR PLANS

25 MARCH 2026

0 2 4 8 16FT
SCALE 1/16" = 1'-0"



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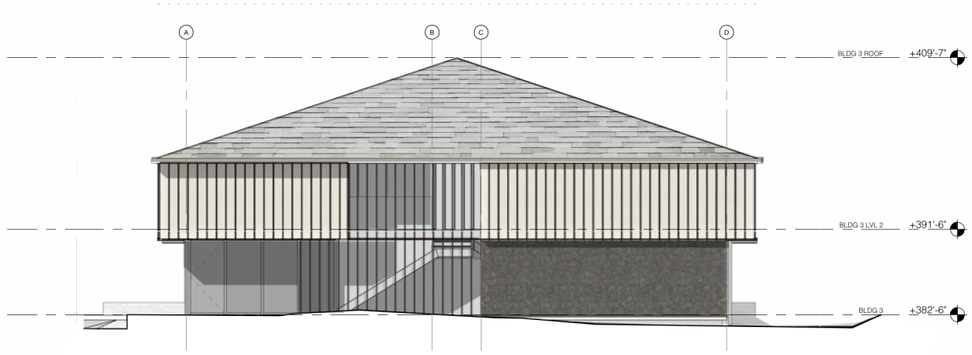

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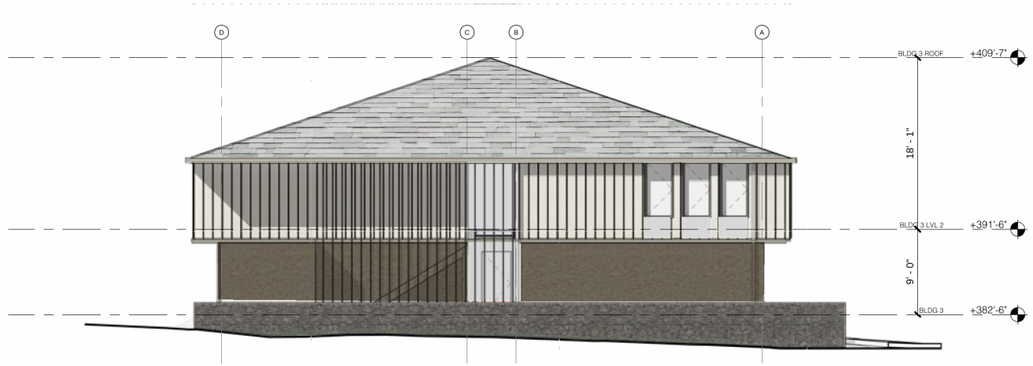

S



W

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TYPICAL ELEVATIONS

25 MARCH 2026

0 2 4 8 16FT
SCALE 1/16" = 1'-0"

ALEXANDER HOUSE
BEYOND



PEDESTRIAN GATE -
EMERGENCY ACCESS
ONLY

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AUPUNI RENDERED VIEW

09 APRIL 2026



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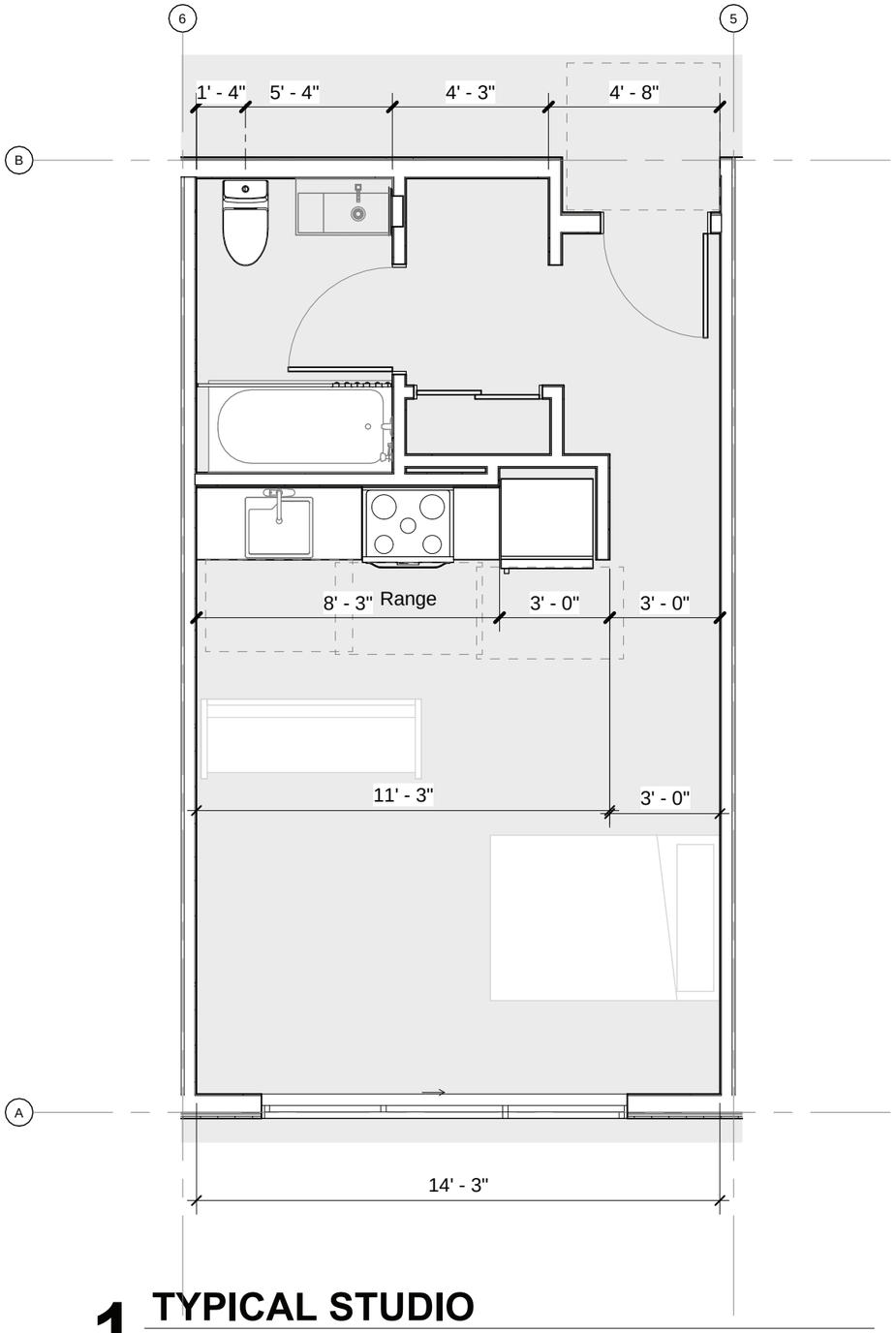
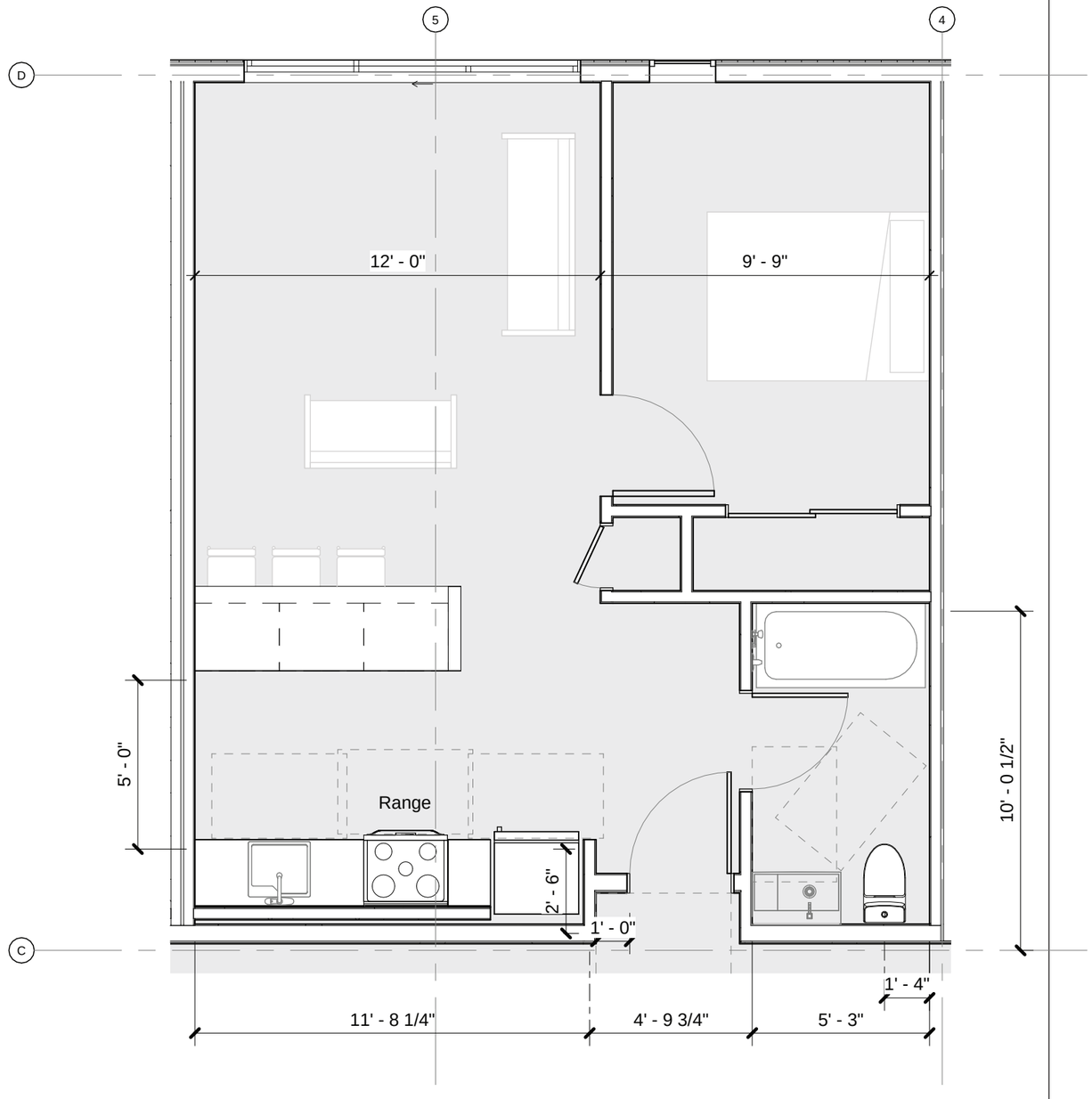
MAIN ST RENDERED VIEW

25 MARCH 2026



1 TYPICAL STUDIO

1/4" = 1'-0"



2 TYPICAL ONE BR

1/4" = 1'-0"

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TYPICAL UNIT PLANS

25 MARCH 2026

0 1 2 4 FT
SCALE 1/4" = 1'-0"



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25 MARCH 2026



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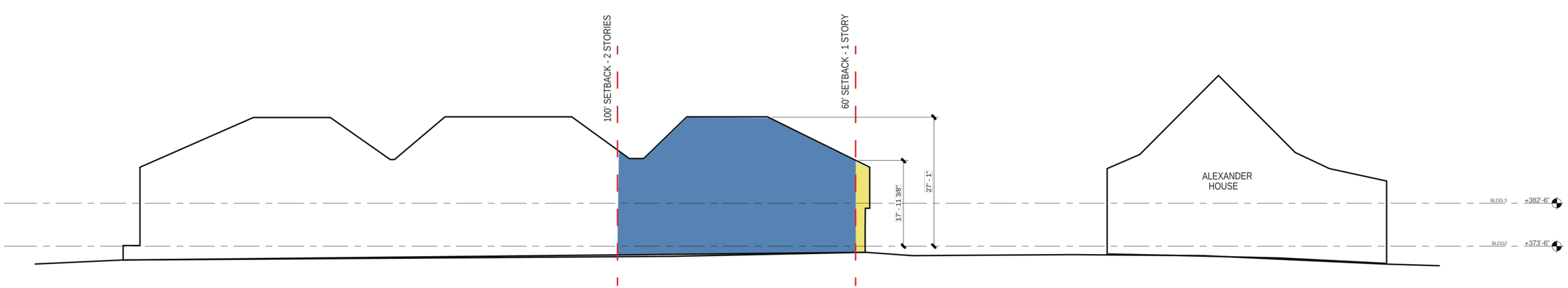
NEIGHBORHOOD PLAN

09 APRIL 2026



MAUI COUNTY CODE
CHAPTER 19.52.100 - REGULATIONS FOR HISTORIC DISTRICT NO. 3.

Required	Proposed
2 story building limit	2 stories
1 story building height max: 25 feet - separated from historic buildings by 60 feet	2 story Intrusion into 60 feet setback - 562sf (18 feet building height)
2 story building height max: 35 feet - separated from historic buildings by 100 feet	2 story Intrusion into 100 feet setback - 5,909 sf (27 feet building height)



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MAUI CODE - HD NO.3 C

09 APRIL 2026

Appendix C

Landscape Plan & Plant Palette



Landscape Plan

Wailuku Mission Senior Affordable Housing

EAH Housing — Island of Maui

North — Linear Scale (feet) 0 20 40 80

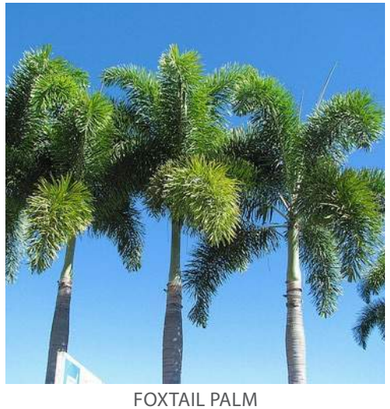
PBR HAWAII & ASSOCIATES, INC.



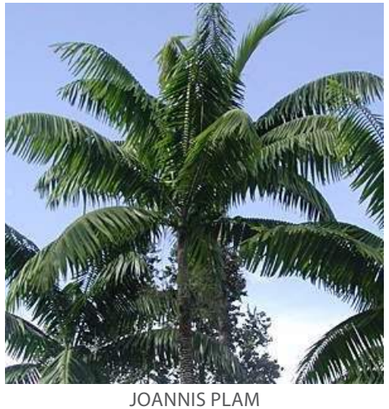
CREPE MYRTLE
Lagerstroemia speciosa



DATE PALM
Phoenix dactylifera



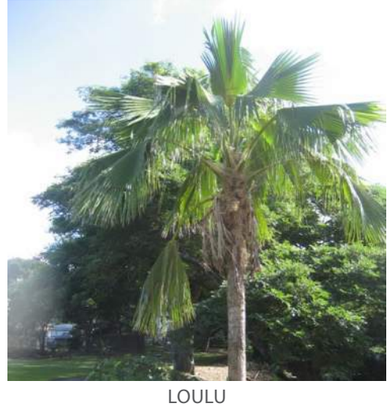
FOXTAIL PALM
Wodyetia bifurca



JOANNIS PLAM
Veitchia joannis



KOU
Cordia subcordata



LOULU
Pritchardia spp.



PUAKENIKENI
Fragraea berteroana



ROYAL POINCIANA
Delonix regia



ULU
Artocarpus altilis



WHITE SINGAPORE PLUMERIA
Plumeria obtusa



YELLOW PLUMERIA
Plumeria rubra

WAILUKU MISSION HOUSING LANDSCAPE IMPROVEMENTS

suggested plant palette | *overstory*

PBR HAWAII & ASSOCIATES, INC.

shrubs



AKIA
Wikstroemia uva-irsi



GOLDEN ERANTHEMUM
Pseuderanthemum reticulatum



'HULA GIRL' HIBISCUS
Hibiscus rosa-sinensis 'Hula Girl'



MAO
Gossypium tomentosum



NAUPAKA KAHAKAI
Scaevola taccada



PANAX
Polyscias guilfoylei



POHINAHINA
Vitex rotundifolia



TI
Cordyline fruticosa

groundcovers & turf



DWARF CARISSA
Carissa macrocarpa



LAUAE
Microssorium scolopendrium



GOLDEN GLORY
Arachis pintoi



ZOYSIA
Zoysia japonica

WAILUKU MISSION HOUSING LANDSCAPE IMPROVEMENTS

suggested plant palette | *understory*

PBR HAWAII & ASSOCIATES, INC.

Appendix D

Preliminary Engineering Report

CIVIL ENGINEERING
PRELIMINARY ENGINEERING REPORT
FOR
WAILUKU MISSION SENIOR
AFFORDABLE HOUSING

Wailuku, Hawaii
TAX MAP KEY: (2) 3-4-014: 005

Prepared for:

AMA A/E
1050 Queen Street, Suite 203
Honolulu, Hawaii 96814

Prepared by:

Goto Engineering LLC
PO Box 283238
Honolulu, Hawaii 96828

February 2026

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Figure 4 Flood Insurance Rate Map - Community Panel No.: 1500030391E
Figure 5 Existing Condition Plan
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Figure 7 Existing Sewer System Map
Figure 8 Existing DWS System Map

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- Process Request Checklist submitted October 30, 2024
- Average wastewater flow calculations
- Pre-Assessment Consultation letter for the Environmental Assessment (EA)

APPENDIX B - WATER SYSTEM INFORMATION

- Reservation of Available Service Capacity
- Average water demand and peak flow calculations
- Pre-Assessment Consultation letter for the EA

APPENDIX C - STORM DRAINAGE SYSTEM INFORMATION

- Figure 9 - Existing Drainage Condition
- Figure 10 - Proposed Drainage Condition
- Hydrologic Calculations
- Storage volume calculations
- Water quality calculations

APPENDIX D – GAS SYSTEM INFORMATION

- Hawaii Gas Correspondence

APPENDIX E – ELECTRICAL AND TELECOMMUNICATION SYSTEM INFORMATION

- Maui Electric Company will serve letter
- Hawaiian Telcom will serve letter
- Spectrum will serve letter
- MECo meters and Specttrum service path
- Preliminary load calculations – no design

I. EXECUTIVE SUMMARY

Project Description:

The project is proposing to construct approximately 85 multi-family residential units, paved parking lots, walkways, landscaping, and utilities within three buildings in TMK: (2) 3-4-014: 5 in Wailuku, Hawaii on the island of Maui. Bounded by Main Street to the north, Aupuni Street to the south, and other properties to the east and west, the property is zoned as HD-3 Historic District. Two existing buildings on the property will be demolished, while two other existing buildings, including the historic William and Mary Alexander House, will remain and be rehabilitated.

Access:

Vehicle access will be provided through three driveways along Main Street at similar locations to existing driveways to the property. The driveways will serve two parking lots with an approximate total stall count of 42. There are no existing pedestrian sidewalks extending to the property from either Main Street or Aupuni Street.

Sanitary Sewer:

A Process Request Checklist was submitted to the County of Maui Department of Environmental Management (DEM) Wastewater Reclamation Division on October 30, 2024, through the Maui Automated Planning and Permitting System (MAPPS) to confirm the existing sanitary sewer system can accommodate the Project. As of March 2026, DEM did not provide a response. The estimated average wastewater flow generated by the Project based on Wastewater Flow Standards dated February 2006 is 23,715 gpd.

Water System:

The Department of Water Supply (DWS), County of Maui provides water service to the Project site. According to DWS, the major source of water for the Central Maui area is the Iao Aquifer with a sustainable yield of 20 million gallons per day (MGD). In their Pre-Assessment Consultation letter for the EA, DWS noted that the three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. A Reservation of Available service Capacity will be submitted to DWS to confirm the existing water system can accommodate the proposed Project.

Fire Protection:

Automatic fire sprinkler systems will be installed in the three proposed buildings. All Maui Fire Department fire protection requirements are anticipated to be met by the sprinkler systems and the existing roads and fire hydrants surrounding the property.

Storm Drainage System:

An on-site storm drainage system consisting of 6-inch to 12-inch HDPE piping, grated drain inlets, and underground chambers will collect runoff from the site prior to discharge toward Main Street and Aupuni Street following existing drainage patterns. It is anticipated that 0.16-acre-ft of runoff will be retained on-site prior to discharge to meet County of Maui quantity and quality requirements.

Gas System:

Gas is not anticipated for the project. In their Pre-Assessment Consultation letter for the EA, Hawai'i Gas determined that the area around the Project site is clear of gas utility facilities.

Electrical System:

Maui Electric Company's (MECo) Mā'alaea Power Plant serves the Wailuku-Kahului region. MECo is a subsidiary of the Hawaiian Electric Company. In their Pre-Assessment Consultation letter for the EA, the Hawaiian Electric Company had no objections to the Project and recommended they be advised of anticipated electrical loads and a Project timeline.

Telecommunication System:

Hawaiian Telcom provides voice, internet, and cable television services to the Wailuku area. Hawaiian Telcom's existing plant serving the area has sufficient capacity to service the Project. Existing Hawaiian Telcom facilities in this area are overhead and follow the MECo overhead lines. In their Pre-Assessment Consultation letter for the EA, Hawaiian Telcom confirmed that their telecommunications facilities run overhead on the north side of Main Street with no underground facilities entering the Project site. However, Hawaiian Telcom noted that service poles located on or near the property are owned by the Hawaiian Electric Company.

Spectrum is a cable television provider on Maui and also provides voice and internet services. Existing Spectrum facilities are overhead and follow those of MECo and Hawaiian Telcom. In their Pre-Assessment Consultation email for the EA, Spectrum confirmed that the Project will not impact their existing cable plant.

II. PROJECT DESCRIPTION

A. Existing Conditions

The approximate 2.65-acre project site is located in Wailuku, Hawaii on the island of Maui within TMK: (2) 3-4-014: 5. It is bounded by Main Street to the north, Aupuni Street to the south, TMK: (2) 3-4-014: 2 and 84 to the east, and TMK: (2) 3-4-014: 60 and 83 to the west. The property is zoned as HD-3 Historic District 3. According to Chapter 19.50.030 of the County of Maui Code of Ordinances, the purpose of this district is to preserve and protect the several well-preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of the County of Maui. The William and Mary Alexander house within the property, dating to 1836, is a historic structure within the district and currently used by Maui Architectural Group as an architect office. There are three other structures inside of the property, including the Baybrook House that is being used as a chiropractic office, along with an A.C. paved driveway and dirt/gravel driveway entrance from Main Street, and an A.C. paved driveway entrance from Aupuni Street. In general, the site is grassed with trees in various locations. See Project Location and Vicinity Map Figure 1 and Tax Map Key Figure 2.

1. Topography

The existing site elevations range from approximately +388 mean sea level (MSL) along the west side of the property to approximately +355 MSL along the east side of the property per a topographic survey performed by Valley Isle Surveyors, Inc. dated April 12, 2017. An existing rock retaining wall borders the east face of the property generally directing stormwater runoff toward Main Street and Aupuni Street. See Existing Condition Plan Figure 5.

2. Soils

According to USDA Soil Conservation Survey, the underlying soil within the project site consists primarily of Wailuku silty clay (WvB), 3 to 7 percent slopes, MLRA 163. Wailuku series is described as having a consistency of very deep, well drained soils that formed in alluvium weathered from basic igneous rocks. See Soils Map Figure 3.

3. Flood Hazard

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel No.: 1500030391E dated September 25, 2009, the project site is located in Zone X, which are areas determined to be outside the 0.2% annual chance floodplain. See FIRM Map Number 1500030391E Figure 4.

B. Proposed Improvements

The project is proposing to construct three multi-family residential buildings with an approximate 85-unit count, in addition to two paved parking lots, landscaping, and utilities. Two of the existing structures will be demolished, while the William and Mary Alexander House and Baybrook House will be rehabilitated to be used as a multipurpose center and onsite management office, respectively. See Proposed Condition Plan Figure 6.

The development includes the following proposed project programming:

- Studios = 41 Units
- 1-Bedroom = 43 Units
- 2- Bedroom = 1 Units
- Total = 85 Units



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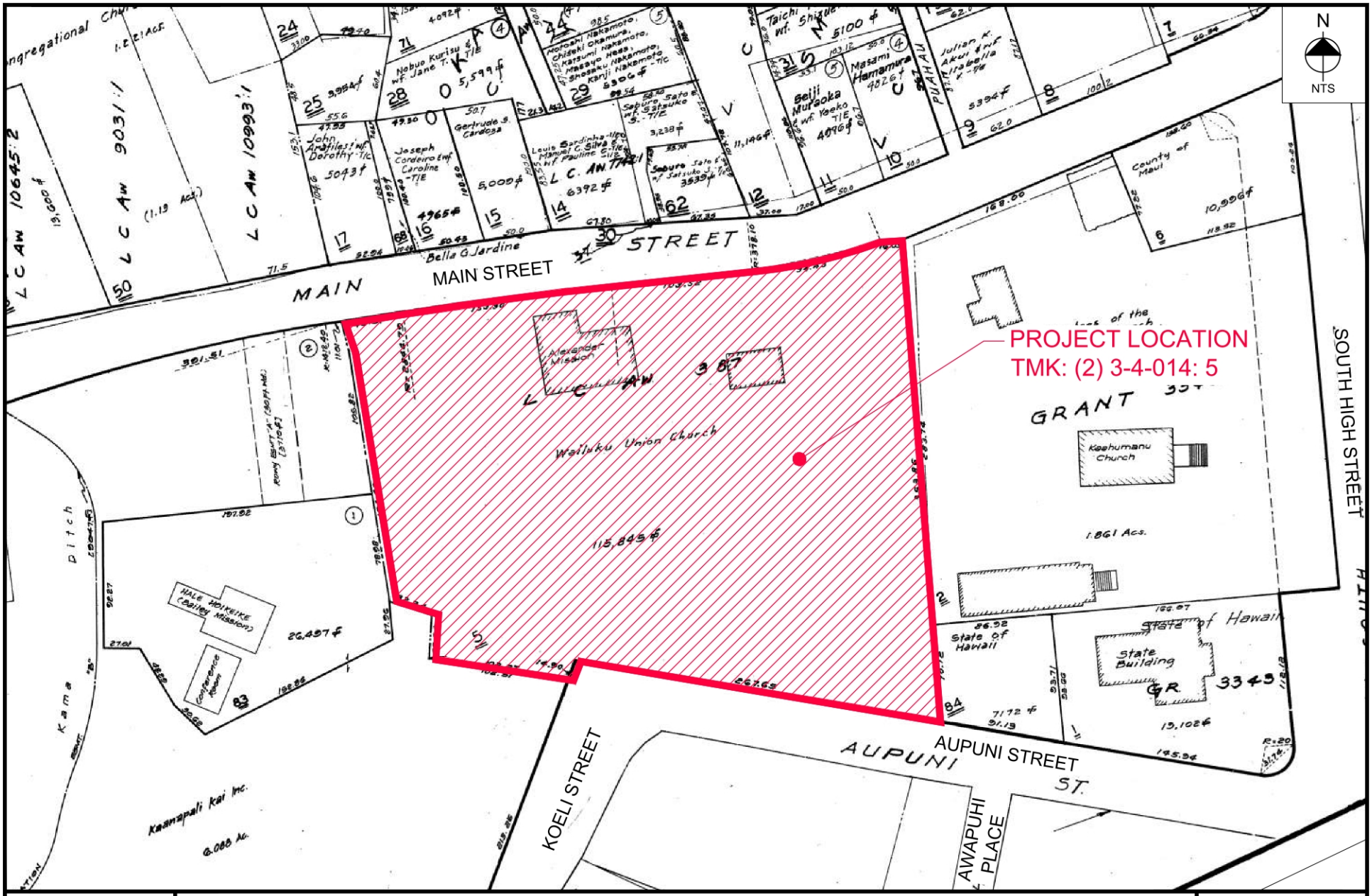
WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

PROJECT LOCATION AND VICINITY MAP

FIGURE 1



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WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

TAX MAP KEY

FIGURE 2



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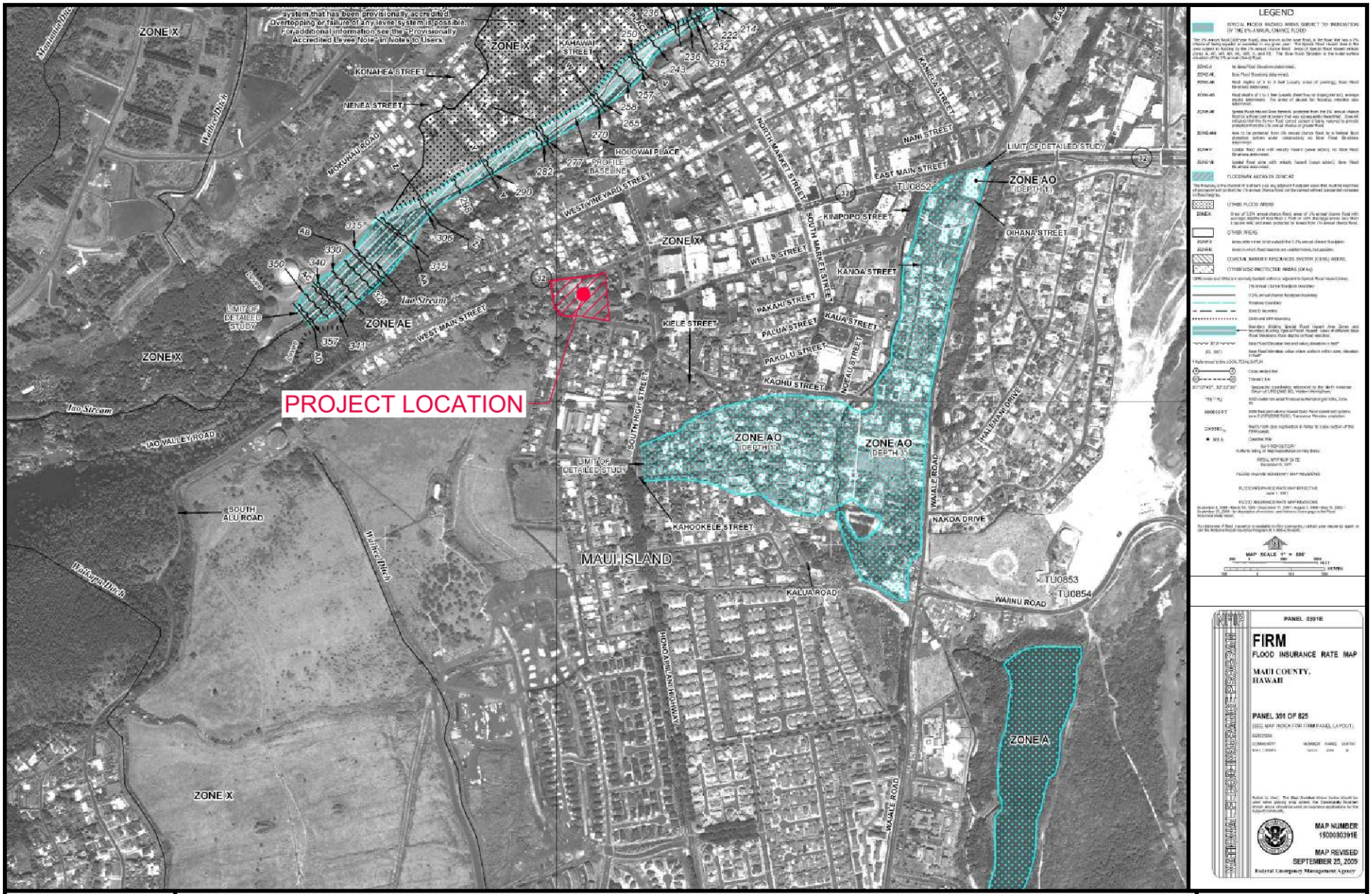
WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

SOILS MAP

FIGURE 3



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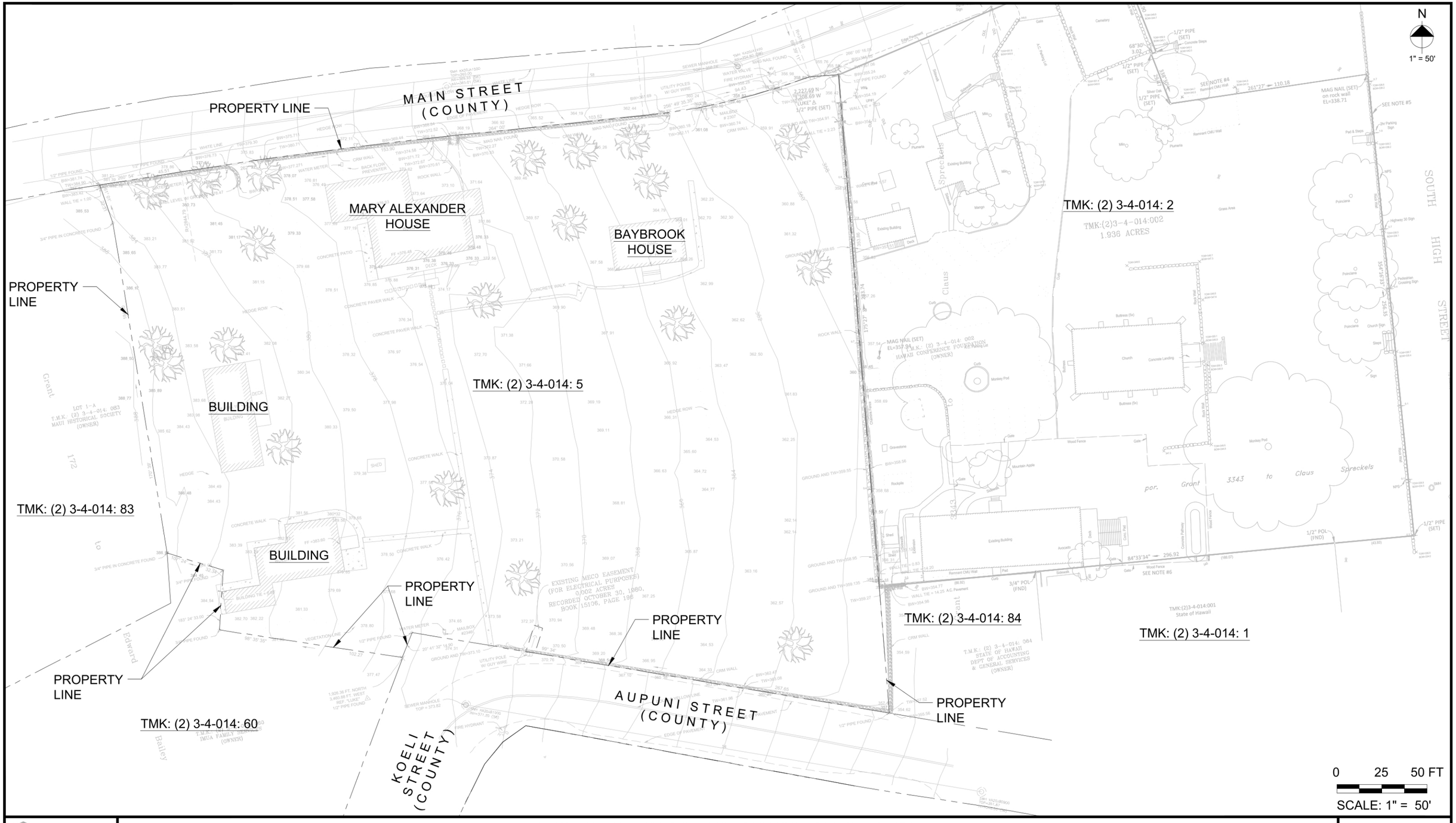
WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

FLOOD INSURANCE RATE MAP - COMMUNITY PANEL NO.: 1500030391E

FIGURE 4



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WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

EXISTING CONDITION PLAN

FIGURE 5

3" COMPOUND METER

EXIST W18 (ASSUMED LOCATION)

PROPERTY LINE

OVERFLOW DRAIN INLET

MAIN STREET (COUNTY)

OVERFLOW DRAIN INLET

6" ABOVE GROUND - DOUBLE CHECK DETECTOR ASSEMBLY

UNDERGROUND CHAMBER SYSTEM

MARY ALEXANDER HOUSE

BAYBROOK HOUSE

DRAIN MANHOLE, TYP.

TMK: (2) 3-4-014: 5

TMK: (2) 3-4-014: 2

RETATINING WALL, TYP.

A.C. PAVEMENT, TYP.

PROPERTY LINE

CONCRETE WALKWAY, TYP.

LANDSCAPE, TYP.

BUILDING 1

BUILDING 2

BUILDING 3

TMK: (2) 3-4-014: 83

CONCRETE STAIRS, TYP.

SEWER MANHOLE, TYP.

PROPERTY LINE

PROPERTY LINE

PROPERTY LINE

TMK: (2) 3-4-014: 84

TMK: (2) 3-4-014: 1

FIRE ACCESS GATE

AUPUNI STREET (COUNTY)

KOELI STREET (COUNTY)

SEWER CONNECTION TO COUNTY SEWER SYSTEM

TMK: (2) 3-4-014: 60

EXIST S6

N

1" = 50'

0 25 50 FT

SCALE: 1" = 50'

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WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

PROPOSED CONDITION PLAN

FIGURE 6

III. ACCESS

A. Existing Conditions

There are three existing driveway entrances into the property: 1. An A.C. paved entry from the western side of Main Street, 2. A dirt/gravel entry from the eastern side of Main Street, and 3. An A.C. paved entry from Aupuni Street. Both Main Street and Aupuni Street are two-lane two-directional roads and owned and maintained by the County of Maui. There are no pedestrian sidewalks along either road.

B. Proposed Conditions

Three A.C. paved driveways are proposed from Main Street at similar locations to the existing driveways from Main Street. The two driveways located at the western-most side of the property will serve an approximate 17-stall parking lot, while the eastern-most driveway will serve an approximate 25-stall parking lot. There will be no driveways from Aupuni Street.

C. Recommendations

The driveways shall be constructed to County of Maui standard detail R-50 with 22-ft widths and 15-ft curved radii on either side. Each driveway shall further be clear of any existing utility poles, fire hydrants, or other obstructions by at least 2-ft.

IV. SANITARY SEWER SYSTEM

A. Existing Conditions

The sanitary sewer system servicing the site is owned by the County of Maui and maintained by the Department of Environmental Management, Wastewater Reclamation Division (WWRD). The property is within the Wailuku-Kahului Wastewater Reclamation Facility collection system.

According to County of Maui Wastewater Infrastructure GIS website and Wailuku Sewer System Job No. 204-B record plan dated December 1933, there are existing 6-inch and 8-inch gravity main systems in Main Street and an existing 6-inch gravity main system in Aupuni Street. Both systems are vitrified clay material and approximately 4-ft to 6-ft deep. There are two 6-inch gravity laterals to the Main Street main and two 6-inch gravity laterals to the Aupuni Street main from the property.

B. Proposed Conditions

A Process Request Checklist was submitted to DEM on October 30, 2024, through MAPPS to confirm the existing sanitary sewer system can accommodate the Project. As of March 2026, DEM did not provide a response.

The estimated average wastewater flow generated by the proposed project based on WWRD Wastewater Flow Standards dated February 2006 is 23,715 gallons per day (gpd).

The DEM Pre-Assessment Consultation letter for the EA received on June 20, 2025, requested a discussion of wastewater infrastructure and compliance requirements in the Draft EA, including: estimated wastewater flow rates; proposed point of connection to the County sewer system; confirmation of a sewer service manhole at the property line; plans for managing non-contact cooling water and condensates prohibited from discharge into the sewer system; and compliance with County Pretreatment Program requirements such as grease interceptors and sand/lint traps for laundry facilities. See Appendix A.

C. Recommendations

An on-site sanitary sewer network consisting of 6-inch gravity PVC piping, concrete manholes, and cleanout risers will connect each of the three multi-family buildings to the 6-inch Aupuni Street main. The connection to the main

shall be made via a “doghouse” manhole to maintain existing flow within the main without disruption. A maintenance-access manhole will also be installed at the property line per County requirements. All sanitary sewer system improvements will follow County standards.



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PO BOX 283238
HONOLULU, HI, 96828
808-392-6538

WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

EXISTING SEWER SYSTEM MAP

FIGURE 7

V. WATER SUPPLY SYSTEM

A. Existing Conditions

Potable water for the property is supplied by the County of Maui, Department of Water Supply (DWS). The primary water source for the Central Maui area is the Iao aquifer, which has a sustainable yield of approximately 20 million gallons per day (MGD). According to the DWS, the three-year demand projection for the Central Maui water system is currently estimated to be between 98% and 100% of the system's maximum reliable capacity.

The DWS system in the area consists of looped transmission mains, fire hydrants, and water meters. Maps provided by DWS show an 18-inch main along Main Street and a 6-inch main along Aupuni Street. There are three fire hydrants located adjacent to the property: 1. Along Main Street near the northwest corner of the property, 2. At the intersection of Aupuni Street and Awapuhi Place near the southeast corner of the property, and 3. At the intersection of of Aupuni Street and Koeli Street near the southwest corner of the property. The existing buildings on the property are served by the following meters:

- M/N: 200258398 (1-inch) on Aupuni Street
- M/N: 19787692 (5/8-inch) on Main Street

B. Proposed Conditions

1. Domestic and Fire Protection Water System

The DWS Pre-Assessment Consultation letter for the EA received on July 22, 2025, restated County of Maui Administrative Rules §16- 201-03(g)(1) that exempts projects comprised of 100% residential workforce housing units should not be considered as projects using large quantities of water. See Appendix B.

A Reservation of Available Service Capacity will be submitted to DWS to confirm the existing water system can accommodate the proposed Project.

The estimated average water flow demand by the proposed project based on the DWS Water System Standards dated 2002 is 47,600 gpd, while the peak flow is 142,800 gpd.

2. Irrigation System

According to the DWS Pre-Assessment Consultation letter for the EA, water conservation measures should be implemented for the proposed development. These measures include but not limited to water reuse for new landscape design projects; applying drip irrigation, soaker hoses, or rotating micro-spray emitters for trees, plants and shrubs; not irrigating turf and landscapes during rain and postponing irrigation during high winds.

3. MFD Requirements

The Maui Fire Department (MFD) requirements for multi-family residential buildings with an automatic fire sprinkler system are as follows:

1. All portions of the building must be within 450-ft. from a fire access road.
2. At least one external door must be within 50-ft. from a fire access road.
3. The closest portion of the building is within 400-ft. from a fire hydrant.
4. A dead-end fire access road must have a turnaround when the length exceeds 150-ft.

C. Recommendations

1. Domestic Water System

It is anticipated that a 3-inch DWS compound meter with 4-inch reduced pressure backflow preventer will serve the proposed domestic and irrigation demand for the project from the existing main along Main Street. An on-site system consisting of 4-inch PVC piping, gate valves, and air relief valves will connect the meter to each of the three buildings.

The existing 5/8-inch meter on Main Street and 1-inch meter on Aupuni Street will be cut and plugged at the main.

All proposed improvements will meet DWS requirements.

2. Irrigation System

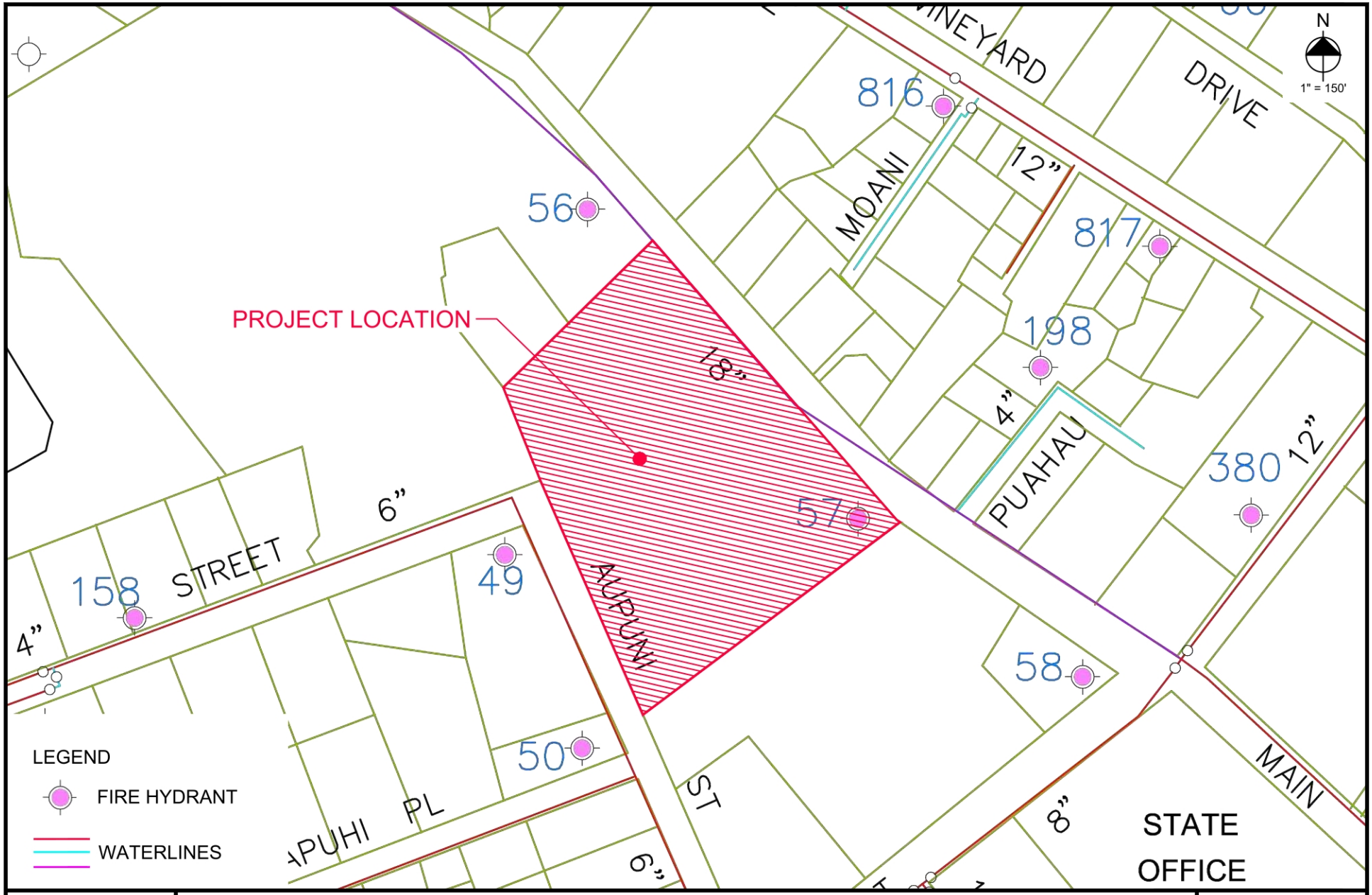
There are no existing non-potable water mains in the area. Therefore, utilization of water conservation measures indicated by DWS shall be considered. Any irrigation shall be done during non-peak hours to minimize the peak-hour demand.

3. Fire Protection System and MFD Requirements

It is anticipated that a 6-inch DWS detector check meter will serve the proposed fire protection automatic fire sprinkler demand for the project from the existing main along Main Street. An on-site system consisting of 6-inch PVC piping, gate valves, and air relief valves will connect the meter to each of the three buildings.

All fire protection requirements are anticipated to be met by the existing roads and fire hydrants surrounding the property, in addition to the proposed fire sprinkler systems within each building

The proposed improvements will follow DWS and MFD standards.



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WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

EXISTING DWS SYSTEM MAP

FIGURE 8

VI. STORM DRAINAGE SYSTEM

A. Existing Conditions

The storm drainage system servicing the property is owned and maintained by the County of Maui. There are no known catch basins, grated drain inlets or underground pipe systems directly fronting the property on either Main Street or Aupuni Street; however, an existing catch basin drain is located at the Main Street and South High Street corner, and an existing drain inlet is located at the Aupuni Street and High Street corner. In general, the existing property site sheet flows from the east to the west before being directed to Main Street and High Street by an existing stone retaining wall along the west property boundary. There are four existing buildings on the property with limited pavement area.

Based on hydrologic analysis per the County of Maui Storm Drainage Standards dated July 14, 1995, the existing site generates a peak flow 4.77 cubic feet per second (cfs) and 0.20 acre-ft in volume for a 50-year 1-hour design storm event.

B. Proposed Conditions

Two of the existing buildings will be demolished in preparation for the construction of the three proposed multi-family buildings, paved parking lots and paved walkways. There will be a 1-acre increase in impervious area resulting from the proposed development compared to that of the existing conditions.

Based on hydrologic analysis per the County of Maui Storm Drainage Standards, the proposed site generates a peak flow 7.48 cubic feet per second (cfs) and 0.32 acre-ft in volume for a 50-year 1-hour design storm event.

C. Recommendations

An on-site storm drainage system consisting of 6-inch to 12-inch HDPE piping, grated drain inlets, and underground chambers will collect runoff from the site. County of Maui requires any increase in proposed runoff compared to existing conditions be retained on-site per a 50-year 1-hour design storm event. Underground chambers located under the paved parking areas will capture the 0.16-acre-ft increase in runoff between the existing and proposed conditions prior to discharging to Main Street and Aupuni Street without exceeding the runoff rates and volumes of the existing drainage patterns. It is intended the chambers will be StormTech half-domed shaped system surrounded by aggregate on all sides, or an equivalent product. A series of 3x4 chambers is anticipated to be located in the northwest parking lot and a series of 6x4 chambers is anticipated to be located in the northeast parking lot.

The required water quality volume calculated according to the County of Maui Storm Water Quality Standards dated November 09, 2012, is 0.101-acre ft. It is anticipated the storage provided by the chambers will also meet the required water quality volume.

The proposed project is not expected to cause any adverse impacts to surrounding properties, adjacent roadways, or County drainage systems.

VII. GAS SYSTEM

A. Existing Conditions

Review of the gas system is based on consultation with Hawaii Gas. According to Hawaii Gas, there are no existing gas systems in the area. See Appendix D for Hawaii Gas Correspondence.

B. Proposed Improvements

Gas is not anticipated for the project.

VIII. ELECTRICAL SYSTEM

A. Existing Conditions

Maui Electric Company's (MECo) Mā'alaea Power Plant serves the Wailuku-Kahului region. MECo is a subsidiary of the Hawaiian Electric Company. MECo operates and is regulated under a tariff approved by the State Public Utilities Commission (PUC). The Hawaiian Electric Company Pre-Assessment Consultation letter for the EA received on June 28, 2025, had no objections to the Project. The Hawaiian Electric Company recommended they be advised of anticipated electrical loads (see Appendix E) and a Project timeline.

MECo infrastructure includes overhead lines along Main and Aupuni Streets on joint use utility poles. The overhead utility services include: MECo 12kV and secondary circuits, Hawaiian Telcom, and Spectrum.

There is MECo service to the project site serving MECo meters:

- 506222 (Alexander House to remain).
- 506223 (Baybrook House to remain).
- 508473 (building to be demolished).
- 508540 (building to be demolished).

B. Proposed Improvements

This section summarizes the proposed electrical power system infrastructure for the proposed development excluding the Alexander and Baybrook Houses along Main Street.

The section is preliminary and is based on preliminary calculations and no design. Recommendations and utility companies' requirements are subject to change pending progression of the electrical design requirements detailed out and further studied by the utility companies.

Service requests with schematic stage calculations and design will be submitted to MECo. As design progresses, updated calculations and design will be forwarded to MECo for further review and refinement of their requirements.

Easements, right-of-entry, and joint development documents may be required for and in favor of the MECo for their overhead and underground facilities proposed on the project's property. Additional research needs to occur to determine if existing utilities have a right-of-entry in place for MECo.

Services connections are proposed to be taken from Aupuni Street.

The proposed improvements are not expected to have significant impacts on MECo. Coordination will be done with MECo to provide the necessary infrastructure to meet MECo requirements to serve the project and to minimize disruptions to the surrounding community.

Infrastructure for MECo will be constructed, after which MECo will install their cables and equipment.

In order to provide an efficient electrical system requiring a minimum level of maintenance and a maximum level of safety within budgeted costs, a commercial property operating environment requiring quick and easy maintenance with little or no downtime and a high degree of reliability will be considered for system design and equipment selection

C. Recommendations

The project will strive to implement energy conservation best practices and to the extent practicable, comply with HRS 196-9.

Preliminary estimated electrical load calculations were done in accordance with the 2020 National Electrical Code based on no design (see Appendix E).

The recommendations are:

- Request 208/120-volts, 3-phase, 4-wire service from MECo to service the loads on site.
- Infrastructure for MECo's use will be in accordance with MECo requirements.
- Due to the size of the loads, it is recommended to provide primary voltage underground feeders to padmount MECo transformers - one transformer for each building. MECo primary voltage underground risers from Aupuni Street and associated handholes and ductlines to the padmount MECo transformers and related secondary voltage handholes and ductlines to project's metering equipment in each building.
- MECo metering will be provided in each building to monitor residential loads and common area loads. Each residential unit will be submetered.
- Coordination to de-energize and ground lines if construction operations encroach within 20-feet of the lines in accordance with OSHA 1926.1408.
- No standby power (engine generator) will be provided. Units with integral batteries will be provided for life safety loads as backup power upon loss of MECo power

IX. TELECOMMUNICATION SYSTEM

A. Existing Conditions

Similar to MECo, HAWAIIAN TELCOM operates and is regulated under a tariff approved by the PUC and was the sole provider of telecommunications services until the advent of cable television. Subsequently, Spectrum (fka Oceanic Time Warner Cable), which is not regulated by the PUC but is a franchise of the Department of Commerce and Consumer Affairs, State of Hawaii (DCCA), has become a competitor of HAWAIIAN TELCOM.

HAWAIIAN TELCOM's and Spectrum's systems appear to be located within road rights-of-ways under rights granted under the government of the Territory of Hawaii in HAWAIIAN TELCOM's case, or utility easements. Hawaii Revised Statute (HRS) 440G-8.2 established the ability for Spectrum as a cable franchise to occupy public rights-of-ways.

Hawaiian Telcom provides voice, internet, and cable television services to the Wailuku area. Hawaiian Telcom's existing plant serving the area has sufficient capacity to service the Project (see Appendix E). Existing telephone facilities in this area are overhead and follow the MECo overhead lines. The Hawaiian Telcom Pre-Assessment Consultation email for the EA received on June 17, 2025, confirmed that their telecommunications facilities run overhead on the north side of Main Street with no underground facilities entering the Project site. Hawaiian Telcom noted that service poles located on or near the property are owned by Hawaiian Electric.

Spectrum is a cable television provider in Maui and also provides voice and internet connection services. Existing Spectrum facilities are overhead and follow those of MECo and Hawaiian Telcom. The Spectrum Pre-Assessment Consultation email for the EA received on June 17, 2025, confirmed that the Project will not impact their existing cable plant (see Appendix E).

Along Main and Aupuni Streets there are overhead utility services mounted on joint poles. The services include: MECo 12kV and secondary circuits, Hawaiian Telcom, and Spectrum. There are services to the Project location.

B. Proposed Improvements

This section summarizes the proposed Hawaiian Telcom and Spectrum systems infrastructure for the proposed affordable housing development excluding the Alexander and Baybrook Houses along Main Street.

The following section is preliminary and is based on no design. Recommendations and utility companies' requirements are subject to change pending progression of the electrical design requirements detailed out and further studied by the utility companies.

Service requests with schematic stage design have will be submitted to the utility companies. As design progresses, updated design will be forwarded to the utility companies for further review and refinement of their requirements.

Easements, right-of-entry, and joint development documents may be required for and in favor of the utility companies for their overhead and underground facilities proposed on the project's property. Additional research needs to occur to determine if existing utilities have a right-of-entry in place for utilities.

Services connections are proposed to be taken from Aupuni Street.

The proposed improvements are not expected to have significant impacts on HAWAIIAN TELCOM and Spectrum facilities. Coordination will be done with each electric utility company to provide the necessary infrastructure to meet utility requirements to serve the project and to minimize disruptions to the surrounding community.
Infrastructure for the utility companies will be constructed, after which the utility companies will install their cables and equipment

C. Recommendations

The recommendations are:

- Infrastructure for HAWAIIAN TELCOM's and Spectrum's use will be in accordance with HAWAIIAN TELCOM and Spectrum requirements, respectively.
- The closest service point for HAWAIIAN TELCOM and Spectrum appears to be the overhead service on off Aupuni Street. Intercept HAWAIIAN TELCOM's and Spectrum's aerial services along Aupuni Street, with separate HAWAIIAN TELCOM and Spectrum underground risers and associated handholes and ductlines to each building's point of entry. HAWAIIAN TELCOM's and Spectrum's ducts will collocate in the ductbank with MECo's ducts.
- Provide padmount Spectrum power supply cabinet fed by MECo's transformer if required by Spectrum.
- HAWAIIAN TELCOM will begin their engineering planning upon HAWAIIAN TELCOM being advised project will be built.

- Spectrum obtains approval to attach to and lease space on the utility pole from MECo as the pole's Owner.

HAWAIIAN TELCOM and Spectrum advised they are able to provide access to their services for the project.re is or will be capacity to serve the project. Further review will be done by HAWAIIAN TELCOM and Spectrum as the design progresses and HAWAIIAN TELCOM and Spectrum assess their systems.

HAWAIIAN TELCOM service will be required regardless of whether Spectrum's voice, internet and cable television services will be provided. Spectrum does not offer phone service for fire (and elevator). Spectrum does not have a solution to be in service when the power goes out and it is important for essential services to be up at all times.

X. REFERENCES

- Department of Public Works Standard Details for Public Works Construction dated September 1984
- Department of Public Works Rules for the Design of Storm Drainage Facilities in the County of Maui
- Department of Public Works Rules for the Design of Storm Water Treatment Best Management Practices
- County of Maui, Hawaii – Code of Ordinance
- Department of Water Supply 2002 Water System Standards with Amendments
- Department of Justice 2010 ADA Standards for Accessible Design dated September 15, 2010
- Flood Insurance Rate Map, State of Hawaii, Federal Emergency Management Agency dated November 26, 2010
- Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii, United Stated Department of Agriculture Soil Conservation Service dated August 1972, Effective Amendments
- Contract Drawings for the Construction of the Wailuku Sewer System, Job No. 204-B dated December 1933

APPENDIX A

SANITARY SEWER SYSTEM INFORMATION

- Process Request Checklist submitted October 30, 2024
- Average wastewater flow calculations
- Pre-Assessment Consultation letter for the Environmental Assessment (EA)

Process Request Checklist – WWRD Miscellaneous

This checklist should accompany any of the Process type requests listed in the table below. Fully completing this checklist and attaching all required items plus any additional information will help us expedite your request.

Requestors Name: Kevin Goto

Business Name: Goto Engineering

Address: PO Box 283238, Honolulu, HI, 96828

Phone number: (808) 392-6538 email: kevin@gotoengineering.net

Project Name (if applicable): Wailuku Mission Grounds Housing

Tax Map Key(s) of Property: (2) 3-4-014:005

Address of Property: 2307 Main St. Wailuku, HI 96793

Description of Information or Action Requested:

Confirmation of sewer system capacity to support the proposed project programming:

Studios = 42 Units
1-Bedrooms = 49 Units
2-Bedrooms = 2 Units

Total = 93 Units

	WWRD - Miscellaneous Review	Required items
☐	General Info Request	Process Request Checklist
☐	Sewer Line/Lateral Info Request	Process Request Checklist
■	Sewer Capacity Info Request	Process Request Checklist
☐	Recycled Water Inquiry	Process Request Checklist
☐	Construction Plan Review	Process Request Checklist Complete Construction Plan Set
☐	Property Sewer Service Manhole/Cleanout Installation	Process Request Checklist Complete Construction Plan Set
☐	Sewer Lateral Installation	Process Request Checklist Complete Construction Plan Set
☐	Site Specific Spill Prevention Plan (SSSPP)	SSSPP, Site Plan
☐	By-pass Plan	SSSPP, Site Plan
☐	Dewatering Plan	Dewatering Plan
☐	Tenant Space Listing	Process Request Checklist, Floor Plan
☐	Memorandum of Understanding (MOU) Review	Agreement
☐	MECO Plan Review	Process Request Checklist Complete Construction Plan Set
☐	Test Boring Plan Review	Process Request Checklist Complete Construction Plan Set
☐	Authorization of Existing Sewer Easement - MCC 18.12.030(E)(13)(a)	Process Request Checklist
☐	Acceptance of Sewer System Improvements	Process Request Checklist, As-Built Plans
☐	Irrigation Meter Review	Irrigation Plans, Application, As-Built Plans
☐	Miscellaneous Inspection	Process Request Checklist
☐	Other	Process Request Checklist

APPENDIX A
AVERAGE WASTEWATER FLOW

	Quantity (Units)	Rate (gal/acre/day)	Total (gal per day)
Apartment/Condo	93	255	23,715
Total Average Wastewater Flow for Current Proposed Programming =			23,715

RICHARD T. BISSEN, JR.
Mayor

SHAYNE R. AGAWA, P.E.
Director

MICHAEL D. PETERSEN
Deputy Director

MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

CECILE POWELL, Acting Manager
Environmental Protection &
Sustainability Division



COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAI'I 96793

June 20, 2025

Mr. Bradley Furuya
PBR HAW All & Associates, Inc.
I 001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

DEMD2025-00002

Dear Mr. Furuya,

SUBJECT: WAILUKU MISSION AFFORDABLE HOUSING PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT WAILUKU DISTRICT, ISLAND OF MAUI, HAWAII TMK (2) 3-4-014:005

Thank you for the opportunity to provide early input regarding the subject Environmental Assessment (EA). The proposed project lies within the Central Maui sewer service area, with wastewater treated at the Wailuku/Kahului Wastewater Reclamation Facility. The EA should address the following items related to wastewater infrastructure and compliance:

1. Estimated wastewater flow rates (in gallons per day) generated by the project.
2. Proposed point of connection to the County's sewer system.
3. Confirmation that a sewer service manhole will be provided at the property line.
4. Plans for managing non-contact cooling water and condensates (e.g., from air-conditioning systems or equipment), which are prohibited from being discharged into the sewer system. Similarly, discharges from elevator sumps, swimming pools, and decorative water features are not allowed.
5. Compliance with County Pretreatment Program requirements (e.g., installation of grease interceptors for any community kitchen, and sand/lint traps for central laundry facilities, if applicable).

For any questions or additional coordination, please contact Scott Rollins at (808) 270-7417 in our Wastewater Reclamation Division.

Sincerely,

Shayne R Agawa

DN: cn=Shayne R. Agawa, o=Director of Dept. of Environmental Management, ou=County of Maui, email=shayne.agawa@co.maui.hi.us, c=US
Date: 2025.06.20 10:54:20 -10'00'

SHAYNE R. AGAWA, P.E.
Director of Environmental Management

SA:sr (20250620 WMGAH pre consult EA comments.docx)

PBR HAWAII
& ASSOCIATES, INC.

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Executive Vice-President / Principal

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Executive Vice-President / Principal

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C.R. 'IMIPONO WICHMAN
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THERESA DEAN
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Chairman Emeritus

RUSSELL Y. J. CHUNG, PLA, FASLA
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SECRETARY					
OPERATIONS					

DEM	INFO	ACTION
DIRECTOR	✓	
DEPUTY	✓	
PERS		
WWR	✓	✓
SW	✓	✓
EP&S		
SECTY		

Mr. Shayne Agawa
Director
County of Maui
Department of Environmental Management
Kalana O Maui Building
200 S High Street
Wailuku, HI 96793

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Agawa,

PBR HAWAII & Associates, Inc. is preparing a Chapter 343, Hawai'i Revised Statutes (HRS) Environmental Assessment (EA) for the proposed Wailuku Mission Affordable Housing in Wailuku, Maui. The 2.66-acre Wailuku Mission property is at 2307 Main Street in Wailuku and is identified by Tax Map Key (TMK) (2) 3-4-014:005 (see attached location map and TMK map).

In advance of preparing a Draft EA we are seeking your early comments regarding information that you think should be addressed in the EA.

Background

For over 150 years, Wailuku Union Church has served as a place of worship and hub of social activity in the community and continues to fulfill this vital role today as one of Hawai'i's oldest church congregations. In addition to its church site, the Church owns the property between Main Street and Aupuni Street referred to as the Mission Grounds. This property is one of the few places in central Wailuku available for new, infill affordable housing and includes the historic Alexander House and the Baybrook House along with the grounds behind both houses.

Summary

The Church is partnering with EAH Housing, an experienced nonprofit affordable housing provider and manager, to add 84 senior affordable rental apartments (studios and 1 bedrooms) on the property. The apartments will be rented to seniors aged 62 and older who earn 60% or less of the Area Median Income (AMI).

In addition to the senior affordable apartments, improvements will include:

- Restoration of Alexander House into a resident multipurpose center
- Restoration of Baybrook House into a management office
- A resident manager apartment (non-revenue generating)
- Approximately 42 off-street parking spaces
- A pickup and drop off area
- Landscaping that provides for resident enjoyment through active and passive uses while complementing the existing grounds' character

EAH Housing will design and construct all improvements in a historically appropriate manner that preserves the property's heritage in context with the Wailuku Historic District. This in-fill housing initiative places affordable homes in central Wailuku, where residents can walk to State and County government offices, restaurants, shops, and essential services.

The initiative addresses critical community affordable housing needs while preserving historic buildings.

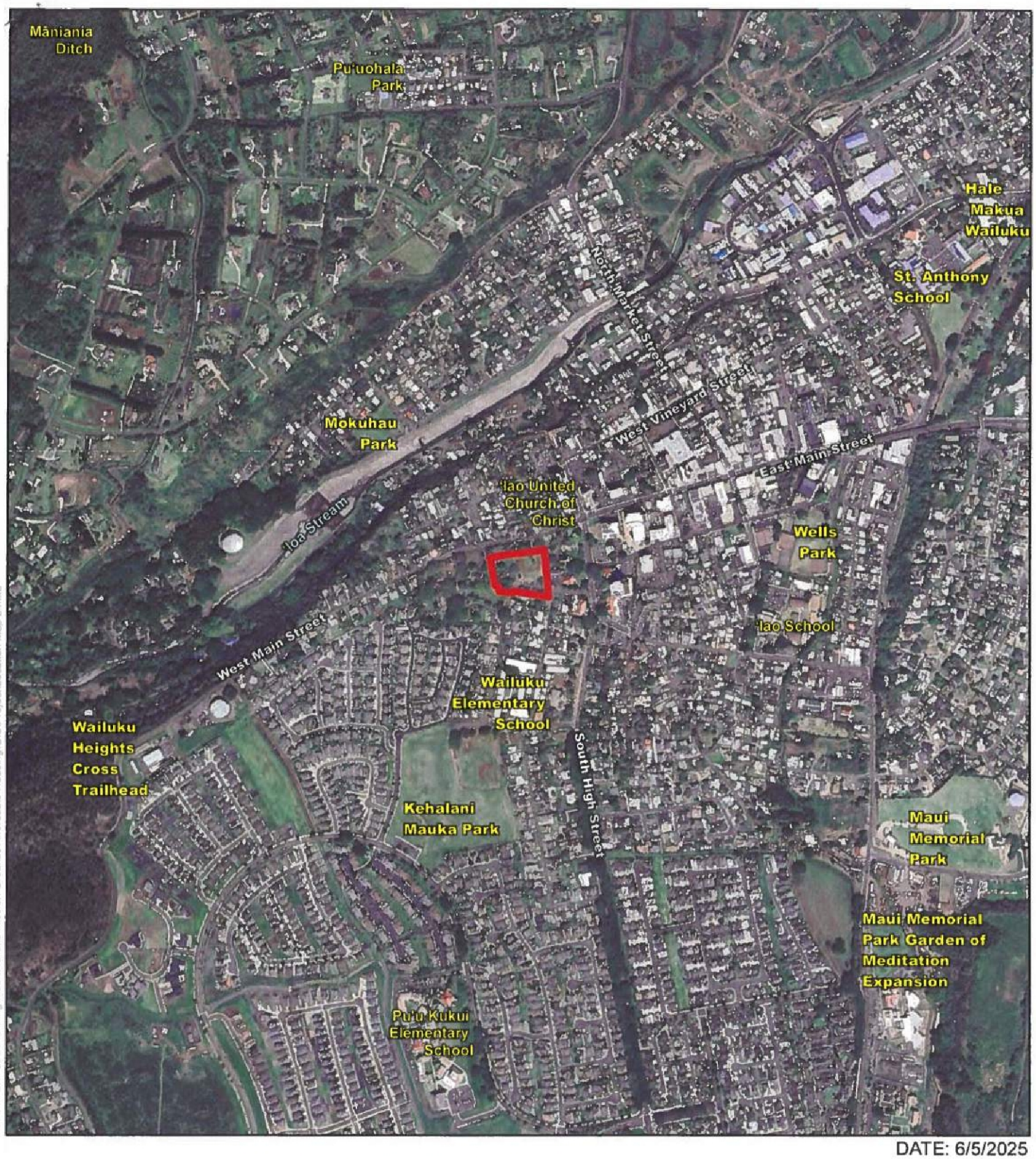
Please provide any comments by **July 11, 2025.** You may mail comments to PBR HAWAII at the address listed below or email directly to Bradley Furuya at bfuruya@pbrhawaii.com.

PBR HAWAII & Associates, Inc.
Attn: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

Aloha,

Bradley Furuya, AICP
Associate

Attachments: Location map
TMK map



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DATE: 6/5/2025

Legend

Property

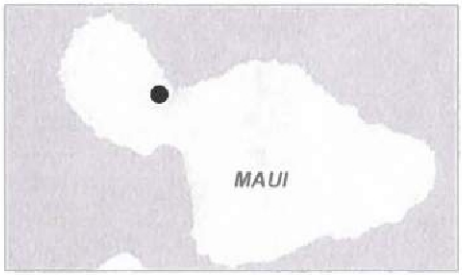


Figure 1: Location Map

Wailuku Mission Affordable Housing

EAH Housing — Island of Maui

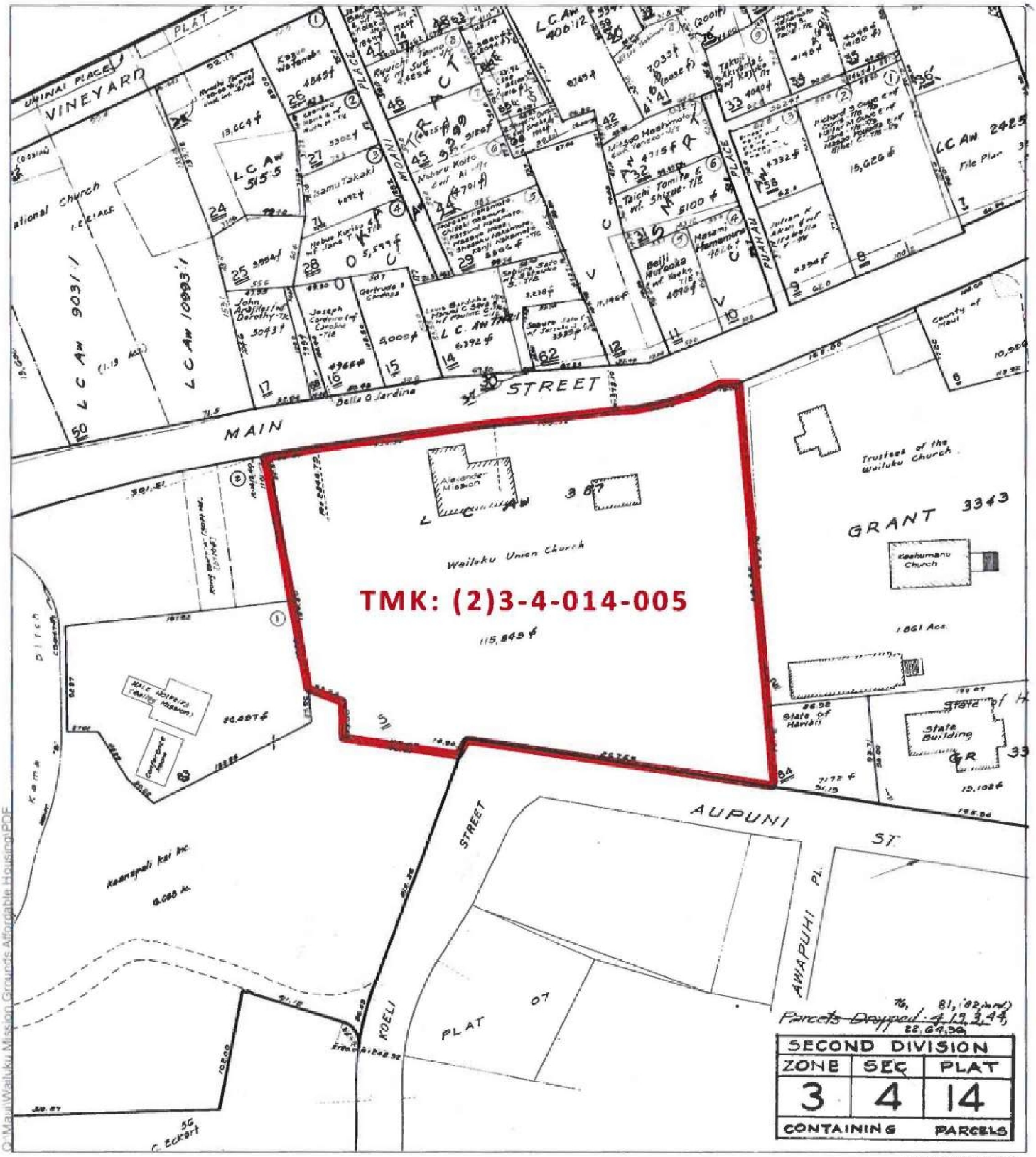
North — Linear Scale (feet)

0 500 1000

Source: County of Maui, 2024. Google Earth, 2025

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis

PBR HAWAII & ASSOCIATES, INC.



DATE: 6/3/2025

LEGEND

Property

Figure 2:
Tax Map Parcel

Wailuku Mission Affordable Housing

EAH Housing — Island of Maui

North

Source: Tax Maps Bureau, 1934

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

APPENDIX B

WATER SYSTEM INFORMATION

- Reservation of Available Service Capacity
- Average water demand and peak flow calculations
- Pre-Assessment Consultation letter for the EA

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 South High Street, 5th Floor
Wailuku, Maui, Hawaii 96793-2155
www.mauiwater.org

Reservation No.: _____

RESERVATION OF AVAILABLE SERVICE CAPACITY

APPLICANT NAME: Wailuku Union Church
(Property Owner)

CAPACITY: 1 - 3" Compound Meter; 1 - 6" Detector Check Meter
(Number and Size of Meters)

SUBDIVISION/PROJECT NAME: Wailuku Mission Grounds Housing

TMK: (2) 3-4-014:005 SD NO. _____ LOT NO.: _____ BPA NO.: _____

LOCATION: 2307 Main Street, Wailuku, HI 96793

DEPOSIT AMOUNT: N/A

The Applicant hereby requests a reservation of service capacity for the stated project, as the Applicant is not able to accept water service at this time. The reservation of service capacity is subject to the provisions of Maui County Code Section 14.07.090 – Payment of Water System Development Fee. The Applicant shall pay a deposit equal to the current Water System Development Fee in conjunction with this form. The Applicant shall pay the total Water System Development Fee in effect at the time the water meter is installed.

The Applicant understands and agrees that the reservation will expire five years from the date of the Director's approval. The Department and the Applicant shall agree in writing on the amount of any reserved allocation.

The Applicant understands and agrees that all required water system improvements shall be installed and have passed final inspection prior to the reservation's expiration date.

If within five years, the Applicant is not able to accept installation of water service (improvements have not been installed and passed final inspection), the application and the reservation of the allocation shall expire, the deposit paid by the Applicant shall be forfeited, and said deposit shall be applied to the water system development fee fund with no credit of any kind toward any future application.

ACKNOWLEDGEMENT:

The foregoing is understood and agreed to by the Applicant.

Applicant's Signature: the Rev Robb Kojima

Applicant's Name (Print): Robb Kojima (authorized agent)

Phone Number: 808-244-9177 Email Address: wailukuunionchurch@gmail.com

Date: 11/12/2024

CONTACT PERSON INFORMATION:

Name: Kevin Goto

Zoning/Use: HD-3

Mailing Address: PO Box 283238
Honolulu, HI 96828

Parcel Acreage: 2.65 acres

Phone Number: 808-392-6538

Email Address: kevin@gotoengineering.net

APPROVED:

Signature: _____
Director, DEPARTMENT OF WATER SUPPLY

Date of Reservation: _____

Expiration Date of Reservation: _____
(5 years from date of reservation with no extensions)

Return this form to:

Department of Water Supply, Engineering Division
200 South High Street, 5th Floor
Wailuku, HI 96793-2155

Please call Department of Water Supply, Engineering at (808) 270-7835 if you have any questions.

APPENDIX B

Table B1

AVERAGE DAILY WATER DEMAND

	Quantity (Units)	Rate (gal/acre/day)	Total (gal per day)
Multi-Family Low Rise	93	560	52,080
Total Average Daily Water Demand for Current Proposed Programming =			52,080

Table B2

PEAK FLOW

Peak Flow	
Quantity	Total (gal per day)
Total Peak Flow = 3 x Average Daily Water Demand	156,240.00

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director

JOHN STUFFLEBEAN, P.E.
Director

JAMES A. LANDGRAF
Deputy Director

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAI'I 96793
http://www.mauicounty.gov/water

July 22, 2025

PBR Hawaii & Associates, Inc.
Attn: Bradley Furuya
1001 Bishop Street
Suite 650
Honolulu, HI 96813

RE: Pre-Assessment Consultation for Environmental Assessment (EA) for the Proposed Wailuku Mission Affordable Housing Project. TMK: (2)3-4-014:005

Dear Mr. Furuya,

The Department of Water Supply (DWS) Water Resources and Planning Division appreciates the opportunity to comment on the proposed Wailuku Mission Affordable Housing project application.

Source of Water
The project is served by the DWS. The major source of water in the central area is Iao aquifer with a sustainable yield of 20 million gallons per day (MGD).

The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. Given this condition, requests for water service that exceed 1,200 gpd are considered a "large quantity of water" and are subject to the limitations described in §16-201-04 of the County of Maui Administrative Rules. However, §16- 201-03(g)(1) exempts projects comprised of 100 percent residential workforce housing units, as defined in section 2.96.020, Maui County Code, evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

Consumption Guideline
Based on Water Systems Standards (2002, State of Hawai'i), the projected water demand for the project is 560 gpd per multi-family residential unit, or 47,600 gpd (84 senior affordable rental apartments plus one manager's apartment). Actual consumption

may vary depending upon the design and maintenance of units, landscaping, and multi-purpose center.

Water Conservation Best Management Practices (BMPs) - Indoor
DWS recommends the following indoor conservation measures be implemented:

- Install Environmental Protection Agency (EPA) Water Sense labeled plumbing fixtures and EPA Energy Star and the American Society of Heating, Refrigeration and Air-Conditioning Engineers certified appliances;
- Install high-efficiency (HE) faucet aerators in all plumbing fixtures wherever possible;
- Install dual flush toilets with HE models that use 1.28 gallons per flush or less;
- Install HE showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 pounds per square inch (psi);
- Install HE bathroom sink faucets with fixtures that do not exceed 1 gpm at 60 psi. Laundry facilities and/or individual unit machines should use Energy Star labeled washers; and
- Install recirculating indoor water features with solar photovoltaic when practical.

Water Conservation BMPs – Outdoor
DWS recommends the following outdoor conservation measures be implemented:

- Install high-efficiency irrigation systems and products. Examples include evapotranspiration irrigation controllers, drip irrigation, soaker hoses, misters, and punch-in and micro-sprinklers that only direct irrigation to intended areas without causing run-off;
- Apply graywater to tolerant native and non-native landscaping with subsurface drip irrigation, including courtyards and other applicable areas with vegetation whenever possible and only when permitted and applied using the Hawaii State Department of Health guidelines;
- Install recirculating outdoor water features with solar photovoltaic when practical;
- Install drip irrigation or combine drought tolerant landscaping with gravel and rocks at narrow medians to reduce run-off, where applicable;
- Use mulching in landscaped areas to help retain soil moisture. Set irrigation timers for early morning or evening to limit high evaporation;
- Reduce and replace underutilized lawn areas with native plants to save water and reduce the heat island effect;
- Use native, climate-adapted, plants for landscaping whenever possible;

- Limit watering or irrigation of lawn, landscape, or other vegetated areas to the hours before 9:00 a.m. and after 5:00 p.m;
- Limit landscape irrigation for no more than three days per week, except where stricter irrigation requirements apply during a water shortage declaration;
- Avoid spray irrigation during excessively windy days; and
- Avoid irrigation during rain events

Water Waste
Water waste includes, but is not limited to, the following actions:

- Applying water in quantities to landscapes, and for yard maintenance or other outdoor activities that overflows or sprays onto adjacent property to pool or to obstruct public thoroughfare, and to potentially cause erosion; and
- Disregard for high volume water loss occurring by chronic wastefulness or by not fixing leaks in a reasonable amount of time. Not adhering to Chapter 14.06A, Water Conservation and Control of Water Usage During Water Shortage

To avoid water waste, DWS recommends the following remedies to prevent wasting water:

- Applying drip irrigation, soaker hoses, or rotating micro-spray emitters for trees, plants and shrubs;
- Properly adjusting and targeting water-efficient sprinkler heads, bubblers and emitter;
- Regularly monitoring and maintaining irrigation systems and setting efficient watering schedules with timers or using a smart central irrigation controller;
- Using a hand-held bucket or similar container, a hand-held hose equipped with a shut-off nozzle, or by using a low volume, high-pressure washer to clean vehicles, boats, or equipment on impervious surfaces to minimize incidental run-off onto adjacent property or the public right-of-way;
- Clearing yard waste or debris from driveways and sidewalks with an electric blower;
- Not irrigating turf and landscapes during rain and postponing irrigation during high winds; and
- Fixing indoor and outdoor water leaks

Water waste does not apply to:

- Cleaning outdoor impervious surfaces with water necessary for public health, safety or when other cleaning methods are impractical and dangerous; and
- Backwashing and periodic draining of swimming pools and spas for sanitary water balancing and necessary pool maintenance.

Water Reuse
DWS recommends the following water reuse measure be implemented for new landscaped design projects:

- All new ornamental water features, such as ponds and fountains shall be free of water leaks, use a water recirculating system with optimally regulated water pumps.

Should you have any questions please reach out to staff planner Geovanna Torres at (808) 463-3104 or via email at Geovanna.Torres@co.maui.hi.us.

Sincerely,

John Stufflebean, P.E.
Digitally signed by John Stufflebean, P.E.
Date: 2025.07.22 13:04:05 -10'00'

John Stufflebean, P.E.
DWS Director
GT

S:\PLANNING\PERMIT_Review\Planning\EA-EIS\0_Early Consult\Central\2_3_4_014_005_Wailuku_Mission_Aff_Hsg

APPENDIX C

STORM DRAINAGE SYSTEM INFORMATION

- Figure 9 – Existing Drainage Condition
- Figure 10 – Proposed Drainage Condition
- Hydrologic calculations
- Storage volume calculations
- Water quality calculations

SUBBASIN	AREA (ACRES)	Q_{10} (CFS)	VOLUME (ACRE-FT)	DISCHARGE POINT
E1	1.33	2.68	0.11	SHEET FLOW (MAIN STREET)
E2	1.32	2.09	0.09	SHEET FLOW (AUPUNI STREET)
TOTAL	2.65	4.77	0.20	

N

1" = 50'

LEGEND

XX — BASIN AREA

DRAINAGE FLOW ARROW

MAIN STREET (COUNTY)

E1

E2

TMK: (2) 3-4-014: 5

TMK: (2) 3-4-014: 2

TMK: (2) 3-4-014: 83

TMK: (2) 3-4-014: 84

TMK: (2) 3-4-014: 60

AUPUNI STREET (COUNTY)

KOELI STREET (COUNTY)

EXISTING MECO EASEMENT (FOR ELECTRICAL PURPOSES) 0.002 ACRES RECORDED OCTOBER 30, 1980, BOOK 15105, PAGE 196

0 25 50 FT

SCALE: 1" = 50'

GOTO ENGINEERING LLC
PO BOX 283238
HONOLULU, HI, 96828
808-392-6538

WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

EXISTING DRAINAGE CONDITION

FIGURE 9

SUBBASIN	AREA (ACRES)	Q50 (CFS)	VOLUME (ACRE-FT)	COLLECTION POINT	DISCHARGE POINT
P1A	0.33	0.76	0.04	-	SHEET FLOW (MAIN STREET)
P1B	0.55	1.95	0.08	STORMWATER CHAMBER SYSTEMS	
P1C	1.00	3.61	0.15		
P2	0.78	1.16	0.05	VEGETATED SWALES	SHEET FLOW (AUPUNI STREET)
TOTAL	2.65	7.48	0.32		

N

1" = 50'

MAIN STREET (COUNTY)

P1A

P1C

P1B

P2

TMK: (2) 3-4-014: 5

TMK: (2) 3-4-014: 83

TMK: (2) 3-4-014: 2

TMK: (2) 3-4-014: 84

TMK: (2) 3-4-014: 60

AUPUNI STREET (COUNTY)

KOELI STREET (COUNTY)

LEGEND

XX — BASIN AREA

DRAINAGE FLOW ARROW

0 25 50 FT

SCALE: 1" = 50'

GOTO ENGINEERING LLC
PO BOX 283238
HONOLULU, HI, 96828
808-392-6538

WAILUKU MISSION SENIOR AFFORDABLE HOUSING

WAILUKU, HAWAII

PROPOSED DRAINAGE CONDITION

FIGURE 10

Hydrologic Calculations - Wailuku Mission Senior Affordable Housing

TABLE 1 - Existing Runoff Coefficients and Peak Flow Calculations

Note: Calculations based on a 50 year 1 hour design storm event.

Basin Area	Ground Cover Type	Drainage Area (ac)	Total Area (ac)	C	Weighted C	Length (ft)	Slope	T_c (min.)	I (in/hr)	Q (cfs)	V (ac-ft) (1)	Discharge Point
E1	Impervious	0.23	1.33	0.85	0.40	440	7.50%	10.00	5.10	2.68	0.11	Main Street
	Pervious (grass)	1.10		0.30								
E2	Impervious	0.08	1.32	0.85	0.33	410	7.20%	13.00	4.75	2.09	0.09	Aupuni Street
	Pervious (grass)	1.24		0.30								
Total			2.65							4.77	0.20	

TABLE 2 - Proposed Runoff Coefficients and Peak Flow Calculations

Note: Calculations based on a 50 year 1 hour design storm event.

Basin Area	Ground Cover Type	Drainage Area (ac)	Total Area (ac)	C	Weighted C	Length (ft)	Slope	T_c (min.)	I (in/hr)	Q (cfs)	V (ac-ft) (1)	Discharge Point
P1A	Impervious	0.11	0.33	0.85	0.48	410	6.94%	12.23	4.83	0.76	0.04	Main Street (0.27 ac-ft)
	Pervious (grass)	0.22		0.30								
P1B	Impervious	0.40	0.55	0.85	0.70	610	4.65%	10.00	5.10	1.95	0.08	
	Pervious (grass)	0.15		0.30								
P1C	Impervious	0.74	1.00	0.85	0.71	510	3.20%	10.00	5.10	3.61	0.15	
	Pervious (grass)	0.26		0.30								
P2	Impervious	0.06	0.78	0.85	0.35	480	5.32%	17.50	4.30	1.16	0.05	Aupuni Street
	Pervious (grass)	0.72		0.30								
Total			2.65							7.48	0.32	

Note:
(1) Volume, V, is computed using the equation: V = Q * 1/2 t, where t=3600s

Since the proposed runoff volume discharging to Main Street exceeds the existing discharge by 0.16 ac-ft, this excess runoff will be stored in the stormwater chambers. See Table 3 and 4 for the storage volume calculation.

Storage Capacity - Wailuku Mission Senior Affordable Housing

TABLE 3 - Total Required Storage Volume

Discharge Point/Area	Flow (Q), cfs		Volume (V), acre-ft		Required Capacity, acre-ft
	Existing Drainage	Proposed Drainage	Existing Drainage	Proposed Drainage	
Main Street	2.68	6.32	0.11	0.27	0.16

TABLE 4 - Provided Storage Volume

Discharge Point/Area	Storage Type	Location	Provided Volume, acre-ft	Subtotal
Main Street	Stormwater Chamber	West Parking	0.08	0.20
		East Parking	0.12	

Note:
(1) Capacity of stormwater chambers are determined using ADS Design Tool

Water Quality Calculations - Wailuku Mission Senior Affordable Housing

TABLE 5 - Storm Water Quality Design Volume Calculation

Note: Calculations based on Subchapter 2, Section 15-111-5 of Rules for the Design of Storm Water Treatment Best Management Practices

Basin Area	Ground Cover Type	Drainage Area, acres	Total Area, acres	Impervious Area, %	C	Water Quality Design Volume (1), cf	Water Quality Design Volume (1), acre-ft
P1A	Impervious	0.11	0.33	33.40	0.35	414.07	0.010
	Pervious (grass)	0.22					
P1B	Impervious	0.40	0.55	72.87	0.71	1403.05	0.032
	Pervious (grass)	0.15					
P1C	Impervious	0.74	1.00	74.02	0.72	2599.77	0.060
	Pervious (grass)	0.26					
Total			1.87			4416.90	0.101

Note:
(1) Water Quality Design Volume is computed using the equation: V = C * 1" * A * 3630
Where C = 0.05 + 0.009 * (Impervious Area Percentage)

Water Quality Volume < Provided Storage Volume

TABLE 6 - Storm Water Quality Flow Calculation

Note: Calculations based on Subchapter 2, Section 15-111-5 of Rules for the Design of Storm Water Treatment Best Management Practices

Basin Area	Ground Cover Type	Drainage Area, acres	Total Area, acres	Impervious Area, %	C	Water Quality Flow Rate (1), cfs
P2	Impervious	0.06	0.78	8.26	0.36	0.11
	Pervious (grass)	0.72				

Note:
(1) Water Quality Flow Rate is computed using the equation: WQFR = C * 0.4" * A
Where C is determined from Tables 1, 2 and 3 of Subchapter 2, Section 15-111-5 of Rules for the Design of Storm Water Treatment Best Management Practices

APPENDIX D

GAS SYSTEM INFORMATION

- Hawaii Gas Pre-Assessment Consultation email for the EA

From: Keith Yamamoto <kkyamamo@hawaiigas.com>
Sent: December 5, 2024 2:02 PM
To: Kevin Goto; Jeremy Santiago
Cc: Crispin Zulueta; Arvin Dela Cruz
Subject: Re: Wailuku Mission Housing - Gas System

Kevin,

There are no utility gas lines in this area.

Thanks,
Keith

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Kevin Goto <kevin@gotoengineering.net>
Sent: Wednesday, December 4, 2024 4:57:11 PM
To: Jeremy Santiago <jsantiago@hawaiigas.com>; Keith Yamamoto <kkyamamo@hawaiigas.com>
Cc: Crispin Zulueta <crispin@gotoengineering.net>; Arvin Dela Cruz <arvin@gotoengineering.net>
Subject: [EXTERNAL EMAIL] Wailuku Mission Housing - Gas System

CAUTION: **This email was received from outside of Hawaii Gas. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Jeremy or Keith:

We are working on a multi-family housing project in Wailuku on Maui at 2331 Main Street.

Do you know if there are any Hawaii Gas systems in the area? I am not sure if they want the buildings to use gas yet, but we wanted to check if there are any available systems.

Thanks again for your help.

Kevin Goto, PE, LEED AP
Civil Engineer
Goto Engineering LLC
808-392-6538
www.gotoengineering.net

Note: This electronic message and its attachments contain information from Hawaii Gas that may be confidential, proprietary, attorney-client privileged, or otherwise protected from disclosure. If you are not the intended recipient, please notify us immediately via reply e-mail and delete or destroy this message and any copies of it. Thank you for your cooperation.

APPENDIX E

ELECTRICAL AND TELECOMMUNICATION SYSTEM INFORMATION

- Maui Electric Company will serve letter
- Hawaiian Telcom will serve letter
- Spectrum will serve letter
- MECo meters and Specttrum service path
- Preliminary load calculations – no design

February 24, 2026

Via Email

Albino Prieto, Associate Principal
Inatsuka Engineering LLC
1003 Bishop St, Ste 1960
Honolulu, HI 96813
E-mail: albino@inatsukaeng.com

Subject: Wailuku Mission Grounds Housing
2307 Main Street
Wailuku, Hawaii 96793
TMKs. :(2) 3-4-014:005

Dear Mr. Prieto,

Hawaiian Electric can provide electric service to the parcels stated in the subject above in accordance with our tariffs on file with the Hawai'i Public Utilities Commission.

Hawaiian Electric recommends energy efficient and conservation measures to reduce the maximum electrical demand and energy consumption. The developer may call Hawai'i Energy at (808) 537-5577 for questions or details on available programs.

As of this date, there are no requests for service for this project. It is encouraged that the developer's electrical consultant open a service request with Hawaiian Electric via our link to our Interconnection Tool as soon as practical to ensure timely electrical facility installation. For more information and instructions, here is the link to our website: Upgrade, Modify, or Install Service | Hawaiian Electric .

If you have any questions, please contact us at (808) 871-2390 or email us at CI@hawaiianelectric.com .

Sincerely,

Luttrell-Paet, Madison

Digitally signed by Luttrell-Paet, Madison
DN: CN="Luttrell-Paet, Madison", OU=ActiveLH, OU=Users, OU=MECO, DC=hawaiianelectric, DC=net
Date: 2026.02.25 06:51:19-10'00'

Madison Luttrell-Paet
Supervisor
Transmission and Distribution Engineering
Hawaiian Electric Company – Maui County

Email: Madison.paet@hawaiianelectric.com

6/28/2025

[Via Email Only]
Mr. Bradley Furuya, AICP
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
bfuruya@prhawaii.com

Subject: Wailuku Mission Affordable Housing
Pre-Assessment Consultation for an Environmental Assessment
2307 Main Street
Wailuku, Maui, Hawaii
Tax Map Key: (2) 3-4-014:005

Dear Mr. Furuya,

Thank you for allowing us to comment on the subject project.

In reviewing our records and the information received, Hawaiian Electric Company has no comments or objections to the subject project at this time. We highly encourage the customer's electrical consultant to advise our company of the anticipated electrical loads to be added and the project timeline.

Should you have any other questions or concerns, please feel free to call me at (808-871-2321).

Sincerely,

X Luttrell-Paet, Madison

Digitally signed by Luttrell-Paet, Madison
DN: CN="Luttrell-Paet, Madison", OU=ActiveLH, OU=Users, OU=MECO, DC=hawaiianelectric, DC=net
Date: 2025.06.30 07:19:14-10'00'

Madison Luttrell-Paet
T&D Engineering Supervisor

Hawaiian Electric Company – Maui County

Hawaiian Telcom

February 19, 2025

Albino Prieto
Inatsuka Engineering LLC
1003 Bishop Street, Suite 1960
Honolulu, HI 96813

Subject: Will Serve Letter – Wailuku Mission Housing- 2307 Main Street, Wailuku, HI 96793
TMK- (2) 3-4-014:005

Dear Mr. Prieto:

Thank you for sharing information on your proposed Wailuku Mission Housing project comprising of three 2-story buildings with elevator for total of about 92 living units (mix of studio and 1-bedroom units) with ground level parking located on a 2.66 acre site at 2307 Main Street, Wailuku, Maui (TMK 2-3-4-014: 005). We are excited to be a part of the development and would gladly provide access to Hawaiian Telcom's services to this new development.

If you have any questions, please do not hesitate to contact me at (951) 203-2174 or email Braycen.lorenzo@hawaiiantel.com.

Sincerely,

Braycen Lorenzo

Braycen Lorenzo
OSP Network Engineer
Hawaiian Telcom

From: Corey Vianzos <Corey.Vianzos@hawaiiantel.com>
Sent: Tuesday, June 17, 2025 4:03 PM
To: HT-Plan Reviews; sysadmin
Cc: Bradley Furuya; Jon Lui-Kwan
Subject: RE: Wailuku Mission Affordable Housing Environmental Assessment Pre-Assessment Consultation_HT-PR-25061201BS

Aloha,

In our initial review we can confirm that our HT facilities run over head on Main st but is located on the opposite side of the road. There is no underground facilities that enter the project site either. Our main facilities should have no impact on your project.

The only concern you might have is there are service poles that is located on or near the property, however these are owned by Hawaiian Electric.

Mahalo!



1/14/2025

Wailuku Union Church
C/O Inatsuka Engineering LLC
1003 Bishop Street, Suite 1960
Honolulu, HI 96813
Attn: Albino

Re: Will Serve Letter for Wailuku Mission Housing

Dear Wailuku Union Church,

Spectrum Oceanic LLC ("Spectrum"), directly or through its parent or affiliate companies, is an innovative provider of cable television, video, data, voice and other services (collectively, the "Services"). Wailuku Union Church ("Owner") is the owner of a proposed project of 84 senior rental housing units located on a property at 2307 Main Street in Wailuku. The 2.66 acre property is bounded by Main Street to the north, and Aupuni Street to the south. Oceanic's understanding is that the Owner wishes to make the Services available to residents and/or commercial tenants at the Project.

This is confirmed that Spectrum is willing and able to provide the Services to the Project subject to all of the terms and conditions of its applicable franchise agreement with the State of Hawaii, all applicable federal, state and county laws, rules and regulations, and all other terms and conditions stated in this letter. Owner and/or its successors in interest will enter into a mutually agreeable services agreement with Spectrum, which shall specify the provision of equipment and facilities for the provision of the Services, the specific type(s) of Services provided, and other terms and conditions (which may include terms relating to the provision of easements, conduits, and accommodations for equipment

The issuance of this letter by Spectrum, inclusive of the foregoing terms and conditions, is based upon the representations of the Owner to Spectrum with respect to the location and scope of the Project as of the date of this letter. Please contact us should you have any questions regarding the foregoing.

Jaycie Abe-Cameron
200 Akamainui Street | Mililani, HI | 96789
Director, Spectrum Community Solutions
Office: 1-808-628-2646

From: Yonamine, Connie E <Connie.Yonamine@charter.com>
Sent: Tuesday, June 17, 2025 10:15 AM
To: Bradley Furuya
Cc: Yasui, Kellee A
Subject: RE: [EXTERNAL] RE: Wailuku Mission Affordable Housing Environmental Assessment

Hi Bradley,
Thank you for taking the time to talk to me.
After my review, this parcel for the Wailuku Mission Affordable Housing in Wailuku, will have no impact on our existing Cable plant.
Please feel free to contact my should you have any questions or concerns.

Respectfully,

Spectrum

Connie Yonamine | Construction Coordinator | O-808.442.4831
158 Ma'a St | Kahului HI 96732

Albino Prieto

From: kim, dayne <dayne.kim@charter.com>
Sent: Tuesday, January 14, 2025 1:30 PM
To: Albino Prieto
Cc: Kaai, Allyson K; Haw.engineering.research; HT-PlanReviews@hawaiiantel.com; Yasui, Kellee A; Kevin Miyamura
Subject: RE: [EXTERNAL] RE: Wailuku Mission Housing
Attachments: 2025-01-14 13_23_46-Google Maps.png

Albino,

Aupuni St. will be the closest service point at this time.

Thank you,

Spectrum

DAYNE KIM | Construction Coordinator II | 808.442.4846
158 Maa st. | Kahului, HI 96732

From: Albino Prieto <albino@inatsukaeng.com>
Sent: Tuesday, January 14, 2025 11:02 AM
To: kim, dayne <dayne.kim@charter.com>
Cc: Kaai, Allyson K <Allyson.Kaai@charter.com>; Haw.engineering.research <Haw.engineering.research@charter.com>; HT-PlanReviews@hawaiiantel.com; Yasui, Kellee A <Kellee.Yasui@charter.com>; Kevin Miyamura <kevin@ama-ae.com>
Subject: [EXTERNAL] RE: Wailuku Mission Housing

CAUTION: The e-mail below is from an external source. Please exercise caution before opening attachments, clicking links, or following guidance.

Thanks Dayne
Could you please advise where we may tie-in to Spectrum for service to the project. (Mark up the site plan for a point of connection.)

Thank you,
Albino Prieto, Jr.
808.469.3200 (office), 808.351.9555 (mobile)
albino@inatsukaeng.com

From: kim, dayne <dayne.kim@charter.com>
Sent: Tuesday, January 14, 2025 9:00 AM
To: Albino Prieto <albino@inatsukaeng.com>
Cc: Kaai, Allyson K <Allyson.Kaai@charter.com>; Haw.engineering.research <Haw.engineering.research@charter.com>; HT-PlanReviews@hawaiiantel.com; Yasui, Kellee A <Kellee.Yasui@charter.com>
Subject: Wailuku Mission Housing

Albino,

Site has been reviewed. I have no comments to add at this time.

Please let us know when project is projected to start and when infrastructure plans become available.

Thank you,

DAYNE KIM | Construction Coordinator II | 808.442.4846
158 Maa st. | Kahului, HI 96732

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MECo meter 506222
MECo meter 506223
MECo meter 508540
MECo meter 508473
PROPOSED CLOSEST SERVICE PATH
Iao Preschool
Iao United Church of Christ
Main St
Puuhau Pl
Honolii Park
Kaahumanu Church
Historic site with gothic architecture
Maui Historical Society
Hawaiiana collection in a historic home
Labor & Industrial Relations Department
Wells St
S High St
Aupuni St
Imua Discovery Garden
Koeli St
Awapuhi Pl
Brown and Caldwell
Wailuku Public Library
Murekiyo & Hiraga

PRELIMINARY LOAD CALCS - no design

2-Jan-25

STUDIO

1	UNITS		347	SF (LIVING UNIT)		208 / 120	VOLTS,	1 PHASE	
347	SF	*	3	VA/SF	=	1,041	VA		
0	LAUNDRY	*	1,500	VA/LAUNDRY	=	0	VA		
2	APPLIANCE CKT	*	1,500	VA/CIRCUIT	=	3,000	VA		
1	RANGE	*	10,400	VA/RANGE	=	10,400	VA		
1	MICROWAVE-HOOD	*	1,200	VA/MICRWAVE-HOOD	=	1,200	VA		
0	DRYER	*	5,000	VA/DRYER	=	0	VA		
1	HEATER 1	*	4,500	VA/HEATER	=	4,500	VA		
0	HEATER 2	*	4,500	VA/HEATER	=	0	VA		
1	BATH EXHAUST FAN	*	30	VA/EXHAUST FAN	=	30	VA		
				TOTAL		20,171	VA		
				10,000 VA AT 100%		10,000	VA		
				BALANCE AT 40%		4,068	VA		
1	AC SYSTEM 1	*	1,716	VA/AC SYSTEM	=	1,716	VA		
0	AC SYSTEM 2	*	2,230	VA/AC SYSTEM	=	0	VA		
0	AC SYSTEM 3	*	2,879	VA/AC SYSTEM	=	0	VA		
0	AC SYSTEM 4	*	5,725	VA/AC SYSTEM	=	0	VA		
				CALCULATED LIVING UNIT LOAD (DEMAND)	=	15,784	VA		
				CALCULATED LIVING UNIT AMPS AT 208V/1-PH	=	76	A	66 ESTIMATED AMPS AT 240V/1-PH	

1 BED

1	UNITS		577	SF (LIVING UNIT)		208 / 120	VOLTS,	1 PHASE	
577	SF	*	3	VA/SF	=	1,731	VA		
0	LAUNDRY	*	1,500	VA/LAUNDRY	=	0	VA		
2	APPLIANCE CKT	*	1,500	VA/CIRCUIT	=	3,000	VA		
1	RANGE	*	10,400	VA/RANGE	=	10,400	VA		
1	MICROWAVE-HOOD	*	1,200	VA/MICRWAVE-HOOD	=	1,200	VA		

0	DRYER	*	5,000	VA/DRYER	=	0	VA
1	HEATER 1	*	4,500	VA/HEATER	=	4,500	VA
0	HEATER 2	*	4,500	VA/HEATER	=	0	VA
1	BATH EXHAUST FAN	*	30	VA/EXHAUST FAN	=	30	VA
				TOTAL		20,861	VA
				10,000 VA AT 100%		10,000	VA
				BALANCE AT 40%		4,344	VA
0	AC SYSTEM 1	*	1,716	VA/AC SYSTEM	=	0	VA
1	AC SYSTEM 2	*	2,230	VA/AC SYSTEM	=	2,230	VA
0	AC SYSTEM 3	*	2,879	VA/AC SYSTEM	=	0	VA
0	AC SYSTEM 4	*	5,725	VA/AC SYSTEM	=	0	VA
				CALCULATED LIVING UNIT LOAD (DEMAND)	=	16,574	VA
				CALCULATED LIVING UNIT AMPS AT 208V/1-PH	=	80	A

70 ESTIMATED AMPS AT 240V/1-PH

3330-20-002 Wailuku Mission Housing

EV ??

PRELIMINARY LOAD CALCS - no design

2-Jan-25

RESIDENTIAL BUILDING

28 UNITS — 12,936 SF (LIVING UNITS) — 208 / 120 VOLTS, 3 PHASE

12,936	SF	*	3	VA/SF	=	38,808	VA	
0	LAUNDRY	*	1,500	VA/LAUNDRY	=	0	VA	
56	APPLIANCE CKT	*	1,500	VA/CIRCUIT	=	84,000	VA	
28	RANGE	*	10,400	VA/RANGE	=	291,200	VA	
28	MICROWAVE-HOOD	*	1,200	VA/MICRWAVE-HOOD	=	33,600	VA	
0	DRYER	*	5,000	VA/DRYER	=	0	VA	
28	HEATER 1	*	4,500	VA/HEATER	=	126,000	VA	ASSUMED
0	HEATER 2	*	4,500	VA/HEATER	=	0	VA	
28	BATH EXHAUST FAN	*	30	VA/EXHAUST FAN	=	840	VA	1 FAN/ BATH
14	AC SYSTEM 1	*	1,716	VA/AC SYSTEM	=	24,024	VA	ASSUMED FOR STUDIO UNITS
14	AC SYSTEM 2	*	2,230	VA/AC SYSTEM	=	31,220	VA	ASSUMED FOR 1 BD UNITS
0	AC SYSTEM 3	*	2,879	VA/AC SYSTEM	=	0	VA	ASSUMED FOR 2 BD UNITS
28 0	AC SYSTEM 4	*	5,725	VA/AC SYSTEM	=	0	VA	ASSUMED FOR 3 BD UNITS

CALCULATED LIVING UNITS LOAD (CONNECTED)	=	629,692	VA	
DEMAND FACTOR	=	33%		
CALCULATED LIVING UNITS LOAD (DEMAND)	=	207,798	VA	
CALCULATED LIVING UNITS AMPS AT 208V/3-PH	=	577	AMPS	

1	ELEVATOR	15000	VA/ELEVATOR	=	15000	VA	WAG 15HP	100%
6	WASHER/DRYER	5000	VA/WASHER-DRYER	=	22,500	VA	DF	75%
			ESTIMATED HOUSE LOAD LTG/PWR	=	7,218	VA	WAG @ 3 W/SF	
			ESTIMATED HOUSE LOAD (DEMAND)	=	44,718			
			ESTIMATED HOUSE AMPS AT 208V/3-PH	=	124	AMPS		

CALCULATED BUILDING AMPS AT 208V/3-PH	=	701	AMPS	1053 ESTIMATED BLDG AMPS AT 240V/1-PH
RECOMMENDED BUILDING AMPS AT 208V/3-PH	=	800	AMPS	

PRELIMINARY LOAD CALCS - no design

2-Jan-25

PROJECT SUMMARY

		84	UNITS		0	SF (LIVING UNITS)		208 / 120	VOLTS,	3 PHASE	
RESI BLDG	3	38,808	SF	*	3	VA/SF	=	349,272	VA		
RESI B	0	0	SF	*	3	VA/SF	=	0	VA		
		0	LAUNDRY	*	1,500	VA/LAUNDRY	=	0	VA		
		168	APPLIANCE CKT	*	1,500	VA/CIRCUIT	=	252,000	VA		
		84	RANGE	*	10,400	VA/RANGE	=	873,600	VA		
		84	MICROWAVE-HOOD	*	1,200	VA/MICRWAVE-HOOD	=	100,800	VA		
		0	DRYER	*	5,000	VA/DRYER	=	0	VA		
		84	HEATER 1	*	4,500	VA/HEATER	=	378,000	VA	ASSUMED FOR UNITS	
		0	HEATER 2	*	4,500	VA/HEATER	=	0	VA		
		84	BATH EXHAUST FAN	*	30	VA/EXHAUST FAN	=	2,520	VA	1 FAN/ BATH	
		42	AC SYSTEM 1	*	1,716	VA/AC SYSTEM	=	72,072	VA	ASSUMED FOR STUDIO UNITS	
		42	AC SYSTEM 2	*	2,230	VA/AC SYSTEM	=	93,660	VA	ASSUMED FOR 1 BD UNITS	
		0	AC SYSTEM 3	*	2,879	VA/AC SYSTEM	=	0	VA	ASSUMED FOR 2 BD UNITS	
	84	0	AC SYSTEM 4	*	5,725	VA/AC SYSTEM	=	0	VA	ASSUMED FOR 3 BD UNITS	
						CALCULATED LIVING UNITS LOAD (CONNECTED)	=	2,121,924	VA		
						DEMAND FACTOR	=	23%			
						CALCULATED LIVING UNITS LOAD (DEMAND)	=	488,043	VA		
						CALCULATED LIVING UNITS AMPS AT 208V/3-PH	=	1,355	AMPS		
		3	ELEVATOR		15000	VA/ELEVATOR	=	40500	VA	WAG 15HP	90%
		18	WASHER/DRYER		5000	VA/WASHER-DRYER	=	36,000	VA	DF	40%
						ESTIMATED HOUSE LOAD LTG/PWR	=	21,654	VA	WAG @ 3 W/SF	
						ESTIMATED HOUSE LOAD (DEMAND)	=	98,154			
						ESTIMATED HOUSE AMPS AT 208V/3-PH	=	272	AMPS		
						CALCULATED PROJECT AMPS AT 208V/3-PH	=	1,627	AMPS		

PROJECT TOTAL	ESTIMATED PROJECT AMPS AT 208V/3-PH	=	1,627	AMPS
	ESTIMATED PROJECT LOAD (DEMAND)	=	586,197	VA
	ESTIMATED PROJECT LOAD (CONNECTED)	=	2,278,578	VA

PRELIMINARY LOAD CALCS - no design

2-Jan-25

PROJECT TOTAL	ESTIMATED PROJECT AMPS AT 240V/1-PH	=	2,442	AMPS
	ESTIMATED PROJECT LOAD (DEMAND)	=	586,197	VA
	ESTIMATED PROJECT LOAD (CONNECTED)	=	2,278,578	VA

PRELIMINARY LOAD CALCS - no design

2-Jan-25

	ground floor				second floor				building total					project total				
	unit type	area (sf)	qty	total area (sf)	unit type	area	qty	total area (sf)	unit type	area	qty	total area (sf)		unit type	qty/bldg	no. of bldgs	total	
residential building	studio	347	7	2429	studio	347	7	2429	studio	347	14	4858		studio	14	3	42	
	1 bed	577	7	4039	1 bed	577	7	4039	1 bed	577	14	8078		1 bed	14		42	
	2 bed	0	0	0	2 bed	0	0	0	2 bed	0	0	0		2 bed	0		0	
	circulation	1090	1	1090	circulation	795	1	795	circulation	1885	1	1885		circulation	1		3	
	laundry	124	1	124	laundry	0	0	0	laundry	124	1	124		laundry	1		3	
	lobby	0	0	0	lobby	334	1	334	lobby	334	1	334		lobby	1		3	
	elevator	63	1	63	elevator	0	0	0	elevator	63	1	63		elevator	1		3	
									building total units		28	12936			total	3	84	
									building total non-unit			2406						
									building total			15342					46026	sf total
																	38808	sf with ac
																	7218	sf common area
											stalls	32	8	20			5120	sf parking

Appendix E

Ground Penetrating Radar Survey Report

Draft

Ground Penetrating Radar Survey Report for the Development of the Mission Grounds at Wailuku Union Church Wailuku Ahupua‘a, Wailuku District, Maui Island, TMK: [2] 3-4-014:005

Prepared for
Wailuku Union Church
and
Planning Consultants Hawaii, LLC

Prepared by
Trevor M. Yucha, B.S.
and
Hallett H. Hammatt, Ph.D.

Cultural Surveys Hawai‘i, Inc.
Kailua, Hawai‘i
(Job Code: WAILUKU 46)

June 2017

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Management Summary

Reference	Ground Penetrating Radar Survey Report for the Development of the Mission Grounds at Wailuku Union Church, Wailuku Ahupua‘a, Wailuku District, Maui Island, TMK [2] 3-4-014:005 (Yucha and Hammatt 2017)
Date	June 2017
Project Number(s)	Cultural Surveys Hawai‘i, Inc. (CSH) Job Code: WAILUKU 46
Investigation Permit Number	CSH completed this fieldwork under archaeological fieldwork permit number 17-08, issued by the Hawai‘i State Historic Preservation Division (SHPD) per Hawai‘i Administrative Rules (HAR) §13-13-282.
Land Jurisdiction	Private; Wailuku Union Church
Project Proponent	Planning Consultants Hawaii, LLC
Project Funding	Wailuku Union Church
Project Location	The project area is located at the Mission Grounds of the Wailuku Union Church and includes the entirety of TMK [2] 3-4-014:005. The project area is bounded by Main Street to the north, Aupuni Street to the south, Ka‘ahumanu Church grounds to the east, and the Old Bailey House grounds to the west. The project area is depicted on a portion of the 1997 Wailuku 7.5-minute series U.S. Geological Survey topographic quadrangle.
Project Description	The proposed project includes the construction of a community center building, a preschool building, three multi-unit residential buildings (20 total residential units), and a parking lot and access road that includes a total of approximately 80 stalls.
Project Acreage	The project area is 2.67 acres. The non-contiguous GPR survey area included 1.08 acres (4,364 m^2) or approximately 40 percent of the project area.
Document Purpose	The Ground Penetrating Radar (GPR) survey was conducted as a preliminary study to potentially identify subsurface anomalies within the accessible portions of the project area. This GPR survey is intended to assist in the determination whether an archaeological inventory survey (AIS) is required for this project. If an AIS is required, this GPR survey may be useful to determine the scope of the AIS fieldwork for this project, specifically the number and location of controlled subsurface excavations that may be required by the SHPD in order to fulfill the requirements of HAR §13-13-276 (identify, document, and assess significance of any historic properties).
Fieldwork Effort	Fieldwork was accomplished between 22 May 2017 and 31 May 2017 by CSH archaeologist under the general supervision of Principal Investigator Hallett H. Hammatt, Ph.D.

Summary of Methodology	The GPR survey was performed using a Geophysical Survey Systems, Inc. (GSSI) SIR-3000 system equipped with a 400 MHz antenna. The maximum depth of interest was set at 2.0 meters. The soil type for this area was determined to be "Loamy soil (average residential)" and assigned Soil Type 2 with a dielectric of 8. The scans per unit was set at 50 scans per meter. The settings used for this survey were based on the recommendations of GSSI for this soil type. The survey was completed using the GSSI Quick3D collection mode. Eleven GPR grids were placed in all accessible portions of the project area in order to provide maximum coverage. The individual GPR grids together are referred to as the non-contiguous GPR survey area. Grids were surveyed in one direction (normal mode) and line spacing was set at 0.50 meters. The corners of each grid were located using a Trimble pro XH mapping grade GPS unit. Post-processing was completed using GSSI RADAN 7 software to produce a 3D grid file for each GPR grid. The grid file was viewed using the Table 30 Xform 1 format. A plan view slice of each grid file was recorded at increments of 25 centimeters (0-175) and exported as an image file. The image files were then georeferenced to the corresponding GPS grid locations and compiled within ESRI's ArcGIS 10.4.1. The non-contiguous GPR survey area was then analyzed as a whole for the presence of subsurface anomalies.
Summary of Findings	The GPR survey identified six subsurface anomalies within the survey area. Five of these anomalies were identified as rectangular or linear objects that were easily distinguished from the surrounding soil matrix. No other information could be determined of these five subsurface anomalies other than an approximate depth. The sixth subsurface anomaly was identified as a possible filled ditch based on surface evidence of a noticeable swale that extended from a possible buried culvert. None of the six anomalies could be correlated with objects or structures depicted on historic maps of the area. In addition to the six subsurface anomalies, the GPR survey identified seven sections of buried metal pipes that may relate to active or abandoned utilities. The changes in soil compaction of the two dirt/gravel access roads within the survey area were also observed in the GPR data.

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Section 1 Introduction

1.1 Project Background

In coordination with the Hawai‘i State Historic Preservation Division (SHPD) and at the request of Wailuku Union Church, Cultural Surveys Hawai‘i, Inc. (CSH) has prepared this Ground Penetrating Radar Survey Report for the Development of the Mission Grounds at Wailuku Union Church, Wailuku Ahupua‘a, Wailuku District, Maui Island, TMK [2] 3-4-014:005. The project area is located at the Mission Grounds of the Wailuku Union Church and includes the entirety of TMK [2] 3-4-014:005. The project area is bounded by Main Street to the north, Aupuni Street to the south, Ka‘ahumanu Church grounds to the east, and the Old Bailey House grounds to the west. The project area is depicted on a portion of the 1997 Wailuku U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 1), a tax map plat (Figure 2), and a 2009 aerial photograph (Figure 3).

The proposed project includes the construction of a community center building, a preschool building, three multi-unit residential buildings (20 total residential units), and a parking lot and access road that includes a total of approximately 80 stalls.

The project area is 2.67 acres. The non-contiguous GPR survey area included 1.08 acres (4,364 m^2) or approximately 40 percent of the project area.

1.2 Document Purpose

The Ground Penetrating Radar (GPR) survey was conducted as a preliminary study to potentially identify subsurface anomalies within the accessible portions of the project area. This GPR survey is intended to assist in the determination whether an archaeological inventory survey (AIS) is required for this project.

If an AIS is required, this GPR survey may be useful to determine the scope of the AIS fieldwork for this project, specifically the number and location of controlled subsurface excavations that may be required by the SHPD in order to fulfill the requirements of HAR §13-13-276 (identify, document, and assess significance of any historic properties).

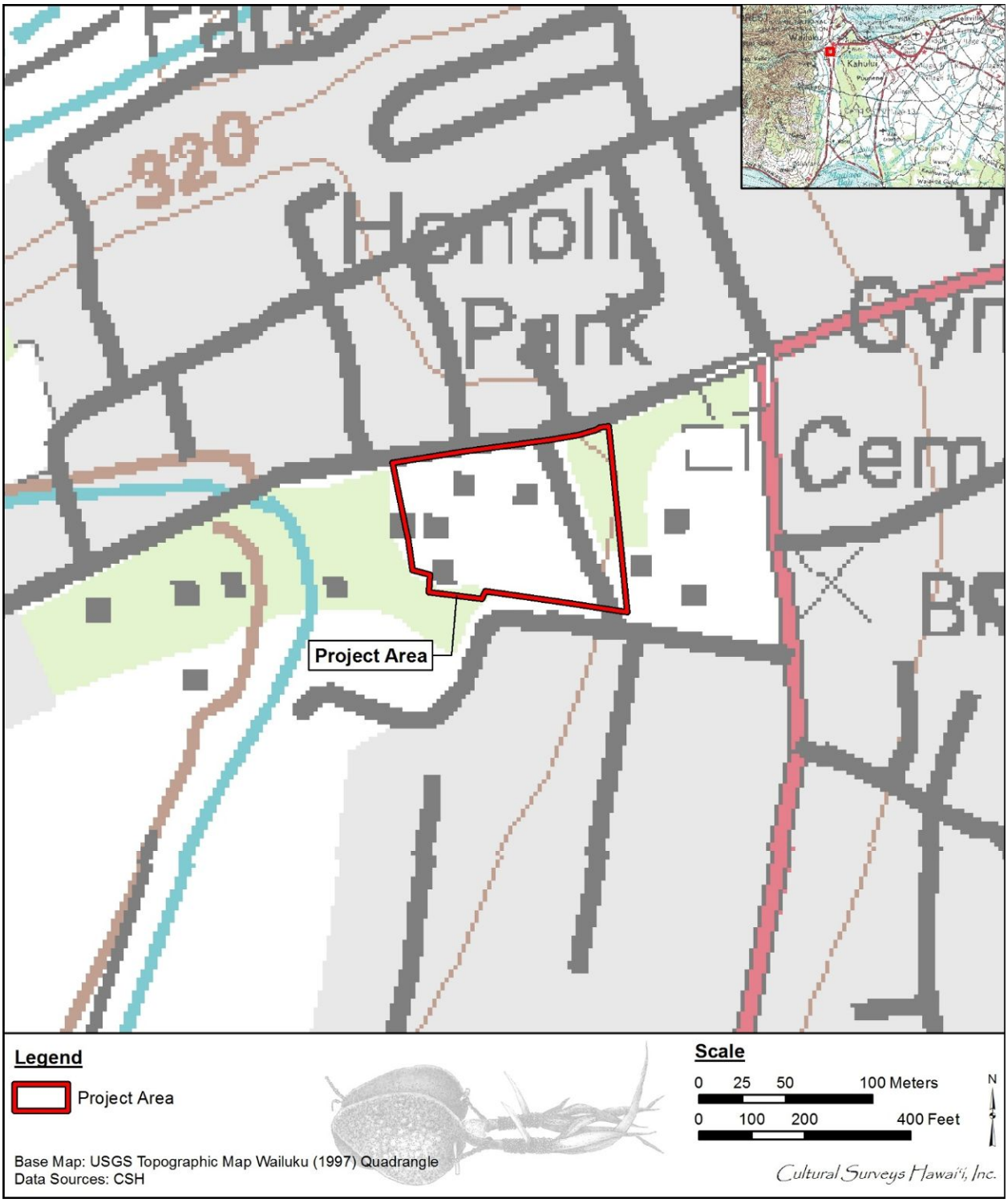

Figure 1. Portion of the 1997 Wailuku USGS 7.5-minute topographic quadrangle showing the location of the project area (U.S. Geological Survey 1997)

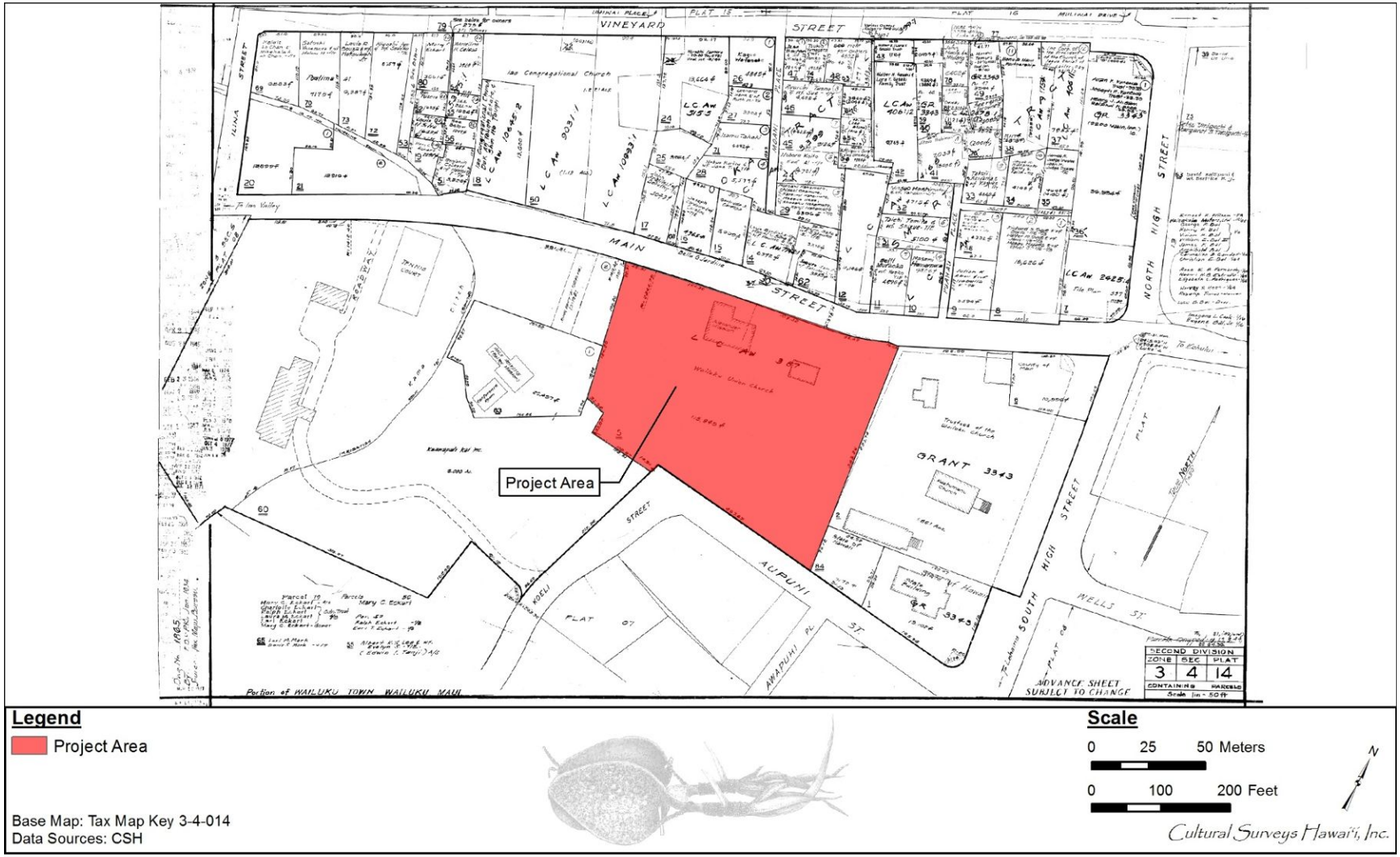

Figure 2. Tax Map Key (TMK) [2] 3-4-014 showing the project area (Hawaii TMK Service 2014)



Figure 3. Aerial photograph of the project area (ESRI Inc. 2009)

Section 2 Methods

2.1 Survey Methodology

The GPR survey was performed using a Geophysical Survey Systems, Inc. (GSSI) SIR-3000 system equipped with a 400 MHz antenna. This is a bistatic system, in which electromagnetic energy in the radar frequency range is transmitted into the ground via a sending antenna. Radar energy is reflected off of the subsurface matrix and is then received by another, paired antenna. Reflected energy is sampled and the travel time (in nanoseconds) of the individual reflection waves is recorded. Wave propagation speed varies depending on the nature of the subsurface medium. Any changes in density or electromagnetic properties within the stratigraphic column may cause observable variations in reflection intensity. Reflection features may include discrete objects, stratigraphic layering, or other subsurface anomalies.

GPR data collection parameters were held constant throughout the survey under the assumption that soil characteristics were relatively consistent throughout the survey area (Table 1). The maximum depth of interest was set at 2.0 meters. The soil type for this area was determined to be "Loamy soil (average residential)" and assigned Soil Type 2 with a dielectric of 8. The scans per unit was set at 50 scans per meter. The settings used for this survey were based on the recommendations of GSSI for this soil type.

The effectiveness of GPR is highly dependent on local soil conditions. The high signal attenuation rate of many soil types restricts the depth of radar penetration and therefore limits the effectiveness of GPR surveys. The Natural Resource Conservation Service (NRCS) produced maps indicating the relative suitability of GPR applications throughout the U.S. The GPR suitability data was generated based on U.S. Department of Agriculture (USDA) soil survey data. Figure 4 shows the project area on the NRCS GPR Suitability Map for Hawai‘i. The project area is shown to primarily traverse lands in the low to moderate suitability category.

The survey was completed using the GSSI Quick3D collection mode. GPR grids were placed in all accessible portions of the project area in order to provide maximum coverage (approximately 40% of the surface area). GPR grids were numbered according to their GPR file numbers (Table 2 and Figure 5). The individual GPR grids together are referred to as the non-contiguous GPR survey area. Grid layout was completed using pins to mark the grid corners and spray-paint to mark the grid boundaries and transect lines. Grids were surveyed in one direction (normal mode) and line spacing was set at 0.50 meters. The corners of each grid were located using a Trimble pro XH mapping grade GPS unit.

Table 1. GPR Data Collection Parameters

Parameter	Settings
Antenna	400 MHz
Depth of Interest	2.0 m
Soil Type	Type 2 “Loamy soil (average residential)”
Dielectric	8
Scans Per Unit	50

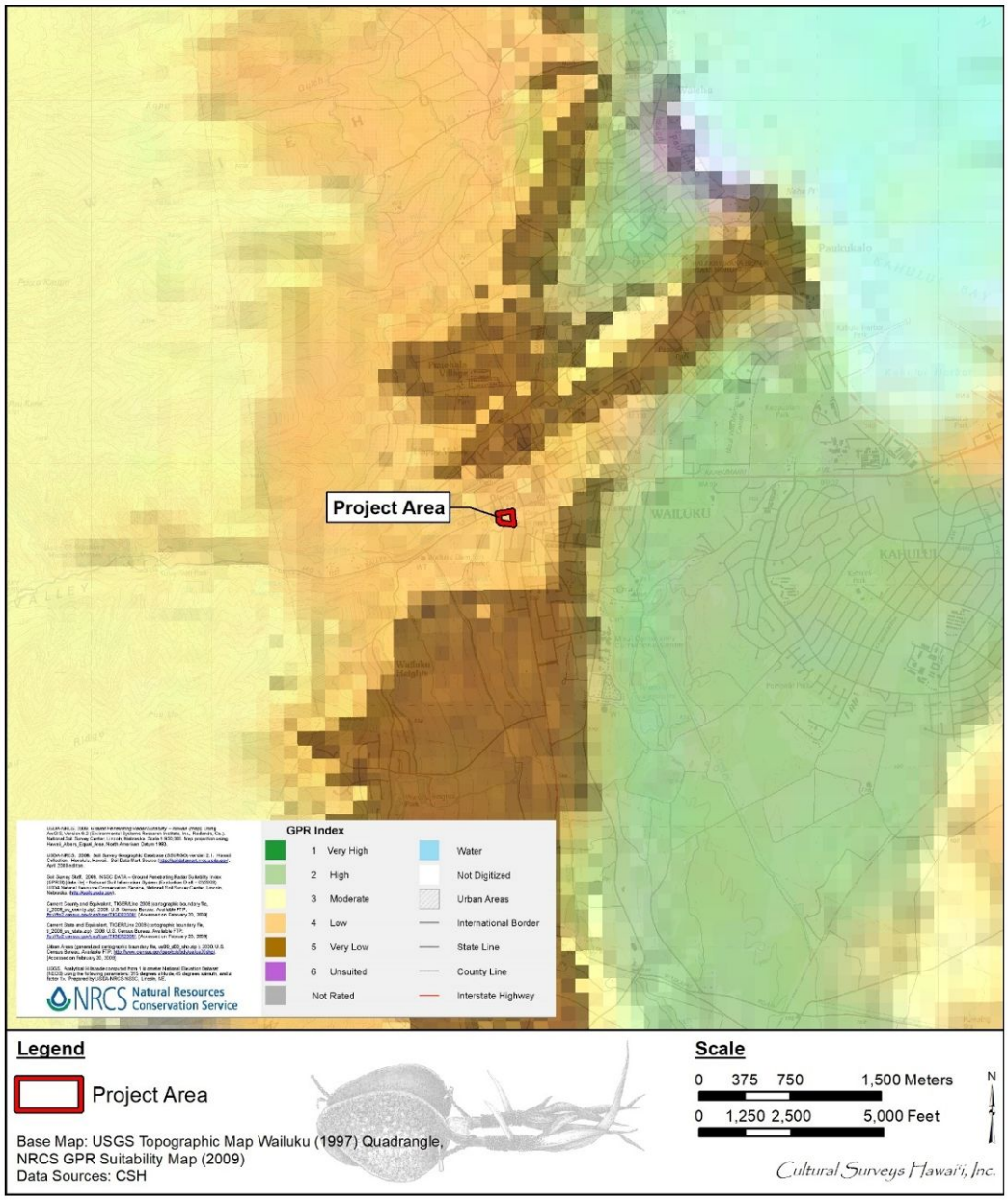

Figure 4. Portion of the 1997 Wailuku USGS 7.5-minute topographic quadrangle with an overlay of NRCS GPR suitability data (NRCS 2009)

Table 2. Individual GPR Grid Information

Grid #	N/S (m)	E/W (m)	Starting Point (0,0)	Direction of Travel
1	31	22	SW	N
3	27	30	NE	S
5	27	30	NE	S
6	16	32	SE	N
7	15	16	SW	N
8	16	20	SW	N
9	6	17	NE	E
10	5	9	NE	E
12	21	20	SE	N
13	10	15	NW	S
15	23	9	SW	N

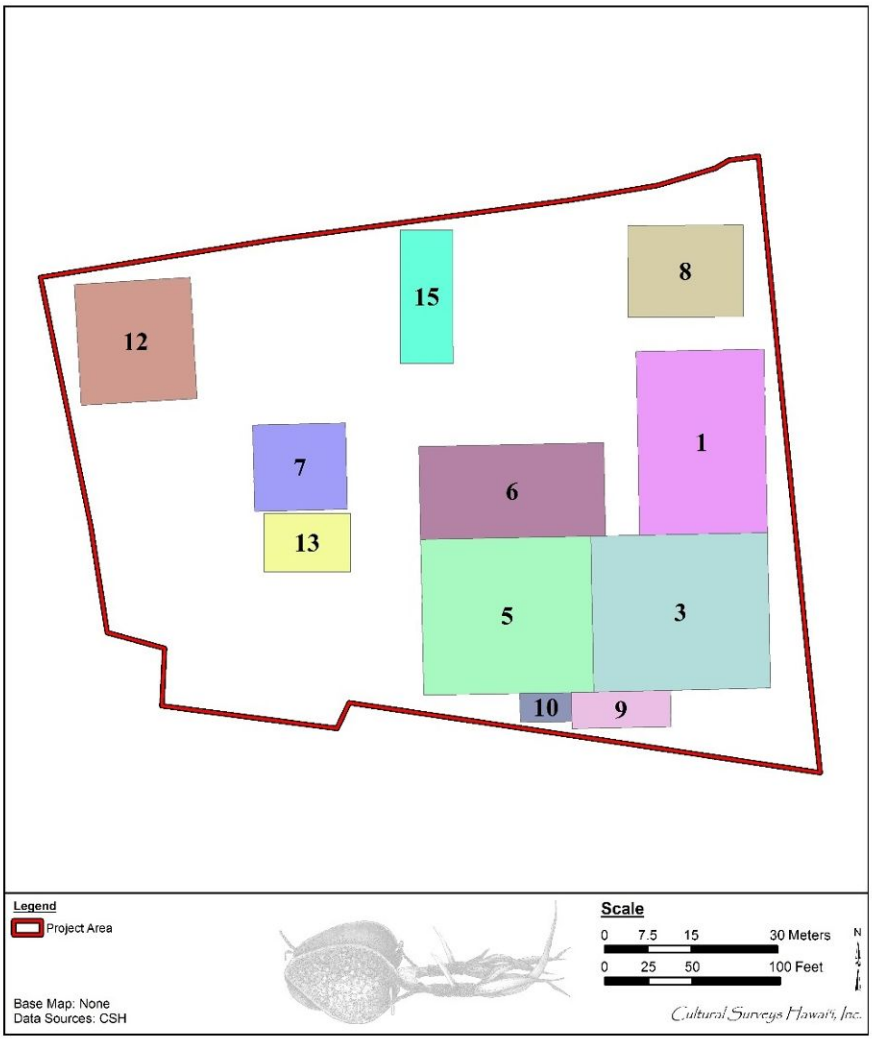

Figure 5. Location of individual GPR grids within the project area

2.2 Data Processing

Post-processing was completed using GSSI RADAN 7 software to produce a 3D grid file for each GPR grid. Post-processing included an adjustment of the Time-Zero line to eliminate the GPR signal that is recorded between the base of the antenna and the ground surface. No other post-processing techniques were utilized. The grid file was viewed using the Table 30 Xform 1 format. A plan view slice of each grid file was recorded at increments of 25 centimeters (0-175) and exported as an image file. The image files were then georeferenced to the corresponding GPS grid locations and compiled within ESRI's ArcGIS 10.4.1. The non-contiguous GPR survey area was then analyzed as a whole for the presence of subsurface anomalies.

Section 3 GPR Survey Results

The GPR survey identified six subsurface anomalies within the survey area (Figure 6 to Figure 13). Five of these anomalies were identified as rectangular or linear objects that were distinguished from the surrounding soil matrix. The sixth subsurface anomaly was identified as a possible filled ditch based on surface evidence of a noticeable swale that extended from a possible buried culvert (Figure 14 and Figure 15).

In addition to the six subsurface anomalies, the GPR survey identified seven sections of buried metal pipes that may relate to active or abandoned utilities (see Figure 6 to Figure 13). The changes in soil compaction of the two dirt/gravel access roads within the survey area were also observed in the GPR data.

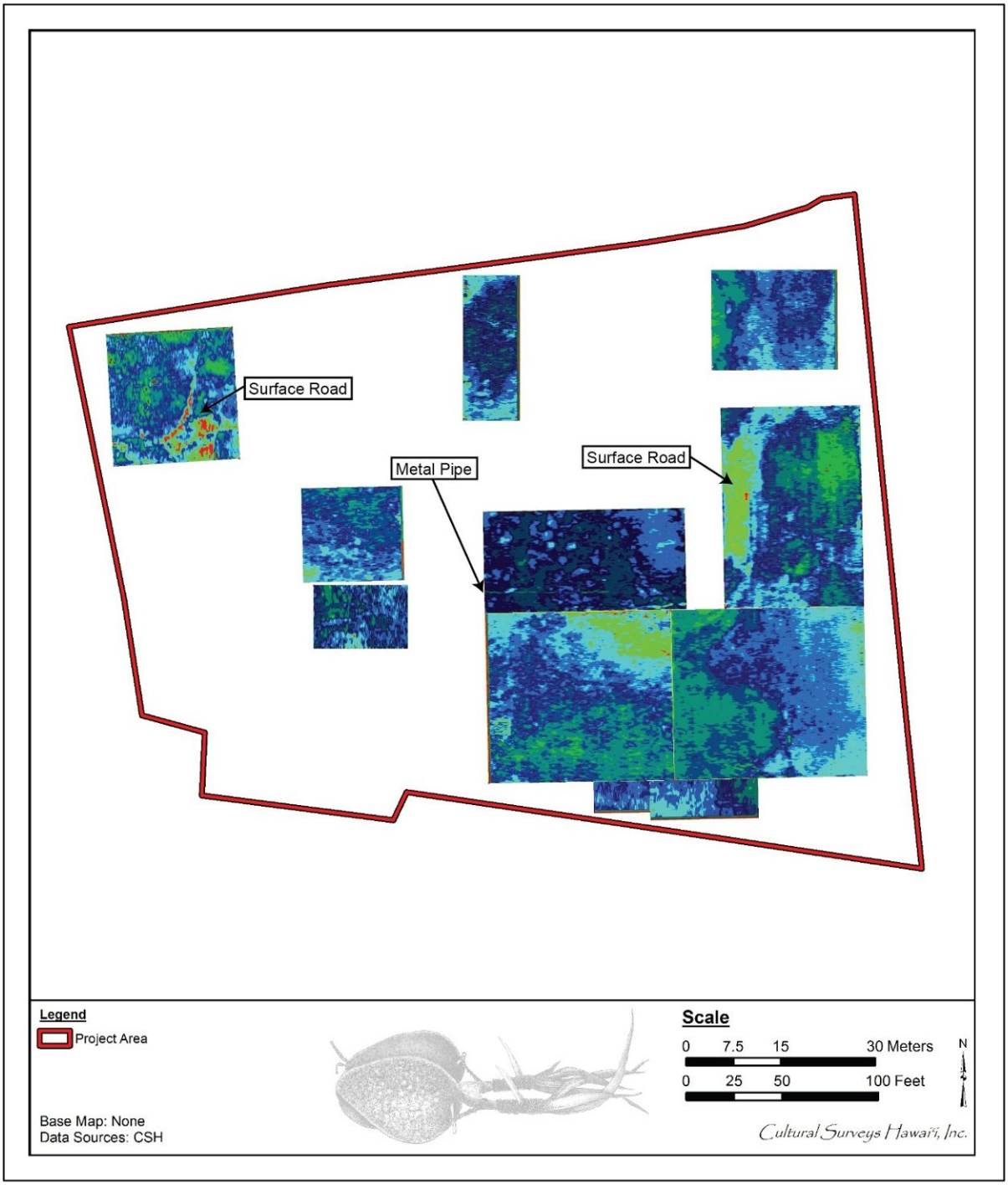

Figure 6. GPR ground surface scan (0 cm) depicting changes in soil compaction associated with the two dirt/gravel roads within the survey area and a shallow metal pipe utility line

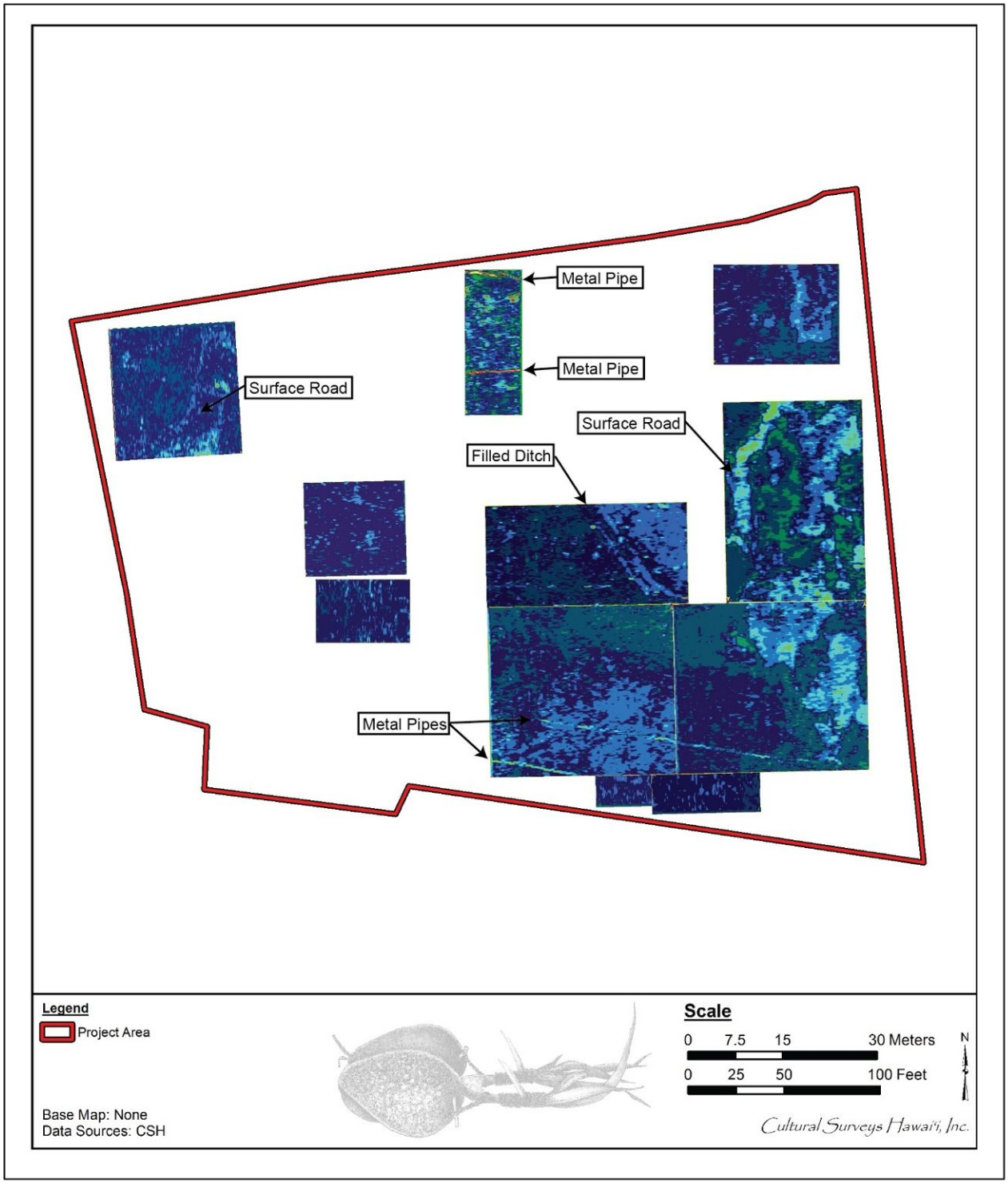

Figure 7. GPR 25 cm scan depicting changes in soil compaction associated with the two dirt/gravel roads within the survey area (also seen in surface scan), a filled ditch anomaly, and four metal pipe utility lines

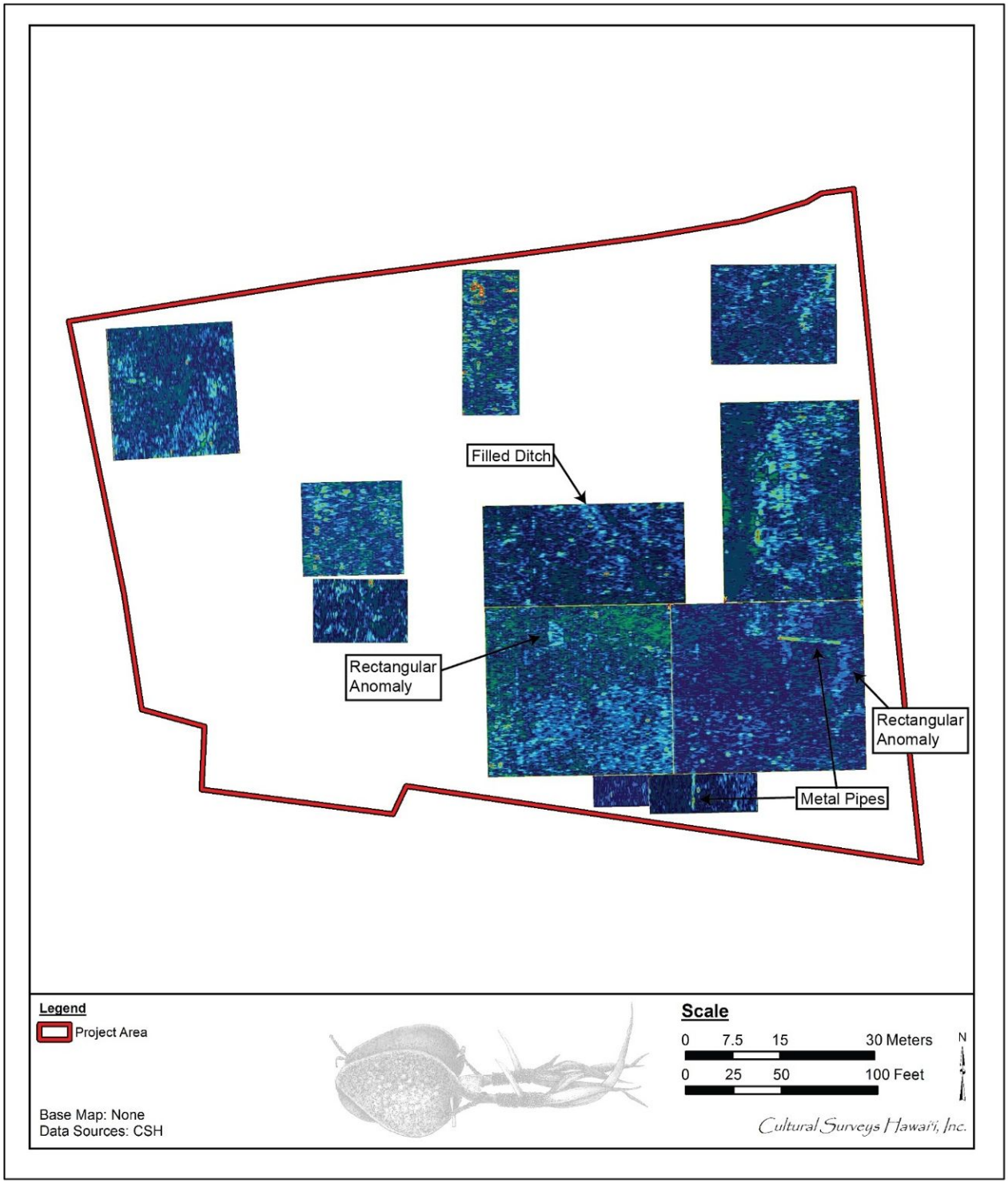

Figure 8. GPR 50 cm scan depicting the filled ditch anomaly (also seen at 25 cm), two rectangular anomalies, and two metal pipe utility lines

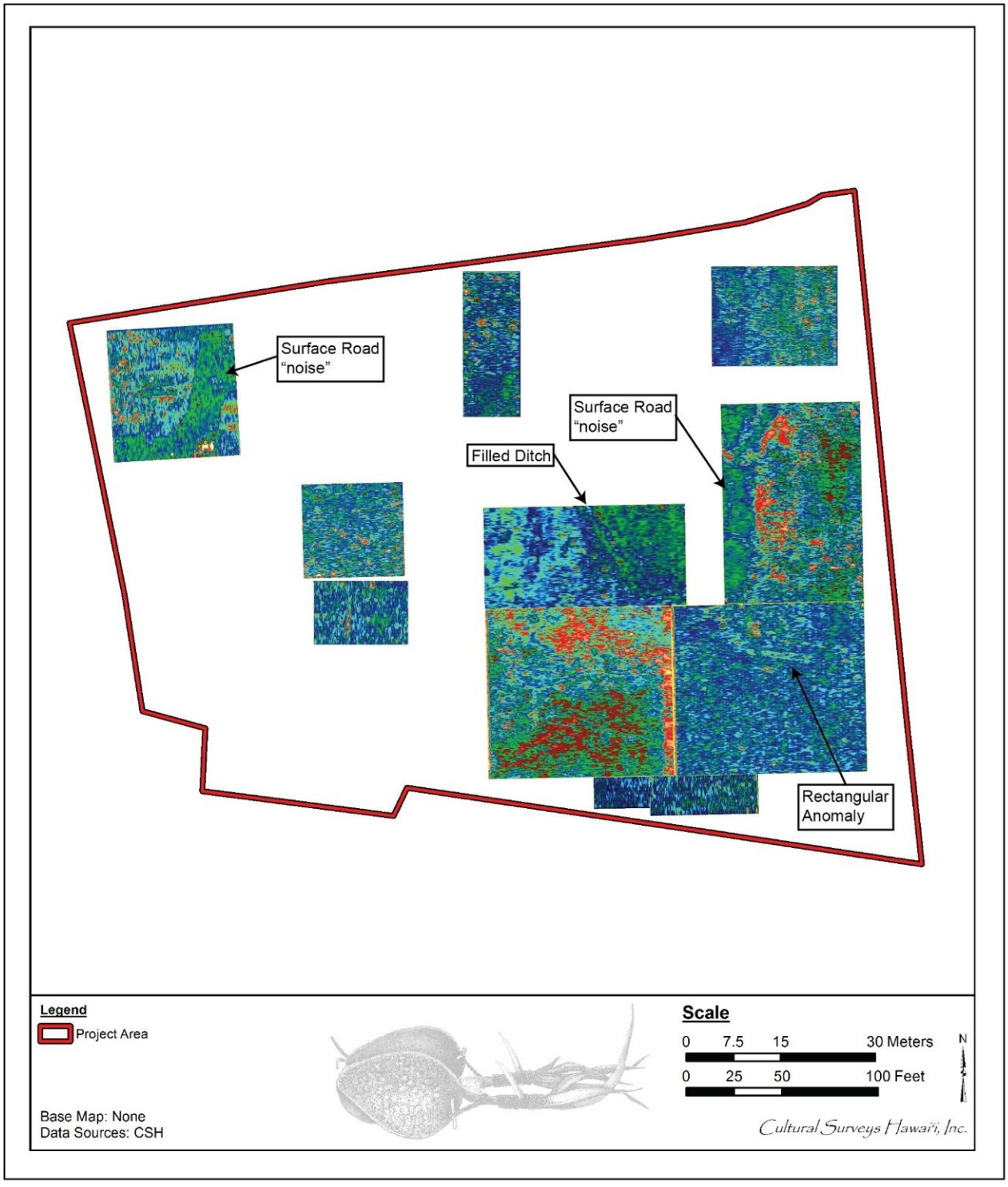

Figure 9. GPR 75 cm scan depicting the filled ditch anomaly (also seen at 25 cm and 50 cm), and one rectangular anomaly; interference ("noise") from the surface roads is projected deeper in the GPR profile and visible

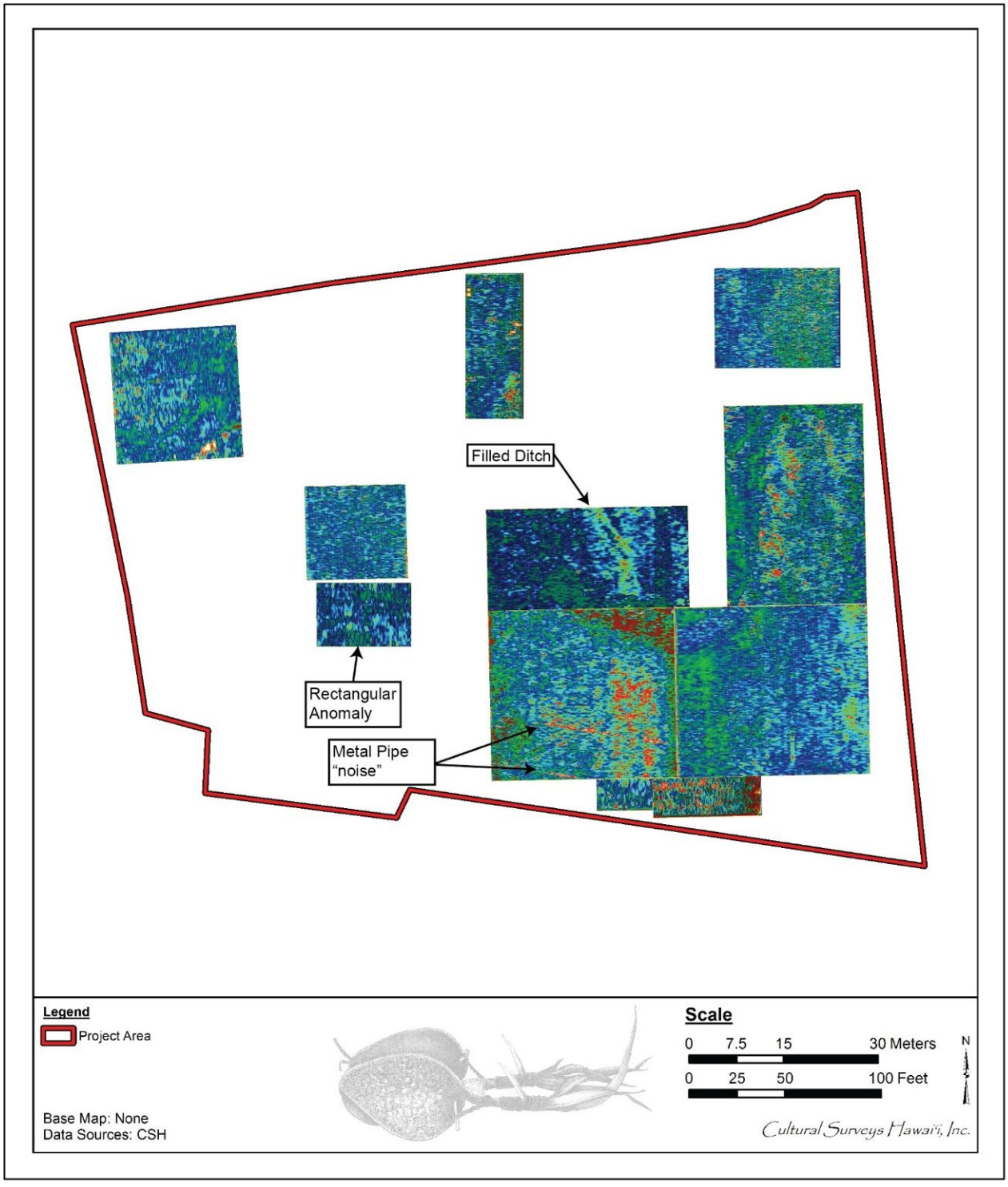

Figure 10. GPR 100 cm scan depicting the filled ditch anomaly (also seen at 25 cm, 50 cm, and 75 cm) and a rectangular anomaly; interference ("noise") from two metal pipe utility lines is projected deeper in the GPR profile and visible

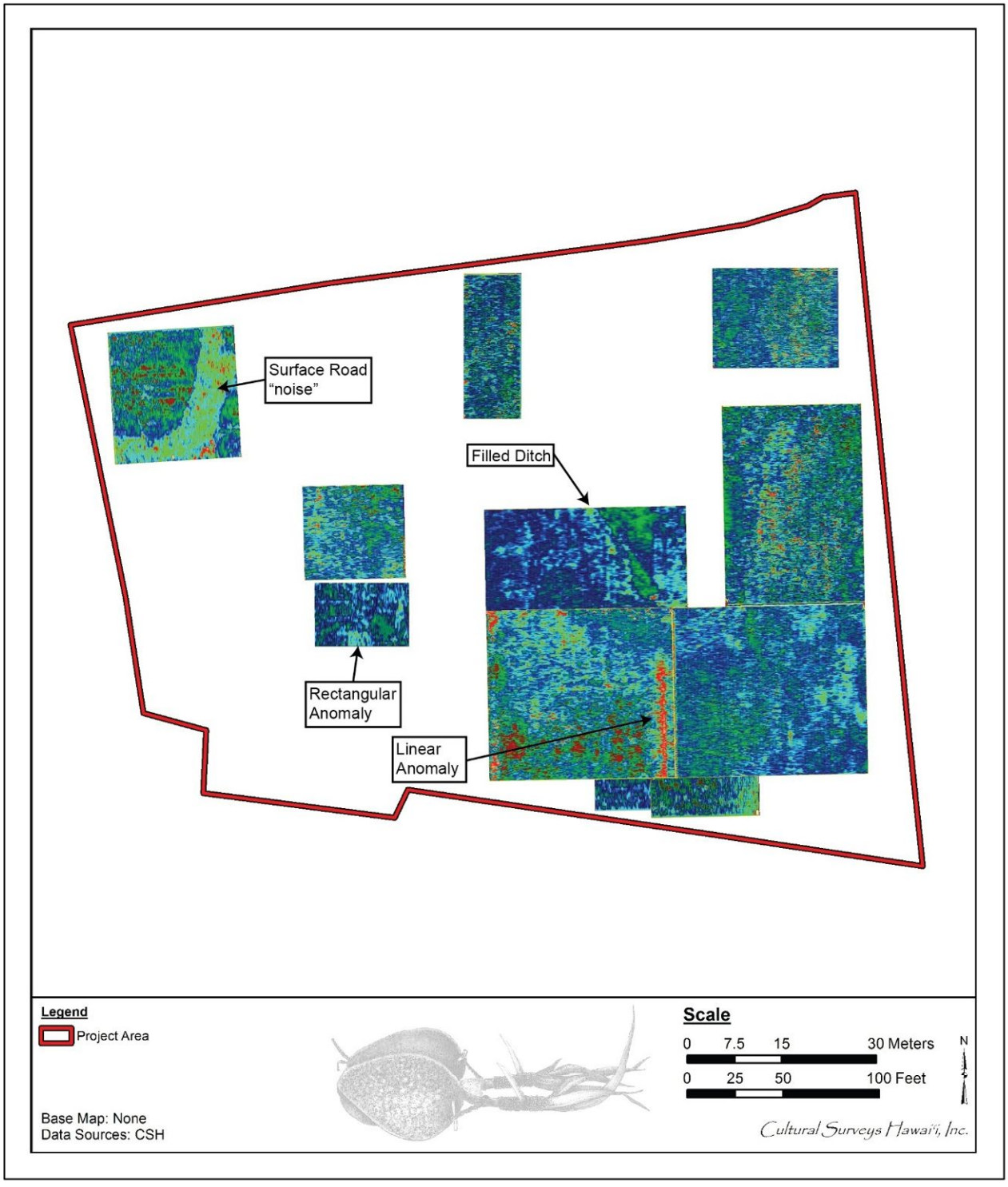

Figure 11. GPR 125 cm scan depicting the filled ditch anomaly (also seen at 25 cm, 50 cm, 75 cm, and 100 cm), a rectangular anomaly (also seen at 100 cm), and a linear anomaly; interference ("noise") from the surface road is projected deeper in the GPR profile and visible

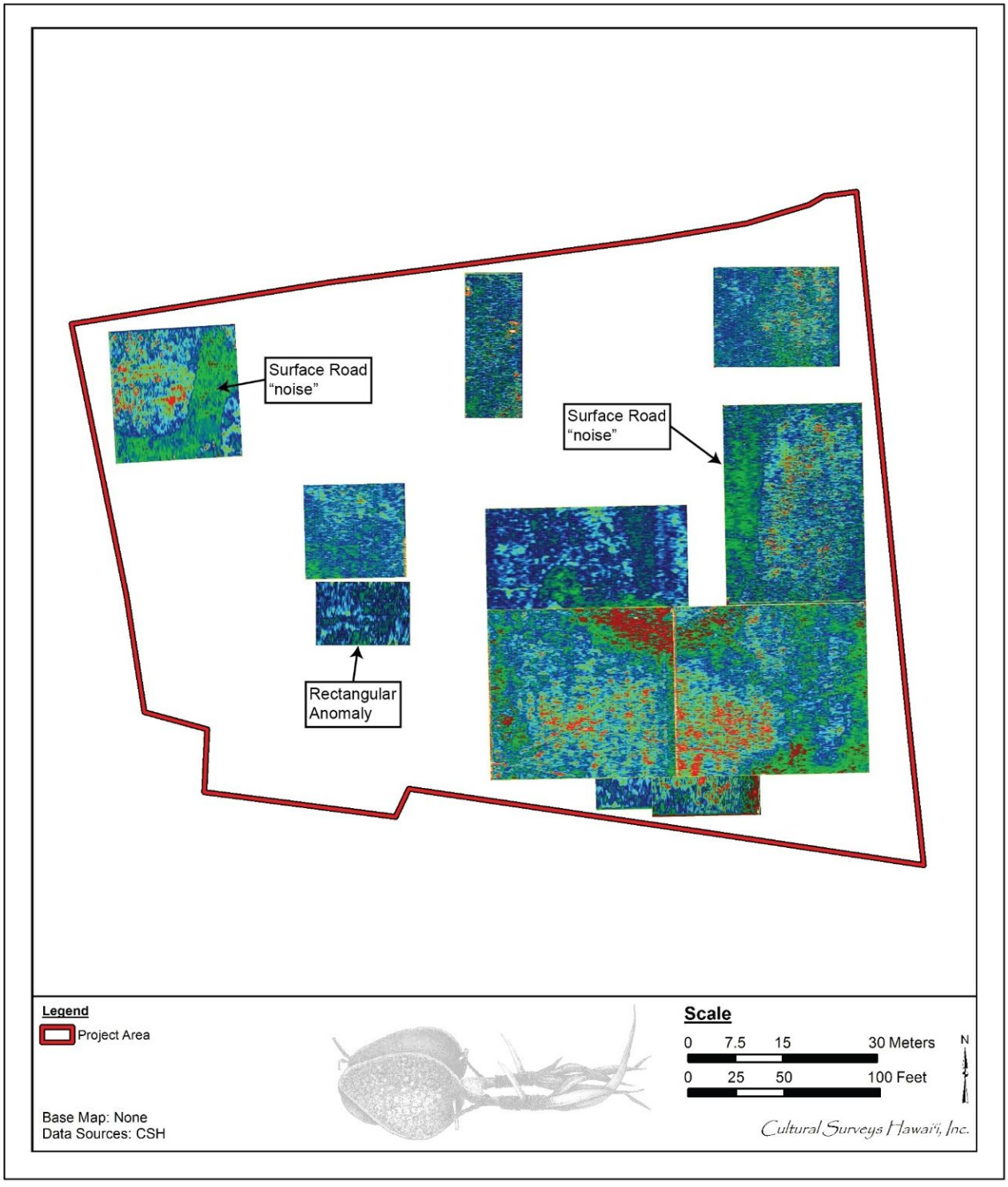

Figure 12. GPR 150 cm scan depicting a rectangular anomaly (also seen at 100 cm and 125 cm); interference ("noise") from the surface roads is projected deeper in the GPR profile and visible

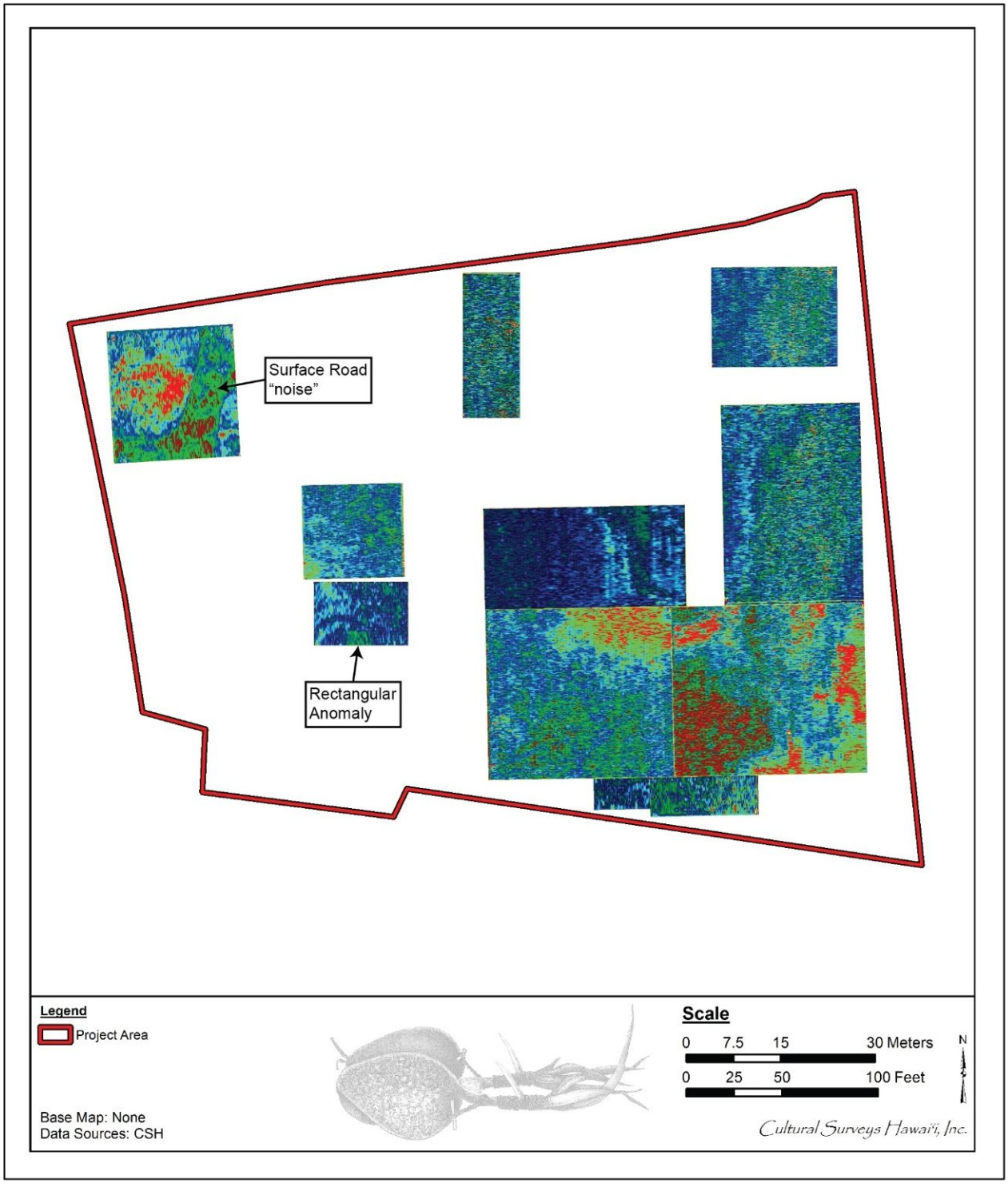

Figure 13. GPR 150 cm scan depicting a rectangular anomaly (also seen at 100 cm, 125 cm, and 150 cm); interference ("noise") from the surface road is projected deeper in the GPR profile and visible



Figure 14. Overview of GPR Grid 6 showing a soil swale (marked by green vegetation) extending from a possible buried culvert (left, background), view to northwest



Figure 15. Close-up view of possible buried culvert at the upslope (mauka) end of the soil swale, view to northwest

Section 4 Analysis and Interpretation

Given what is known regarding history and chronology of Wailuku Ahupua‘a, and given the findings of nearby archaeological studies, evidence for a variety of pre-contact traditional activities and historic era use may be found within the current project area. These activities include both pre-Contact and historic era permanent and temporary habitation, traditional agriculture (both wetland and dryland), and animal husbandry. As the current project area borders the Kaahumanu Church and cemetery, it is also possible that historic era human interments may extend into the easternmost extent of the current project area.

The GPR survey identified a possible filled ditch that may have functioned as a water diversion for agriculture/animal husbandry or may have been constructed as a drainage to divert water away from the historic buildings on the parcel. The function or origin of the remaining five subsurface anomalies cannot be determined.

GPR survey grids were placed along the eastern boundary of the project area, nearest to Kaahumanu Church in an effort to inspect for any subsurface anomalies that could be attributed to historic era human interments. There were no subsurface anomalies identified along the eastern boundary of the project area that border the historic Kaahumanu Church belfry or cemetery plot (GPR Grid 1 and 8). The nearest anomaly to the eastern boundary is a rectangular anomaly that measures approximately 9.7 meters (31.8 feet) long by 3.3 meters (10.8 feet) wide and is located approximately 6.3 meters (20.7 feet) west of the eastern project area boundary (GPR Grid 3). The dimensions of this anomaly are not characteristic of an excavation associated with a historic human interment.

The seven sections of buried metal utility pipes that were observed during the GPR survey are likely related to historic habitation, but may also have played a role in historic agriculture or animal husbandry.

The six GPR anomalies and seven utility pipes were traced in ArcGIS so that they could be superimposed on historic maps allowing for potential correlation with historic structures. In general, historic maps of the project area did not provide much evidence of the origin or function of the GPR anomalies in the survey area, but are nonetheless useful in documenting land use within the project area over time.

An early drawing by Richard Armstrong’s daughter, Caroline, that is presently on display within the Alexander House depicts a garden with sugarcane, pond fields (lo‘i), possible irrigation ditches (auwai) and outbuildings surrounding the Alexander home (Figure 16). This perspective drawing cannot be used to correlate with the subsurface anomalies identified during the GPR survey, but suggests that remnants of buried agricultural deposits, walls, or other earthen features may be present within the project area.

An 1882 Monsarrat map of a portion of Wailuku (RM 1261) depicts the W. R Alexander home fronting Main Street and a small, possibly fenced, structure in the southeastern corner (Figure 17). Two of the six subsurface anomalies are located within or immediately adjacent to the fenced structure. Additionally, one of the metal pipe utility lines extends to the location of the former structure. Two other metal utility pipes are located in the front and back of the Alexander house.



Figure 16. Photograph of an early drawing by Richard Armstrong's daughter, Caroline, that is presently displayed within the Alexander House (courtesy of Maui Architectural Group)



Figure 17. Portion of the 1882 Monsarrat map of Wailuku (RM 1261) depicting the location of the six subsurface anomalies (teal) and seven metal utility lines (yellow) that were identified within the GPR survey area

There is no evidence of the (filled) ditch or other anomalies that are located in the central portion of the project area

A 1936 house numbering system map depicts several structures in the project area (Figure 18). None of the anomalies are correlated to these structures. One metal utility pipe extends east from the Parsonage.

A 1958 map showing properties adjoining Kaahumanu Church and a 1964 road widening project map do not provide any correlation to the six subsurface anomalies (Figure 19 and Figure 20). One metal utility pipe extends east from the Parsonage and another appears to extend east from the sidewalk that connects the Parsonage to Aupuni Street.

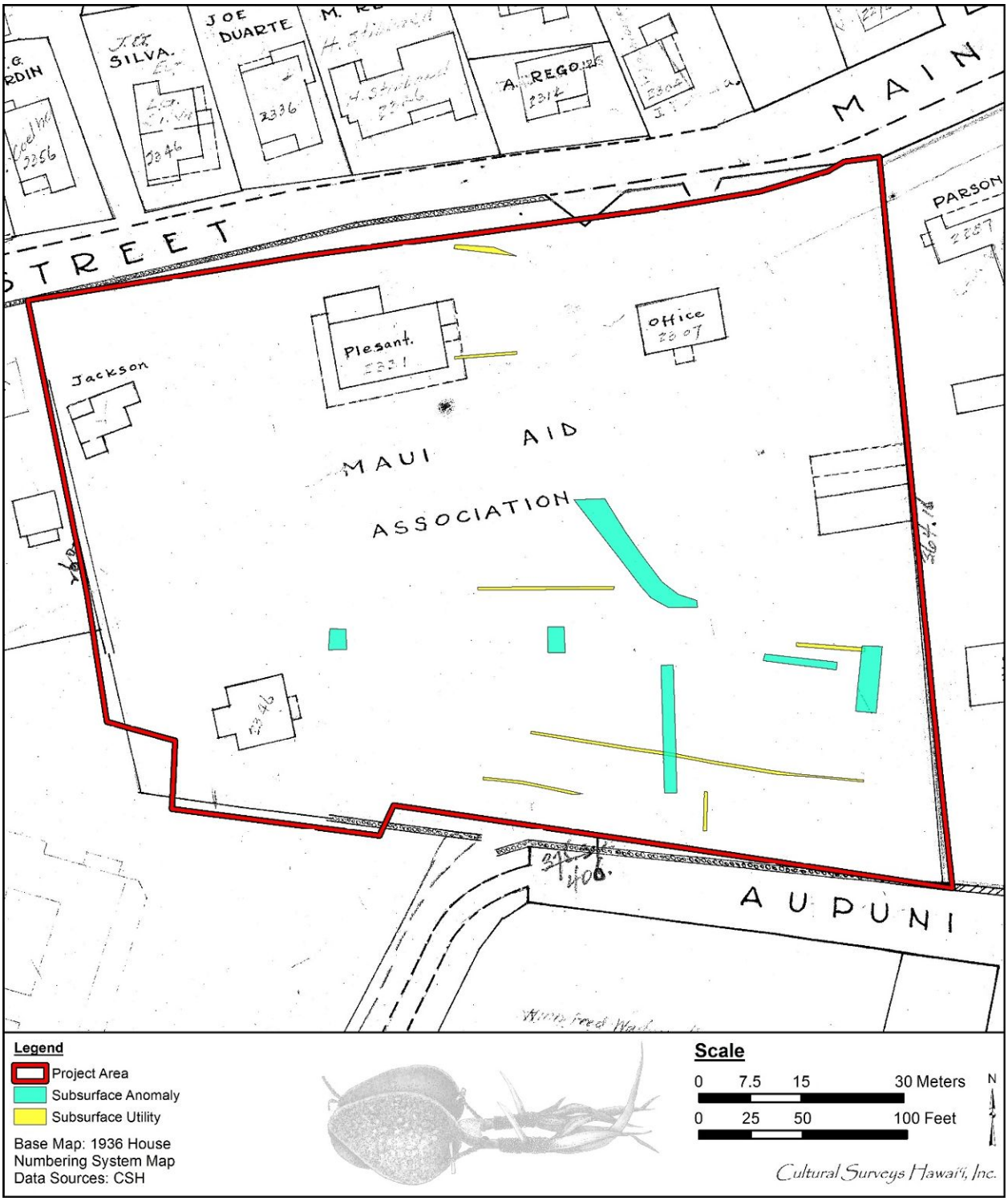

Figure 18. Portion of the 1936 house numbering system map depicting the location of the six subsurface anomalies (teal) and seven metal utility lines (yellow) that were identified within the GPR survey area

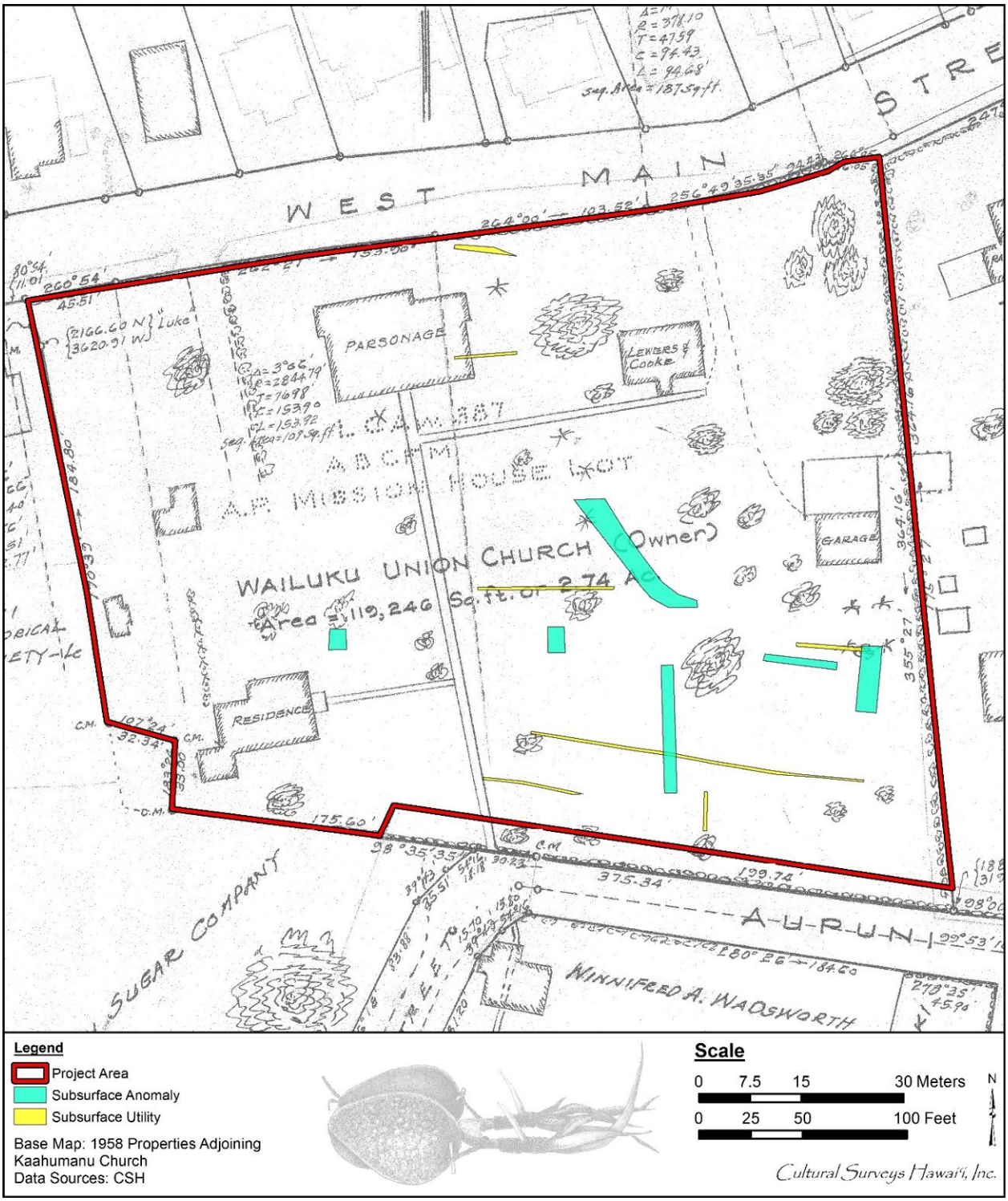

Figure 19. Portion of the 1958 map showing properties adjoining Queen Kaahumanu Church depicting the location of the six subsurface anomalies (teal) and seven metal utility lines (yellow) that were identified within the GPR survey area

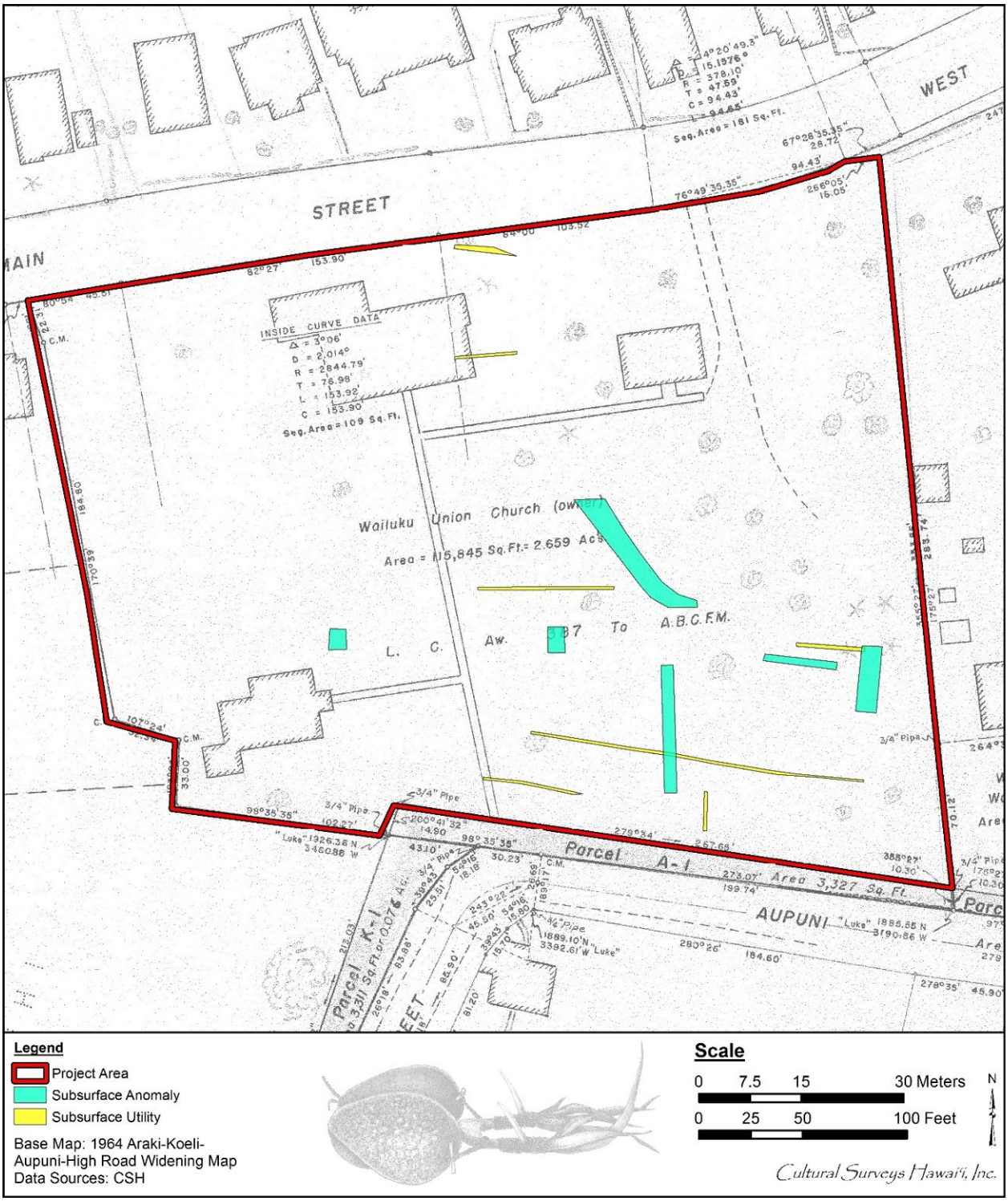

Figure 20. Portion of a 1964 road widening project map depicting the location of the six subsurface anomalies (teal) and seven metal utility lines (yellow) that were identified within the GPR survey area

Section 5 Conclusion and Recommendations

A review of background information of the area did not provide additional information regarding the age, origin, or function of the six subsurface anomalies that were identified during this GPR survey. Five of the anomalies appear as rectangular or linear subsurface objects with no correlation to previous extant structures or objects. Additionally, there is no clear patterning of these anomalies that would suggest type or function. One anomaly was identified as a possible filled ditch based on a combination of the GPR data and pedestrian survey evidence. The age of the filled ditch is presently unknown, however, the associated possible buried culvert appears to be older than 50 years.

It should also be noted that GPR cannot reliably locate all subsurface historic properties (any building, structure, object, district, area, or site over 50 years old), particularly those properties that are small or those with a similar structure or density to the surrounding soil matrix. This is especially true within the current project area, which is located in an area that was designated as low to moderate suitability for the use of GPR by the NRCS. If additional information regarding the age, origin, or function of the six subsurface anomalies is required, ground truthing, in the form of subsurface excavation is recommended in order to expose and document these anomalies.

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U.S. Geological Survey

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Appendix F

SHPD Ground Penetrating Radar Review Letter

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April 30, 2018

IN REPLY REFER TO:
Log No. 2018.00561
Doc No. 1804MBF07
Archaeology

Trevor Yucha, Project Manager
Cultural Surveys Hawai'i, Inc.
1860 Main Street
Wailuku, HI 96793
TYucha@culturalsurveys.com

Dear Mr. Yucha,

SUBJECT: **Chapter 6E-42 Historic Preservation Review –**
Draft Ground Penetrating Radar Survey Report for the
Development of the Mission Grounds at Wailuku Union Church
Wailuku Ahupua'a, Wailuku District, Maui Island
TMK: (2) 3-4-014:005

Thank you for the opportunity to provide comment on the subject report, *Draft Ground Penetrating Radar Survey Report for the Development of the Mission Grounds at Wailuku Union Church; Wailuku Ahupua'a, Wailuku District, Maui Island; TMK: (2) 3-4-014:005* (Yucha and Hammatt, June 2017). The State Historic Preservation Division (SHPD) received the draft report on March 5, 2018.

The project area includes the entirety of TMK: (2) 3-4-014:005 and is bounded by Main Street to the north, Aupuni Street to the south, Ka'ahumanu Church grounds to the east, and the Old Bailey House grounds to the west. Most of the project area consists of open lawn surrounding historic structures of Maui Historic District No. 3, and circa 1920s residences that are not currently associated with any historic district. The proposed project includes the construction of a community center building, a preschool building, three multi-unit residential buildings (20 total residential units), and an access road and parking lot with approximately 80 stalls. The project area is 2.67 acres.

SHPD records indicate that proposed repairs to the Baybrook House, which is located on the subject parcel, triggered a National Historic Preservation Act (NHPA) - Section 106 review, which resulted in a finding of no adverse effect to the historic property. The effect determination given at the time was "no historic properties affected" (September 11, 2015; Log No. 2015.03267, Doc No. D1509AB04). Additionally, an archaeological inventory survey (AIS) was completed for the eastern portion of the subject parcel in advance of a different project (Lee-Greig et al. 2015). The SHPD did not review that AIS.

In scoping for this project, the proponent retained Cultural Surveys Hawai'i, Inc. (CSH) to conduct a geophysical investigation of the property using ground-penetrating radar (GPR). The geophysical survey method is often used as a noninvasive technique of archaeological prospection. The subject GPR survey area included 1.08 acres (4,364 m²), approximately 40 percent of the project area.

The report indicates that the project area is considered low to moderately suited for GPR survey, per the Natural Resources Conservation Services (NCRS) Ground-Penetrating Radar Maps of Soil Suitability (GPR Suitability). The most significant performance limitation of GPR is attempting to conduct survey among high-conductivity materials, such as water-trapping clay and mineral-rich soil, like soil with a high concentration of sodium chloride

(salt). Performance is also limited by signal scattering in heterogeneous conditions, like rocky soils. Environments with high rates of signal attenuation interrupt wave penetration and can limit the suitability of GPR.

However, it appears from the GIS visualization in the report, the soil suitability map for Maui was digitized from an image and incorporated with CSH's GIS database. An image of the GPR Suitability for Hawaii at 1:900,000 scale was superimposed on a 1:24,000 scale USGS quadrangle map of a portion of Maui. The visualization produced the appearance of a raster-like, continuous surface indicating low-to-moderate suitability for GPR in the project area. Yet, the layout is misleading because measurements in the overlay are not precise due to some inescapable errors when deriving GIS modeling data and visualizing it in this way.

The first introduction of error is assumption-based. The NRCS process for creating soil suitability maps involves capturing attribute data contained in the State Soil Geographic (STATSGO) and the Soil Survey Geographic (SSURGO) databases to develop thematic maps showing (with varying scales and resolution), the relative suitability of soils for GPR within broadly defined soil and physiographic areas. These maps are created with vector data products, and are known as area class maps that show a feature class at every point. In general, soil maps rightly suggest that feature class is uniform across broad areas, but soil changes are not abrupt. There is wide variation within discrete areas, particularly in island environments like Hawaii.

While such small-scale maps might be considered "accurate," there is often distortion across zones of transition. A zone of transition (or border) between suitability classifications should not be assumed "precise" on large-scale maps, such as USGS quadrangles. One must match the appropriate scale to the level of detail required in the project. And enlarging a small-scale map does not increase its level of accuracy or precision. In fact, enlarging a small-scale map has the opposite effect. The quality of layered GIS data is proportional to differences in scale and projection.

The second introduction of error is inherent to the process of digitizing. Digitizing is a common procedure used for the construction of geodatabases. There is a great deal of geographic information available in formats that cannot be immediately integrated with spatially-referenced GIS data. These days, "heads-up" digitizing is the preferred method for converting geographic data in an image to coordinate point, line, or polygon data. To use geographic information that is not spatially referenced, it is necessary to align it with existing data in a process called georeferencing. Georeferencing is a necessary step in the digitization process. It is helpful to recognize that manually georeferrncing spatial data introduces positional error because of inconsistences among data sources. It is important to describe the uncertainty of positional error with measures such as *root mean square error* (RMS). The RMS is a measure of the difference between locations that are known and locations that have been digitized. When making assumptions about the spatial accuracy of derived data products, consider including RMS in the map legend.

The project area appears to be very close, if not within, multiple zones of transition between low, moderate, and high suitability for GPR applications. It is not clear as to the true nature of soil suitability for GPR in the project area. But from the report, regardless of assumed suitability, the GPR survey was successful.

The subject GPR survey identified six subsurface anomalies within the survey area. Five of these anomalies were identified as rectangular or linear objects that were easily distinguished from the surrounding soil matrix. The technician's report indicates that no other information could be determined about these subsurface anomalies other than location and approximate depth. Yet, that is expected, as other information is rarely derived from GPR survey. The GPR hyperbola, as read in the profile output, do not provide information about what an anomaly is. Raw data only indicate that the radar waves did not penetrate something under the surface, hence the term "anomaly." Post-processing of reflection signatures lead to more specific information about detectable subsurface anomalies.

The use of GPR in isolation is not always useful for identifying anthropogenic anomalies in such environments. Most scholars in the field of archaeological geophysics now agree that using a combination of geophysical instruments leads to more reliable data. The integration of GPR with one or more other sources, such as electrical resistance, electromagnetic conductivity, gradiometry, or magnetic susceptibility, can improve predictive models.

The results presented in the report provide information about location and depth of six anomalies. The survey helps to establish the probability of encountering buried archaeological features across the project area. Once the relevant permit application and design plans are forwarded to SHPD for review, recommendations will be better informed.

Pursuant to HRS §6E-42(a), *Review of Proposed Projects*:

> Before any agency or officer of the State or its political subdivisions approves any project involving a permit, license, certificate, land use change, subdivision, or other entitlement for use, which may affect historic property, aviation artifacts, or a burial site, the agency or office shall advise the department and prior to any approval allow the department an opportunity for review and comment on the effect of the proposed project on historic properties, aviation artifacts, or burial sites, consistent with section 6E-43, including those listed in the Hawaii register of historic places.

You may contact Dr. Matthew Barker Fariss at matthew.b.fariss@hawaii.gov, or at (808) 243-4626, for any questions regarding this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Lena Morita, Church Moderator
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Michael J. Summers, MURP, President
msummers@planningconsultantshawaii.com

Appendix G

Reconnaissance Level Survey

Reconnaissance Level Survey Report for Wailuku Union Church Mission Grounds Housing Project Wailuku, Maui, Hawai'i

Wailuku Union Church
Wailuku Mission Grounds Housing Project
HICRIS Project Number 2018PR26759

Prepared by MASON under contract to
AMA/AE, Architecture and Environment

September 2024



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Introduction

Mason Architects, Inc. (MASON) was hired as a consultant to AMA/AE to develop a Reconnaissance Level Survey (RLS) of the Wailuku Union Church Mission Grounds. This survey was prepared in response to the State Historic Preservation Division's (SHPD) HRS 6E-42 review of the proposed Wailuku Union Church Mission Grounds Housing project, HICRIS Project Number 2018PR26759, and request for an RLS. MASON surveyed the Mission Grounds primary buildings and structures [TMK: (2) 3-4-014:005], the Wailuku District 3 buildings and structures, and the buildings and structures within an approximate 150-foot radius surrounding the Wailuku Union Church Mission Grounds. These resources were then evaluated against Hawaii Administrative Rules (HAR) §13-275-6 significance Criteria a-d. (Appendix A)

Of the 41 resources studied for this report, 28 were found to be listed on the Hawai'i and National Register of Historic Places (NRHP) or evaluated as eligible and meeting HAR §13-275-6 significance criteria, either individually or, for the surrounding residential properties, as part of a potential historic district.
The resources surveyed were grouped and evaluated follows:

- Resources within the Mission Grounds
    - Of the four (4) resources within the project area, three (3) were evaluated as significant and one (1) does not meet the HAR significance criteria.
- Resources within the Wailuku District 3
    - Of the 15 resources surveyed within the District 3 (not including the above Mission Grounds resources), six (6) resources are significant and currently listed on the Hawai'i and NRHP, five (4) were evaluated as significant and potentially eligible for individual listing and as contributing resources to the District 3; two (3) were evaluated as significant and contributing to the historic district but not individually eligible; and two (2) were evaluated as non-historic properties and not meeting the HAR significance criteria.
- Resources within the Wailuku Civic Center District
    - All four (4) resources in the District are currently listed on the Hawai'i and NRHP. Note: The Old State Building is part of the Civic Center District but is located within the Wailuku District 3.
- Resources along Main Street within the 150-foot survey zone
    - Of the 14 resources surveyed, six (6) were evaluated as significant and potentially eligible for individual listing and as part of a potential historic district; one (1) was evaluated as significant and as part of a potential historic district but not individually eligible; and seven (7) were evaluated as non-historic properties or not meeting the HAR significance criteria.
- Resources along Aupuni Street within the 150-foot survey zone
    - Of the four (4) resources surveyed, only one (1) was evaluated as significant.

Project Objectives

This RLS is intended to fulfill historic property identification and significance evaluation requirements for HRS Chapter §6E-42 review of the proposed Wailuku Union Church Mission Grounds Housing project. The RLS was requested by the SHPD in an email correspondence to MASON on 9 May 2022 that stated:

> *The proposed project impacts the entire Wailuku Historic District, as so I would like to see all the eligible buildings in the historic district included in the survey. In addition, the proposal may impact historic properties located outside the historic district. Suggest mapping a 150 ft. buffer (actual distance TBD) around just TMK 2-3-4-014-005 to identify historic buildings that are within the border but outside the historic district.*

Maui County Cultural Resource Planner reiterated the inclusion of a 150-foot buffer survey area in a May 2022 email.

Methodology

MASON developed the list of properties to survey/evaluate (Table 1) for this RLS based on the Wailuku District 3 map and TMK plat maps of the surrounding area. Also included in the survey are site structures and objects.

On June 17, 2022, Angie Westfall of MASON conducted fieldwork at the site to document the resources. Research was later undertaken to develop the historical context. Ms. Westfall meets the Secretary of the Interior's historic architect and architectural historian professional qualification standards.

Referencing fieldwork notes, MASON archives, on-line research, HABS and NRHP documentation, and the Historic Architectural Survey of Wailuku Maui (Duensing, 1993) provided by the Maui County Cultural Resource Planner, MASON evaluated the significance of individual resources, the district, and its surroundings against HAR §13-275-6 Criteria a-d. (Note: MASON did not evaluate the resources for Criterion "e", "having important value to the native Hawaiian people or to other ethnic group" because MASON is not qualified or scoped to undertake this work.)

Boundary Explanation and Justification

The project area surveyed is the entire Wailuku Historic District 3 (Figure 1), located generally at 2307 Main Street, Wailuku, Maui, Hawaii 96793, and the areas immediately surrounding the district. The proposed Wailuku Union Church Mission Grounds Housing project is located wholly within TMK: (2) 3-4-014:005 and is wholly contained within the Wailuku Historic District 3 (Figure 2). The area of potential effect, as prescribed by SHPD, includes the entire district and the residential areas within a 150-foot radius as shown in Figure 3.

This district designation is a Maui County planning and preservation tool, established by ordinance in 1966. The district is currently not listed on either the State or National Register.

Setting

The Wailuku Union Church Mission Grounds, within the Wailuku Historic District 3, is located on the western end of Wailuku at the top of Main Street, between Main, High, and Aupuni Streets. The area surveyed is located within the ahupua'a of Wailuku and the moku of Pu'ali Komohana.

The Wailuku Union Church Mission Grounds property covers 2.66 acres and contains four buildings, three of which have previously been documented by their own RLSs. (Appendix B) The fourth, the William & Mary Alexander House (Parsonage), considered the oldest building in Wailuku, is individually eligible for the National Register of Historic Places and has had previous HABS documentation (HABS HI-46)[1] (Figure 4).

The property slopes gently down to the east, towards town, and is surrounded on the north and south sides by residential neighborhoods. To the east is the historic Wailuku Civic District. Access to the district site is from various driveways on the north and south sides. The site includes wide open grass and dirt spaces with many shade trees. Near the east end of the district is a portion of the Kama ditch and aqueduct. Low, rock wall terraces are located at various spots within the district, and a small cemetery surrounded by a rock wall is located near the corner of Main and High Streets. There are three asphalt paved parking areas within the district: at Bailey House, Ka'ahumanu Church, and at the Little Theater/Old State Building.

[1] On-line sources seem to indicate that the 1966 documentation of the house included only photography.

Wailuku Historic District 3 Boundary

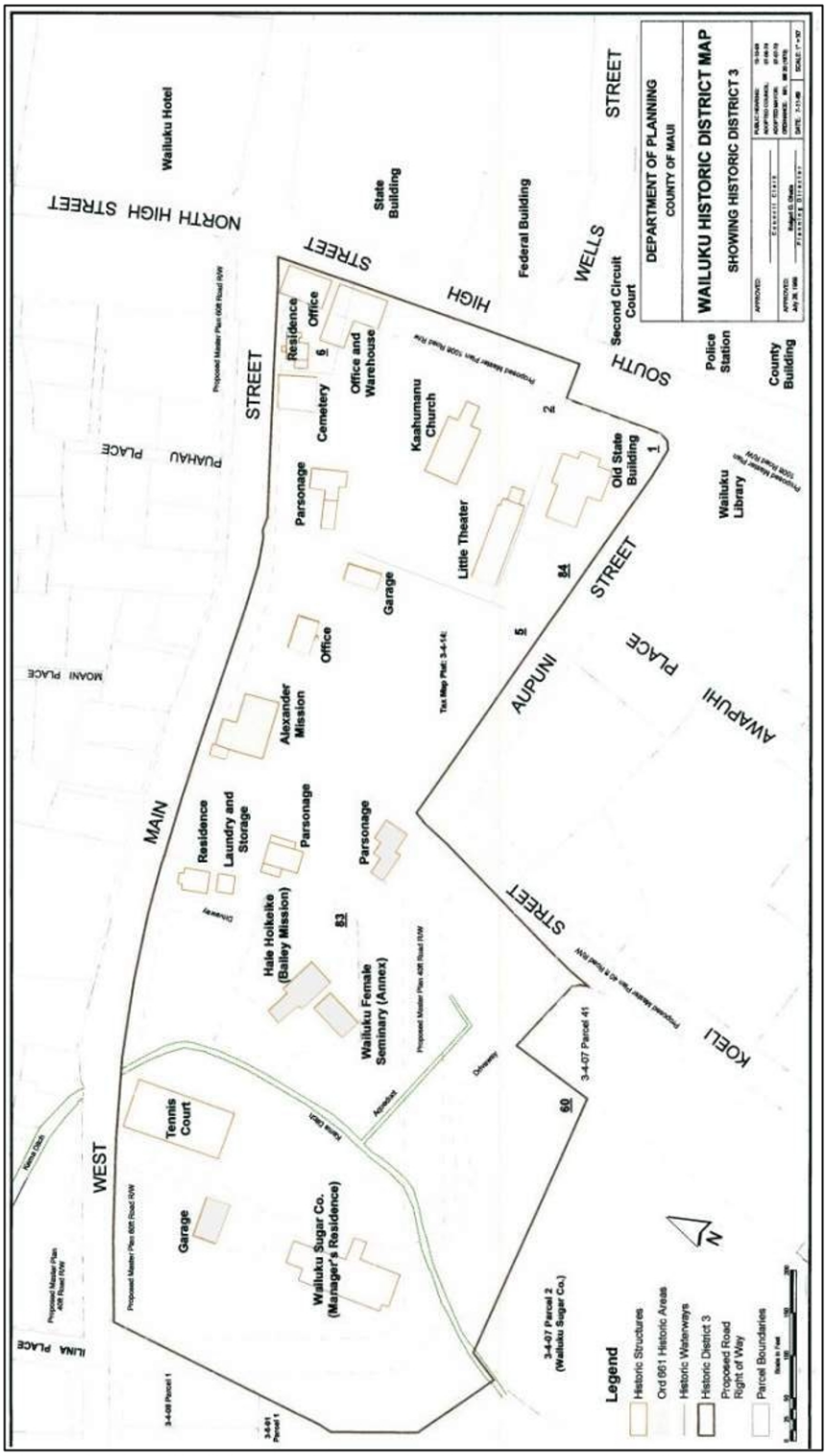

Figure 1: Wailuku Historic District 3. Source: County of Maui

Project Area Map

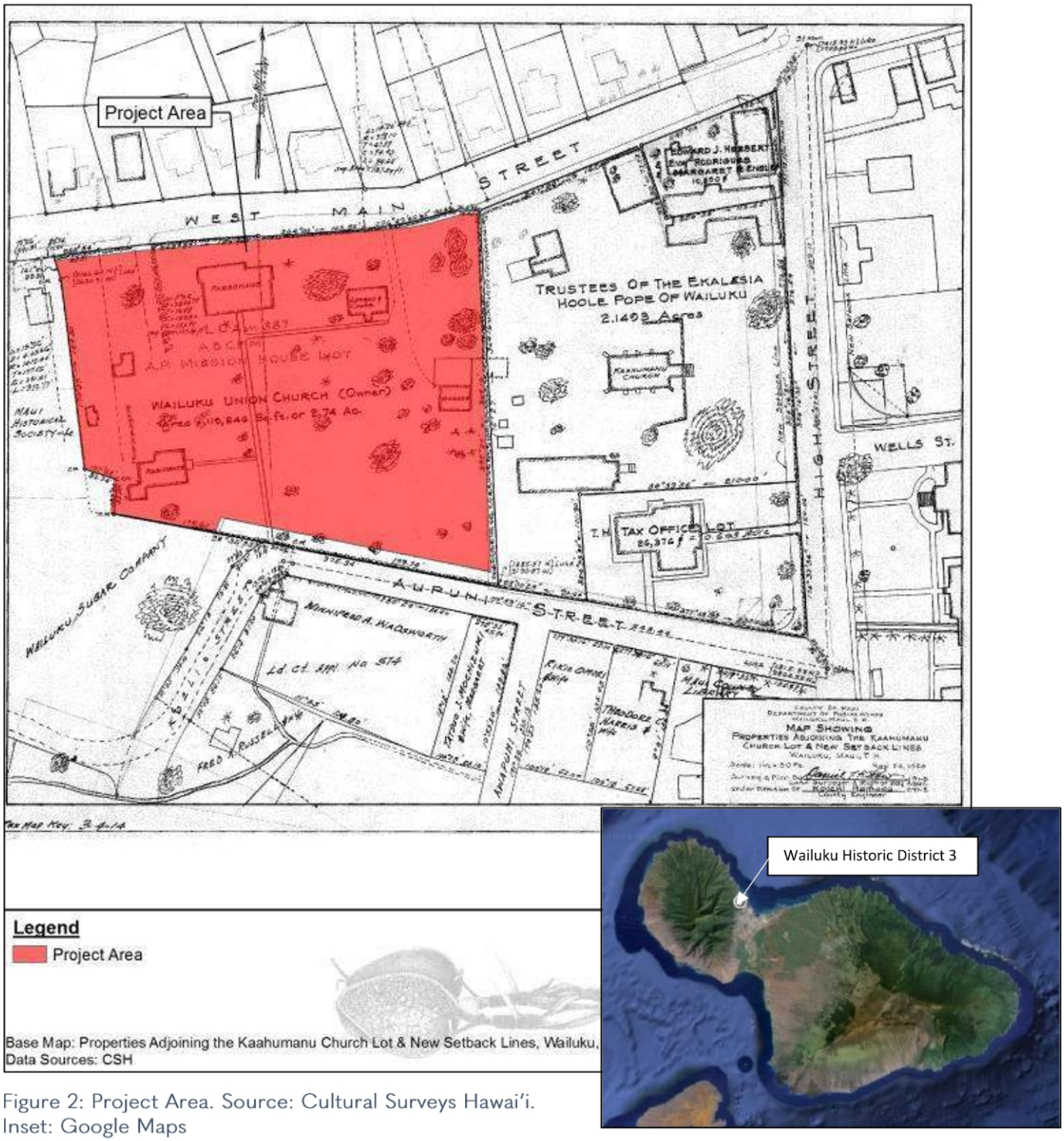

Figure 2: Project Area. Source: Cultural Surveys Hawai'i.
Inset: Google Maps

RLS Study Area Boundaries

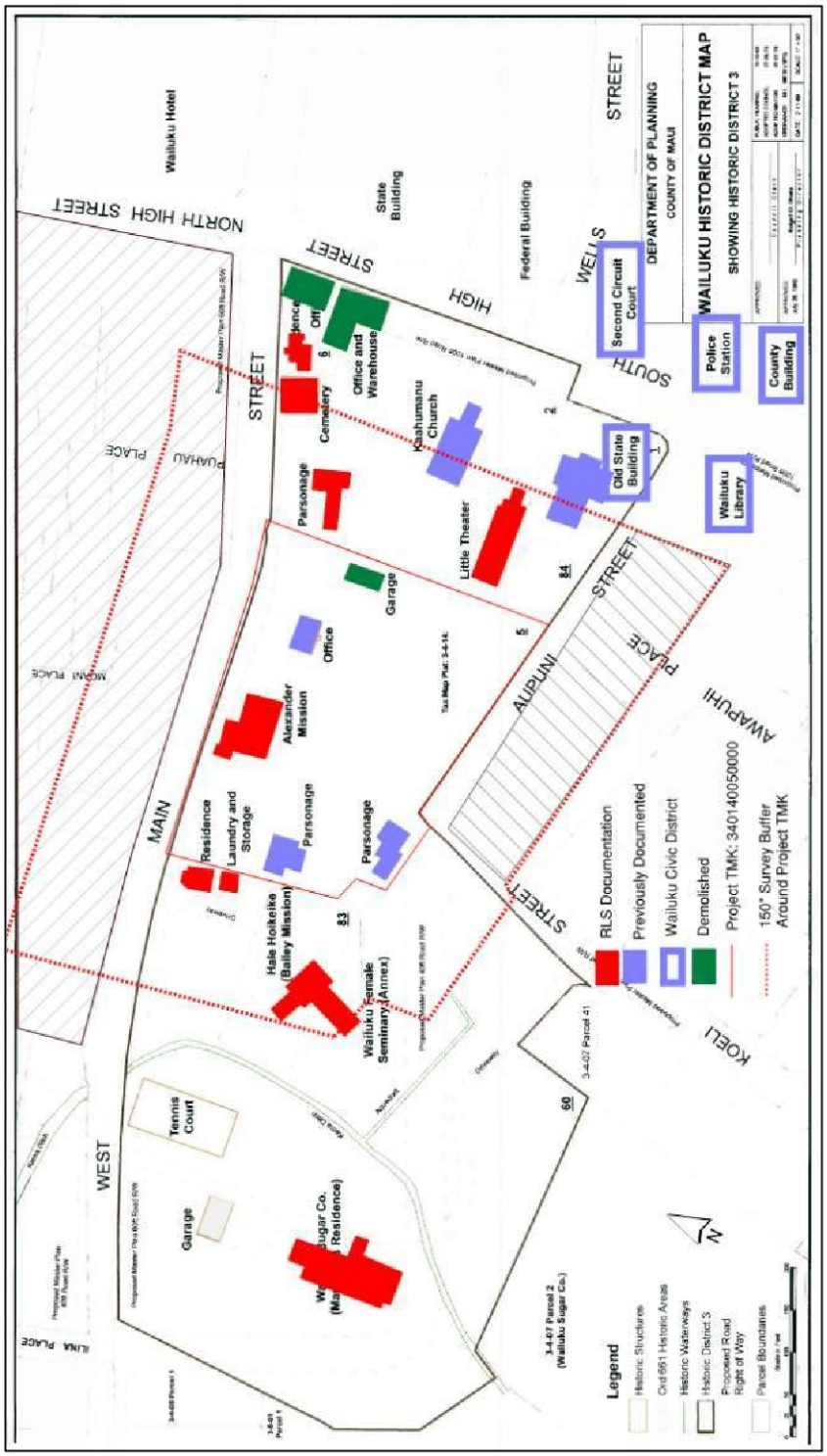

Figure 3: RLS Study Area Boundaries. Source: Co. of Maui, with boundary information added by MASON.

Historical Background

The Wailuku District 3 and its surrounding area was once a thriving Hawaiian settlement and the grounds of the royal compound of King Kahekili II, Maui's last ruling chief. The name Wailuku, which means "water of destruction," came from an epic battle fought in 1790 in the nearby ʻĪao Valley. In this battle King Kamehameha I defeated the army of Maui in his bid to unite the Hawaiian Islands.[2]

Missionaries first arrived in Wailuku in 1832, sent by the American Board of Commission of Foreign Missions (ACBFM) and land was provided by the Maui chiefs for the purpose of establishing a missionary station.[3] The land was officially granted to the American Board of Missions in 1836 through Land Commission Award (LCA) 387.

Reverend Jonathan S. Green was sent to Lahaina by the ACBFM in 1928 as part of the third company sent by the organization and was transferred first to Hilo and then to Wailuku in 1833. Green at first held church in the open air and later in a shed building that was in turn followed by a large, thatched roof meeting house. It was said that as many as 3000 worshipers could be in attendance at services.[4] It was around this time that Queen Kaʻahumanu, a Christian convert, asked that the church be named after her. It wasn't until the construction of the current church in 1876 that her wish was honored, over 40 years later.

Reverend Richard Armstrong was sent to Wailuku in 1836 to replace Green. In 1840 Armstrong supervised the construction of a new stone church with a thatched roof to meet the need for a better and larger church. By the late 1830s, Armstrong was growing sugar in Wailuku and shortly thereafter (about 1840) two of his church members began a commercial sugar operation.

Wailuku Female Seminary began in 1837 and was the first female school begun by the Hawaii missionaries. Jonathan Green was named the headmaster, and his wife Theodosia and Miss Maria Ogden were the first teachers. Green became an independent pastor around 1843 and founded a church in Makawao on land donated by King Kamehameha and where Green preached sermons in Hawaiian.

Following Green's tenure at the seminary school was Edward Bailey and his wife Caroline. By 1849 the Seminary lost its church funding and closed. Bailey purchased the school and the adjacent residence, Bailey house, which was the family home until 1888. The seminary was converted into a day school for Hawaiian boys and girls on a tuition basis until its closure in the mid-1850s. During this time Bailey also resigned from mission work and began a small sugar plantation that was to become part of the Wailuku Sugar Company. Bailey designed and built a water-powered mill at

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[2] George Engebretson, *Exploring Historic Wailuku, Small Town Series Maui*, Watermark Publishing, 2000. P2.
[3] Dawn E. Duensing. *History Commerce and Architecture in Wailuku (Appendix A). Wailuku Redevelopment Area Design Guidelines*, Maui County Planning Department, Wailuku, HI, January 2006. P64.
[4] Gary Cummins, *Kaʻahumanu Church National Register of Historic Places Nomination Form*. US Department of the Interior, National Park Service. 1975.

the mission house for grinding wheat and sugar.[5] The remnants of the ditches and aqueduct for the demolished mill are extant on the property.

William Alexander became the church in pastor in 1857 and began petitioning for a new church building as early as 1866. It wasn't until 1872 that fund-raising efforts were undertaken by William Pulepule Kahale, the first Native Hawaiian pastor in the church. The current Ka'ahumanu Church, the fourth on the site, was built in 1876. Edward Bailey, who had become the manager of Wailuku Sugar Company, supervised the construction. In 1884 the clock tower was added with money donated by Bailey.[6] Maui County officials designated the clock in Ka'ahumanu Church as the "Town Clock" in 1964.

The Wailuku Sugar Company began its operations in 1862. Controlling interest was gained by C. Brewer & Company in 1877. An 1867 court case brought by the Wailuku Sugar Company set the precedent for ownership of water rights. Under Hawaiian law, the chiefs controlled the use of water, but this case said landowners held the rights to water on their land and broke the Hawaiian shared water tradition. The ruling did not stop further waster disputes between competing plantations but did lead to the rapid expansion of the sugar industry and the subsequent growth of population in central Maui.[7,8]

The establishment of the Wailuku Sugar Company in 1862 led to the rapid expansion of the small town of Wailuku, which became very prosperous and was named the county seat. The public buildings within the Wailuku Civic Center District represent the built expression of this prosperity. The Wailuku Civic Center District remains the center of Maui County's government activity and was named to the National Register of Historic Places in 1986. Prominent architects associated with the Wailuku Civic Center District include the following.

Charles W. Dickey
Dickey's Maui work spanned from approximately 1896 to 1939. The Wailuku Library and the Territorial Office Building, both contributing resources to the Wailuku Historic Civic District, remain two of his important governmental commissions. Dickey designed many buildings on Maui that included private and public, residential, and commercial commissions. Other Maui buildings include the Baldwin Bank (built in 1931 in Kahului), the Wailuku Sugar Company Manager's House (built in 1936 and part of the Wailuku Historic District 3), several residences for members of the Baldwin family, and Hāmakuāpoko School ("Old Maui High School", 1921). The Wailuku Public School (1904) was one of Dickey's earliest commissions on Maui and is probably his earliest surviving building on the island. Dickey is recognized as one of Hawaii's most distinguished architects; his work on Maui is only a small part of his prolific contributions to developing a Hawaiian regional style of architecture.

[5] Kuykendall, The Hawaiian Kingdom, Vol. I, 180; Missionary Album, 34-35; E. E. Pleasant, "Maui 100 Years Ago," Maui News, March 26, 1941.
[6] Gary Cummins, *Ka'ahumanu Church National Register of Historic Places Inventory – Nomination Form*. US Department of Interior, National Park Service. 1975.
[7] Dawn E. Duensing. *Historic Architectural Survey of Wailuku, Maui, Hawaii.* County of Maui, January 1993. P4.
[8] Carol Wilcox. *Sugar Water: Hawai'i's Plantation Ditches*. University of Hawai'i Press, 1996. P122.

H.L. Kerr
Kerr worked in Hawai'i during the early part of the 20th century and was responsible for the design of over 900 buildings, primarily small commercial buildings in Honolulu. His more notable work included the Yohkohama Specie Bank (1908), and McKinley (Linekona) School (1908). In both Linekona and the Maui County Courthouse (1907), Kerr employed the use of concrete masonry units (CMU) faced to look like dressed bluestone. The CMU used for the Maui County Courhouse were cast on island from forms made specifically for the project.

William D'Esmond
D'Esmond was a prolific Maui architect practicing in the early to mid-20th century. His commissions included the Lahaina Courthouse remodel (1925), Paia Elementary (1926), contributor to the Hāna Belt Road (1900-1947), along with many residences.

Identification of Historic Resources

In the section that follows are photographs and descriptions of each of the individual resources surveyed within the Study Area, along with a short individual history.

The resources are presented as follows:

- Resources within the Mission Grounds
- Resources within the Wailuku District 3
- Resources within the Wailuku Civic Center District
- Resources along Main Street within the 150-foot survey zone
- Resources along Aupuni Street within the 150-foot survey zone



Figure 4: William and Mary Alexander House, HABS HI-46. Photo by Jack E. Boucher, July 1966.

Wailuku Union Church Mission Grounds

William & Mary Alexander Parsonage (TMK: 340140050000)



Figure 5: Alexander House *Source: MASON, 2022*

Description

The Alexander House is large rectangular two-story, home. The building is located along Main Street, but its primary façade faces the opposite direction, looking out to the south onto the open area of the Mission Grounds. The first floor of the building is constructed of field stones with walls twenty inches thick. The second story gable ends are sheathed in horizontal clapboards. The dominant feature of the house is its steeply pitched side gable roof with two gabled dormers. The home is surrounded on three sides by a porch that is covered by a hipped roof extension that transitions to a lower pitch at the exterior walls. On the east gable end is a second story porch with a shed roof. The exterior of the building retains significant integrity and appears today the same as it did in vintage photos and drawings. The surrounding barren landscape though, is much changed. Old photos, drawings, and descriptions show very verdant lush grounds.

General History

The Alexander House was built in 1836 for the Reverend Armstrong and family who resided in the home for four years before moving to O'ahu, where Reverend Armstrong replaced Hiram Bingham as the pastor of Kawaiaha'o Church. Reverend Alexander and his family resided in the house from 1856 to 1884 when they left Wailuku for California. Reverend Bailey owned the house for a few years after that until it became the property of Emily (Alexander) Baldwin, the Alexander's daughter. Mrs. Baldwin, in 1919, deeded the property to the Maui Aid Society for use again as a parsonage. The house is considered the oldest residence in Wailuku and is currently being used as offices.

Baybrook House (Maui Aid Association) (TMK: 340140050000)



Figure 6: Baybrook House *Source: MASON, 2017.*

Description

Baybrook House is rectangular in plan with a small outset stoop and is approximately 1000 square feet. The structure is located at the northeast corner of the Wailuku Union Church grounds. A large open grassy area stretches to the south in front of the structure. Vehicular access is via a dirt and asphalt drive that enters the property along Main Street to the east of the office. The building is sited alongside the Alexander House, which is directly to the east along Main Street. Baybrook House is of single wall construction and is elevated on a post and pier foundation. The one-story structure has a side gable with a shallow overhang with closed eaves all around. The roof is currently sheathed in standing-seam metal roofing, but undated archival photos appear to show wood shakes. The exterior walls of the house are wide board and batten with flat two-inch battens. The tall rectangular windows are original wood double-hung arranged symmetrically around the building. The front (south) elevation has a center entrance with two windows on each side. The tall ceilings throughout the building (approximately twelve feet in height) are wood tongue and groove boards and the floors, in all spaces except the bathroom, are original hardwood strip flooring.

General History

Baybrook House was built in 1909 as the offices for the Maui Aid Association and the Wailuku Union Church pastor. It is currently in use as a chiropractic office.

Kennan House (Parsonage 1) (TMK: 340140050000)



Figure 7: Kennan House *Source: MASON, 2024.*

Description

The Kennan House is L-shaped in plan with an additional semi-detached shed roof addition. It is approximately 1220 square feet with an additional 215 square feet for the addition. The house is located at the southwest corner of the Wailuku Union Church grounds. The house is accessed via a dirt and asphalt drive and a large open grassy area stretches to the east in front of the house. The house is of single wall construction and is elevated on a post and pier foundation. The main portion of the one-story residence has a side gable with a slightly rounded peak and a two-foot overhang all around. The gable is intersected off-center at the rear by a second gabled roof. Based on historic photographs, this intersecting L is likely original. The lower shed roof addition connects to the rear portion of the house near southwest corner. The walls and ceiling throughout the interior are vertical tongue and groove boards with a center V-groove. The living room does not have interior girts, while the dining room, three bedrooms, and bathroom all have interior girts at approximately four feet above the finished floor. The girts in the dining room and in two of the bedrooms have been trimmed-out to be decorative while the ones in the other remaining spaces are simple 2 x 4s.

General History

Built in 1928, the house is currently named after Rev. Robert E. Kennan who was pastor at Wailuku Union Church from 1941 to 1947.

Iao Parsonage (Parsonage 2) (TMK: 340140050000)



Figure 8: Iao Parsonage *Source: MASON, 2017.*

Description
The house is rectangular in plan with a rectangular covered lanai along the front (east) elevation, and a semi-detached garage. It is approximately 1400 square feet, not including the lanai or garage. The house is located along the western boundary of the multi-structure parcel bounded by Main Street to the north and Aupuni Street to the south. A large open grassy area stretches to the east in front of the house. The house is accessed via a dirt and asphalt drive that enters the property along Main Street, west of the Alexander Mission House. The house is constructed of CMU with stucco exterior on a concrete slab foundation. The one-story residence has a hipped roof with a three-foot overhang all around. The shed roof garage connects to the rear portion of the house at the northwest corner. The interior of the residence is a typical ranch-style layout. Throughout the house the walls are exposed CMU at the exterior walls and wood stud with painted plywood sheathing for the interior partitions. The ceiling throughout the residence is canec and all the floors are vinyl composition tile (VCT).

Building History
Built in 1963, the Iao Parsonage, then known as Parsonage 2, was built on land donated to the Iao Congregational Church. The building was purchased in 2008 by the Wailuku Union Church. The ʻĪao Parsonage has been previously evaluated as not eligible for the NRHP.

Wailuku Historic District 3

Bailey House (Bailey Mission/Hale Hō'ike'ike) (TMK: 3401408300)



Figure 9: Bailey House. *Source: MASON, 2022.*

Description

The Bailey House is a three-story, lava stone structure with walls 20-36 inches thick. The main house measures approximately 30 feet by 20 feet and has a steep gable roof with ohia rafters. A stone porch on the front is covered by a wood deck above, and a small Juliet balcony is centered on the third level. The rear of the house is built into the site slope. Slightly uphill from the main living was a lava stone cookhouse, approximately 15 feet square, constructed shortly after the main portion of the house. An additional stone structure with a basement was built in 1837, sharing the south wall of the cookhouse. These structures were all connected in 1842.

General History

One of the first western-style houses in Wailuku, the Old Bailey House is a combination of four structures built between 1833 and 1850. It was built by Reverend Johnathan Green who also started the Wailuku Female Seminary, translated the bible into Hawaiian, and published the first book on the history Christian churches in Hawaii. In 1844 Edward Bailey took over as headmaster of the Seminary, helped design and build Ka'ahumanu Church, and founded a sugar plantation and mill that would become part of the Wailuku Sugar Company The Bailey House is one of the most intact examples of early missionary architecture remaining in Hawaii, with the buildings remaining essentially as they were in the mid-1880s. It is currently a house museum and archive, home to the Maui Historical Society.

Wailuku Female Seminary Dining Hall (TMK: 340140830000)



Figure 10: Annex Building. *Source: MASON, 2022.*

Description
Located to the west of the Bailey house is the Wailuku Female Seminary Dining Hall building. This single-story, plaster-covered lava stone building was the dining hall for the girls' seminary (no longer extant). The 16 x 42-foot building features a five-foot-wide wrap-around porch that is raised stone at the front with stone steps and a wood railing, and transitions to a grade-level porch at the rear due to the sloping site. The building has a "Hawaiian-style" double pitch roof with wide overhangs that shelter the porches. Wood double hung windows are located on the front and rear and have operable wood shutters.

General History
Wailuku Female Seminary Dining Hall was built in 1837 as an accessory building to the seminary. Wailuku Female Seminary was the first female school begun by the missionaries. Jonathan Green, his wife Theodosia and Miss Maria Ogden were the first teachers, followed by Edward Bailey and his wife Caroline. By 1849 the Seminary lost its church funding and closed. Bailey purchased the school and the Bailey house and began a small sugar plantation that was to become part of the Wailuku Sugar Company. The Bailey House and the Dining Hall are now the Maui Historical Society's Hale Hō'ike'ike (House of Display). The museum features Hawaiian history, culture, and artifacts, along with paintings and furnishings from the 19th century.

Museum Restrooms (Utility Shed) (TMK: 340140830000)



Figure 11: Utility Shed *Source: MASON, 2022.*

Description
Located to the north of the Bailey house is rectangular utility building that houses restrooms for the Hale Hoikeiki Museum. This single-story, board and batten building is 12 x 26 feet and has a steeply pitched hip roof with wide overhangs. A stone walkway surrounds portions of the building.

General History
The shed is listed on the Maui County Tax Assessment website with a 1939 construction date. The Bailey House was in use as a residence during the sugar era when this building was likely built as either a garage or storage. The brief NRHP nomination for the Old Bailey House (1973) does not mention this building as a contributing resource. The building has undergone significant changes for its adaptive reuse.

Residence (2361 Main Street) (TMK: 340140830000)



Figure 12: Residence *Source: MASON, 2022.*

Description
The residence at 2361 Main Street is a single-story plantation style home with a hipped roof and front porch extension. It sits on a raised post and pier foundation and is of single wall construction with a single exterior girt. A detached garage structure is located at the rear (south) of the residence. The house is located along Main Street adjacent to the Bailey House, which sits behind.

General History
The house shares a TMK with the Bailey House but is not listed on the Maui County Tax Assessment website nor does it appear on Wailuku plat maps or the Historic Architectural Survey of Wailuku document (1993), therefore its date of construction is not available. The address was obtained from the number on the house itself. Both the house and the freestanding garage are shown on the Wailuku Historic District 3 map.

Wailuku Plantation Manager's House (TMK: 340140600000)



Figure 13: Wailuku Plantation Manager's House. *Source: MASON, 2022.*

Description

The Wailuku Plantation Manager's House is a large, sprawling, stucco-covered stone house designed in 1936 by C.W. Dickey. The two-story central portion features a large double-pitched hipped roof; often identified as a "Dickey roof." Extending from two story section is a wood-framed grand porte cohere with large square columns and a hipped roof. The second floor features a wrought-iron balcony across its length. Flanking the main body of the house are single story wings., also with "Dickey roofs." The roof of the left (south) larger wing extends to cover a porch area, while the right (north) wing is smaller and has shorter eaves and a hipped dormer. An expansive yard stretches out around the home and is dotted with large mature trees.

General History

The Wailuku Plantation Manager's House was not only the manager's residence but the social and administrative center for the Wailuku Plantation. It was one of Dickey's grandest homes of his later career. The Wailuku Sugar Plantation (originally named Bailey & Son's Sugar Plantation) was founded by Edward Bailey on lands he acquired after the closure of the Wailuku Female Seminary. The current residence is the second manager's residence to be built on this site. In recent years the house and grounds have been known as the Yokouchi Estate and is now being used as the Imua Discovery Garden, an educational venue for children.

Manager's House Pool and Pool House (TMK: 340140600000)



Figure 14: Residence *Source: MASON, 2022.*

Description
The pool and pool house building are sited in an open lawn area to the south of the Manager's House. The pool is rectangular and is surrounded by a paved deck. On the east (short) side of the pool is an arched pergola. The pool house, located on the south (long) side of the pool and connecting to the pergola, consists of three connected buildings, each with a pyramidal roof.

General History
The pool and pool house are later additions. The Maui County Tax Assessment website lists the construction date as 1992.

Wailuku Plantation Manager's Garage (TMK: 340140600000)



Figure 15: Wailuku Plantation Manager's House Garage. *Source: MASON, 2022.*



Figure 16: Wailuku Plantation Manager's House Tennis Court. *Source: MASON, 2022.*

Description

The Wailuku Plantation Manager's House garage was designed by CW Dickey in 1938 along with the main house and has the same detailing. The front of the two-car garage is sheathed in stone while the remainder of the building is wood framed. The double-sloped hipped roof has wide overhangs with open eaves. The garage, whose footprint is approximately 50 feet by 30 feet, is sited directly to the north of the house and is surrounded by asphalt paving.

General History

The Wailuku Plantation Manager's House garage is contemporary to the home and was also designed by CW Dickey. The tennis court that is shown on the Wailuku District 3 map is extant but has been abandoned.

Kama Ditch and Aqueduct (TMK: 340140600000)



Figures 17 and 18: Aqueduct and Kama Ditch *Source: MASON, 2022.*



Description

Two ditches run through the Wailuku District 3. The upper ditch runs in a general north-south direction and is located west (behind) the Bailey House and Annex. The lower ditch enters the district to the east of Bailey House and travels in a northeast-southwest direction. The aqueduct runs perpendicular to the upper ditch and runs along the south side of the Seminary Annex. A portion of the aqueduct water wheel structure remains and is covered in vines. A map drawn by Edward Bailey in 1878 notes a tunnel from the aqueduct structure shown above to the lower ditch.

General History

The Kama Ditch and Aqueduct were constructed to provide water from Iao Stream to the Hawaiian Sugar Mill begun by Reverend Bailey. The construction date was not found, but the resources pre-date the 1878 map.

Ka'ahumanu Church (TMK: 340140020000)



Figure 19: Ka'ahumanu Church *Source: MASON, 2022.*

Description

The Ka'ahumanu Church is a large bluestone building with stucco-covered walls over two feet thick. It features a steeply pitched front-facing gable roof topped by a tall wood-framed bell tower and spire that was a later addition to the church. Concrete stairs lead to a centered double door entry. Diagonal buttresses extend from each corner of the church along with three additional buttresses located on each side. Between each buttress are very tall double-hung gothic windows with tracery at the upper arched portion. The bell and three clock faces were added in 1884 and brought from the east coast of the United States around Cape Horn.

General History

Ka'ahumanu Church, located on South High Street, was built in 1876. William Pulepule Kahale, the first Native Hawaiian pastor of the church, lead fund-raising efforts to build the church and Reverend Edward Bailey assisted in its design and construction. The bell tower, added in 1884, was donated by Bailey at a cost of $100,000. The history of the congregation and the present church have associations with many notable missionaries and political figures, such as Queen Ka'ahumanu, who personally asked that the church be named after her.

Mission Church Belfry Remnant TMK: 340140020000



Figure 20: Stone Structure *Source: MASON, 2022.*

Description
Located behind Ka'ahumanu Church is a square stone object with a single opening that is identified as "Remains of Belfry of Mission Church Built in 1842." A low rock wall surrounds the belfry. The NRHP nomination for the Ka'ahumanu Church notes there are also several grave sites behind the church.

General History
The NRHP nomination for the Ka'ahumanu Church says the church this belfry is identified to be a part of was built in 1840 and "was 100 feet by 52 feet and was two stories (actually one story and a gallery) in height." The church was called Wailuku Church and construction was supervised by Reverend Richard Armstrong.

Little Theater (TMK: 34014002000)



Figure 21: Little Theater. *Source: MASON, 2022.*

Description
Located on High Street between Ka'ahumanu Church and the Old State Building, this long rectangular wood framed building has a gable roof and horizontal wood siding. The front of the building features wide wooden steps up to a covered porch. Double-hung windows are evenly spaced along both long side elevations. A rear portion, that may be an addition, has a lower hipped roof projecting from the rear elevation.

General History
Built in 1955, the building was used as a meeting hall and included a stage platform along the wall opposite the entry. The building is currently being used as a daycare facility.

Cemetery (TMK: 34014002000)



Figure 22: Cemetery. *Source: MASON, 2022.*

Description
Located north of Ka'ahumanu Church, along Main Street, is a small cemetery surrounded by a stone wall. The wall appears to have once been covered in cement stucco but most of that has worn away. Several grave markers in a variety of forms are located within.

General History
A sign at the entry to the cemetery says: "Graveyard of the Kahale Family. Donors of this land for a church. Several early Hawaiian Christians may be buried here in unmarked graves, possibly John Honolii, Thomas Hopu. Hawaii and Kawailepolepo."

Parsonage (TMK: 34014002000)



Figure 23: Parsonage. *Source: MASON, 2022.*

Description
Located along Main Street, the small plantation-style parsonage has an irregular plan due to multiple additions. The original portion of the residence is rectangular with a hipped roof with open rafters, an inset front porch, and sits on a raised post and pier foundation. Hipped roof additions extend from the south and west that appear to be on a concrete slab. The house has vertical siding, a central girt, and a combination of double-hung and louvered windows.

General History
Built in 1940, the home retains its early 20th century plantation-style attributes despite multiple additions and the changes to the windows.

Accessory Building (TMK: 34014002000)



Figure 24: Cemetery. *Source: MASON, 2022.*

Description
Located south of the Wailuku District 3 parsonage residence is a small accessory building that appears to be used for storage. The rectangular building has vertical siding, a low-slope gable roof, a post and pier foundation, and vinyl double-hung windows.

General History
The Maui County Property Parcel Information says this building was built in 1932 but no aspect of the structure supports this early construction date. It is believed this building likely replaced the referenced 1932 building sometime in the more recent past.

Wailuku Historic District 3 and Wailuku Historic Civic District

Territorial Building (Old State Building) (TMK: 340140010000)



Figure 25: Old State Building. *Source: MASON, 2022.*

Description

The Old State Building is a two-story, stucco-covered stone building. The building has a steeply sloped double-pitched hipped roof with deep overhangs and exposed rafters. The entry is centered on the front façade and covered by a shed roof supported by square columns. Decorative bris soleil openings and a Spanish tile bench are located at the entry. The upper façade features wrought-iron mock balconies with French doors, located near the corners of the building.

General History

The Old State Building, located at the corner South High Street and Aupuni Streets, built in 1931, was designed by renowned Hawaii architect C.W. Dickey in his signature style that is a Hawaiian adaptation of the Mediterranean Revival style. Originally it was the Territorial Office Building. It is a contributing resource to the Wailuku Civic Center Historic District and the Wailuku Historic District 3.

Wailuku Historic Civic District

Old Maui County Courthouse (TMK: 340140010000)



Figure 26: Maui County Courthouse *Source: MASON, 2022.*

Description
The Maui County Courthouse is a Beaux Arts building constructed of hollow concrete block, cast on-site to mimic dressed stone. The single-story building sits on daylight basement expressed as a raised concrete foundation. The symmetrical building features a central grand staircase leading to an outset porch that features ionic columns. The 68 by 52-foot building has a hipped roof with gablets and is covered in red barrel tiles. Originally the building had a flat roof, but this was replaced in 1929 by the current hipped roof. The double hung windows have concrete surrounds and are capped by a concrete pediment supported by scroll console.

General History
The Maui County Courthouse, located along South High Street, was built in 1907 and designed by noted architect H.L. Kerr. It was also the first building in Wailuku to be wired for electricity. The building is the oldest of the five designated buildings within the Wailuku Civic District.

Wailuku Public Library (TMK: 340140020000)



Figure 27: Wailuku Library. *Source: MASON, 2022.*

Description
The Wailuku Library is a one-story asymmetrical stone and concrete building. The building has a dominant steeply pitched hipped roof covered in red barrel tiles. Wide concrete steps lead to a covered entry porch that features a tile drinking fountain with a silver sword motif. Large rectangular windows are inset from the rough-hewn, stucco-covered walls.

General History
The Wailuku Library building, located at the corner South High Street and Aupuni Streets, built in 1928, was designed by renowned architect C.W. Dickey in a Hawaiian adaptation of the Mediterranean style, for which Dickey is known.

Old Police Station (County Office Building)(TMK: 34008053000)



Figure 28: Wailuku Police Station. *Source: MASON, 2022.*

Description
The Police Station is a one-story, reinforced concrete building. Like the County Courthouse building, it sits on daylight basement expressed as a raised concrete foundation. The symmetrical building is U-shaped and features arcaded lanais at both levels on the front facade. Curving staircases flank the extensions of the "U" and lead to the upper lanai. The lower level is accessed via both stairs and sloping sidewalks. The building has a low-slope hipped roof covered in red barrel tiles.

General History
The Police Station building, located at the corner South High Street and Kaohu Streets, was built in 1925 and was designed by Maui architect William D'Esmond in the Mediterranean Revival style. Originally it was the County Office Building, then a police station and is currently occupied by County of Maui offices.

Main Street (150-foot survey zone)

2246 Main Street (TMK: 340140080000)



Figure 29: 2246 Main Street. *Source: Google Maps.*

Description
2246 Main Street is a vernacular Craftsman-style residence. According to Maui property records, the house is approximately 1400 square feet and features a hipped roof with a front gable. Windows appear to be original double hung. The original front porch has been enclosed and a simple shed roof covering has been added to the front of the home.

Building History
Built ca. 1929. The house has been altered but still retains some of its original architectural style.

2260 Main Street (TMK: 340140090000)



Figure 30: 2260 Main Street *Source: MASON, 2022.*

Description
2260 Main Street is a vernacular plantation-style single family residence. According to Maui property records, the house is approximately 700 square feet and features a hipped roof and an inset porch with concrete stoop. Windows appear to be original double hung and there is a central exterior girt.

Building History
Built ca. 1939. The house is in a deteriorated condition but appears to have not been renovated or expanded.

2278 Main Street (TMK: 340140100000)



Figure 31: 2278 Main Street *Source: MASON, 2022.*

Description
2278 Main Street is a vernacular plantation-style residence. According to Maui property records, the house is approximately 1200 square feet and features a hipped roof and an inset porch with concrete stoop. Windows appear to be original double hung and there is a central exterior girt.

Building History
Built 1938. The house is in good condition and appears from the streetside to have not been renovated or expanded, although the roof is partially covered with solar and PV panels.

2290 Main Street (TMK: 340140110000)



Figure 32: 2290 Main Street *Source: MASON, 2022.*

Description
2290 Main Street is a vernacular plantation-style single family residence. According to Maui property records, the house is approximately 1000 square feet and features hipped roofs with exposed rafters. Original double hung windows have dominant outset trim. Exterior walls are vertical boards with a double girt.

Building History
Built ca. 1949. The house is in good condition and appears to have not been renovated or expanded.

2304 Main Street (TMK: 340140120000)



Figure 33: 2304 Main Street *Source: MASON, 2022.*

Description
2304 Main Street is a vernacular bungalow-style residence. According to Maui property records, the house is approximately 1150 square feet and features a hipped roof and an inset porch with concrete stoop. Windows appear to be original double hung and there is a central exterior girt.

Building History
Built ca. 1929. The house appears in good condition with no visible renovations or expansions. Landscaping currently hides most of the home from street view.

2314 Main Street (TMK: 340140620000)



Figure 34: 2314 Main Street *Source: MASON, 2022.*

Description
2314 Main Street is a vernacular bungalow-style single family residence. According to Maui property records, the house is approximately 1000 square feet and features a hipped roof and an inset porch with concrete stoop. Windows appear to be original double hung and there is a central exterior girt.

Building History
Built in 1932. The house appears in good condition with no recent renovations or expansions.

2326A Main Street (TMK: 340140140000)



Figure 35: 2326A Main Street *Source: MASON, 2022.*

Description
2326A Main Street is a single-story residence with a side gabled roof and a large inset porch. Windows are a combination of aluminum sliders and double hung.

Building History
Built ca. 1923. The house has been extensively renovated and is not recognizable as a 1920s residence. The home has been sheathed in vertical siding since the time of the *Historic Architectural Survey of Wailuku* (1993). Other exterior changes since the 1993 photo include a portion of the of the front porch has been enclosed, street-facing porch stairs have been moved, and the front yard has been converted to graveled parking.

2336 Main Street (TMK: 340140150000)



Figure 36: 2336 Main Street *Source: MASON, 2022.*

Description
2336 Main Street is a single-story, vernacular bungalow. It has a cross gable roof with clipped eaves and horizontal vinyl siding. The house features a large, covered porch and double French entry doors with sidelights.

Building History
Built 1938. The house is in fair condition but appears to have not been renovated or expanded.

2346 Main Street (TMK: 340140160000)



Figure 37: 2346 Main Street *Source: MASON, 2022.*

Description
2246 Main Street is a two-story residence. The ground level, which sits below street level, is of smooth faced concrete masonry and the second floor is T-111. The roof is a low-slope gable with solar panels mounted on top. An exterior wood stair with small porch leads to the second floor. Windows are aluminum sliders.

Building History
Built ca. 1978, the house is not yet 50 years of age.

2356 Main Street (TMK: 340140170000)



Figure 38: 2356 Main Street *Source: MASON, 2022.*

Description
2260 Main Street is a vernacular single-family residence. According to Maui property records, the house is approximately 700 square feet and features a hipped and gable roof and an inset porch. Decorative banding has been applied to the outset front façade and windows all appear to be replaced.

Building History
Built 1935, the house appears to have been extensively remodeled. It was determined eligible in the Architectural Survey of Wailuku (1993) but is unrecognizable as the home pictured in that report.

ʻĪao Church Office and Preschool (TMK: 340140180000)




Figures 39 and 40: 2371 Main Street *Source: MASON, 2022.*

Description
The ʻĪao Church Office and Preschool sit at opposite ends of a large asphalt-paved parking lot that fronts Main Street. The T-111 sheathed office sits on a raised foundation and has a low-slope hipped roof covered in photovoltaic panels. The preschool is at a lower level, with its eaves nearly even with Main Street and the paved parking. The long, rectangular building has a low-slope shed roof and is constructed of smooth-face concrete masonry.

Building History
Built in 1973 and 1979, respectively, the buildings are part of the larger ʻĪao Church campus along Vineyard Street.

2445 W Vineyard Street (TMK: 340140510000)

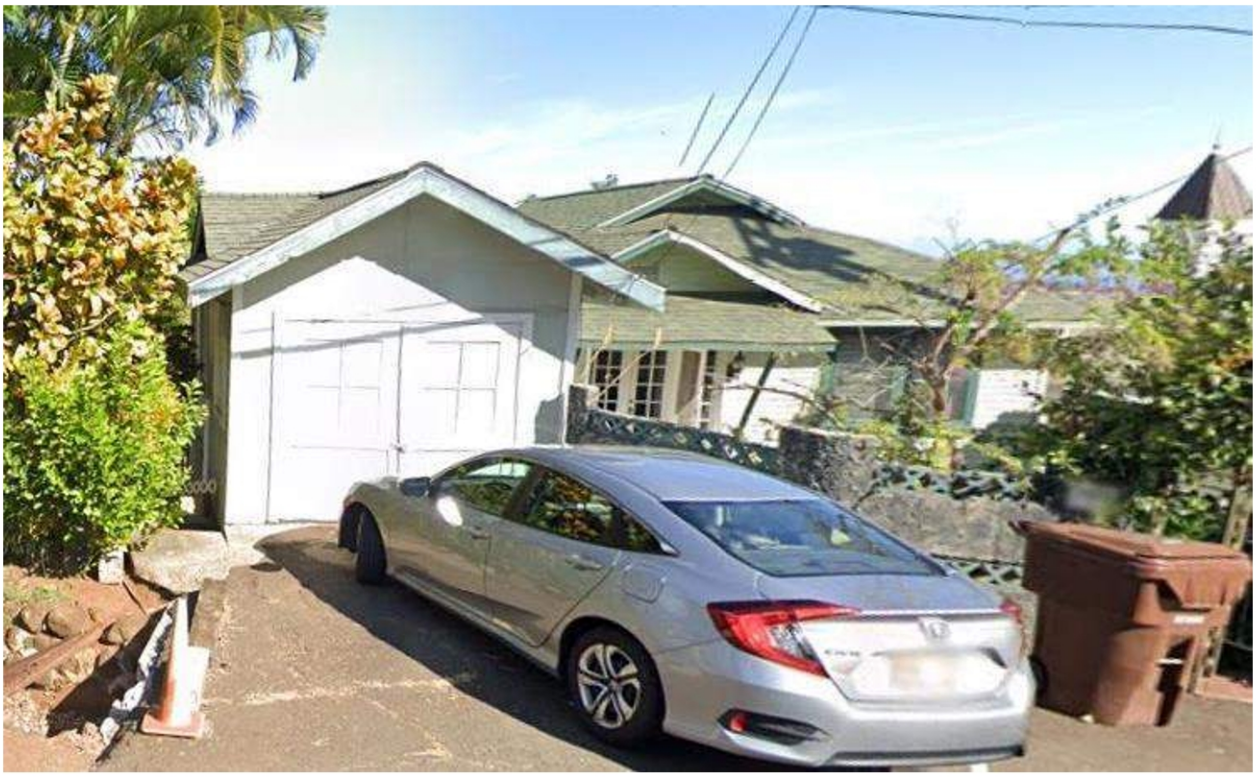


Figure 41: 2444 W Vineyard Street *Source: Google.*

Description
The house at 2445 W Vineyard fronts Main Street despite its address. The house is a vernacular bungalow-style single family residence. It features hipped and gable roofs with gable dormers and a front stoop covered by a shed roof extension. Windows appear to be original wood double hung. A small garage with a gable roof sits at street level, while the house is at a lower level.

Building History
Built in 1964.

2444A Main Street (TMK: 340140200000)



Figure 42: 2444A Main Street *Source: MASON 2022.*

Description
2444 Main Street is a two-story, single-family residence with a dominant mansard shake roof. The slightly sloping mansard roof has windows set into the sides. The house is constructed of split-faced concrete masonry with a wide attached carport that has a flat roof with a matching mansard detailing. The house is set farther back from Main Street than most houses along this road and has a large fenced front yard.

Building History
Built in 1979, the house is not yet 50 years of age.

Aupuni Street (150-foot survey zone)

2333 Aupuni Street (TMK: 3400701100)



Figure 43: 2333 Aupuni Street *Source: MASON 2022.*

Description
2333 Aupuni Street is a two-story, single-family residence with a gently sloping gable roof. The first floor appears to be stucco-covered concrete masonry and the second floor is wood board and batten. The residence has aluminum sliding windows and a second-story wood deck. The house is sited on a large corner lot.

Building History
Built in 1953. The Architectural Survey of Wailuku (1993) notes a second home on the parcel from the 1930s that appears to no longer be extant.

207 Awapuhi Place (TMK: 3400704700)



Figure 44: 207 'Awapuhi Place *Source: MASON 2022.*

Description
207 'Awapuhi Place sits at the corner of Aupuni and Awapuhi with its primary façade on 'Awapuhi. The single-story residence has a multi- hipped roof with shed dormers and exposed rafters. The house is board and batten with an exposed concrete foundation. Along 'Awapuhi Place there is an inset front porch flanked by room extensions with square bay windows filled with mult-light wood windows. On the Aupuni façade is a covered lanai with decorative brick railings.

Building History
Built in 1939, the house is in deteriorated condition but would be a contributing resource to a historic district. The Historic Architectural Survey of Wailuku (1993) posited that the home may have been designed by William d'Esmond, prominent Maui architect and designer of the nearby Police Station (1925) that is part of the Wailuku Historic Civic District.

210 Awapuhi Place (TMK: 3400700900)



Figure 45: 2333 Aupuni Street *Source: MASON 2022.*

Description
210 'Awapuhi Place sits back from the corner of Aupuni on Awahuphi with its primary façade on 'Awapuhi. The single-story concrete masonry home is a long rectangle with a low slope gable roof. The residence has aluminum sliding windows and an attached open carport.

Building History
Built in 1965.

2261 Aupuni Street (TMK: 3400702500)



Figure 46: 2261 Aupuni Street *Source: Google.*

Description
2261 Aupuni Street is a two-story, commercial office building. The first floor is slightly lower than the asphalt parking lot that occupies much of the parcel. The second is accessed via an exterior stairway behind a screen wall. The roof is a cross-hipped, flat-top mansard covered in barrel tile. A concrete wall surrounds the paved parking area.

Building History
Built in 1976, the building is not yet 50 years of age.

Significance and Integrity Evaluation

The Historical Background section provided historical information in support of the significance evaluations presented below, and in the Identification of Historic Resources and Table 1: Significance Evaluations, to follow.

The Wailuku Union Church Mission Grounds in Wailuku was assessed for significance and integrity in keeping with Hawaii Administrative Rule 13-284-6, Criteria a-d. MASON is not a qualified ethnographer that meets the qualifications in Chapter 13-281, and did therefore did not evaluate this property for HAR Sec. 13-284-6 Criterion e.

Significance

Hawaii Administrative Rules, Section 13-284-6 - Evaluation of Significance

The Wailuku District 3 is significant at the local, state, and national level. The Maui County ordinance that set up the district in 1970 states that "The purpose of this district is to preserve and protect the several well-preserved historic structures and sites now existing, which are deemed to be of great value because they are closely identified with the early history of Maui County." It goes on to specify four (4) specific historic resources on the site: (1) Ka'ahumanu Church, (2) Alexander House, (3) Hale Hoikeiki (Bailey House and Annex), and (4) the Kama Ditch and Aqueduct.[9]

Under Criterion a, the Wailuku Union Church Mission Grounds possesses significance for its association with the Congregational Missionary movement on Maui and the missionary history of Wailuku, Maui. The Mission Grounds are also significant for the development of the early sugar industry in Wailuku. The property is a central contributing element to Maui County's Wailuku Historic District 3.

Under Criterion b, there are multiple associations to historically prominent or important persons. Included are the early missionary Reverends Greene, Armstrong, Bailey, and Alexander. Edward Bailey went on to become a prominent figure in the sugar industry history of Wailuku for his association with Wailuku Sugar Company. It is likely there are also associations to prominent figures in early Hawaiian history, but this evaluation was limited to the period of significance of 1832 to 1930 that spans the missionary period and the early sugar industry.

Under Criterion c, the Wailuku Union Church Mission Grounds possesses significance for the three NRHP-eligible buildings: Alexander House, Kennan House, and Baybrook House.

[9] Maui County Ordinance 661 (Bill No. 20 (1970)). An Ordinance Amending the Maui County Historic Districts Ordinance, Ordinance No. 514, Article 3 of Chapter 8 of the Permanent Ordinances of The County of Maui, 1966, As Amended, By Amending Sec. 8-3.12, Sec. 8-3.13 And Sec. 8-3.14 https://www.mauicounty.gov/DocumentCenter/View/79617/Ord-0661?bidId=

Under Criterion d, given its history, the Wailuku Union Church Mission Grounds likely contains information from history or prehistory.

Period of Significance

The missionary period spans from 1833 to 1876 and encompasses the stationing of American missionaries in Wailuku to the construction of Ka'ahumanu Church. The missionaries were assigned to towns and villages to introduce Christianity throughout the Hawaiian Islands chain. In Wailuku their homes and church functions were centered almost exclusively in the area of Wailuku District 3. A second period of significance is the early sugar growing era as it pertains to these missionaries, many of whom became involved in the early commercial cultivation and milling of sugar. This period spans from 1840 when the Wailuku Sugar Mill was constructed through 1930 when the sugar industry peaked in Hawai'i.

Integrity

Location: The Wailuku Union Church Mission Grounds retains integrity of Location.

Design: The site currently has three historic buildings, one from the early missionary period and two that are from the sugar era but are associated with the church functions of the site.

Setting: The site retains partial integrity of Setting. Although the civic and residential environment along Main Street and High Street in Wailuku has undergone significant changes, the Wailuku Union Church Mission Grounds and the wider Wailuku Historic District 3 retain much of their historic fabric and open spaces. Early photos and drawings do show that the grounds were previously more verdant and manicured than they are presently.

Materials and Workmanship: The eligible buildings on Wailuku Union Church Mission Grounds retain integrity of Materials and Workmanship. The buildings have undergone few renovations, and significant historic fabric remains.

Feeling and Association: The Wailuku Union Church Mission Grounds retains integrity of Feeling or Association because the buildings remain representative of their eras and there have been few more-recent additions to the site.

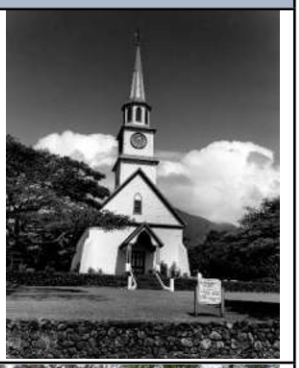
In summary, the Wailuku Union Church Mission Grounds retains sufficient integrity to meet HAR §13-284-6 (b) Integrity criteria.

Table 1: Significance Evaluations

Building	Year Built	HAR §13-275-6 Evaluation of Significance	Photo
Wailuku Union Church Mission Grounds			
William & Mary Alexander Parsonage TMK: 340140050000 HABS HI-46	1836	Meets HAR §13-275-6 significance Criteria a, b, and c as an individually eligible historic property and as a contributing element of the Wailuku Historic District 3. *The two-story, stone residence is considered the oldest building in Wailuku and retains good integrity.*	
Baybrook House (Maui Aid Association Office) TMK: 340140050000 RLS: 2017	1909	Meets HAR §13-275-6 significance Criteria a and c as an individually eligible historic property and as a contributing element of the Wailuku Historic District 3. *The building is a good example of a small single-wall Hawaii vernacular bungalow and retains good integrity.*	
Kennan House (Parsonage 1) TMK: 340140050000 RLS: 2017	1928	Meets HAR §13-275-6 significance Criteria a as a contributing element of the Wailuku Historic District 3. The house is not an individually eligible resource. *A fair example of a small single-wall Hawaii vernacular bungalow, it possesses sufficient architectural integrity, both inside and out.*	
ʻĪao Parsonage (Parsonage 2) TMK: 340140050000 RLS: 2017	1966	Does not meet HAR significance Criteria, not a historic property. The house not considered eligible for the NRHP, neither on its own or as a contributing element to Maui County's Wailuku Historic District 3. *It does not possess sufficient architectural significance or character, nor is it associated with the mission church period of significance.*	

Wailuku Historic District 3			
Bailey Mission/Old Bailey House/ Hale Hoikike TMK: 340140830000 NRHP 1973	1833-1850	Meets HAR §13-275-6 significance Criteria a, b, and c. It is listed individually on the NRHP and is a contributing resource of the Wailuku Historic District 3. *The residence is one of the first western-style houses in Wailuku. It retains good integrity as one of the most intact examples of early missionary architecture remaining in Hawaii. The building remains essentially as it was in the mid-1880s.*	
Wailuku Female Seminary Dining Hall/Bailey House Annex TMK: 340140830000 NRHP 1973	1837	Meets HAR §13-275-6 significance Criteria a, b, and c. It is listed as a contributing resource to the Bailey House on the NRHP and is a contributing resource of the Wailuku Historic District 3. *The building retains good integrity and, along with the Bailey House, is among the most intact examples of early missionary architecture in Hawaii.*	
Museum Restroom TMK: 340140830000 NRHP 1973	1939	Meets HAR §13-275-6 significance Criteria a and c. It is a contributing resource to the Bailey House during the later sugar period and is a contributing resource of the Wailuku Historic District 3. *Part of the Bailey House Museum. Shed has been adaptively reused for use as museum restroom and storage but retains its exterior historic integrity.*	
2361 Main Street (Residence and Detached Garage) TMK: 340140830000	------	The house shares a TMK with the Bailey House but is not listed on Maui County records and documents. The plantation style residence may be eligible as a contributing feature to the Wailuku Historic 3. *The plantation style house retains good integrity*	

Wailuku Historic District 3			
Wailuku Sugar Co. Manager's House (Yokouchi Estate) TMK: 340140600000	1936	Meets HAR §13-275-6 significance Criteria a, b, and c. It is eligible for listing individually on the NRHP and is a contributing resource of the Wailuku Historic District 3. *The large, stucco-covered stone house retains good integrity to meet HAR significance criteria and is an excellent example of architect CW Dickey's residential aesthetic.*	
Manager's House Pool and Pool House TMK: 340140060000	1992	Does not meet HAR significance Criteria; not a historic property. This building is less than 50 years of age. *The pool and pool house are later additions and are therefore non-contributing resources to the Wailuku Historic District 3.*	
Manager's House Garage TMK: 340140060000	1936	Meets HAR §13-275-6 significance Criteria a, b, and c. It is eligible for listing on the NRHP as a contributing resource to the Wailuku Sugar Company Manager's House and is a contributing resource of the Wailuku Historic District 3. *The garage was designed by CW Dickey along with the main house and has the same detailing. The building retains sufficient integrity to meet HAR significance criteria.*	
Kama Ditch and Aqueduct TMK: 340140060000	Pre-1878	Two ditches run through the Wailuku District 3. The upper ditch is located west of the Bailey House and Annex. The lower ditch enters the district to the east of Bailey House. The aqueduct runs perpendicular to the upper ditch and runs along the south side of the Seminary Annex. A portion of the aqueduct water wheel structure remains and is covered in vines. The Kama Ditch and Aqueduct is a contributing feature to the Wailuku Historic District 3 and would also be individually NRHP eligible.	

Wailuku Historic District 3			
Ka'ahumanu Church (Wailuku Kealesia Hō'ole Pope) TMK: 340140020000 NRHP 1973	1876	Meets HAR §13-275-6 significance Criteria a, b, and c. It is listed individually on the NRHP and is a contributing resource of the Wailuku Historic District 3. *The church retains good integrity as an excellent example of the adaptation of New England style Gothic architecture to Hawaii employing native materials. The clock steeple was added in 1884.*	
Mission Church Belfry Remnant TMK: 340140020000 NRHP 1973	Ca 1840	Meets HAR §13-275-6 significance Criteria a, and b. It is listed as a contributing resource on the Ka'ahumanu Church NRHP nomination and is a contributing resource of the Wailuku Historic District 3. *The NRHP nomination identified this structure as a remnant of the third mission church built (the existing Ka'ahumanu Church is the fourth).*	
Little Theater TMK: 340140020000 NRHP 1973	1955	Meets HAR §13-275-6 significance Criteria a and c. It is listed as a contributing resource on the Ka'ahumanu Church NRHP nomination and is a contributing resource of the Wailuku Historic District 3. *The building was built as a church meeting hall and included a stage platform along the wall opposite the entry. It retains good integrity.*	
Cemetery TMK: 340140020000	------	Meets HAR §13-275-6 significance Criteria a, b, and c, and is a contributing resource of the Wailuku Historic District 3. *Located north of Ka'ahumanu Church, along Main Street, the small cemetery is surrounded by a stone wall. Several grave markers in a variety of forms are located within. The cemetery shows signs of deterioration but retains fair integrity*	
Parsonage TMK: 340140020000	1940	Meets HAR §13-275-6 significance Criteria a and c, and is a contributing resource of the Wailuku Historic District 3 but has been evaluated as not individually eligible for inclusion on the NRHP. *The plantation-style parsonage has an irregular plan due to multiple additions but retains much of its early 20th century plantation-style attributes and possesses fair integrity.*	
Wailuku Historic District 3			

Church Accessory Building TMK: 340140020000	-----	Does not meet HAR significance Criteria. Wood framed accessory building used for storage. Parcel information says this building was built in 1932 but no aspect of the structure supports this early construction date. Therefore, this building has been evaluated as non-contributing to the Wailuku Historic District 3 and not eligible for inclusion on the NRHP.	
Wailuku Civic Center Historic District			
District Court Building (Old State Building) TMK: 340140010000 NRHP 1986 Also located within the Wailuku Historic District 3	1931	Meets HAR §13-275-6 significance Criteria a and c. The building is a contributing resource to both the Wailuku Civic Center Historic District and the Wailuku Historic District 3. *Designed by C.W. Dickey, the building incorporates Mediterranean Revival and Hawaiian architectural styles. The building retains good integrity.*	
Wailuku Public Library TMK: 340140020000 NRHP 1986	1928	Meets HAR §13-275-6 significance Criteria a and c. The building is a contributing resource to the Wailuku Civic Center Historic District. *Designed by C.W. Dickey, the building incorporates Mediterranean Revival and Hawaiian architectural styles. The building retains good integrity.*	
Old Police Station (Kalana Pakui Building) TMK: 340080530000 NRHP 1986	1925	Meets HAR §13-275-6 significance Criteria a and c. The building is a contributing resource to the Wailuku Civic Center Historic District. *Designed by Maui architect William d'Esmond, in the Mediterranean Revival Style. The building retains good integrity.*	
Old Maui County Courthouse Building TMK: 340080420000 NRHP 1986	1907	Meets HAR §13-275-6 significance Criteria a and c. The building is a contributing resource to the Wailuku Civic Center Historic District. *Designed by Henry Livingston Kerr in the Beaux-Arts style. The building retains good integrity.*	

		Main Street (150-foot survey zone)	
Residence 2246 Main Street TMK: 340140080000 Historic Architectural Survey of Wailuku (1993) (Wailuku Survey)	1929	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home has been evaluated as not individually eligible to the Hawai'i Register of Historic Places. *The vernacular Craftsman-style residence has been altered but still retains some of its original architectural style and fair integrity.*	
Residence 2260 Main Street TMK: 340140090000 Wailuku Survey	1939	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular plantation-style residence is in a deteriorated condition but appears to have not been renovated or expanded and retains its historic integrity.*	
Residence 2278 Main Street TMK: 340140100000 Wailuku Survey	1938	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular plantation-style residence is in good condition, appears to have not been renovated or expanded, and retains its historic integrity.*	
Residence 2290 Main Street TMK: 340140110000 Wailuku Survey	1949	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular plantation-style residence is in good condition, appears to have not been renovated or expanded, and retains its historic integrity.*	

		Main Street (150-foot survey zone)	
Residence 2304 Main Street TMK: 340140120000 Wailuku Survey	1929	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular bungalow-style residence is in good condition, appears to have not been renovated or expanded, and retains its historic integrity.*	
Residence 2314 Main Street TMK: 340140620000 Wailuku Survey	1932	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular bungalow-style residence is in good condition with renovations and expansions only at the rear and therefore retains its historic integrity.*	
Residence 2356 Main Street TMK: 340140170000 Wailuku Survey	1935	Does not meet HAR significance Criteria due to extensive remodeling. *The vernacular residence was determined eligible in the Architectural Survey of Wailuku (1993) but is unrecognizable as the home pictured in that report and no longer possess historic integrity due to the significant changes.*	
Residence 2326A Main Street TMK: 340140140000 Wailuku Survey	1923	Does not meet HAR significance Criteria due to extensive remodeling. *The vernacular residence was determined eligible in the Architectural Survey of Wailuku (1993) but has undergone significant material changes since that report and no longer possess historic integrity due to those changes.*	

		Main Street (150-foot survey zone)	
Residence 2336 Main Street TMK: 340140150000 Wailuku Survey	1938	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may be individually eligible to the Hawai'i Register of Historic Places. *The vernacular bungalow-style residence is in good condition. Despite the addition of vinyl siding, the home appears to have not been otherwise renovated or expanded and retains its historic integrity.*	
Residence 2346 Main Street TMK: 340140160000 Wailuku Survey	1978	Does not meet HAR significance Criteria due to age.	
Īao Church Office and Preschool TMK: 340140180000 Wailuku Survey	1973, 1979	Do not meet HAR significance Criteria due to age.	 
Residence 2445 W. Vineyard Street TMK: 340140160000 Wailuku Survey	1964	Does not meet HAR significance Criteria. The house, although compatible in style, would likely not be a contributing resource to a historic district because it would fall outside of the period of significance for the area. The house could possibly be individually eligible to the Hawai'i Register of Historic Places. *The vernacular bungalow-style residence is in good condition and retains its historic integrity.*	
Residence 2444 Main Street TMK: 340140200000 Wailuku Survey	1979	Does not meet HAR significance Criteria due to age.	

Aupuni Street (150-foot survey zone)			
Residence 2333 Aupuni Street TMK: 340070110000 Wailuku Survey	1953	Does not meet HAR significance Criteria. The house does not possess the architectural qualities that would make it a contributing resource to a historic district nor would it be individual eligibility to the Hawai'i Register of Historic Places.	
esidence 207 'Awapuhi Place TMK: 340070470000 Wailuku Survey	1939	Meets HAR significance Criteria a and c as a contributing resource to a possible historic district associated with the prosperity and rapid expansion of Wailuku during the sugar industry's boom years. The home may have been designed by William d'Esmond and is likely individually eligible to the Hawai'i Register of Historic Places. *The vernacular bungalow-style residence is in disrepair. Despite the abandoned condition, the home appears to have not been otherwise renovated or expanded and retains its historic integrity.*	
Residence 210 'Awapuhi Place TMK: 340070090000	1965	Does not meet HAR significance Criteria. The house does not possess the architectural qualities that would make it a contributing resource to a historic district nor would it be individual eligibility to the Hawai'i Register of Historic Places.	
Residence 2333 Apuna Street TMK: 340070250000	1976	Does not meet HAR significance Criteria; not a historic property. This building is less than 50 years of age.	

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Appendix A - HAR §13-275-6 Criteria for Evaluation

Hawai'i Administrative Rules (HAR) Section §13-275-6, Evaluation of Significance, explains that "to be significant, a historic property shall possess integrity of location, design, setting, materials, workmanship, feeling, and association and shall meet one or more of the following criterion:

a. That are associated with events that have made a significant contribution to the broad patterns of our history; or
b. That are associated with the lives of significant persons in our past; or
c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a distinguishable entity whose components may lack individual distinction; or
d. That have yielded or may be likely to yield, information important in history or prehistory;
e. Has an important value to the native Hawaiian people or to another ethnic group of the state due to association with cultural practices once carried out, or still carried out at the property; or due to associations with traditional beliefs, events or oral accounts – these associations being important to the group's history and cultural identity (similar traditional cultural significance for NRHP)"

Appendix B – Wailuku Mission Grounds 2017 RLSs

Appendix H

Traffic Impact Analysis Report

TRAFFIC IMPACT ANALYSIS REPORT
WAILUKU MISSION SENIOR HOUSING PROJECT

WAILUKU, MAUI, HAWAII

FINAL

February 26, 2026

Prepared for:

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TRAFFIC IMPACT ANALYSIS REPORT
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AUSTIN, TSUTSUMI & ASSOCIATES, INC. CIVIL ENGINEERS • SURVEYORS
CONTINUING THE ENGINEERING PRACTICE FOUNDED BY H. A. R. AUSTIN IN 1934

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Maui Branch Manager

TRAFFIC IMPACT ANALYSIS REPORT

WAILUKU MISSION SENIOR HOUSING PROJECT

Wailuku, Maui, Hawaii

1. INTRODUCTION

This report documents the findings of a traffic study conducted by Austin, Tsutsumi & Associates, Inc. (ATA) to evaluate the potential traffic impacts resulting from the proposed Wailuku Mission Senior Housing Project (hereinafter referred to as the "Project").

1.1 Location

The Project is located in Wailuku to the west of High Street and bordered by Main Street to the north and Aupuni Street to the south; more specifically identified as TMK (2) 3-4-014:005. Figure 1.1 shows the location of the proposed Project site.

1.2 Project Description

The Project proposes to construct approximately 85 units of affordable rental housing targeting senior households (aged 62 and older) upon a property located at 2307 Main Street in Wailuku. However, study methodology assumed up to 92 units to conservatively measure the Project's potential impacts. As proposed, the Project will have 44 off-street parking spaces in two (2) parking areas, both accessed from Main Street. Some existing structures on the site, including the Kennan House and Iao House are proposed to be demolished, while the Alexander House and Baybrook House are planned to be preserved and incorporated into the Project as the Community Center and property management offices, respectively. Access to the Project site planned to occur via two (2) existing access points along Main Street. To address neighbors' concerns about parking and pedestrian access along Aupuni Street, the Project design does not enable vehicle, pedestrian, or bicycle access from Aupuni Street into the property. The Project includes a fence along Aupuni Street to ensure that all vehicles, pedestrians, and bicycles can only access the Project from Main Street. The fence will include a locked pedestrian gate for emergency access/egress requested by the Maui Fire Department. In the event of an emergency the Fire Department explained they would cut the lock on the gate.

The site plan can be found in Figure 1.2.

WAILUKU UNION AFFORDABLE HOUSING TIAR

AustinTsutsumi & ASSOCIATES, INC.
Engineers & Surveyors

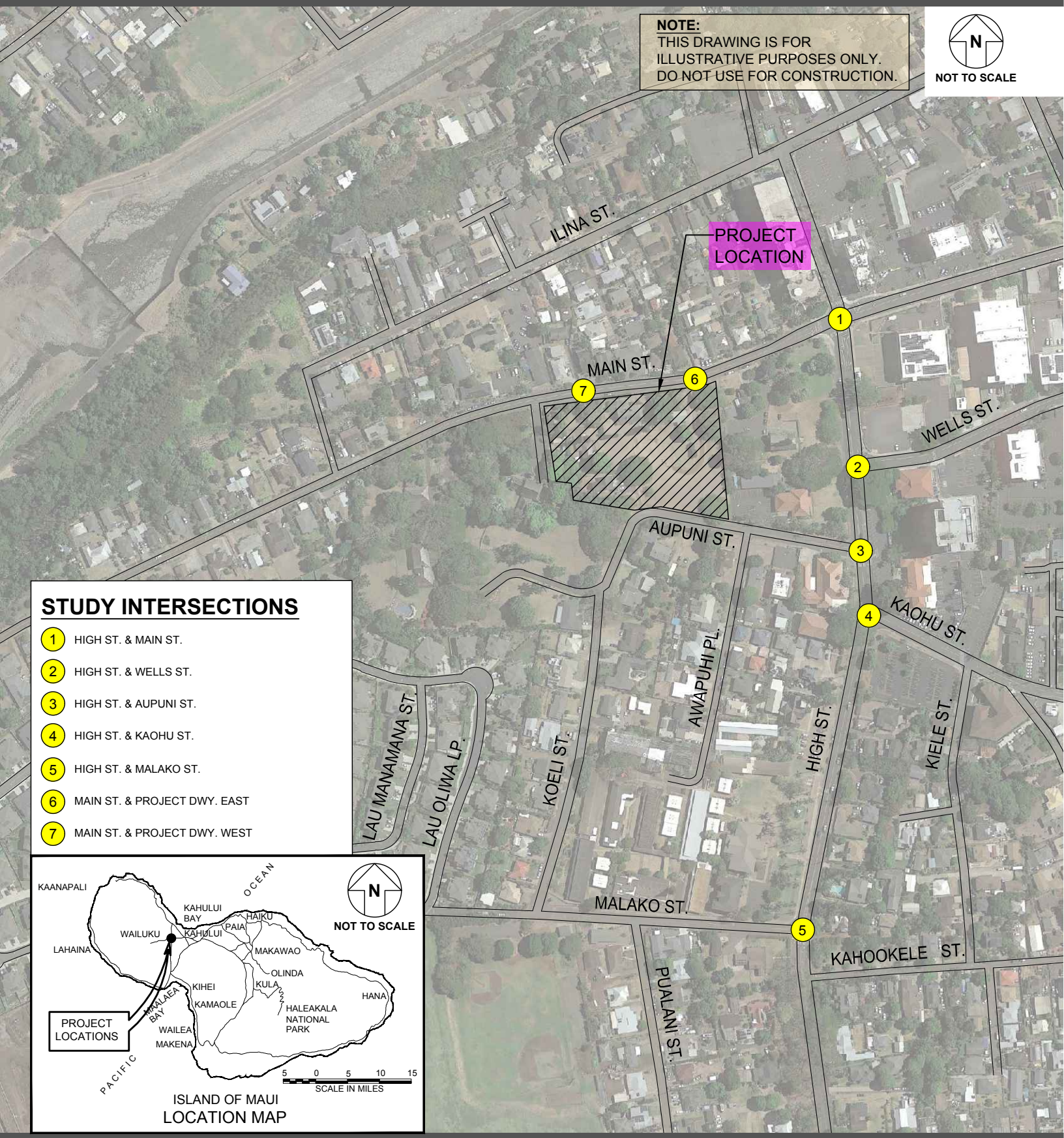

FIGURE 1.1

LOCATION MAP

WAILUKU UNION AFFORDABLE HOUSING TIAR

AustinTsutsumi & ASSOCIATES, INC.
Engineers & Surveyors

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WAILUKU MISSION GROUNDS HOUSING CONCEPTUAL SITE PLAN

TMK:	(2) 3-4-014:005
LOT AREA:	2.6594 Acres
ZONING:	Historic District No.3
PERMITTED USE:	Dwelling, Multifamily
HEIGHT LIMIT:	
REQUIRED:	2 stories 35 Feet Max. 1 story 25 Feet Max.
STREET SETBACK:	
FRONT YARD REQUIRED:	15 Feet Min. (2 Stories)
SIDE YARD REQUIRED:	10 Feet Min. (2 Stories)
REAR YARD REQUIRED:	10 Feet Min. (2 Stories)
OFF STREET PARKING:	
# OF STALLS PROVIDED:	42
# OF ADA STALLS PROVIDED:	2
PROPOSED BUILDING SQ FOOTAGE:	51,300 Gross Sq. Feet
UNITS:	85

FIGURE 1.2

SITE PLAN

2. METHODOLOGY

2.1 Study Methodology

This study will address the following:

- Assess existing traffic operating conditions at key intersections during the weekday morning (AM) and afternoon (PM) peak hours of traffic within the study area.
- Traffic projections for Year 2028 without the Project including traffic generated by other known developments in the vicinity of the Project in addition to an ambient growth rate. These other known developments are projects that are currently under construction or known new/future developments that are anticipated to affect traffic demand and operations within the study area.
- Traffic projections for Year 2028 with the Project, which includes Year 2028 without Project traffic volumes in addition to traffic volumes generated by the Project.
- Recommendations as needed to mitigate any impacts resulting from the addition of Project traffic.

2.2 Intersection Analysis

Level of Service (LOS) is a qualitative measure used to describe the conditions of traffic flow at intersections, with values ranging from free-flow conditions at LOS A to congested conditions at LOS F. The Highway Capacity Manual (HCM), 7th Edition, includes methods for calculating volume to capacity ratios, delays, and corresponding Levels of Service that were utilized in this study. LOS definitions for signalized and unsignalized intersections are provided in Appendix B.

Analyses for the study intersections were performed using the traffic analysis software Synchro, which is able to prepare reports based on the methodologies described in the HCM. These reports contain control delay results based on intersection lane geometry, signal timing, and hourly traffic volumes. Based on the vehicular delay at each intersection, a LOS is assigned to each approach and intersection movement as a qualitative measure of performance. These results, as confirmed or refined by field observations, constitute the technical analysis that will form the basis of the recommendations outlined in this report.

2.3 Study Area Intersection Analysis

Intersection analysis within the Project study area was performed on the following intersections due to their proximity to the Project:

- High Street & Main Street (signalized)
- High Street & Wells Street (unsignalized)
- High Street & Aupuni Street (unsignalized)
- High Street & Kaohu Street (unsignalized)
- High Street & Malako Street (unsignalized)

3. EXISTING CONDITIONS

3.1 Roadway System

The following are brief descriptions of the existing roadways in the vicinity of the Project:

High Street – is a north-south, two-way, two-lane, County roadway that begins to the north at its intersection with Vineyard Street and continues southward until its intersection with Keanu Street, where it transitions to Honoapiilani Highway. The posted speed limit is 20 miles per hour (mph).

Main Street is an east-west, two-way, two-lane roadway that provides connectivity to commercial areas in Wailuku. Main Street begins to the east at its intersection with Lower Main Street and Kaahumanu Avenue and continues westward where it splits into Iao Valley Road and West Alu Road. Along Main Street in the vicinity of the Project, marked curbside parking is available. This roadway begins to the west with its intersection with Kahekili Highway and continues eastward until its intersection with Waiehu Beach Road. The posted speed limit is 20 mph.

Wells Street is an east-west, two-way, two-lane roadway that begins to the east at its intersection with Waiale Road and terminates to the west at its intersection with High Street. Wells Street provides access to many local businesses as well as access to Wells Park. Marked street parking is available along both sides of the roadway. The posted speed limit is 20 mph.

Aupuni Street is an east-west, two-way, two-lane roadway that begins to the east at its intersection with High Street and transitions to southbound Koeli Street to the west. Marked parking is located along both sides of the roadway in the vicinity of the Project. There is no posted speed limit.

Kaohu Street is an east-west, two-way, two-lane roadway that begins to the east at its intersection with Waiale Road and terminates to the west at its intersection with High Street. Kaohu Street provides residential access, as well as access to Iao School. Sharrows, raised crosswalks, and marked street parking are available along the roadway. The posted speed limit is 20 mph.

Malako Street is an east-west, two-way, two-lane roadway that begins to the east at its intersection with High Street and terminates to the west at its intersection with Lau Oliwa Loop. Malako Street provides residential access, as well as access to Wailuku Elementary School. Speed bumps, crosswalks, and unmarked street parking are available along the roadway. There is no posted speed limit.

3.2 Existing Traffic Volumes

The hourly turning movement counts utilized in this report were recorded on Thursday, May 8, 2025:

- High Street & Main Street
- High Street & Wells Street
- High Street & Aupuni Street
- High Street & Kaohu Street
- High Street & Malako Street
- Main Street & Project Driveway East
- Main Street & Project Driveway West

Based on traffic count data, the weekday AM and PM peak hours of traffic were determined to generally occur between 7:00 AM – 8:00 AM, and 3:45 PM – 4:45 PM, respectively. Turning movement count data may be found in Appendix A.

3.3 Existing Traffic Conditions Analysis and Observations

The analysis and observations described below are based on prevailing conditions during the time at which the data was collected.

3.3.1 Regional Observations

The area in the immediate vicinity of the Project is largely comprised of single-family homes and small businesses, with regional access provided by Main Street and High Street. High Street serves as one of the two major north-south commuter routes between the Maui Lani area and Wailuku Town.

Wailuku Elementary School is located to the south of the Project area, bound by High Street to the east, Malako Street to the south, and Koeli Street to the west. Per the school's traffic circulation plan, streets around campus (including Malako Street and Koeli Street) become one-way roads – parents turn off of High Street onto Malako Street for drop-offs or pick-ups at assigned gates along Malako Street and Koeli Street. Parents then use Aupuni Street to return to High Street. During drop-off and pick-up times, a police officer is stationed at the unsignalized High Street/Aupuni Street intersection to assist heavy volumes of school traffic in turning onto High Street, and a crossing guard is stationed at the High Street/Malako Street intersection to facilitate crossings across High Street. The morning drop-off period occurs between 7:00 AM – 8:00 AM and overlaps with the AM peak hour, and the afternoon pick-up period occurs from 1:30 PM – 2:30 PM, before the PM peak hour begins at 3:45 PM.

During the AM peak hour, the police officer and crossing guard arrived at approximately 7:25 AM to direct traffic. Interruptions as a result of the pedestrian crossings at the High Street/Malako Street intersection were minimal, since only one pedestrian crossing was observed during the AM peak hour. As a result of the interruptions in mainline High Street traffic from the police officer directing traffic at High Street/Aupuni Street, the southbound queue was observed to spill back through the Main Street intersection, and sometimes blocked turning and through movements onto High Street. When movements onto southbound High Street were blocked, the westbound left-turn movement at the High Street/Main Street intersection was observed to spill out of the left-turn pocket and block access to the eastbound shared through/right-turn lane. In the northbound direction, the queue from the High Street/Aupuni Street intersection spills back through the Malako Street intersection to Kehalani Mauka Parkway at its maximum. By 8:00 AM, congestion in the area had dissipated.

During the PM peak hour, flow along High Street in both the northbound and southbound directions was generally observed to be acceptable, with temporary queues periodically forming due to pedestrian crossings, and turning vehicles along mainline High Street stopping in the single travel lane to yield to oncoming traffic. Also, it was observed that mainline High Street traffic sometimes stopped in the travel lane to yield to vehicles on the minor street, which added to some instances of congestion along High Street. Overall, these queues cleared quickly as pedestrian crossings were completed, and turning vehicles were able to complete the movement.

3.3.2 Existing Intersection Analysis

For analysis purposes, traffic control by the police officer during the AM peak hour at the High Street/Aupuni Street intersection was modeled by an uncoordinated traffic signal.

Synchro analysis shows that all movements at all study intersections operate at LOS D or better across both peak hours, with the exception of the westbound approach at the High Street/Wells Street intersection which operates at LOS E during the PM peak hour, and the westbound left-turn movement at the High Street/Kaohu Street intersection which operates at operates at LOS F(E) during the AM(PM) peak hours.

As previously described, interruptions in flow along High Street resulted in variability in throughput along High Street, which resulted in queue spillback that worsened analyzed conditions.

Laneage, volumes, and LOS for Existing Conditions can be found in Figure 3.1, and a LOS Summary can be found in Table 3.1.

3.4 Multimodal Facilities

3.4.1 Pedestrian Facilities

There are no sidewalks adjacent to the Project location on Main Street or Aupuni Street. Sidewalks are present along the east side of High Street in the vicinity of the Project. East of High Street there are sidewalks along both sides of Main Street, Wells Street, and Kaohu Street.

The *Central Maui Pedestrian & Bicycle Master Plan for 2030*, does not include plans for pedestrian and bicycle improvements to Main Street and Aupuni Street, fronting the Project site. The plan also does not mention specific pedestrian improvements along the west side of High Street. However, the plan's vision statement for Wailuku says:

> *By 2030 Wailuku will be a pedestrian and bicycle friendly community. Because of its unique historic buildings, charm and livability, Wailuku Town is a popular place for residents of all ages to live.*
>
> *Within the Town's civic and commercial districts – along High, Main, Vineyard, Church, Kaohu and Wells Streets – walking is the preferred mode of transportation for short trips. Residents who live and work in Wailuku walk between home and work because the town offers a safe and pleasant pedestrian experience.*

In addition, other County policies and planning efforts—including the County's Complete Streets policy, the *I Mua Central Maui Transportation Study*, and Downtown Wailuku revitalization concepts—support and may lead to future pedestrian/bicycle upgrades in and around Wailuku. Current project development such as the 'Imi Kala Street Extension (connecting to Lower Main Street) likewise aims to expand multimodal access consistent with these goals.

See Figure 3.2 for existing sidewalks and crosswalk locations.

3.4.2 Bicycle Facilities

The State of Hawaii Department of Transportation (HDOT) published Bike Plan Hawaii, which outlines the State's plans to accommodate and promote bicycling and its existing and future bicycle facilities. In the vicinity of the Project, the following locations provide existing bike facilities:

- Kahekili Highway between Waiehu Beach Road and Piihana Road

- Kaahumanu Avenue from Lunalilo Street, through to Hana Highway

The Bike Plan Hawaii Master Plan identifies the following locations as future signed-shared roadways in the vicinity of the Project:

- High Street between Honoapiilani Highway and Main Street
- Main Street between High Street and Main Street
- Market Street between Main Street and Kahekili Highway

The *Central Maui Pedestrian & Bicycle Master Plan for 2030* focuses on the Wailuku core which excludes areas west of High Street and therefore the plan does not map ped/bike improvements west of High Street, nor side-specific upgrades on High Street's west side. However, the County's Complete Streets policy, the *I Mua Central Maui Transportation Study*, and Downtown Wailuku revitalization concepts collectively support future multimodal improvements in the area.

3.4.3 Transit Facilities

The Maui Bus system offers several routes that connect the major areas in Maui. In the vicinity of the Project, Wailuku Loop Routes 1 and 2 serves Wailuku and portions of Waiehu, with stops at major sites in the area including the State Office Building, Kahului Transit Center, and Maui Memorial Medical Center. Route 1 travels clockwise and Route 2 travels counterclockwise on the loop. The nearest bus stop to the Project is located along High Street, near the intersection with Main Street. A bus stop is also located along Wells Street. Figure 3.2 shows Wailuku Loop Routes 1 and 2 and the bus stops on High Street and Wells Street is shown in Figure 3.2.

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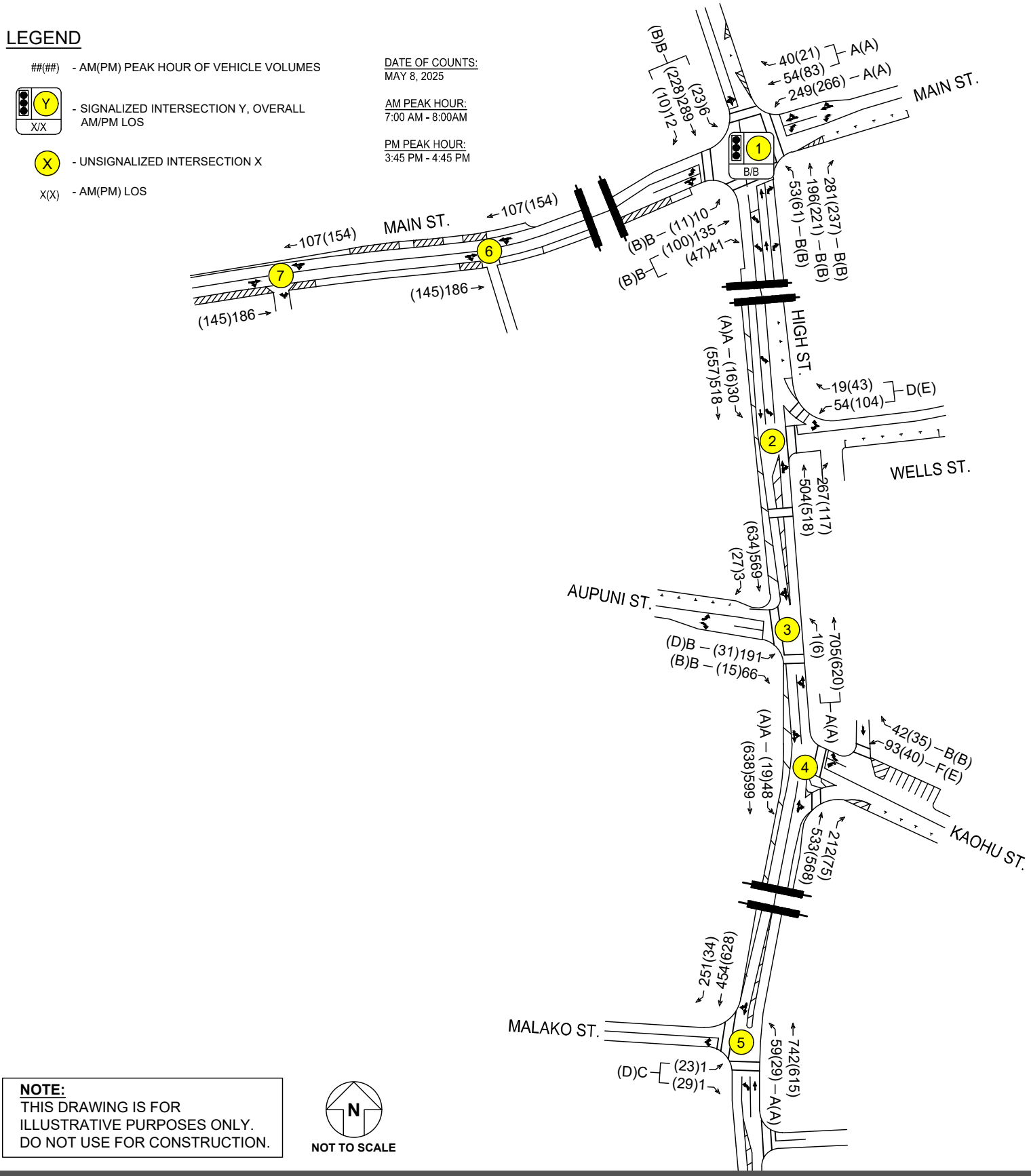

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FIGURE 3.1

EXISTING LANE CONFIGURATIONS, VOLUMES, AND LOS

TABLE 3.1: LOS SUMMARY TABLE
EXISTING CONDITIONS

Intersection	Existing 2025 AM HCM Delay	Existing 2025 AM v/c Ratio	Existing 2025 AM LOS	Existing 2025 PM HCM Delay	Existing 2025 PM v/c Ratio	Existing 2025 PM LOS
1: High St. & Main St.						
NB LT	11.0	0.12	B	10.4	0.12	B
NB TH	12.2	0.41	B	12.1	0.51	B
NB RT	11.0	0.16	B	10.3	0.14	B
EB LT	13.5	0.03	B	12.4	0.03	B
EB TH/RT	16.7	0.59	B	14.9	0.53	B
WB LT	9.2	0.44	A	8.3	0.45	A
WB TH/RT	5.9	0.11	A	5.4	0.13	A
SB LT/TH/RT	13.4	0.55	B	12.2	0.50	B
OVERALL	12.0	-	B	10.8	-	B
2: High St. & Wells St						
WB LT/RT	30.5	0.36	D	41.3	0.64	E
SB LT	9.7	0.04	A	9.1	0.02	A
OVERALL	1.8	-	-	4.6	-	-
3: High St. & Aupuni St						
NB LT/TH	5.6	0.65	A	9.1	0.01	A
EB LT	14.7	0.65	B	34.6	0.22	D
EB RT	12.0	0.25	B	13.6	0.04	B
OVERALL	6.7	-	-	1.0	-	-
4: High St. & Kaohu St						
WB LT	63.3	0.65	F	35.8	0.27	E
WB RT	12.7	0.09	B	13.0	0.08	B
SB LT	8.8	0.05	A	8.8	0.02	A
OVERALL	5.2	-	-	1.6	-	-
5: Malako St. & High St.						
NB LT	9.6	0.08	A	9.2	0.04	A
EB LT/RT	24.8	0.01	C	25.9	0.25	D
OVERALL	0.4	-	-	1.2	-	-

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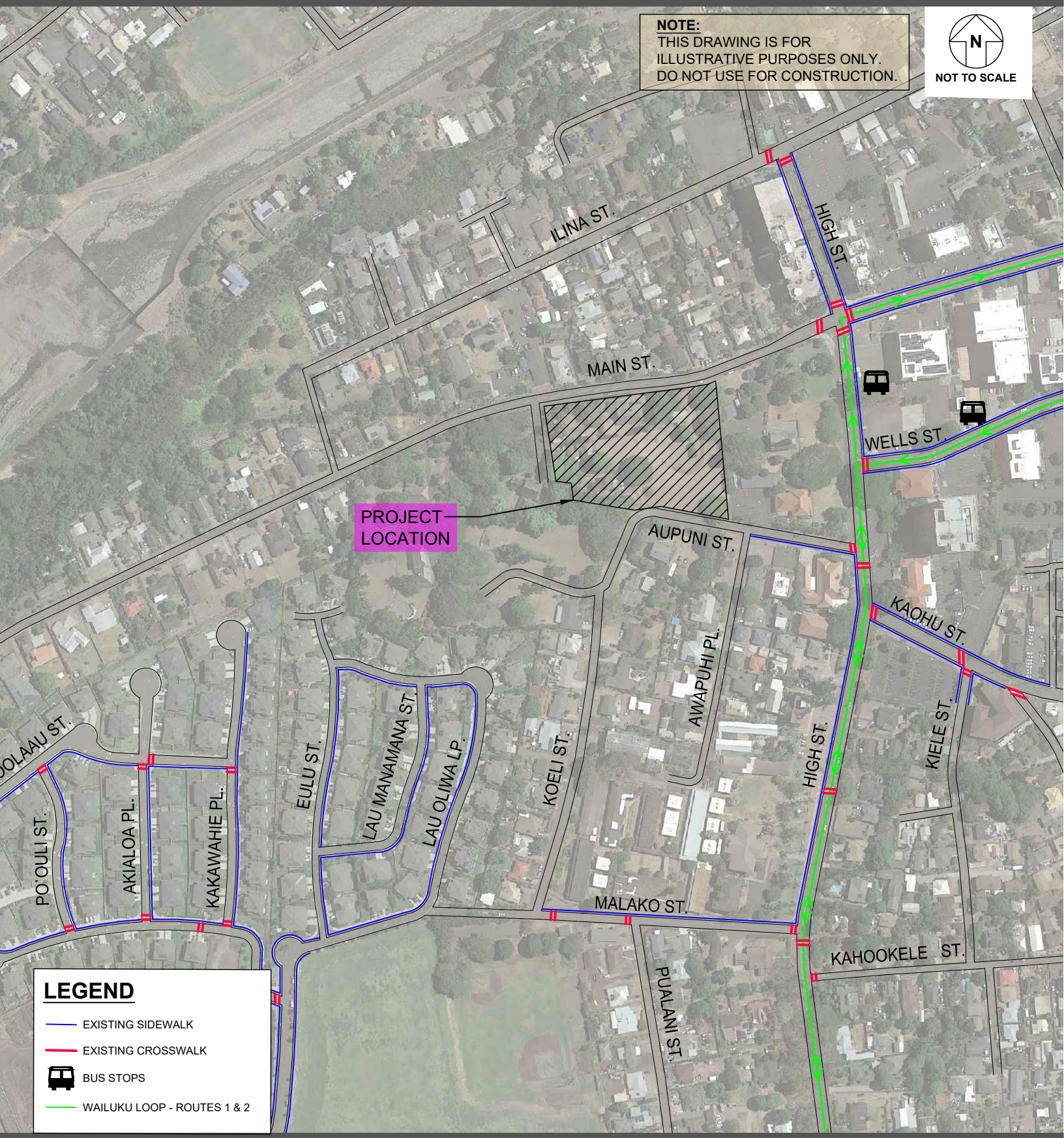

FIGURE 3.2

EXISTING PEDESTRIAN AND TRANSIT FACILITIES

4. BASE YEAR 2028 TRAFFIC CONDITIONS

The Year 2028 was selected to reflect the completion year of the Project.

4.1 Defacto Growth Rate

Projections for Base Year 2028 traffic were based upon existing traffic counts performed by ATA, ambient regional growth, and nearby developments in the immediate vicinity of the Project. Based on historic regional growth comparisons and traffic forecasts based on the Maui Regional Travel Demand Model (MRTDM), ambient growth was conservatively estimated to be approximately 0.9% per year along Main Street and 1.0% per year along High Street.

4.2 Traffic Forecasts for Known Developments

There are a number of planned developments in the area that are in various stages of development. The following projects were considered for inclusion in Base Year conditions:

- **Wailuku Civic Complex (WCC)** – Phase 1A of the project included major off-site improvements including streetscape and pedestrian improvements, replacement of underground utilities, undergrounding of overhead utilities, roadway widening, and traffic signalization at the Main Street/Church Street intersection. Phase 1B of the project included the approximately 400-stall multilevel public parking garage and pedestrian pathways. Both Phase 1A and 1B have been completed, and Phase 2 of WCC, which includes a hula center named Halau of Oiwi Art (HOA), is anticipated to begin construction in 2025. To be conservative, all phases of WCC were included in Base Year conditions.
- **Hale Mahaolu Ke Kahua (formerly Waiehu Affordable Housing)** – Proposed 120-unit affordable housing development on a roughly 13-acre site located in Waiehu, east of Kahekili Highway and south of Waiehu Beach Road. The project is anticipated to include a community clubhouse and an approximately 3,500 SF non-profit building. This project was included in Base Year conditions.
- **Waikapu Light Industrial Project** – Proposed 8.5-acre industrial development along Waiko Road. Forecast traffic growth generated by this development was obtained from the Project's TIAR dated April 2013 and was included in Base Year conditions.
- **Waiale Business Park (formerly Waiko Light Industrial Subdivision)** – This industrial park along Waiko Road is anticipated to include approximately 102,414 SF of commercial space and 215,195 SF of light industrial uses. Forecast traffic growth was based on the latest land use breakdown and was included in Base Year conditions.
- **Emmanuel Lutheran School** – Proposed relocation of Emmanuel Lutheran Church Maui church and school facilities to a currently unoccupied lot located to the south of the Kaulana Mahina apartments. At full build-out, this development is anticipated to include a new preschool, K-8 school and buildings for church/office related functions. In December 2018, State Land Use Commission (LUC) approved a 10-year extension for the project. To be conservative, the preschool, with a 30-student enrollment, was included in Base Year conditions. All other components of the development were not included in Base Year conditions.

- **Maui Lani Village Center** – Expansion of the existing retail center in the Maui Lani subdivision currently occupied by Walgreen and a mix of various commercial, office, residential and warehouse uses. Based on the historic growth of this site, approximately 83,000 SF of commercial, 33,000 SF of office and 231,000 SF of warehouse/self-storage space was assumed to be completed and included in Base Year conditions.

- **Kehalani Village Center** – Infill development of the existing retail center in the Kehalani subdivision currently occupied by Longs Drugs, Foodland, Foodland Gas, American Savings Bank, Coffee Bean & Tea Leaf, McDonalds and Fabmac Homes. It is anticipated that the Kehalani Village Center will be expanded with infill commercial space multi-family dwelling units. The forecast AM and PM peak hour trips for the remaining development were included in Base Year conditions.

- **Kehalani Mauka –** Expansion of the existing residential subdivision located north of Kuikahi Drive, west of Honoapiilani Highway and east of Wailuku Heights. Kehalani is partially developed with residential homes and the Puu Kukui Elementary School. The remaining homes (approximately 345 units) were included in Base Year conditions.

- **Waikapu Country Town** – Proposed master planned development is envisioned to include over 1,500 residential units, 200,000 SF of commercial space, an elementary school, and agricultural preservation land to be located in Waikapu. The first phase of the project, which includes 150 single-family residential units (identified in the project EIS), was included in Base Year conditions.

- **Waikapu Ventures Affordable Housing** – Proposed residential subdivision with 68 single-family units and 12 multi-family units on land bound by Emmanuel Lutheran Pre-School to the north, Waiale Elua to the south, Waiale Road to the east, and Honoapiilani Highway to the west. The forecast AM and PM peak hour trips were obtained from the Project's TIAR dated 2018 and included in Base Year conditions.

- **Kaulana Mahina (formerly Wailuku Apartments)** – Proposed 324 multi-family dwelling units upon 14.4 acres of undeveloped land bound by Kuikahi Drive to the north, Waiale Road to the east, and Honoapiilani Highway to the west. This project was estimated to be approximately 80% occupied at the time of data collection. This project was assumed to be fully complete and included in Base Year conditions.

- **Maui Lani Parkways Phase 3** – Proposed additional 74 single-family units to the existing Maui Lani Parkways Phase 1 and 2 residential subdivision bound by Maui Lani Parkway to the south and The Dunes at Maui Lani Golf Course to the north. This project was included in Base Year conditions.

- **Ag Subdivision Lots** – Proposed five (5) Ag lots, adjacent and to the west of the Project site. Ohana units will be permitted and access to the site will occur temporarily by the existing dirt road easement just north of the Waiolani Subdivision. Permanent access will occur via the future project South Access. The build-out and occupancy timeline of this project is unknown, but this project was included in Base Year conditions to be conservative.

- **Gentry (Maui Lani Ph 8B & 8C)** – Proposed 291 single-family dwelling units. The build-out and occupancy timeline of this project is unknown, but it was conservatively assumed

that this project would be built and occupied by 2028 and was therefore included in Base Year conditions.

- **Puunani Homesteads** – Proposed 137 turn-key homes and 24 vacant residential lots, for a total of 161 single-family dwelling units, bounded by Honoapiilani Highway to the east and the Waiolani residential subdivision to the south. Access to the site will occur via two (2) new driveways off Honoapiilani Highway. This project was included in Base Year conditions.

- **Kuikahi Residential** – Proposed development of approximately 204 residential units. Access to the site is planned to occur from two (2) new driveways on Kuikahi Drive. The eastern access will be located at the existing intersection of Kuikahi Drive/Kehalani Mauka Parkway and will convert the T-intersection into a four-way intersection. This project was included in Base Year conditions.

- **Waiehu Mauka Homestead** – Proposed development of approximately 343 single-family homes and 55 rural half-acre lots for Department of Hawaiian Home Lands (DHHL) beneficiaries. This project was included in Base Year conditions.

- **Boys & Girls Club** – Proposed development of a two-story clubhouse that will replace the existing covered basketball court adjacent to the Paukukalo Community Center in Waiehu. This project was included in Base Year conditions.

Table 4.1 shows the trips generated by each respective development and Figures 4.1A and 4.1B show the locations of the known developments.

Table 4.1: Trips Generated by Known Developments

	AM Peak Hour	AM Peak Hour	AM Peak Hour	PM Peak Hour	PM Peak Hour	PM Peak Hour
Known Development	**Enter**	**Exit**	**Total**	**Enter**	**Exit**	**Total**
Wailuku Civic Complex	301	90	391	240	387	627
Hale Mahaolu Ke Kahua (formerly Waiehu Affordable Housing)	19	45	64	47	32	79
Waikapu Light Industrial Project	74	15	89	21	79	100
Waiale Business Park	187	79	266	183	253	436
Emmanuel Lutheran School	15	14	29	12	14	26
Maui Lani Village Center (formerly VMX)[1]	89	27	116	117	234	411
Kehalani Village Center[2]	37	41	78	133	138	271
Kehalani Mauka[3]	68	206	274	197	114	311
Waikapu Country Town[4]	28	84	112	95	56	150
Waikapu Ventures Affordable Housing	17	51	58	54	32	86
Kaulana Mahina (formerly Wailuku Apartments)	36	103	139	90	51	141
Maui Lani Parkways Phase 3	14	43	57	48	28	76
Ag Subdivision Lots	3	9	12	8	4	12
Gentry (Maui Lani Ph 8B & 8C)	53	158	211	178	105	283
Puunani Homesteads	30	89	119	101	60	161
Kuikahi Residential	24	78	102	73	43	116
Waiehu Master Homestead	107	243	350	302	155	457
Boys & Girls Club	21	11	33	33	37	70

[1] Maui Lani Village Center projections are based on historic growth rate.
[2] Kehalani Village Center is already partially completed with Longs Drugs, Foodland, Foodland Gas and McDonalds. Trips shown accounts for the additional 100,000 SF of commercial space and multi-family low-rise units anticipated to be completed by Year 2028. ITE-recommended 34% pass-by reduction applied to new retail.
[3] Kehalani Mauka projections based on latest assumptions for growth.
[4] Initial residential phase as identified in the Waikapu Country Town Final EIS dated December 2016, assumed to be completed by Year 2028.

WAILUKU UNION AFFORDABLE HOUSING TIAR

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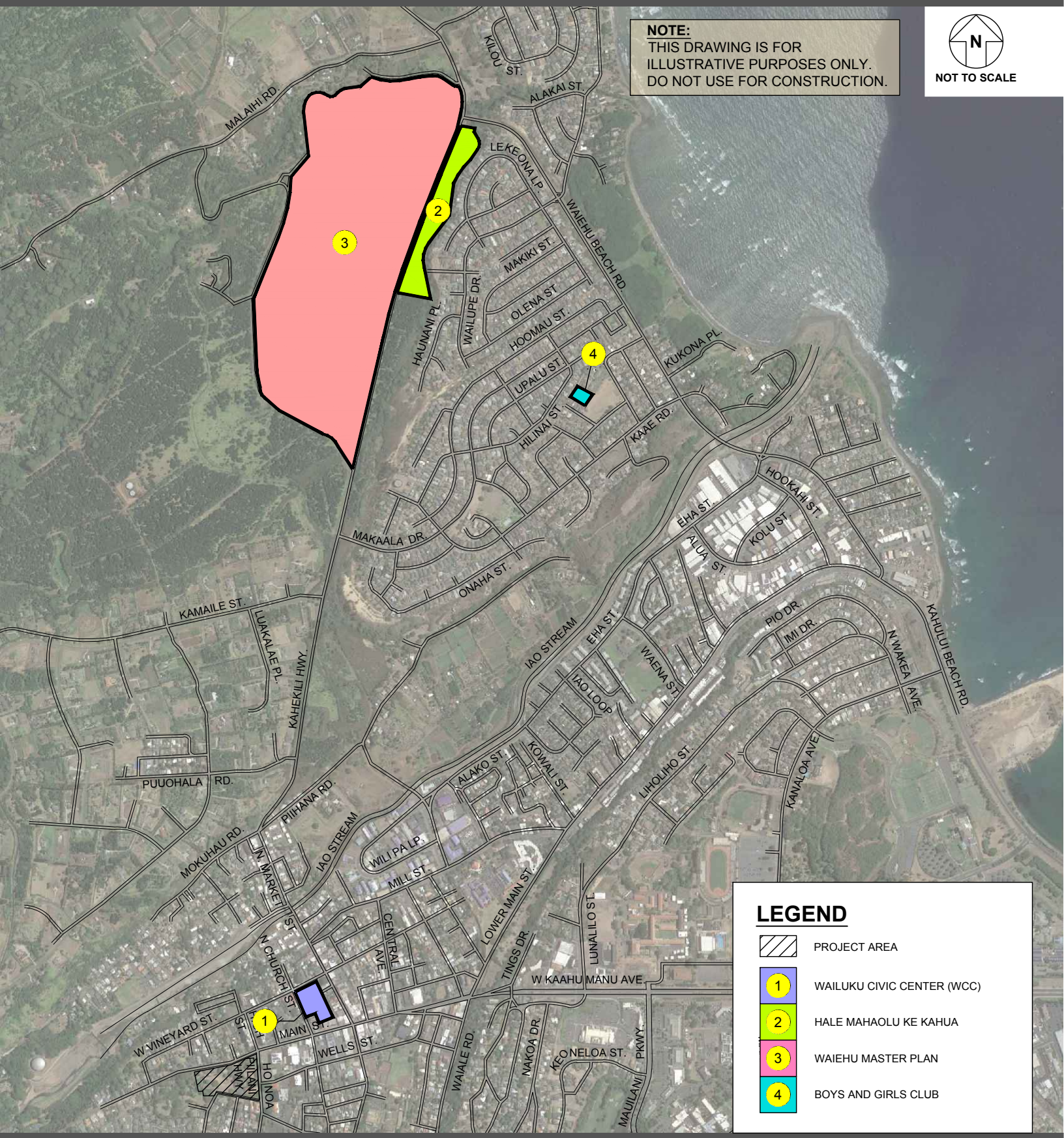

FIGURE 4.1A

BACKGROUND PROJECTS

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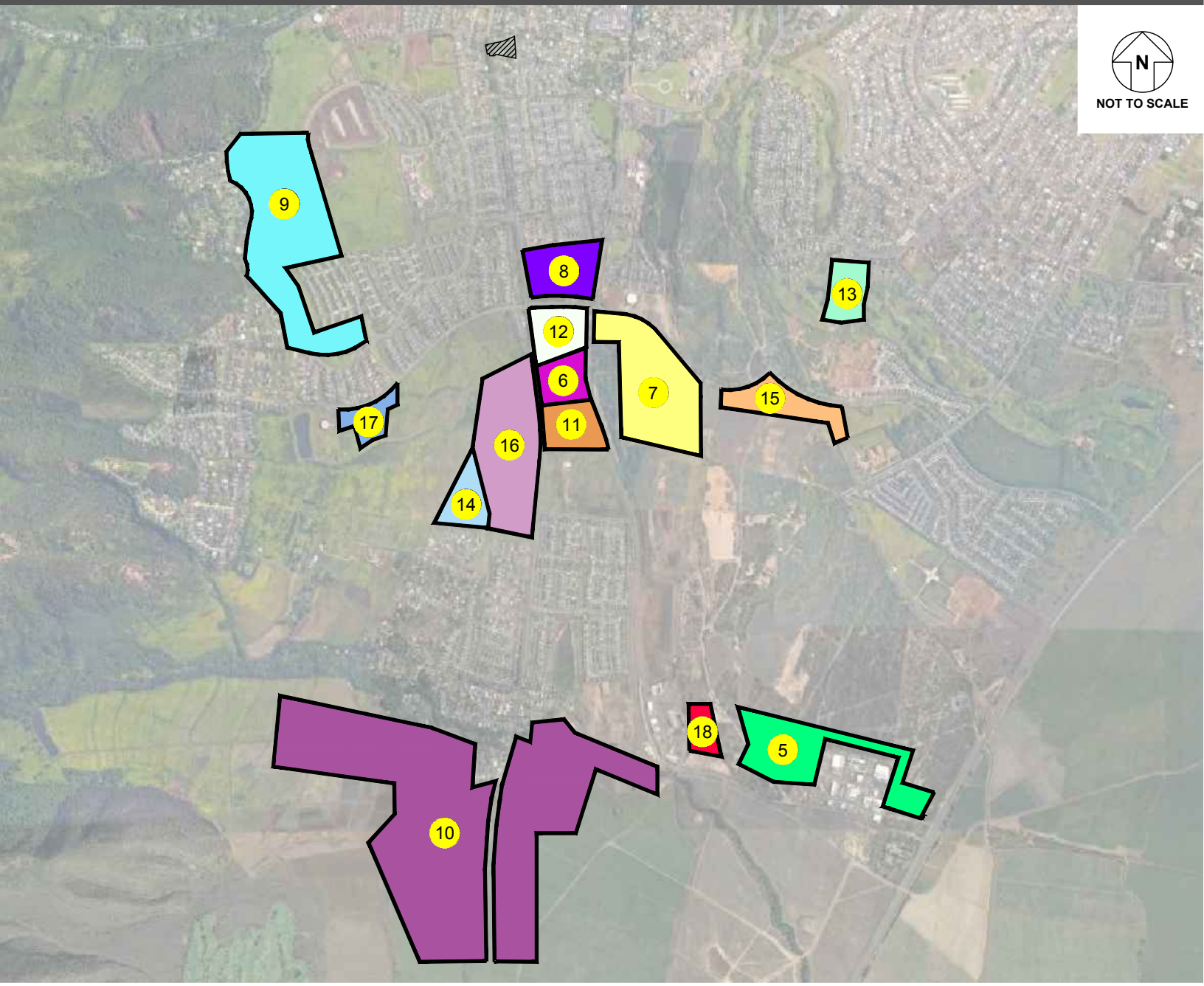

LEGEND

- PROJECT AREA
- 5 WAIALE BUSINESS PARK
- 6 EMMANUEL LUTHERAN SCHOOL
- 7 MAUI LANI VILLAGE CENTER
- 8 KEHALANI VILLAGE CENTER
- 9 KEHALANI MAUKA
- 10 WAIKAPU COUNTRY TOWN
- 11 WAIKAPU VENTURES AFFORDABLE HOUSING
- 12 KAULANA MAHINA
- 13 MAUI LANI PARKWAYS PH. 3
- 14 AG SUBDIVISION LOTS
- 15 GENTRY (MAUI LANI PH 8B & 8C)
- 16 PUUNANI HOMESTEADS
- 17 KUIKAHI RESIDENTIAL
- 18 WAIKAPU LIGHT INDUSTRIAL

FIGURE 4.1B

BACKGROUND DEVELOPMENTS IN PROJECT VICINITY - 2

4.3 Planned Roadway Improvements

There are currently no planned roadway improvements in the vicinity of the Study Area.

4.4 Base Year 2028 Analysis

The ambient traffic growth and trips generated by background developments are anticipated to increase traffic by approximately 19% on average in each direction along Main Street and 28% on average in each direction along High Street in the vicinity of the Project site. For analysis purposes, it was assumed that Wailuku Elementary School operations would be similar to Existing conditions, with the police officer directing traffic at the High Street/Aupuni Street intersection and the crossing guard assisting pedestrians at the High Street/Malako Street intersection during the AM peak hour.

With increased traffic volumes as a result of Base Year growth, it is anticipated that congestive conditions along High Street observed during Existing conditions will continue to persist. At the High Street/Wells Street intersection, the westbound approach is anticipated to worsen from LOS D(E) with Existing conditions during the AM(PM) peak hours to LOS F during the AM peak hour and LOS F and overcapacity conditions during the PM peak hour with Base Year conditions. The High Street/Kaohu Street intersection westbound left-turn movement is anticipated to worsen from LOS F(E) with Existing conditions during the AM(PM) peak hour to LOS F and overcapacity conditions during the AM peak hour and LOS F during the PM peak hour with Base Year conditions. At the High Street/Malako Street intersection, the eastbound approach is anticipated to worsen from LOS C(D) with Existing conditions to LOS E(F) with Base Year conditions during the AM(PM) peak hours.

Analysis shows that all movements at the High Street/Main Street intersection operate at LOS C or better across both peak hours; however queue spillback along southbound High Street observed in Existing conditions and described in Section 3.3 is anticipated to continue to persist with Base Year conditions.

See Figure 4.2 for Base Year 2028 volumes and LOS. A LOS Summary can be found in Table 4.2.

WAILUKU UNION AFFORDABLE HOUSING TIAR

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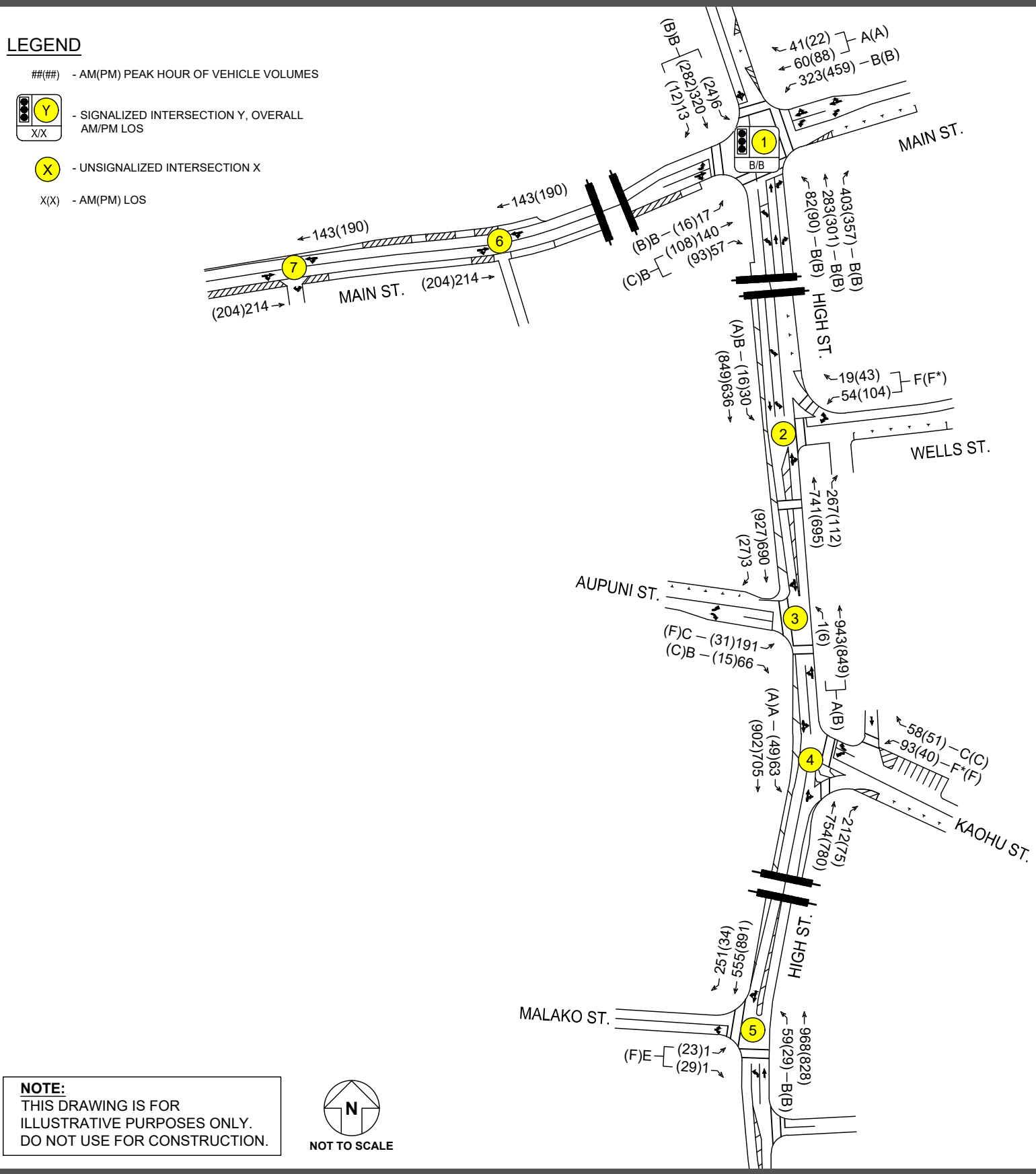

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FIGURE 4.2

BASE YEAR 2028 LANE CONFIGURATIONS, VOLUMES, AND LOS

TABLE 4.2: LOS SUMMARY TABLE
EXISTING CONDITIONS AND BASE YEAR 2028

	Existing 2025 AM	Existing 2025 AM	Existing 2025 AM	Existing 2025 PM	Existing 2025 PM	Existing 2025 PM	Base Year 2028 AM	Base Year 2028 AM	Base Year 2028 AM	Base Year 2028 PM	Base Year 2028 PM	Base Year 2028 PM
Intersection	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
1: High St. & Main St.												
NB LT	11.0	0.12	B	10.4	0.12	B	13.4	0.21	B	15.6	0.26	B
NB TH	12.2	0.41	B	12.1	0.51	B	15.1	0.58	B	17.3	0.63	B
NB RT	11.0	0.16	B	10.3	0.14	B	13.8	0.40	B	15.4	0.38	B
EB LT	13.5	0.03	B	12.4	0.03	B	15.7	0.05	B	17.7	0.05	B
EB TH/RT	16.7	0.59	B	14.9	0.53	B	19.6	0.64	B	22.3	0.67	C
WB LT	9.2	0.44	A	8.3	0.45	A	10.5	0.54	B	11.6	0.71	B
WB TH/RT	5.9	0.11	A	5.4	0.13	A	6.2	0.11	A	6.2	0.12	A
SB LT/TH/RT	13.4	0.55	B	12.2	0.50	B	15.6	0.61	B	17.6	0.63	B
OVERALL	12.0	-	B	10.8	-	B	14.0	-	B	15.3	-	B
2: High St. & Wells St												
WB LT/RT	30.5	0.36	D	41.3	0.64	E	73.2	0.63	F	249.6	1.30	F*
SB LT	9.7	0.04	A	9.1	0.02	A	11.0	0.05	B	9.8	0.02	A
OVERALL	1.8	-	-	4.6	-	-	3.2	-	-	20.3	-	-
3: High St. & Aupuni St												
NB LT/TH	5.6	0.65	A	9.1	0.01	A	6.9	0.77	A	10.4	0.01	B
EB LT	14.7	0.65	B	34.6	0.22	D	22.3	0.71	C	100.3	0.49	F
EB RT	12.0	0.25	B	13.6	0.04	B	18.3	0.28	B	18.3	0.06	C
OVERALL	6.7	-	-	1.0	-	-	8.1	-	-	1.9	-	-
4: High St. & Kaohu St												
WB LT	63.3	0.65	F	35.8	0.27	E	255.6	1.21	F*	148.7	0.71	F
WB RT	12.7	0.09	B	13.0	0.08	B	16.5	0.17	C	16.8	0.15	C
SB LT	8.8	0.05	A	8.8	0.02	A	9.9	0.09	A	9.9	0.07	A
OVERALL	5.2	-	-	1.6	-	-	15.2	-	-	4.0	-	-
5: Malako St. & High St.												
NB LT	9.6	0.08	A	9.2	0.04	A	10.1	0.08	B	10.5	0.05	B
EB LT/RT	24.8	0.01	C	25.9	0.25	D	36.5	0.02	E	60.1	0.48	F
OVERALL	0.4	-	-	1.2	-	-	0.4	-	-	1.9	-	-

5. FUTURE YEAR 2028 WITH PROJECT CONDITIONS

5.1 Background

The Project proposes to construct approximately 85 units of affordable rental housing targeting senior households (aged 62 and older) upon a property located at 2307 Main Street in Wailuku. However, study methodology assumed up to 92 units to conservatively measure the Project's potential impacts. As proposed, the Project will have 44 off-street parking spaces in two (2) parking areas, both accessed from Main Street. Some existing structures on the site, including the Kennan House and Iao House are proposed to be demolished, while the Alexander House and Baybrook House are planned to be preserved and incorporated into the Project as the Community Center and property management offices, respectively. including Access to the Project site planned to occur via two (2) existing access points along Main Street, which will be reconstructed according to Department of Public Works (DPW) standards.

5.1.1 Trip Generation

The Institute of Transportation Engineers (ITE) publishes a book based on empirical data titled, Trip Generation Manual, 11th Edition, providing trip rates and/or formulae based on graphs that correlate vehicular traffic with independent values. The independent variables can range from Dwelling Units (DU) for single and multi-family attached homes to Square-Foot Gross Leasable Area (SF GLA) for commercial development. These trip rates/formulae and their associated directional distributions were used to estimate the increase in the number of vehicular trips generated by the proposed Project. To be conservative, trip rates for multifamily housing (non-age-restricted) was used instead of lower rates for senior affordable multi-family housing.

See Tables 5.1 and 5.2 for Trip Generation formulae and projections for the Project.

Table 5.1: Project Trip Generation Rates

Land Use (ITE Code)	Independent Variable	AM Peak Hour		PM Peak Hour	
		% Enter	Trip Rate	% Enter	Trip Rate
Multifamily Housing Low-Rise (220)	DU	24%	[a]	63%	[b]

Notes
DU = Dwelling Unit
[a] T = 0.31(X) + 22.85
[b] T = 0.43(X) + 20.55

Table 5.2: Project Trip Generation

Land Use (ITE Code)	Quantity	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Multifamily Housing Low-Rise (ITE 220)	92 DU	12	39	51	38	22	60

5.1.2 Trip Distribution/Assignment

Traffic generated by the Project was added to the forecast Base Year 2028 traffic volumes within the vicinity of the Project to constitute the traffic volumes for the Future Year 2028 traffic conditions. Trips generated by the Project were assigned throughout the study area based upon regional origins and destinations as well as existing travel patterns within the vicinity of the Project. Project-generated trips are shown in Figure 5.1.

5.2 Future Year 2028 Analysis

As shown in Table 5.2, the Project is anticipated to generate 51(60) trips during the AM and PM peak hours, respectively. Regionally, the majority of Project trips will route to/from the Kahului-Wailuku areas and will add about 8-22 vehicles along Main Street and 3-11 vehicles along High Street, per direction. This corresponds to an approximately 13% increase along Main Street and 0.9% increase along High Street from Base Year conditions. With the added Project trips, operations at the study intersections are anticipated to be similar to Base Year 2028 conditions.

All movements at the unsignalized Project driveways along Main Street are expected to operate at LOS A.

As a result, no improvements are recommended as a result of the Project.

See Figure 5.2 for Future Year 2028 volumes and LOS. A LOS Summary can be found in Table 5.3.

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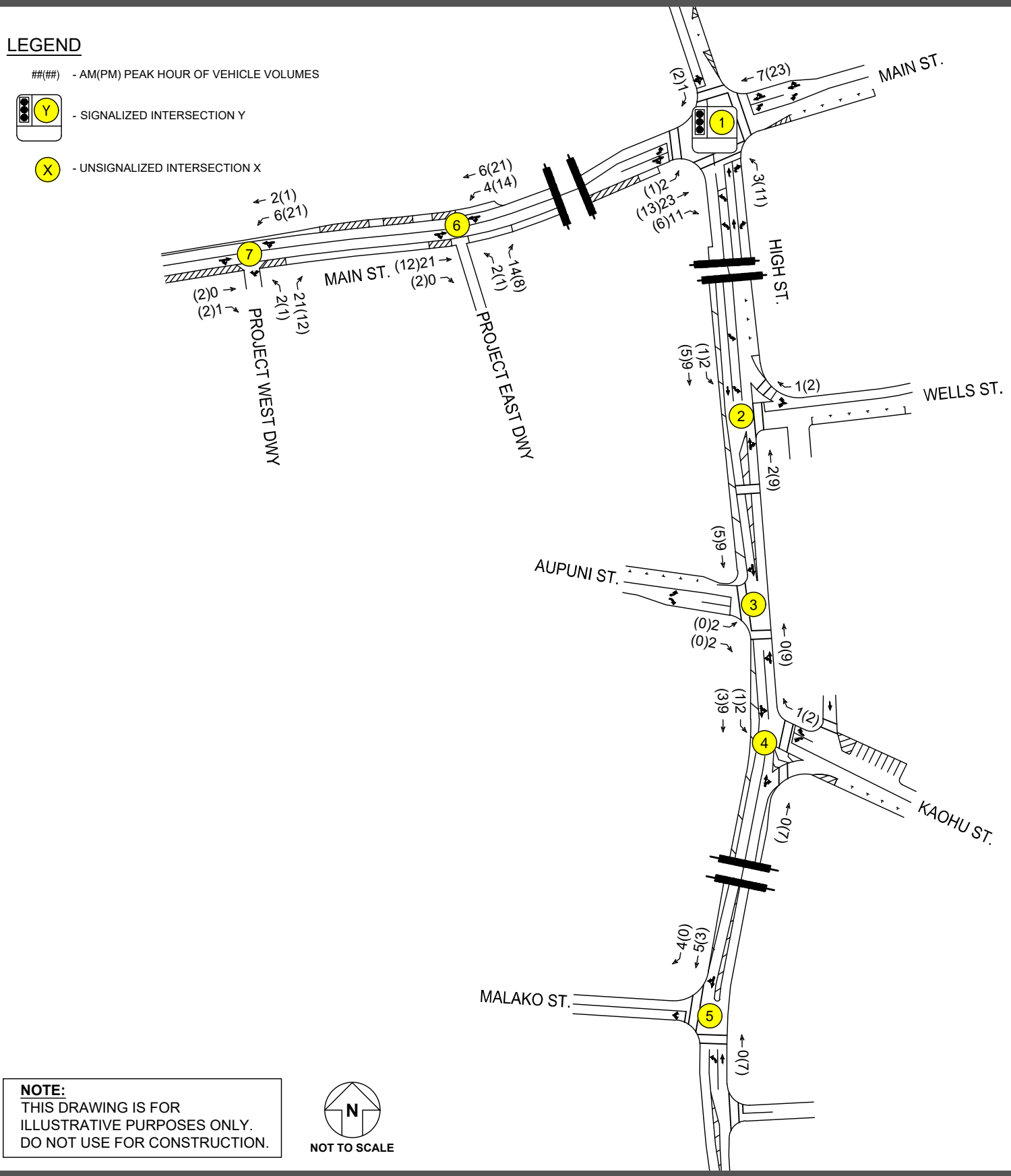

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FIGURE 5.1

PROJECT TRIPS

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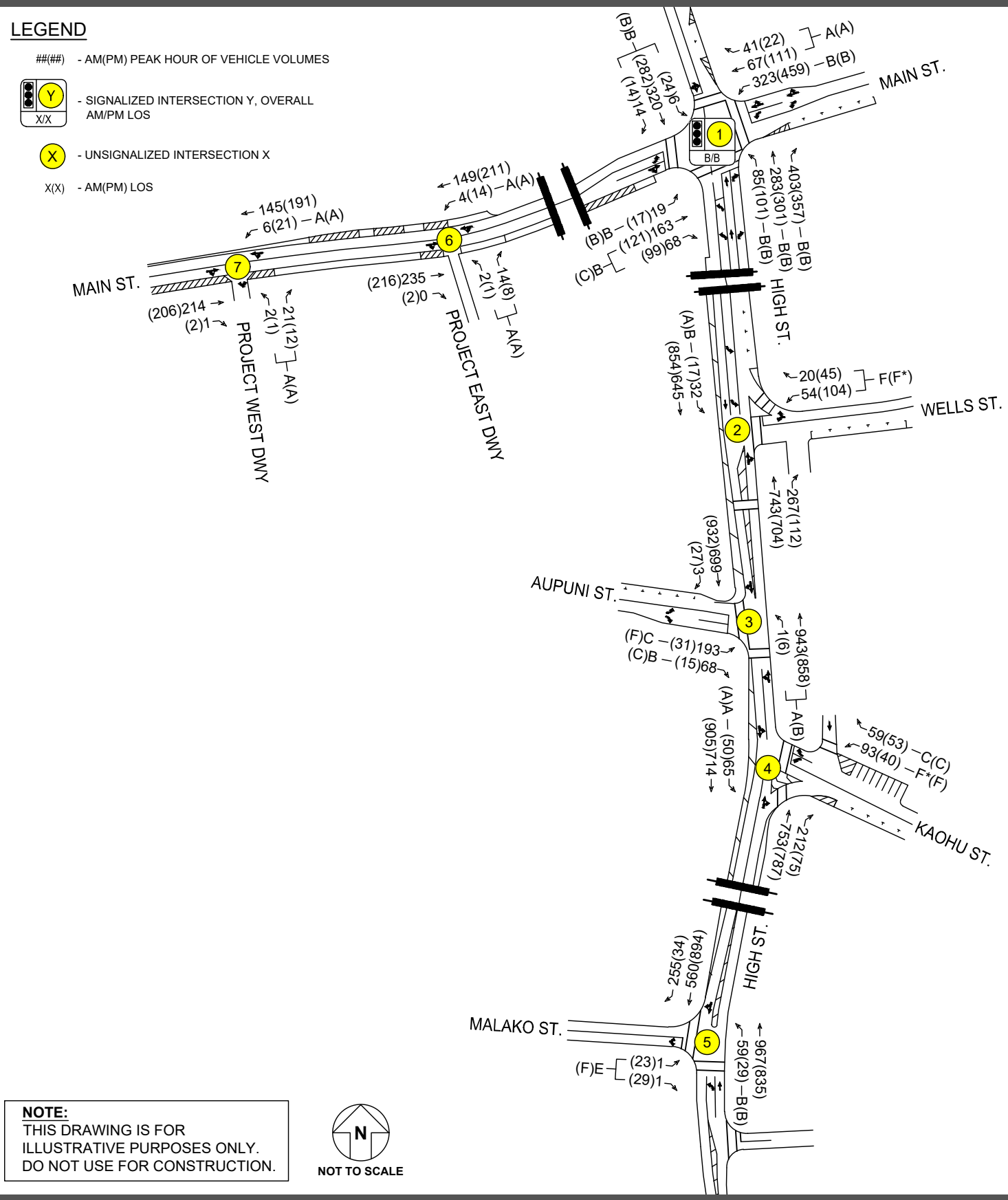

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FIGURE 5.2

FUTURE YEAR 2028 LANE CONFIGURATIONS, VOLUMES, AND LOS

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TABLE 5.3: LOS SUMMARY TABLE
EXISTING CONDITIONS, BASE YEAR 2028, AND FUTURE YEAR 2028

	Existing 2025 AM	Existing 2025 AM	Existing 2025 AM	Existing 2025 PM	Existing 2025 PM	Existing 2025 PM	Base Year 2028 AM	Base Year 2028 AM	Base Year 2028 AM	Base Year 2028 PM	Base Year 2028 PM	Base Year 2028 PM	Future Year 2028 AM	Future Year 2028 AM	Future Year 2028 AM	Future Year 2028 PM	Future Year 2028 PM	Future Year 2028 PM
Intersection	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
1: High St. & Main St.																		
NB LT	11.0	0.12	B	10.4	0.12	B	13.4	0.21	B	15.6	0.26	B	14.2	0.23	B	16.6	0.30	B
NB TH	12.2	0.41	B	12.1	0.51	B	15.1	0.58	B	17.3	0.63	B	15.8	0.58	B	17.8	0.63	B
NB RT	11.0	0.16	B	10.3	0.14	B	13.8	0.40	B	15.4	0.38	B	14.4	0.40	B	15.8	0.38	B
EB LT	13.5	0.03	B	12.4	0.03	B	15.7	0.05	B	17.7	0.05	B	15.5	0.05	B	17.7	0.05	B
EB TH/RT	16.7	0.59	B	14.9	0.53	B	19.6	0.64	B	22.3	0.67	C	19.9	0.68	B	22.6	0.69	C
WB LT	9.2	0.44	A	8.3	0.45	A	10.5	0.54	B	11.6	0.71	B	10.7	0.55	B	11.9	0.72	B
WB TH/RT	5.9	0.11	A	5.4	0.13	A	6.2	0.11	A	6.2	0.12	A	6.3	0.12	A	6.3	0.15	A
SB LT/TH/RT	13.4	0.55	B	12.2	0.50	B	15.6	0.61	B	17.6	0.63	B	16.4	0.62	B	18.2	0.64	B
OVERALL	12.0	-	B	10.8	-	B	14.0	-	B	15.3	-	B	14.6	-	B	15.7	-	B
2: High St. & Wells St																		
WB LT/RT	30.5	0.36	D	41.3	0.64	E	73.2	0.63	F	249.6	1.30	F*	76.4	0.65	F	264.4	1.34	F*
SB LT	9.7	0.04	A	9.1	0.02	A	11.0	0.05	B	9.8	0.02	A	11.0	0.06	B	9.8	0.02	A
OVERALL	1.8	-	-	4.6	-	-	3.2	-	-	20.3	-	-	3.4	-	-	21.5	-	-
3: High St. & Aupuni St																		
NB LT/TH	5.6	0.65	A	9.1	0.01	A	6.9	0.77	A	10.4	0.01	B	6.9	0.77	A	10.4	0.01	B
EB LT	14.7	0.65	B	34.6	0.22	D	22.3	0.71	C	100.3	0.49	F	22.3	0.71	C	103.9	0.50	F
EB RT	12.0	0.25	B	13.6	0.04	B	18.3	0.28	B	18.3	0.06	C	18.3	0.28	B	18.4	0.06	C
OVERALL	6.7	-	-	1.0	-	-	8.1	-	-	1.9	-	-	8.2	-	-	1.9	-	-
4: High St. & Kaohu St																		
WB LT	63.3	0.65	F	35.8	0.27	E	255.6	1.21	F*	148.7	0.71	F	269.8	1.24	F*	155.4	0.72	F
WB RT	12.7	0.09	B	13.0	0.08	B	16.5	0.17	C	16.8	0.15	C	16.5	0.17	C	17.0	0.16	C
SB LT	8.8	0.05	A	8.8	0.02	A	9.9	0.09	A	9.9	0.07	A	9.9	0.09	A	9.9	0.07	A
OVERALL	5.2	-	-	1.6	-	-	15.2	-	-	4.0	-	-	15.9	-	-	4.1	-	-
5: Malako St. & High St.																		
NB LT	9.6	0.08	A	9.2	0.04	A	10.1	0.08	B	10.5	0.05	B	10.1	0.08	B	10.5	0.05	B
EB LT/RT	24.8	0.01	C	25.9	0.25	D	36.5	0.02	E	60.1	0.48	F	36.8	0.02	E	61.4	0.48	F
OVERALL	0.4	-	-	1.2	-	-	0.4	-	-	1.9	-	-	0.4	-	-	1.9	-	-
6: Project East Dwy. & Main St.																		
NB LT/RT	-	-	-	-	-	-	-	-	-	-	-	-	9.9	0.02	A	9.8	0.01	A
WB LT	-	-	-	-	-	-	-	-	-	-	-	-	7.8	0.00	A	7.7	0.01	A
OVERALL	0.0	-	-	0.0	-	-	0.0	-	-	0.0	-	-	0.5	-	-	0.4	-	-
7: Project West Dwy. & Main St.																		
NB LT/RT	-	-	-	-	-	-	-	-	-	-	-	-	9.8	0.0	A	9.7	0.0	A
WB LT	-	-	-	-	-	-	-	-	-	-	-	-	7.7	0.0	A	7.7	0.0	A
OVERALL	0.0	-	-	0.0	-	-	0.0	-	-	0.0	-	-	0.7	-	-	0.7	-	-

6. CONCLUSIONS AND RECCOMMENDATIONS

The Project proposes to construct approximately 85 of affordable rental housing targeting senior households (aged 62 and older) upon a property located at 2307 Main Street in Wailuku. However, study methodology assumed up to 92 units to conservatively measure the Project's potential impacts. As proposed, the Project will have 44 off-street parking spaces in two (2) parking areas, both accessed from Main Street. Some existing structures on the site, including the Kennan House and Iao House are proposed to be demolished, while the Alexander House and Baybrook House are planned to be preserved and incorporated into the Project as the Community Center and property management offices, respectively. including Access to the Project site planned to occur via two (2) existing access points along Main Street, which will be reconstructed according to Department of Public Works (DPW) standards.

6.1 Existing Conditions

During the AM peak hour, interruptions to thoroughfare along High Street resulted in the southbound High Street queue spilling back through the High Street/Main Street intersection and periodically blocking progression onto High Street. When movements onto southbound High Street were blocked, the westbound left-turn movement at the High Street/Main Street intersection was observed to spill out of the left-turn pocket and block access to the eastbound shared through/right-turn lane. In the northbound direction, the queue from the High Street/Aupuni Street intersection spills back through the Malako Street intersection to Kehalani Mauka Parkway at its maximum. By 8:00 AM, congestion in the area had dissipated.

During the PM peak hour, flow along High Street in both the northbound and southbound directions was generally observed to be acceptable, with temporary queues periodically forming due to pedestrian crossings, and turning vehicles along mainline High Street stopping in the single travel lane to yield to oncoming traffic. Also, it was observed that mainline High Street traffic sometimes stopped in the travel lane to yield to vehicles on the minor street, which added to some instances of congestion along High Street. Overall, these queues cleared quickly as pedestrian crossings were completed, and turning vehicles were able to complete the movement.

6.2 Base Year 2028

The ambient traffic growth and trips generated by background developments are anticipated to increase traffic by approximately 19% in each direction along Main Street and 28% in each direction along High Street in the vicinity of the Project site. For analysis purposes, it was assumed that Wailuku Elementary School operations would be similar to Existing conditions, with the police officer directing traffic at the High Street/Aupuni Street intersection and the crossing guard assisting pedestrians at the High Street/Malako Street intersection during the AM peak hour.

With increased traffic volumes as a result of Base Year growth, it is anticipated that congestive conditions along High Street observed during Existing conditions will continue to persist, and the following movements will experience a change in LOS:

- High Street/Wells Street: The westbound approach is anticipated to worsen from LOS D(E) with Existing conditions during the AM(PM) peak hours to LOS F during the AM peak hour and LOS F and overcapacity conditions during the PM peak hour with Base Year conditions.

- High Street/Kaohu Street: The westbound left-turn movement is anticipated to worsen from LOS F(E) with Existing conditions during the AM(PM) peak hour to LOS F and overcapacity conditions during the AM peak hour and LOS F during the PM peak hour with Base Year conditions.
- High Street/Malako Street: The eastbound approach is anticipated to worsen from LOS C(D) with Existing conditions to Lg OS E(F) with Base Year conditions during the AM(PM) peak hours.

6.3 Future Year 2028

As shown in Table 5.2, the Project is anticipated to generate 51(60) trips during the AM and PM peak hours, respectively. Regionally, the majority of Project trips will route to/from the Kahului-Wailuku areas and will add about 8-22 vehicles along Main Street and 3-11 vehicles along High Street, per direction. This corresponds to an approximately 13% increase along Main Street and 0.9% increase along High Street from Base Year conditions. With the added Project trips, operations at the study intersections are anticipated to be similar to Base Year 2028 conditions.

All movements at the unsignalized Project driveways along Main Street are expected to operate at LOS A.

As a result, no capacity-related improvements are recommended as a result of the Project.

6.4 Recommendations

As previously discussed, with the addition of Project-generated trips, traffic operations at all study intersections are anticipated to remain similar to Base Year 2028 conditions, indicating that traffic generated by the Project is not expected substantially affect Levels of Service after completion and occupancy. Since the Project-generated traffic is not anticipated to substantially affect Levels of Service of the study roadways, no capacity-related roadway improvements are recommended as a result of the Project.

While the Project does not provide one (1) parking space per unit, several parking demand strategies can be implemented to help manage on-site parking demand and minimize impacts to street parking in the surrounding neighborhood. These strategies leverage the senior-focused nature of the Project and the urban location:

- On-site Transportation Amenities:
    - On-site pick-up/drop-off areas will accommodate family, friends, and ride-share services to pick up and drop off the residents.
    - Parking spaces may be dedicated for car-sharing services such as Zipcar or similar programs.
- Tenant Selection and Support:
    - EAH will give preference to seniors who do not own a car.
    - An on-site EAH Resource Services Coordinator will assist residents to identify Maui Economic Opportunity, Inc. (MEO) Human Services transportation services they may be eligible for, such as the ADA Paratransit program for residents with disabilities.

- Location Advantages:
    - The Project is in proximity to government offices, services, shops, and restaurants, reducing the need for vehicle trips.
    - Maui Bus service is available free of charge for seniors 55 years of age and older, providing convenient access to destinations throughout the region
    - The nearest bus stop is along High Street near the intersection with Main Street.
- Operational Considerations:
    - Except for the on-site Property Manager, employee parking may be provided off-site to maximize on-site parking availability for residents.

These parking management strategies are appropriate for this senior affordable housing project and will help minimize vehicle ownership rates and associated parking demand, thereby reducing potential impacts to neighborhood street parking.

7. REFERENCES

1. County of Maui, Maui Bus Public Transit System, mauicounty.gov.
2. Federal Highway Administration, Manual on Uniform Traffic Control Devices, 2009.
3. Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021.
4. Maui Metropolitan Organization, Hele Mai Maui Long Range Transportation Plan 2040, 2019.
5. State of Hawaii Department of Transportation, Bike Plan Hawaii Master Plan, 2003.
6. Transportation Research Board, Highway Capacity Manual, 7th Edition, 2022.

APPENDICES

APPENDIX A

LOS CRITERIA

LEVEL OF SERVICE (LOS) CRITERIA

VEHICULAR LEVEL OF SERVICE FOR SIGNALIZED INTERSECTIONS (HCM 7th Edition)

Level of service for vehicles at signalized intersections is directly related to delay values and is assigned on that basis. Level of Service is a measure of the acceptability of delay values to motorists at a given intersection. The criteria are given in the table below.

Level-of Service Criteria for Signalized Intersections

Level of Service	Control Delay per Vehicle (sec./veh.)
A	< 10.0
B	>10.0 and ≤ 20.0
C	>20.0 and ≤ 35.0
D	>35.0 and ≤ 55.0
E	>55.0 and ≤ 80.0
F	> 80.0

Delay is a complex measure, and is dependent on a number of variables, including the quality of progression, the cycle length, the green ratio, and the v/c ratio for the lane group or approach in question.

VEHICULAR LEVEL OF SERVICE CRITERIA FOR UNSIGNALIZED INTERSECTIONS (HCM 7th Edition)

The level of service criteria for vehicles at unsignalized intersections is defined as the average control delay, in seconds per vehicle.

LOS delay threshold values are lower for two-way stop-controlled (TWSC) and all-way stop-controlled (AWSC) intersections than those of signalized intersections. This is because more vehicles pass through signalized intersections, and therefore, drivers expect and tolerate greater delays. While the criteria for level of service for TWSC and AWSC intersections are the same, procedures to calculate the average total delay may differ.

Level of Service Criteria for Two-Way Stop-Controlled Intersections

Level of Service	Average Control Delay (sec/veh)
A	≤ 10
B	>10 and ≤15
C	>15 and ≤25
D	>25 and ≤35
E	>35 and ≤50
F	> 50

APPENDIX B

TRAFFIC COUNT DATA

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File Name : High St - Aupuni St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 1

Groups Printed- Combined Groups

	HIGH ST SOUTHBOUND				WESTBOUND				HIGH ST NORTHBOUND				AUPUNI ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	0	137	0	0	0	0	0	0	1	94	0	0	6	0	4	0	242
06:45 AM	0	135	2	0	0	0	0	0	4	119	0	0	13	0	9	0	282
Total	0	272	2	0	0	0	0	0	5	213	0	0	19	0	13	0	524
07:00 AM	0	122	2	0	0	0	0	0	1	140	0	0	44	0	16	0	325
07:15 AM	0	168	0	0	0	0	0	0	0	170	0	0	49	0	18	0	405
07:30 AM	0	164	0	0	0	0	0	0	0	213	0	0	72	0	15	0	464
07:45 AM	0	115	1	0	0	0	0	0	0	182	0	0	26	0	17	0	341
Total	0	569	3	0	0	0	0	0	1	705	0	0	191	0	66	0	1535
08:00 AM	0	103	0	0	0	0	0	0	4	143	0	0	10	0	7	0	267
08:15 AM	0	95	5	0	0	0	0	0	2	139	0	0	4	0	6	0	251
Grand Total	0	1039	10	0	0	0	0	0	12	1200	0	0	224	0	92	0	2577
Apprch %	0	99	1	0	0	0	0	0	1	99	0	0	70.9	0	29.1	0	
Total %	0	40.3	0.4	0	0	0	0	0	0.5	46.6	0	0	8.7	0	3.6	0	

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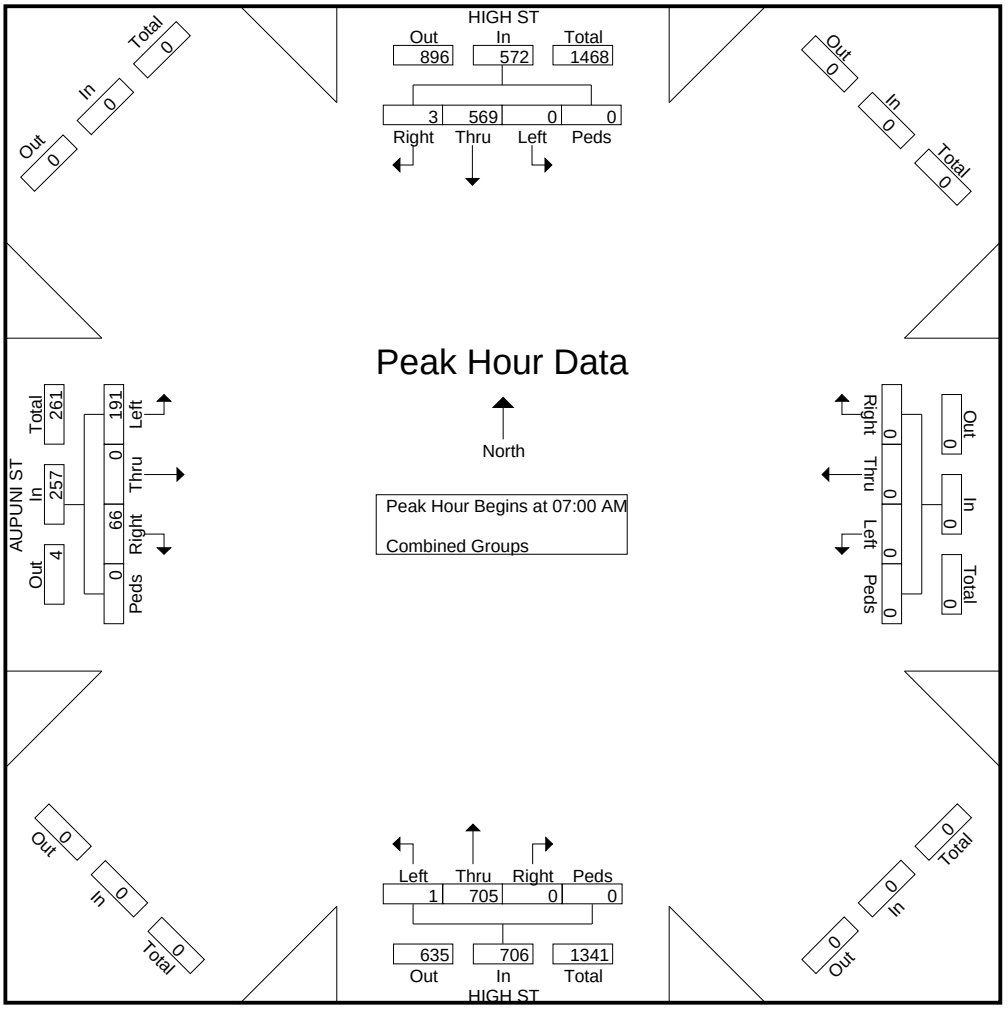
Start Date : 5/8/2025
Page No : 2

	HIGH ST SOUTHBOUND					WESTBOUND					HIGH ST NORTHBOUND					AUPUNI ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 06:30 AM to 08:15 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	0	122	**2**	0	124	0	0	0	0	0	**1**	140	0	0	141	44	0	16	0	60	325
07:15 AM	0	**168**	0	0	**168**	0	0	0	0	0	0	170	0	0	170	49	0	**18**	0	67	405
07:30 AM	0	164	0	0	164	0	0	0	0	0	0	**213**	0	0	**213**	**72**	0	15	0	**87**	**464**
07:45 AM	0	115	1	0	116	0	0	0	0	0	0	182	0	0	182	26	0	17	0	43	341
Total Volume	0	569	3	0	572	0	0	0	0	0	1	705	0	0	706	191	0	66	0	257	1535
% App. Total	0	99.5	0.5	0		0	0	0	0		0.1	99.9	0	0		74.3	0	25.7	0		
PHF	.000	.847	.375	.000	.851	.000	.000	.000	.000	.000	.250	.827	.000	.000	.829	.663	.000	.917	.000	.739	.827



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Start Date : 5/8/2025
Page No : 1

Groups Printed- Combined Groups

	HIGH ST SOUTHBOUND				WESTBOUND				HIGH ST NORTHBOUND				AUPUNI ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	0	155	5	0	0	0	0	0	2	157	0	0	10	0	4	0	333
03:45 PM	0	159	10	0	0	0	0	0	0	161	0	0	6	0	5	0	341
Total	0	314	15	0	0	0	0	0	2	318	0	0	16	0	9	0	674
04:00 PM	0	149	5	0	0	0	0	0	0	167	0	0	10	0	2	0	333
04:15 PM	0	154	7	0	0	0	0	0	2	140	0	0	6	0	4	0	313
04:30 PM	0	172	5	0	0	0	0	0	4	152	0	0	9	0	4	0	346
04:45 PM	0	153	2	0	0	0	0	0	4	142	0	0	7	0	2	0	310
Total	0	628	19	0	0	0	0	0	10	601	0	0	32	0	12	0	1302
05:00 PM	0	148	2	0	0	0	0	0	1	120	0	0	3	0	2	0	276
05:15 PM	0	107	5	0	0	0	0	0	0	118	0	0	4	0	2	0	236
Grand Total	0	1197	41	0	0	0	0	0	13	1157	0	0	55	0	25	0	2488
Apprch %	0	96.7	3.3	0	0	0	0	0	1.1	98.9	0	0	68.8	0	31.2	0	
Total %	0	48.1	1.6	0	0	0	0	0	0.5	46.5	0	0	2.2	0	1	0	

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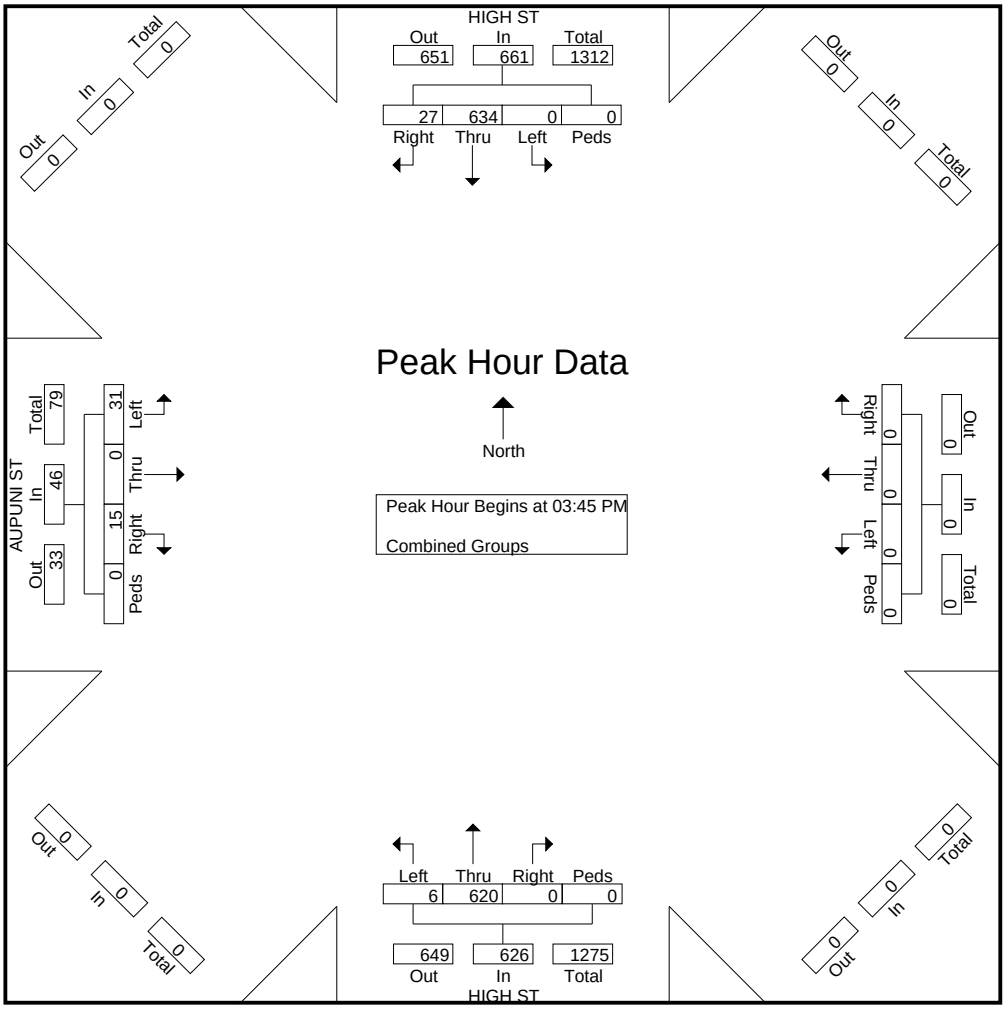
	HIGH ST SOUTHBOUND					WESTBOUND					HIGH ST NORTHBOUND					AUPUNI ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:30 PM to 05:15 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	0	159	**10**	0	169	0	0	0	0	0	0	161	0	0	161	6	0	**5**	0	11	341
04:00 PM	0	149	5	0	154	0	0	0	0	0	0	**167**	0	0	**167**	**10**	0	2	0	12	333
04:15 PM	0	154	7	0	161	0	0	0	0	0	2	140	0	0	142	6	0	4	0	10	313
04:30 PM	0	**172**	5	0	**177**	0	0	0	0	0	**4**	152	0	0	156	9	0	4	0	**13**	**346**
Total Volume	0	634	27	0	661	0	0	0	0	0	6	620	0	0	626	31	0	15	0	46	1333
% App. Total	0	95.9	4.1	0		0	0	0	0		1	99	0	0		67.4	0	32.6	0		
PHF	.000	.922	.675	.000	.934	.000	.000	.000	.000	.000	.375	.928	.000	.000	.937	.775	.000	.750	.000	.885	.963



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File Name : High St - Kaohu St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 1

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				KAOHU ST Westbound				HIGH ST Northbound				Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	7	130	0	0	5	0	4	1	0	87	13	0	0	0	0	0	247
06:45 AM	10	131	0	0	10	0	5	0	0	115	15	0	0	0	0	0	286
Total	17	261	0	0	15	0	9	1	0	202	28	0	0	0	0	0	533
07:00 AM	16	123	0	0	27	0	9	1	0	110	42	0	0	0	0	0	328
07:15 AM	9	174	0	0	23	0	12	3	0	132	67	0	0	0	0	0	420
07:30 AM	16	173	0	0	30	0	11	0	0	131	72	0	0	0	0	0	433
07:45 AM	7	129	0	0	13	0	10	2	0	160	31	0	0	0	0	0	352
Total	48	599	0	0	93	0	42	6	0	533	212	0	0	0	0	0	1533
08:00 AM	7	101	0	0	5	0	13	2	0	121	14	0	0	0	0	0	263
08:15 AM	5	100	0	0	2	0	9	2	0	129	9	0	0	0	0	0	256
Grand Total	77	1061	0	0	115	0	73	11	0	985	263	0	0	0	0	0	2585
Apprch %	6.8	93.2	0	0	57.8	0	36.7	5.5	0	78.9	21.1	0	0	0	0	0	
Total %	3	41	0	0	4.4	0	2.8	0.4	0	38.1	10.2	0	0	0	0	0	
Motorcycles	0	3	0	0	0	0	0	0	0	2	0	0	0	0	0	0	5
% Motorcycles	0	0.3	0	0	0	0	0	0	0	0.2	0	0	0	0	0	0	0.2
Cars & Light Goods	73	1032	0	0	112	0	72	0	0	974	261	0	0	0	0	0	2524
% Cars & Light Goods	94.8	97.3	0	0	97.4	0	98.6	0	0	98.9	99.2	0	0	0	0	0	97.6
Buses	0	14	0	0	2	0	0	0	0	8	0	0	0	0	0	0	24
% Buses	0	1.3	0	0	1.7	0	0	0	0	0.8	0	0	0	0	0	0	0.9
Single-Unit Trucks	4	8	0	0	0	0	1	0	0	1	0	0	0	0	0	0	14
% Single-Unit Trucks	5.2	0.8	0	0	0	0	1.4	0	0	0.1	0	0	0	0	0	0	0.5
Articulated Trucks	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2
% Articulated Trucks	0	0.1	0	0	0.9	0	0	0	0	0	0	0	0	0	0	0	0.1
Bicycles on Road	0	3	0	0	0	0	0	0	0	0	2	0	0	0	0	0	5
% Bicycles on Road	0	0.3	0	0	0	0	0	0	0	0	0.8	0	0	0	0	0	0.2
Bicycles on Crosswalk	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	2
% Bicycles on Crosswalk	0	0	0	0	0	0	0	18.2	0	0	0	0	0	0	0	0	0.1
Pedestrians	0	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	9
% Pedestrians	0	0	0	0	0	0	0	81.8	0	0	0	0	0	0	0	0	0.3

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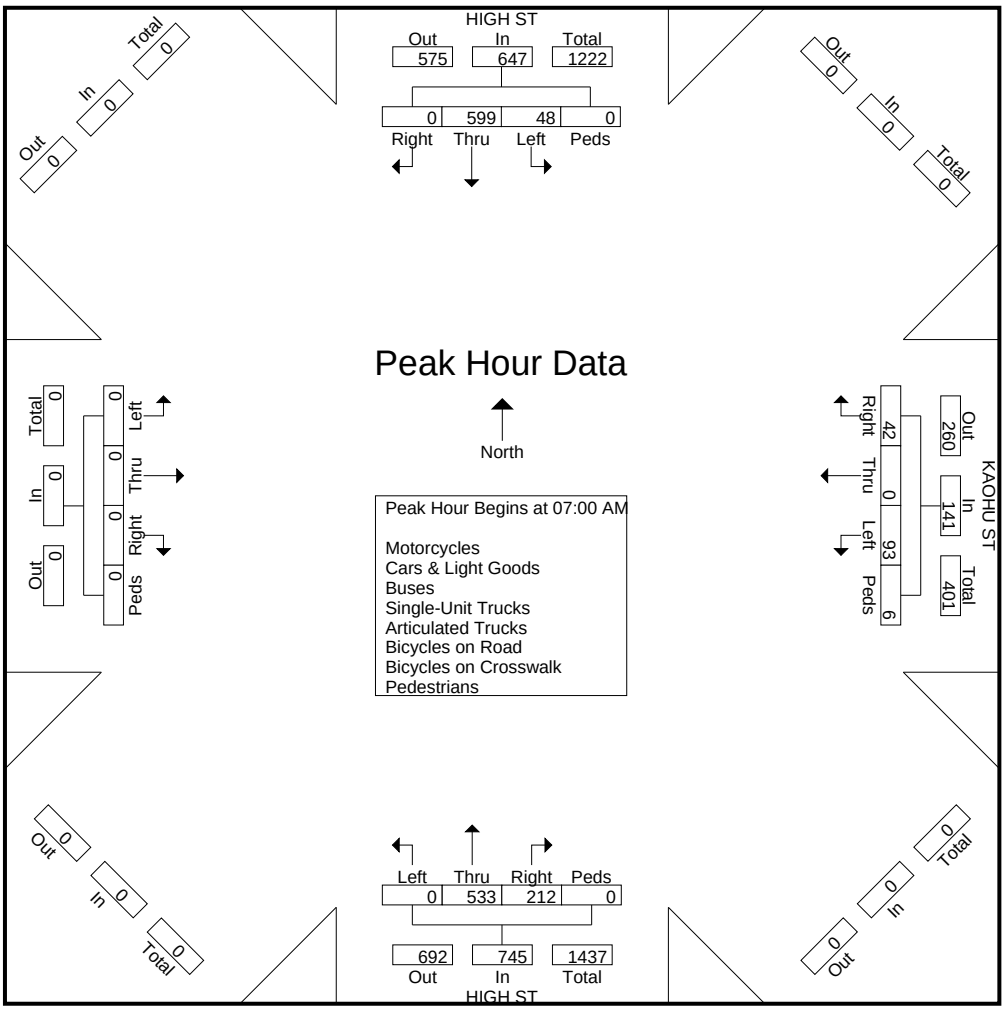
File Name : High St - Kaohu St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 2

	HIGH ST Southbound					KAOHU ST Westbound					HIGH ST Northbound					Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 06:30 AM to 08:15 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	16	123	0	0	139	27	0	9	1	37	0	110	42	0	152	0	0	0	0	0	328
07:15 AM	9	174	0	0	183	23	0	12	3	38	0	132	67	0	199	0	0	0	0	0	420
07:30 AM	16	173	0	0	189	30	0	11	0	41	0	131	72	0	203	0	0	0	0	0	433
07:45 AM	7	129	0	0	136	13	0	10	2	25	0	160	31	0	191	0	0	0	0	0	352
Total Volume	48	599	0	0	647	93	0	42	6	141	0	533	212	0	745	0	0	0	0	0	1533
% App. Total	7.4	92.6	0	0		66	0	29.8	4.3		0	71.5	28.5	0		0	0	0	0		
PHF	.750	.861	.000	.000	.856	.775	.000	.875	.500	.860	.000	.833	.736	.000	.917	.000	.000	.000	.000	.000	.885



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File Name : High St - Kaohu St
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Start Date : 5/8/2025

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				KAOHU ST Westbound				HIGH ST Northbound				Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	6	153	0	0	9	0	11	1	0	144	21	0	0	0	0	0	345
03:45 PM	8	156	0	0	4	0	10	1	0	152	15	0	0	0	0	0	346
Total	14	309	0	0	13	0	21	2	0	296	36	0	0	0	0	0	691
04:00 PM	4	150	0	0	6	0	6	2	0	148	26	0	0	0	0	0	342
04:15 PM	3	157	0	0	15	0	7	1	0	136	17	0	0	0	0	0	336
04:30 PM	4	175	0	0	15	0	12	0	0	132	17	0	0	0	0	0	355
04:45 PM	2	147	0	0	12	0	9	1	0	131	19	0	0	0	0	0	321
Total	13	629	0	0	48	0	34	4	0	547	79	0	0	0	0	0	1354
05:00 PM	5	149	0	0	3	0	8	1	0	110	17	0	0	0	0	0	293
05:15 PM	3	101	0	0	11	0	9	0	0	108	9	0	0	0	0	0	241
Grand Total	35	1188	0	0	75	0	72	7	0	1061	141	0	0	0	0	0	2579
Apprch %	2.9	97.1	0	0	48.7	0	46.8	4.5	0	88.3	11.7	0	0	0	0	0	
Total %	1.4	46.1	0	0	2.9	0	2.8	0.3	0	41.1	5.5	0	0	0	0	0	
Motorcycles	0	3	0	0	0	0	1	0	0	6	0	0	0	0	0	0	10
% Motorcycles	0	0.3	0	0	0	0	1.4	0	0	0.6	0	0	0	0	0	0	0.4
Cars & Light Goods	35	1172	0	0	74	0	70	0	0	1039	138	0	0	0	0	0	2528
% Cars & Light Goods	100	98.7	0	0	98.7	0	97.2	0	0	97.9	97.9	0	0	0	0	0	98
Buses	0	6	0	0	1	0	0	0	0	8	0	0	0	0	0	0	15
% Buses	0	0.5	0	0	1.3	0	0	0	0	0.8	0	0	0	0	0	0	0.6
Single-Unit Trucks	0	1	0	0	0	0	0	0	0	6	3	0	0	0	0	0	10
% Single-Unit Trucks	0	0.1	0	0	0	0	0	0	0	0.6	2.1	0	0	0	0	0	0.4
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	6	0	0	0	0	1	0	0	2	0	0	0	0	0	0	9
% Bicycles on Road	0	0.5	0	0	0	0	1.4	0	0	0.2	0	0	0	0	0	0	0.3
Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pedestrians	0	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	7
% Pedestrians	0	0	0	0	0	0	0	100	0	0	0	0	0	0	0	0	0.3

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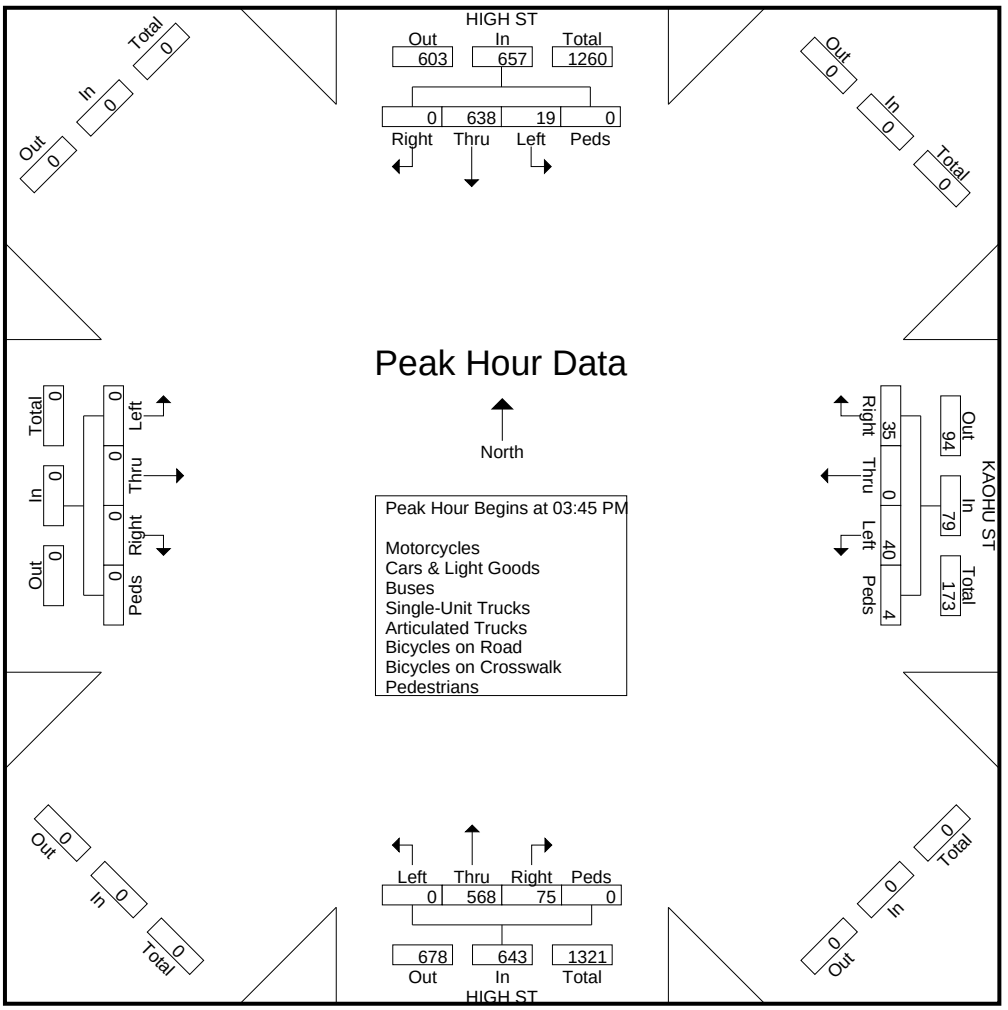
File Name : High St - Kaohu St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 2

	HIGH ST Southbound					KAOHU ST Westbound					HIGH ST Northbound					Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:30 PM to 05:15 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	8	156	0	0	164	4	0	10	1	15	0	152	15	0	167	0	0	0	0	0	346
04:00 PM	4	150	0	0	154	6	0	6	2	14	0	148	26	0	174	0	0	0	0	0	342
04:15 PM	3	157	0	0	160	15	0	7	1	23	0	136	17	0	153	0	0	0	0	0	336
04:30 PM	4	175	0	0	179	15	0	12	0	27	0	132	17	0	149	0	0	0	0	0	355
Total Volume	19	638	0	0	657	40	0	35	4	79	0	568	75	0	643	0	0	0	0	0	1379
% App. Total	2.9	97.1	0	0		50.6	0	44.3	5.1		0	88.3	11.7	0		0	0	0	0		
PHF	.594	.911	.000	.000	.918	.667	.000	.729	.500	.731	.000	.934	.721	.000	.924	.000	.000	.000	.000	.000	.971



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File Name : High St - Main St
Site Code : 21-516 Wailuku Mission Church
Start Date : 4/30/2025

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				MAIN ST Westbound				HIGH ST Northbound				MAIN ST Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	2	82	0	0	36	5	6	4	6	25	33	1	1	15	6	2	224
06:45 AM	2	74	4	4	57	18	16	4	9	35	43	1	2	14	10	1	294
Total	4	156	4	4	93	23	22	8	15	60	76	2	3	29	16	3	518
07:00 AM	0	65	4	1	73	13	13	7	9	40	64	0	2	27	9	2	329
07:15 AM	1	59	3	0	63	16	10	4	15	41	64	5	1	35	11	2	330
07:30 AM	4	87	1	3	66	14	12	2	7	60	71	4	5	41	16	2	395
07:45 AM	1	78	4	0	47	11	5	5	22	55	82	0	2	32	5	1	350
Total	6	289	12	4	249	54	40	18	53	196	281	9	10	135	41	7	1404
08:00 AM	7	45	5	2	40	18	12	5	11	34	65	0	5	27	20	2	298
08:15 AM	4	43	7	1	18	16	8	5	9	39	45	1	1	21	8	1	227
Grand Total	21	533	28	11	400	111	82	36	88	329	467	12	19	212	85	13	2447
Apprch %	3.5	89.9	4.7	1.9	63.6	17.6	13	5.7	9.8	36.7	52.1	1.3	5.8	64.4	25.8	4	
Total %	0.9	21.8	1.1	0.4	16.3	4.5	3.4	1.5	3.6	13.4	19.1	0.5	0.8	8.7	3.5	0.5	
Motorcycles	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
% Motorcycles	0	0.2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cars & Light Goods	21	523	26	0	397	111	82	0	88	325	459	0	19	212	83	0	2346
% Cars & Light Goods	100	98.1	92.9	0	99.2	100	100	0	100	98.8	98.3	0	100	100	97.6	0	95.9
Buses	0	3	1	0	2	0	0	0	0	1	7	0	0	0	1	0	15
% Buses	0	0.6	3.6	0	0.5	0	0	0	0	0.3	1.5	0	0	0	1.2	0	0.6
Single-Unit Trucks	0	3	1	0	1	0	0	0	0	2	0	0	0	0	1	0	8
% Single-Unit Trucks	0	0.6	3.6	0	0.2	0	0	0	0	0.6	0	0	0	0	1.2	0	0.3
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0.2	0	0	0	0	0	0
Bicycles on Road	0	3	0	0	0	0	0	0	0	1	0	0	0	0	0	0	4
% Bicycles on Road	0	0.6	0	0	0	0	0	0	0	0.3	0	0	0	0	0	0	0.2
Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
% Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7.7	0
Pedestrians	0	0	0	11	0	0	0	36	0	0	0	12	0	0	0	12	71
% Pedestrians	0	0	0	100	0	0	0	100	0	0	0	100	0	0	0	92.3	2.9

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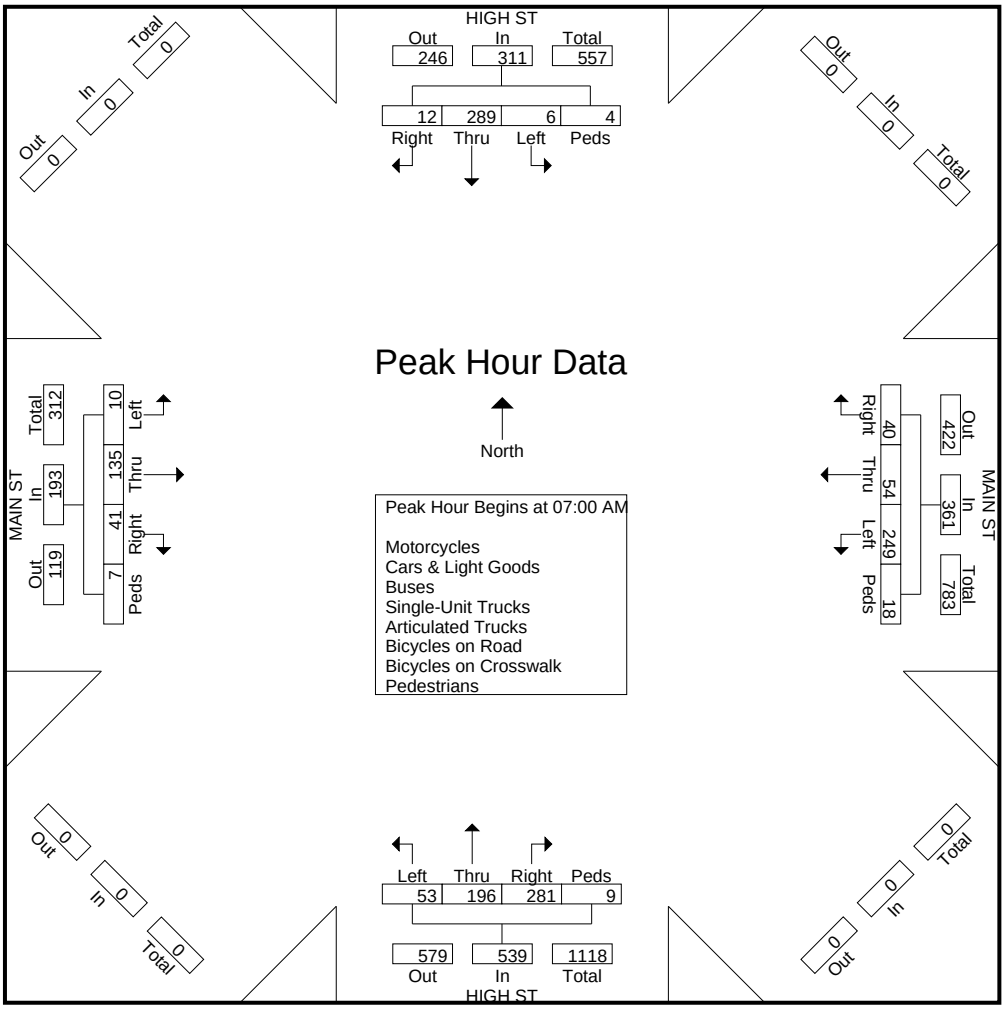
File Name : High St - Main St
Site Code : 21-516 Wailuku Mission Church
Start Date : 4/30/2025
Page No : 2

	HIGH ST Southbound					MAIN ST Westbound					HIGH ST Northbound					MAIN ST Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 06:30 AM to 08:15 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	0	65	4	1	70	73	13	13	7	106	9	40	64	0	113	2	27	9	2	40	329
07:15 AM	1	59	3	0	63	63	16	10	4	93	15	41	64	5	125	1	35	11	2	49	330
07:30 AM	4	87	1	3	95	66	14	12	2	94	7	60	71	4	142	5	41	16	2	64	395
07:45 AM	1	78	4	0	83	47	11	5	5	68	22	55	82	0	159	2	32	5	1	40	350
Total Volume	6	289	12	4	311	249	54	40	18	361	53	196	281	9	539	10	135	41	7	193	1404
% App. Total	1.9	92.9	3.9	1.3		69	15	11.1	5		9.8	36.4	52.1	1.7		5.2	69.9	21.2	3.6		
PHF	.375	.830	.750	.333	.818	.853	.844	.769	.643	.851	.602	.817	.857	.450	.847	.500	.823	.641	.875	.754	.889



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File Name : High St - Main St
Site Code : 21-516 Wailuku Mission Church
Start Date : 4/30/2025
Page No : 1

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST SOUTHBOUND				MAIN ST WESTBOUND				HIGH ST NORTHBOUND				MAIN ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	5	63	4	1	69	21	6	0	14	57	58	1	4	30	24	0	357
03:45 PM	6	49	3	0	53	26	8	1	15	54	69	0	3	23	14	0	324
Total	11	112	7	1	122	47	14	1	29	111	127	1	7	53	38	0	681
04:00 PM	6	64	0	0	68	22	6	4	19	64	57	2	1	25	6	0	344
04:15 PM	4	66	4	0	62	23	4	0	12	49	56	0	1	26	9	1	317
04:30 PM	7	49	3	8	83	12	3	8	15	54	55	6	6	26	18	5	358
04:45 PM	12	49	3	0	64	24	6	4	9	59	60	0	4	30	15	0	339
Total	29	228	10	8	277	81	19	16	55	226	228	8	12	107	48	6	1358
05:00 PM	6	59	3	0	76	16	10	2	8	49	65	0	0	14	18	2	328
05:15 PM	9	73	0	2	64	16	4	1	6	64	44	1	4	20	8	0	316
Grand Total	55	472	20	11	539	160	47	20	98	450	464	10	23	194	112	8	2683
Apprch %	9.9	84.6	3.6	2	70.4	20.9	6.1	2.6	9.6	44	45.4	1	6.8	57.6	33.2	2.4	
Total %	2	17.6	0.7	0.4	20.1	6	1.8	0.7	3.7	16.8	17.3	0.4	0.9	7.2	4.2	0.3	
Motorcycles	0	2	0	0	2	0	0	0	0	2	0	0	0	0	0	0	6
% Motorcycles	0	0.4	0	0	0.4	0	0	0	0	0.4	0	0	0	0	0	0	0.2
Cars & Light Goods	55	469	20	0	535	160	47	0	98	445	456	0	23	192	111	0	2611
% Cars & Light Goods	100	99.4	100	0	99.3	100	100	0	100	98.9	98.3	0	100	99	99.1	0	97.3
Buses	0	1	0	0	2	0	0	0	0	0	6	0	0	1	1	0	11
% Buses	0	0.2	0	0	0.4	0	0	0	0	0	1.3	0	0	0.5	0.9	0	0.4
Single-Unit Trucks	0	0	0	0	0	0	0	0	0	2	2	0	0	1	0	0	5
% Single-Unit Trucks	0	0	0	0	0	0	0	0	0	0.4	0.4	0	0	0.5	0	0	0.2
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
% Bicycles on Road	0	0	0	0	0	0	0	0	0	0.2	0	0	0	0	0	0	0
Bicycles on Crosswalk	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	1	3
% Bicycles on Crosswalk	0	0	0	0	0	0	0	5	0	0	0	10	0	0	0	12.5	0.1
Pedestrians	0	0	0	11	0	0	0	19	0	0	0	9	0	0	0	7	46
% Pedestrians	0	0	0	100	0	0	0	95	0	0	0	90	0	0	0	87.5	1.7

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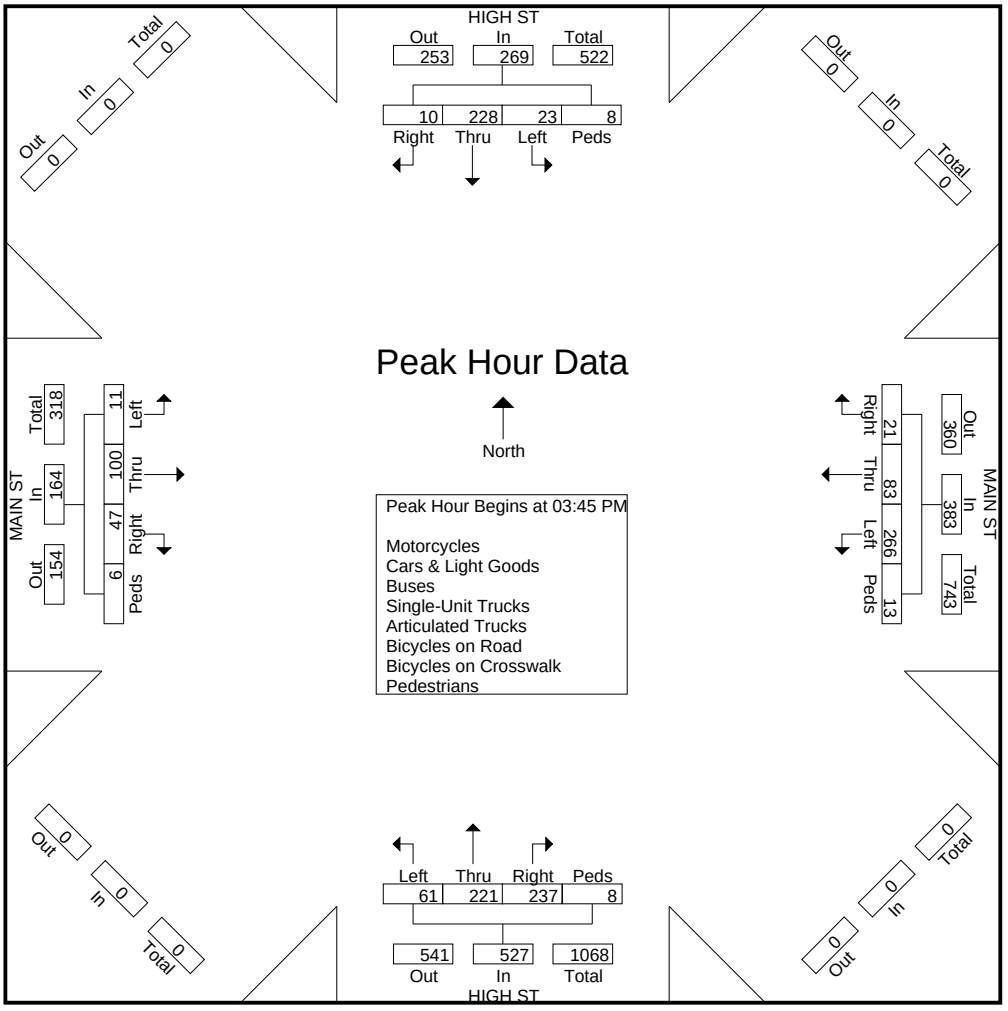
File Name : High St - Main St
Site Code : 21-516 Wailuku Mission Church
Start Date : 4/30/2025
Page No : 2

	HIGH ST SOUTHBOUND					MAIN ST WESTBOUND					HIGH ST NORTHBOUND					MAIN ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:45 PM to 04:30 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	6	49	3	0	58	53	**26**	**8**	1	88	15	54	**69**	0	138	3	23	14	0	40	324
04:00 PM	6	64	0	0	70	68	22	6	4	100	**19**	**64**	57	2	**142**	1	25	6	0	32	344
04:15 PM	4	**66**	**4**	0	**74**	62	23	4	0	89	12	49	56	0	117	1	**26**	9	1	37	317
04:30 PM	**7**	49	3	**8**	67	**83**	12	3	**8**	**106**	15	54	55	**6**	130	**6**	26	**18**	**5**	**55**	**358**
Total Volume	23	228	10	8	269	266	83	21	13	383	61	221	237	8	527	11	100	47	6	164	1343
% App. Total	8.6	84.8	3.7	3		69.5	21.7	5.5	3.4		11.6	41.9	45	1.5		6.7	61	28.7	3.7		
PHF	.821	.864	.625	.250	.909	.801	.798	.656	.406	.903	.803	.863	.859	.333	.928	.458	.962	.653	.300	.745	.938



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File Name : High St - Malako St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				Westbound				HIGH ST Northbound				MALAKO ST Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	0	119	12	0	0	0	0	0	5	93	0	0	5	0	0	0	234
06:45 AM	0	105	33	0	0	0	0	0	12	128	0	0	3	0	4	0	285
Total	0	224	45	0	0	0	0	0	17	221	0	0	8	0	4	0	519
07:00 AM	0	95	55	0	0	0	0	0	19	157	0	0	0	0	0	1	327
07:15 AM	0	117	82	0	0	0	0	0	16	203	0	0	0	0	0	1	419
07:30 AM	0	130	80	0	0	0	0	0	17	201	0	1	0	0	0	0	429
07:45 AM	0	112	34	0	0	0	0	0	7	181	0	0	1	0	1	0	336
Total	0	454	251	0	0	0	0	0	59	742	0	1	1	0	1	2	1511
08:00 AM	0	85	16	1	0	0	0	0	1	125	0	1	8	0	5	3	245
08:15 AM	0	98	6	0	0	0	0	0	6	132	0	0	5	0	2	0	249
Grand Total	0	861	318	1	0	0	0	0	83	1220	0	2	22	0	12	5	2524
Apprch %	0	73	26.9	0.1	0	0	0	0	6.4	93.5	0	0.2	56.4	0	30.8	12.8	
Total %	0	34.1	12.6	0	0	0	0	0	3.3	48.3	0	0.1	0.9	0	0.5	0.2	
Motorcycles	0	3	0	0	0	0	0	0	0	2	0	0	0	0	0	0	5
% Motorcycles	0	0.3	0	0	0	0	0	0	0	0.2	0	0	0	0	0	0	0.2
Cars & Light Goods	0	824	315	0	0	0	0	0	83	1208	0	0	22	0	12	0	2464
% Cars & Light Goods	0	95.7	99.1	0	0	0	0	0	100	99	0	0	100	0	100	0	97.6
Buses	0	14	2	0	0	0	0	0	0	8	0	0	0	0	0	0	24
% Buses	0	1.6	0.6	0	0	0	0	0	0	0.7	0	0	0	0	0	0	1
Single-Unit Trucks	0	17	0	0	0	0	0	0	0	1	0	0	0	0	0	0	18
% Single-Unit Trucks	0	2	0	0	0	0	0	0	0	0.1	0	0	0	0	0	0	0.7
Articulated Trucks	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
% Articulated Trucks	0	0.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	2	1	0	0	0	0	0	0	1	0	0	0	0	0	0	4
% Bicycles on Road	0	0.2	0.3	0	0	0	0	0	0	0.1	0	0	0	0	0	0	0.2
Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
% Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	0
Pedestrians	0	0	0	1	0	0	0	0	0	0	0	2	0	0	0	4	7
% Pedestrians	0	0	0	100	0	0	0	0	0	0	0	100	0	0	0	80	0.3

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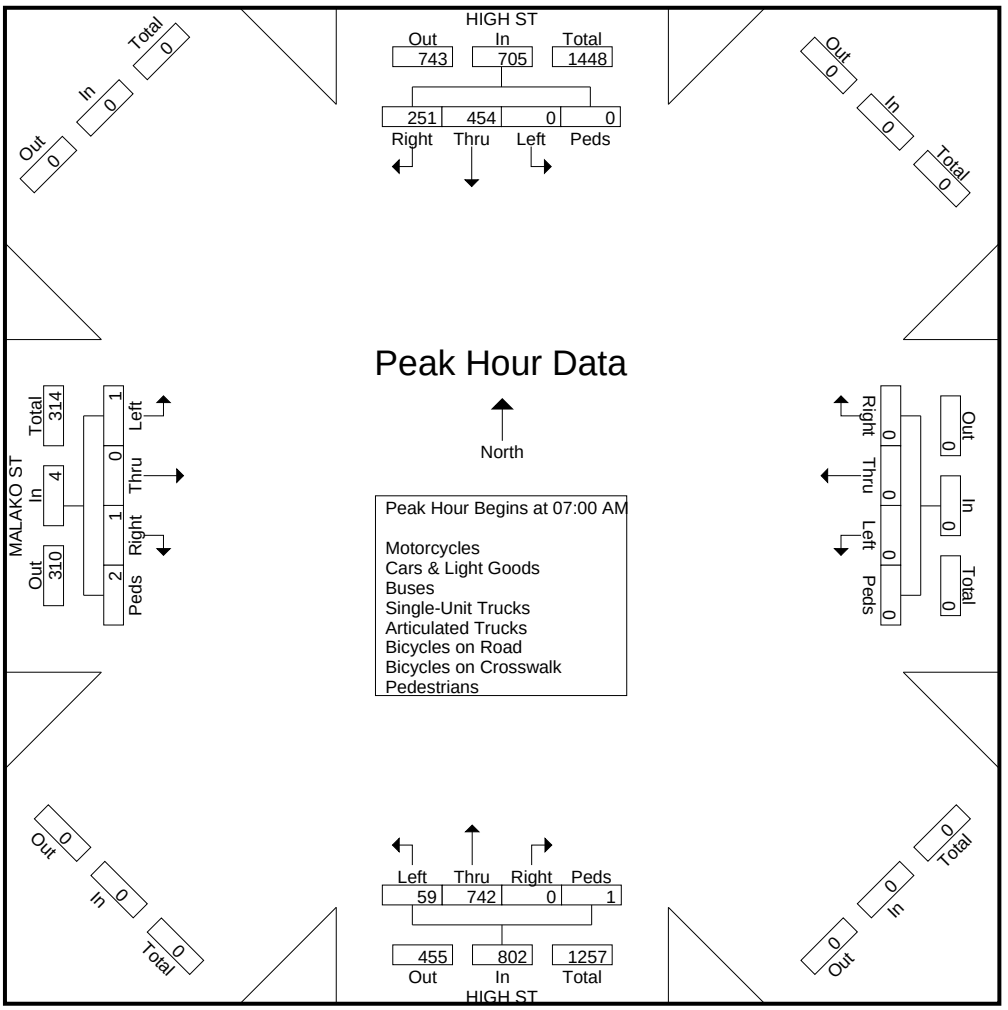
File Name : High St - Malako St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 2

	HIGH ST Southbound					Westbound					HIGH ST Northbound					MALAKO ST Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 06:30 AM to 08:15 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	0	95	55	0	150	0	0	0	0	0	19	157	0	0	176	0	0	0	1	1	327
07:15 AM	0	117	82	0	199	0	0	0	0	0	16	203	0	0	219	0	0	0	1	1	419
07:30 AM	0	130	80	0	210	0	0	0	0	0	17	201	0	1	219	0	0	0	0	0	429
07:45 AM	0	112	34	0	146	0	0	0	0	0	7	181	0	0	188	1	0	1	0	2	336
Total Volume	0	454	251	0	705	0	0	0	0	0	59	742	0	1	802	1	0	1	2	4	1511
% App. Total	0	64.4	35.6	0		0	0	0	0		7.4	92.5	0	0.1		25	0	25	50		
PHF	.000	.873	.765	.000	.839	.000	.000	.000	.000	.000	.776	.914	.000	.250	.916	.250	.000	.250	.500	.500	.881



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File Name : High St - Malako St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 1

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST SOUTHBOUND				WESTBOUND				HIGH ST NORTHBOUND				MALAKO ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	0	153	6	0	0	0	0	0	14	163	0	0	6	0	8	0	350
03:45 PM	0	152	6	0	0	0	0	0	13	157	0	0	8	0	6	0	342
Total	0	305	12	0	0	0	0	0	27	320	0	0	14	0	14	0	692
04:00 PM	0	141	8	0	0	0	0	0	5	164	0	0	5	0	8	0	331
04:15 PM	0	162	9	0	0	0	0	0	6	152	0	0	6	0	6	0	341
04:30 PM	0	173	11	0	0	0	0	0	5	142	0	0	4	0	9	4	348
04:45 PM	0	161	5	0	0	0	0	0	3	146	0	0	8	0	1	0	324
Total	0	637	33	0	0	0	0	0	19	604	0	0	23	0	24	4	1344
05:00 PM	0	148	5	0	0	0	0	0	3	122	0	0	5	0	3	0	286
05:15 PM	0	122	3	0	0	0	0	0	4	115	0	0	3	0	3	1	251
Grand Total	0	1212	53	0	0	0	0	0	53	1161	0	0	45	0	44	5	2573
Apprch %	0	95.8	4.2	0	0	0	0	0	4.4	95.6	0	0	47.9	0	46.8	5.3	
Total %	0	47.1	2.1	0	0	0	0	0	2.1	45.1	0	0	1.7	0	1.7	0.2	
Motorcycles	0	6	0	0	0	0	0	0	0	7	0	0	0	0	0	0	13
% Motorcycles	0	0.5	0	0	0	0	0	0	0	0.6	0	0	0	0	0	0	0.5
Cars & Light Goods	0	1193	52	0	0	0	0	0	53	1140	0	0	45	0	44	0	2527
% Cars & Light Goods	0	98.4	98.1	0	0	0	0	0	100	98.2	0	0	100	0	100	0	98.2
Buses	0	7	0	0	0	0	0	0	0	8	0	0	0	0	0	0	15
% Buses	0	0.6	0	0	0	0	0	0	0	0.7	0	0	0	0	0	0	0.6
Single-Unit Trucks	0	4	1	0	0	0	0	0	0	5	0	0	0	0	0	0	10
% Single-Unit Trucks	0	0.3	1.9	0	0	0	0	0	0	0.4	0	0	0	0	0	0	0.4
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	2	0	0	0	0	0	0	0	1	0	0	0	0	0	0	3
% Bicycles on Road	0	0.2	0	0	0	0	0	0	0	0.1	0	0	0	0	0	0	0.1
Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
% Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	0
Pedestrians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4
% Pedestrians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	80	0.2

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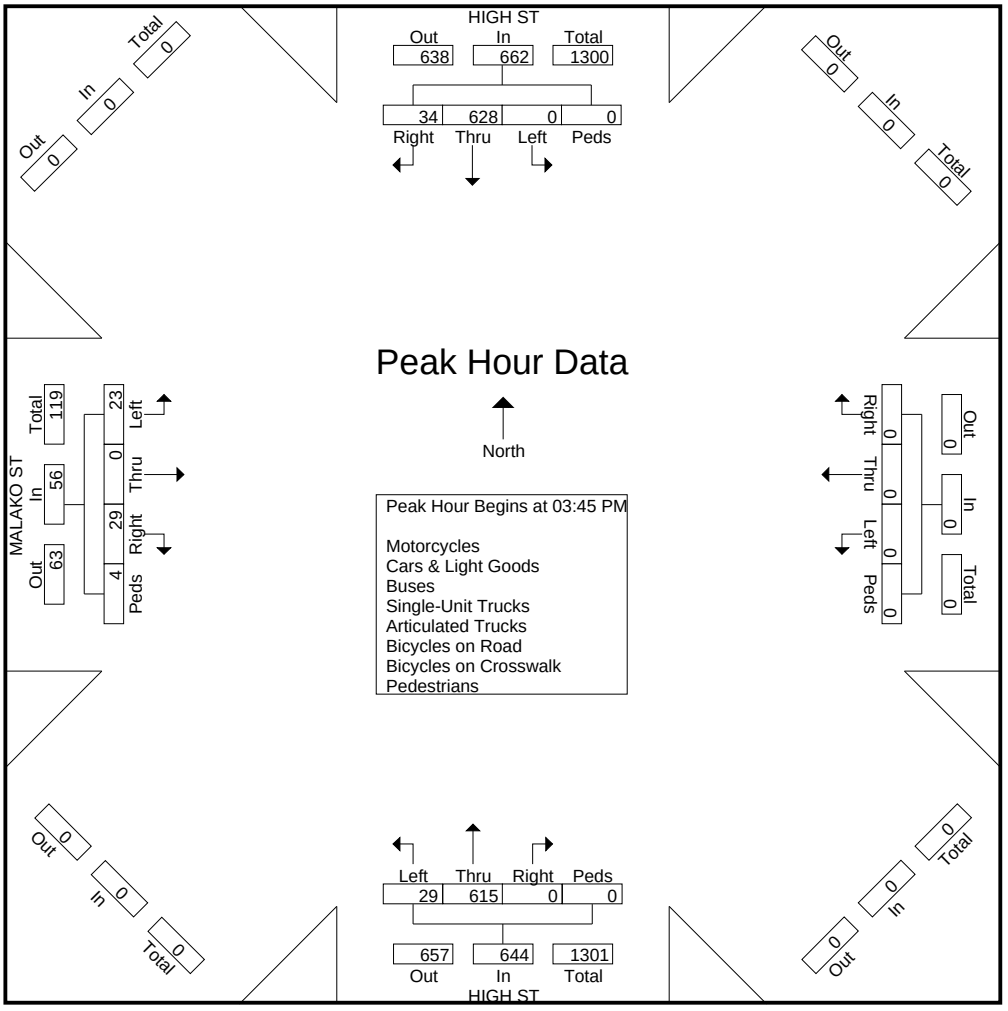
File Name : High St - Malako St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
Page No : 2

	HIGH ST SOUTHBOUND					WESTBOUND					HIGH ST NORTHBOUND					MALAKO ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:45 PM to 04:30 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	0	152	6	0	158	0	0	0	0	0	**13**	157	0	0	**170**	**8**	0	6	0	14	342
04:00 PM	0	141	8	0	149	0	0	0	0	0	5	**164**	0	0	169	5	0	8	0	13	331
04:15 PM	0	162	9	0	171	0	0	0	0	0	6	152	0	0	158	6	0	6	0	12	341
04:30 PM	0	**173**	**11**	0	**184**	0	0	0	0	0	5	142	0	0	147	4	0	**9**	**4**	**17**	**348**
Total Volume	0	628	34	0	662	0	0	0	0	0	29	615	0	0	644	23	0	29	4	56	1362
% App. Total	0	94.9	5.1	0		0	0	0	0		4.5	95.5	0	0		41.1	0	51.8	7.1		
PHF	.000	.908	.773	.000	.899	.000	.000	.000	.000	.000	.558	.938	.000	.000	.947	.719	.000	.806	.250	.824	.978



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File Name : High St - Wells St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				WELLS ST Westbound				HIGH ST Northbound				Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	3	122	0	0	15	0	4	2	0	64	34	0	0	0	0	0	244
06:45 AM	3	126	0	0	11	0	5	1	0	86	42	3	0	0	0	0	277
Total	6	248	0	0	26	0	9	3	0	150	76	3	0	0	0	0	521
07:00 AM	5	108	0	0	16	0	2	2	0	101	55	0	0	0	0	0	289
07:15 AM	10	161	0	0	7	0	6	1	0	118	70	0	0	0	0	0	373
07:30 AM	7	148	0	0	16	0	5	2	0	137	91	1	0	0	0	0	407
07:45 AM	8	101	0	0	15	0	6	2	0	148	51	0	0	0	0	0	331
Total	30	518	0	0	54	0	19	7	0	504	267	1	0	0	0	0	1400
08:00 AM	10	86	0	0	17	0	6	5	0	100	50	1	0	0	0	0	275
08:15 AM	7	84	0	0	16	0	7	1	0	97	48	0	0	0	0	0	260
Grand Total	53	936	0	0	113	0	41	16	0	851	441	5	0	0	0	0	2456
Apprch %	5.4	94.6	0	0	66.5	0	24.1	9.4	0	65.6	34	0.4	0	0	0	0	
Total %	2.2	38.1	0	0	4.6	0	1.7	0.7	0	34.6	18	0.2	0	0	0	0	
Motorcycles	0	3	0	0	0	0	0	0	0	1	2	0	0	0	0	0	6
% Motorcycles	0	0.3	0	0	0	0	0	0	0	0.1	0.5	0	0	0	0	0	0.2
Cars & Light Goods	52	919	0	0	104	0	40	0	0	841	436	0	0	0	0	0	2392
% Cars & Light Goods	98.1	98.2	0	0	92	0	97.6	0	0	98.8	98.9	0	0	0	0	0	97.4
Buses	1	6	0	0	5	0	1	0	0	7	2	0	0	0	0	0	22
% Buses	1.9	0.6	0	0	4.4	0	2.4	0	0	0.8	0.5	0	0	0	0	0	0.9
Single-Unit Trucks	0	5	0	0	4	0	0	0	0	2	0	0	0	0	0	0	11
% Single-Unit Trucks	0	0.5	0	0	3.5	0	0	0	0	0.2	0	0	0	0	0	0	0.4
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	3	0	0	0	0	0	0	0	0	1	0	0	0	0	0	4
% Bicycles on Road	0	0.3	0	0	0	0	0	0	0	0	0.2	0	0	0	0	0	0.2
Bicycles on Crosswalk	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
% Bicycles on Crosswalk	0	0	0	0	0	0	0	6.2	0	0	0	0	0	0	0	0	0
Pedestrians	0	0	0	0	0	0	0	15	0	0	0	5	0	0	0	0	20
% Pedestrians	0	0	0	0	0	0	0	93.8	0	0	0	100	0	0	0	0	0.8

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File Name : High St - Wells St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
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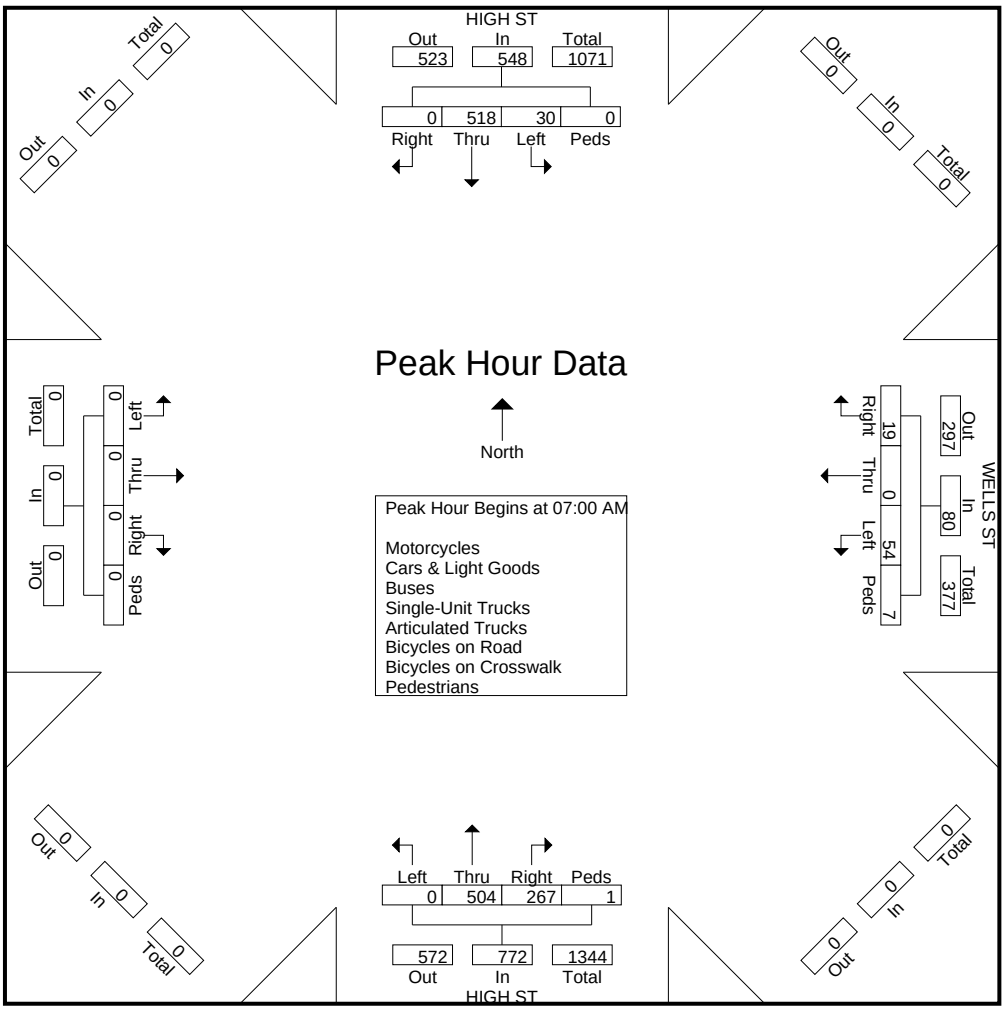
	HIGH ST Southbound					WELLS ST Westbound					HIGH ST Northbound					Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 06:30 AM to 08:15 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	5	108	0	0	113	16	0	2	2	20	0	101	55	0	156	0	0	0	0	0	289
07:15 AM	10	161	0	0	171	7	0	6	1	14	0	118	70	0	188	0	0	0	0	0	373
07:30 AM	7	148	0	0	155	16	0	5	2	23	0	137	91	1	229	0	0	0	0	0	407
07:45 AM	8	101	0	0	109	15	0	6	2	23	0	148	51	0	199	0	0	0	0	0	331
Total Volume	30	518	0	0	548	54	0	19	7	80	0	504	267	1	772	0	0	0	0	0	1400
% App. Total	5.5	94.5	0	0		67.5	0	23.8	8.8		0	65.3	34.6	0.1		0	0	0	0		
PHF	.750	.804	.000	.000	.801	.844	.000	.792	.875	.870	.000	.851	.734	.250	.843	.000	.000	.000	.000	.000	.860



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File Name : High St - Wells St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025

Groups Printed- Motorcycles - Cars & Light Goods - Buses - Unit Trucks - Articulated Trucks - Bicycles on Road - Bicycles on Crosswalk - Pedestrians

	HIGH ST Southbound				WELLS ST Westbound				HIGH ST Northbound				Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	8	130	0	1	30	0	7	5	0	123	38	0	0	0	0	0	342
03:45 PM	2	148	0	0	21	0	11	1	0	137	29	0	0	0	0	0	349
Total	10	278	0	1	51	0	18	6	0	260	67	0	0	0	0	0	691
04:00 PM	6	127	0	0	27	0	8	2	0	142	27	0	0	0	0	0	339
04:15 PM	3	140	0	0	21	0	11	2	0	119	25	0	0	0	0	0	321
04:30 PM	5	142	0	0	35	0	13	3	0	120	36	3	0	0	0	0	357
04:45 PM	2	127	0	0	28	0	5	1	0	116	28	0	0	0	0	0	307
Total	16	536	0	0	111	0	37	8	0	497	116	3	0	0	0	0	1324
05:00 PM	5	119	0	0	31	0	5	1	0	103	19	1	0	0	0	0	284
05:15 PM	3	93	0	0	19	0	6	2	0	105	15	0	0	0	0	0	243
Grand Total	34	1026	0	1	212	0	66	17	0	965	217	4	0	0	0	0	2542
Apprch %	3.2	96.7	0	0.1	71.9	0	22.4	5.8	0	81.4	18.3	0.3	0	0	0	0	
Total %	1.3	40.4	0	0	8.3	0	2.6	0.7	0	38	8.5	0.2	0	0	0	0	
Motorcycles	0	4	0	0	1	0	0	0	0	7	1	0	0	0	0	0	13
% Motorcycles	0	0.4	0	0	0.5	0	0	0	0	0.7	0.5	0	0	0	0	0	0.5
Cars & Light Goods	34	1014	0	0	204	0	66	0	0	946	215	0	0	0	0	0	2479
% Cars & Light Goods	100	98.8	0	0	96.2	0	100	0	0	98	99.1	0	0	0	0	0	97.5
Buses	0	1	0	0	7	0	0	0	0	8	0	0	0	0	0	0	16
% Buses	0	0.1	0	0	3.3	0	0	0	0	0.8	0	0	0	0	0	0	0.6
Single-Unit Trucks	0	4	0	0	0	0	0	0	0	3	1	0	0	0	0	0	8
% Single-Unit Trucks	0	0.4	0	0	0	0	0	0	0	0.3	0.5	0	0	0	0	0	0.3
Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Articulated Trucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bicycles on Road	0	3	0	0	0	0	0	0	0	1	0	0	0	0	0	0	4
% Bicycles on Road	0	0.3	0	0	0	0	0	0	0	0.1	0	0	0	0	0	0	0.2
Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% Bicycles on Crosswalk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pedestrians	0	0	0	1	0	0	0	17	0	0	0	4	0	0	0	0	22
% Pedestrians	0	0	0	100	0	0	0	100	0	0	0	100	0	0	0	0	0.9

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File Name : High St - Wells St
Site Code : 21-516 Wailuku Mission Church
Start Date : 5/8/2025
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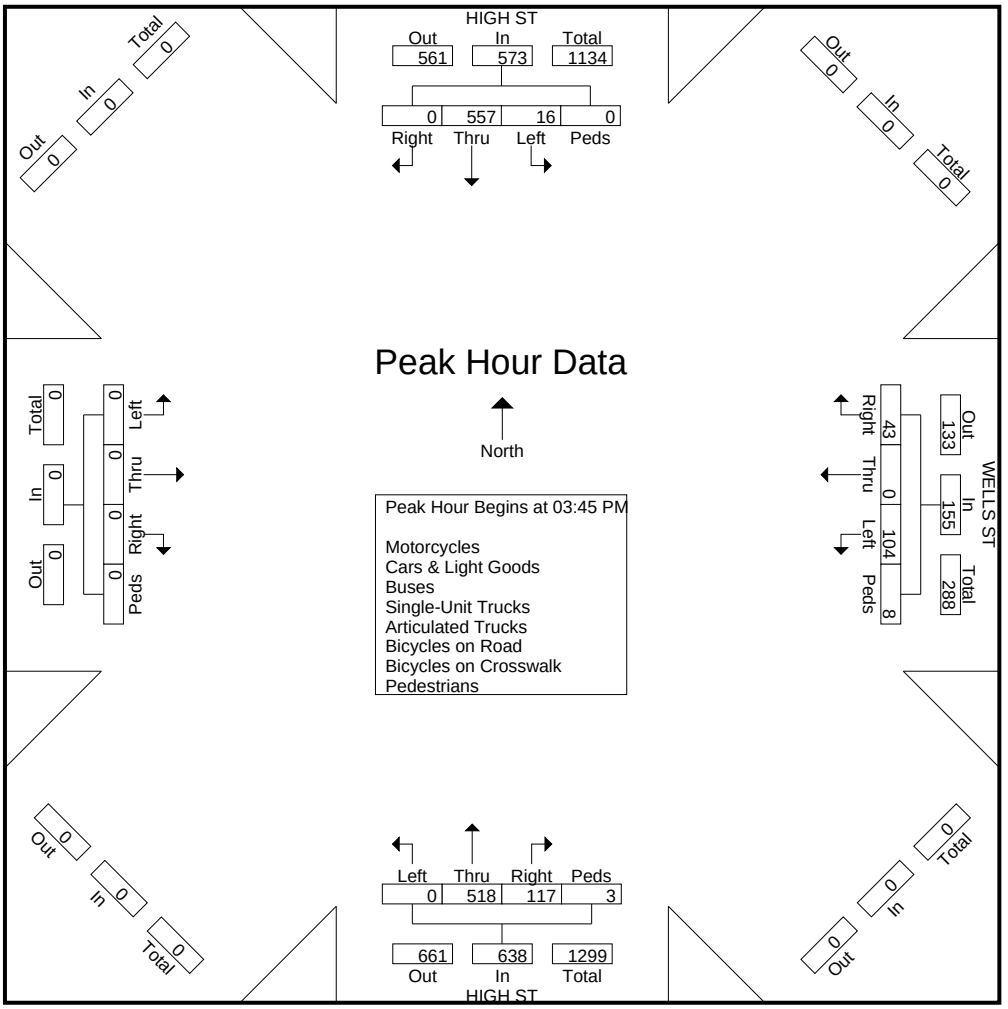
	HIGH ST Southbound					WELLS ST Westbound					HIGH ST Northbound					Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:30 PM to 05:15 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	2	148	0	0	150	21	0	11	1	33	0	137	29	0	166	0	0	0	0	0	349
04:00 PM	6	127	0	0	133	27	0	8	2	37	0	142	27	0	169	0	0	0	0	0	339
04:15 PM	3	140	0	0	143	21	0	11	2	34	0	119	25	0	144	0	0	0	0	0	321
04:30 PM	5	142	0	0	147	35	0	13	3	51	0	120	36	3	159	0	0	0	0	0	357
Total Volume	16	557	0	0	573	104	0	43	8	155	0	518	117	3	638	0	0	0	0	0	1366
% App. Total	2.8	97.2	0	0		67.1	0	27.7	5.2		0	81.2	18.3	0.5		0	0	0	0		
PHF	.667	.941	.000	.000	.955	.743	.000	.827	.667	.760	.000	.912	.813	.250	.944	.000	.000	.000	.000	.000	.957



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File Name : Wailuku Union Church East Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
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Groups Printed- Class 1

	SOUTHBOUND				MAIN ST WESTBOUND				WAILUKU UNION CHURCH EAST DWY NORTHBOUND				MAIN ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	0	0	0	0	1	10	0	0	0	0	0	0	0	22	0	0	33
06:45 AM	0	0	0	0	1	30	0	0	0	0	0	0	0	26	0	0	57
Total	0	0	0	0	2	40	0	0	0	0	0	0	0	48	0	0	90
07:00 AM	0	0	0	0	6	20	0	0	0	0	0	0	0	38	0	0	64
07:15 AM	0	0	0	0	4	30	0	0	0	0	1	0	0	47	0	0	82
07:30 AM	0	0	0	0	1	21	0	0	0	0	0	0	0	62	0	0	84
07:45 AM	0	0	0	0	1	36	0	0	0	0	0	0	0	39	0	0	76
Total	0	0	0	0	12	107	0	0	0	0	1	0	0	186	0	0	306
08:00 AM	0	0	0	0	0	34	0	0	0	0	0	0	0	52	0	0	86
08:15 AM	0	0	0	0	0	32	0	0	0	0	0	0	0	30	0	0	62
Grand Total	0	0	0	0	14	213	0	0	0	0	1	0	0	316	0	0	544
Apprch %	0	0	0	0	6.2	93.8	0	0	0	0	100	0	0	100	0	0	
Total %	0	0	0	0	2.6	39.2	0	0	0	0	0.2	0	0	58.1	0	0	

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File Name : Wailuku Union Church East Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
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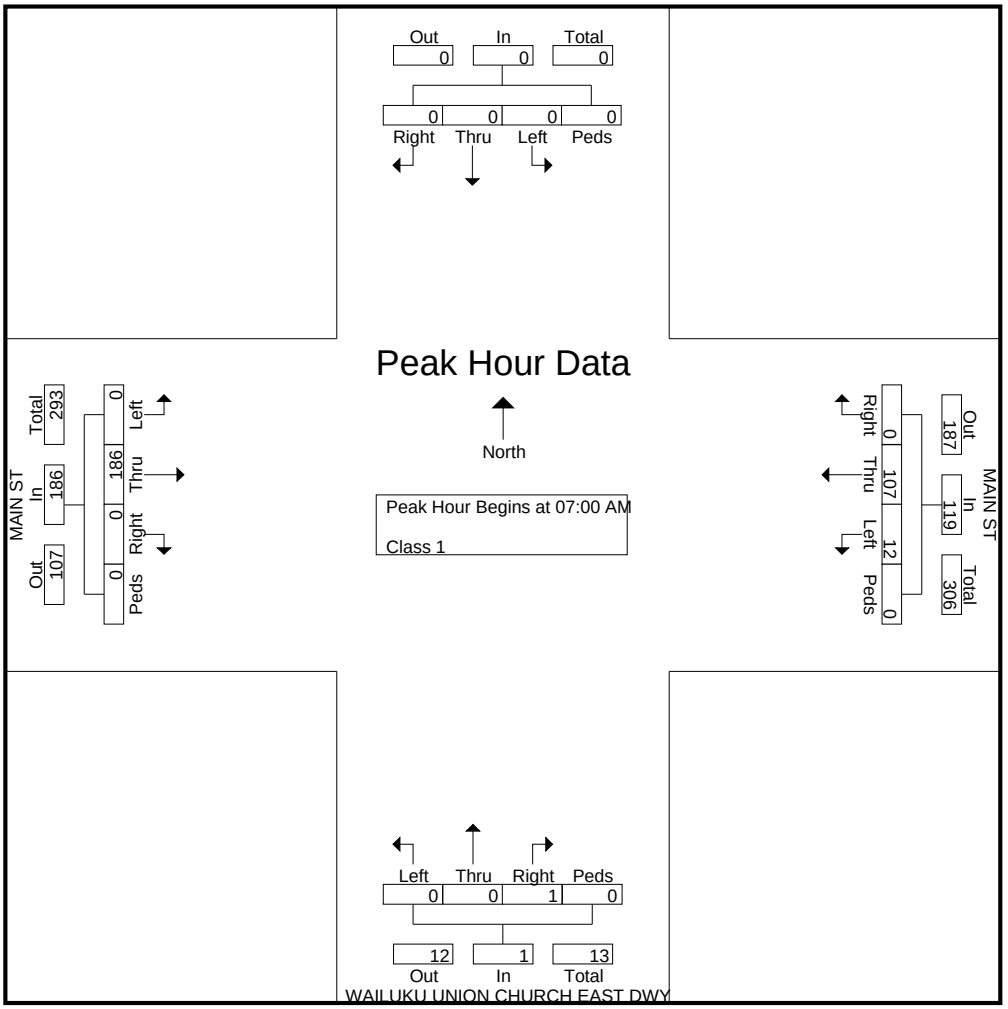
	SOUTHBOUND					MAIN ST WESTBOUND					WAILUKU UNION CHURCH EAST DWY NORTHBOUND					MAIN ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 07:45 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	0	0	0	0	0	**6**	20	0	0	26	0	0	0	0	0	0	38	0	0	38	64
07:15 AM	0	0	0	0	0	4	30	0	0	34	0	0	**1**	0	**1**	0	47	0	0	47	82
07:30 AM	0	0	0	0	0	1	21	0	0	22	0	0	0	0	0	0	**62**	0	0	**62**	**84**
07:45 AM	0	0	0	0	0	1	**36**	0	0	**37**	0	0	0	0	0	0	39	0	0	39	76
Total Volume	0	0	0	0	0	12	107	0	0	119	0	0	1	0	1	0	186	0	0	186	306
% App. Total	0	0	0	0		10.1	89.9	0	0		0	0	100	0		0	100	0	0		
PHF	.000	.000	.000	.000	.000	.500	.743	.000	.000	.804	.000	.000	.250	.000	.250	.000	.750	.000	.000	.750	.911



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File Name : Wailuku Union Church East Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
Page No : 1

Groups Printed- Class 1

	SOUTHBOUND				MAIN ST WESTBOUND				WAILUKU UNION CHURCH EAST DWY NORTHBOUND				MAIN ST EASTBOUND				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	0	0	0	0	0	39	0	0	0	0	1	0	0	57	0	0	97
03:45 PM	0	0	0	0	0	44	0	0	0	0	1	0	0	39	0	0	84
Total	0	0	0	0	0	83	0	0	0	0	2	0	0	96	0	0	181
04:00 PM	0	0	0	0	0	41	0	0	0	0	1	0	0	31	0	0	73
04:15 PM	0	0	0	0	2	39	0	0	0	0	0	0	0	36	0	0	77
04:30 PM	0	0	0	0	0	30	0	0	0	0	11	0	0	39	0	0	80
04:45 PM	0	0	0	0	0	36	0	0	0	0	1	0	0	48	0	0	85
Total	0	0	0	0	2	146	0	0	0	0	13	0	0	154	0	0	315
05:00 PM	0	0	0	0	0	27	0	0	0	0	0	0	0	32	0	0	59
05:15 PM	0	0	0	0	0	22	0	0	0	0	0	0	0	32	0	0	54
Grand Total	0	0	0	0	2	278	0	0	0	0	15	0	0	314	0	0	609
Apprch %	0	0	0	0	0.7	99.3	0	0	0	0	100	0	0	100	0	0	
Total %	0	0	0	0	0.3	45.6	0	0	0	0	2.5	0	0	51.6	0	0	

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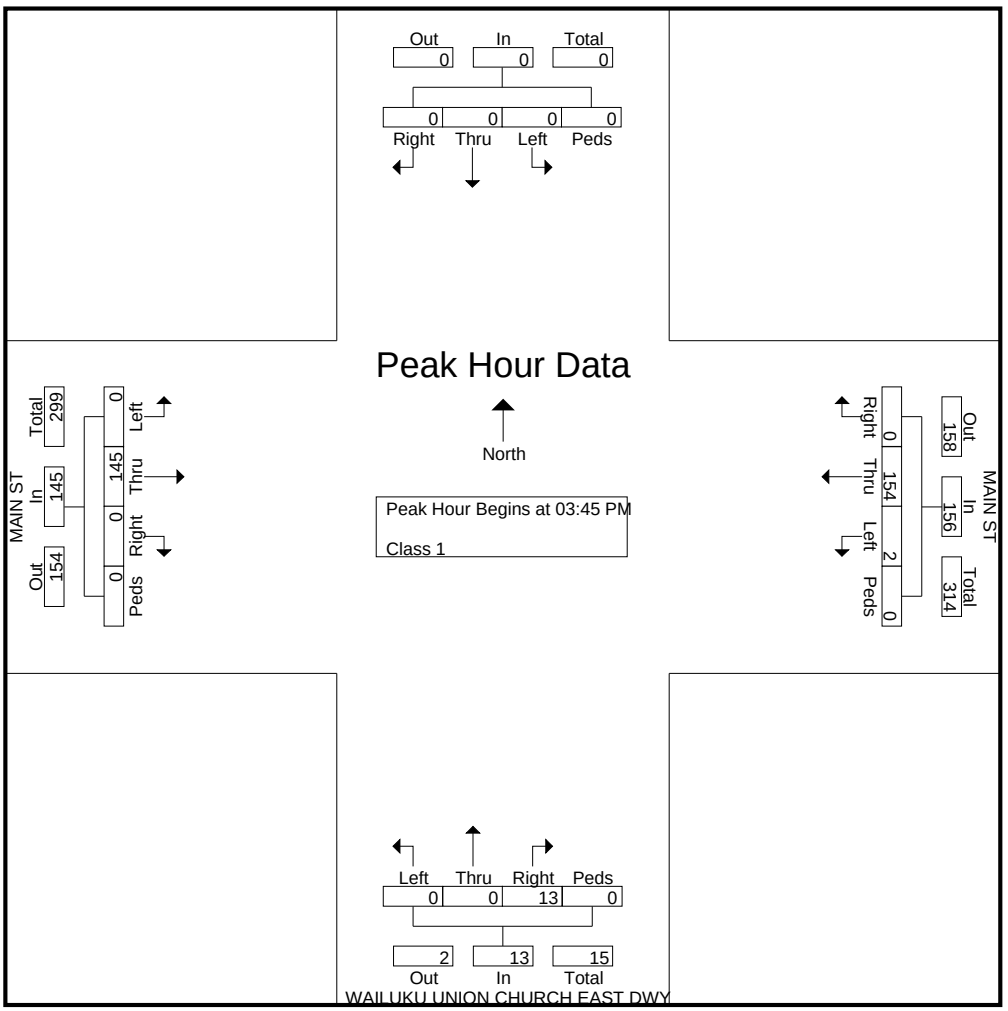
File Name : Wailuku Union Church East Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025

	SOUTHBOUND					MAIN ST WESTBOUND					WAILUKU UNION CHURCH EAST DWY NORTHBOUND					MAIN ST EASTBOUND					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:45 PM to 04:30 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	0	0	0	0	0	0	**44**	0	0	**44**	0	0	1	0	1	0	**39**	0	0	**39**	**84**
04:00 PM	0	0	0	0	0	0	41	0	0	41	0	0	1	0	1	0	31	0	0	31	73
04:15 PM	0	0	0	0	0	**2**	39	0	0	41	0	0	0	0	0	0	36	0	0	36	77
04:30 PM	0	0	0	0	0	0	30	0	0	30	0	0	**11**	0	**11**	0	39	0	0	39	80
Total Volume	0	0	0	0	0	2	154	0	0	156	0	0	13	0	13	0	145	0	0	145	314
% App. Total	0	0	0	0		1.3	98.7	0	0		0	0	100	0		0	100	0	0		
PHF	.000	.000	.000	.000	.000	.250	.875	.000	.000	.886	.000	.000	.295	.000	.295	.000	.929	.000	.000	.929	.935



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File Name : Wailuku Union Church West Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
Page No : 1

Groups Printed- Class 1

	Southbound				MAIN ST Westbound				WAILUKU UNION CHURCH WEST DWY Northbound				MAIN ST Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
06:30 AM	0	0	0	0	0	10	0	0	0	0	0	0	0	22	0	0	32
06:45 AM	0	0	0	0	1	30	0	0	0	0	0	0	0	26	0	0	57
Total	0	0	0	0	1	40	0	0	0	0	0	0	0	48	0	0	89
07:00 AM	0	0	0	0	0	20	0	0	0	0	0	0	0	38	0	0	58
07:15 AM	0	0	0	0	0	30	0	0	0	0	0	0	0	47	0	0	77
07:30 AM	0	0	0	0	0	21	0	0	0	0	0	0	0	62	0	0	83
07:45 AM	0	0	0	0	0	36	0	0	0	0	0	0	0	39	0	0	75
Total	0	0	0	0	0	107	0	0	0	0	0	0	0	186	0	0	293
08:00 AM	0	0	0	0	0	34	0	0	0	0	0	0	0	52	0	0	86
08:15 AM	0	0	0	0	0	32	0	0	0	0	0	0	0	30	0	0	62
Grand Total	0	0	0	0	1	213	0	0	0	0	0	0	0	316	0	0	530
Apprch %	0	0	0	0	0.5	99.5	0	0	0	0	0	0	0	100	0	0	
Total %	0	0	0	0	0.2	40.2	0	0	0	0	0	0	0	59.6	0	0	

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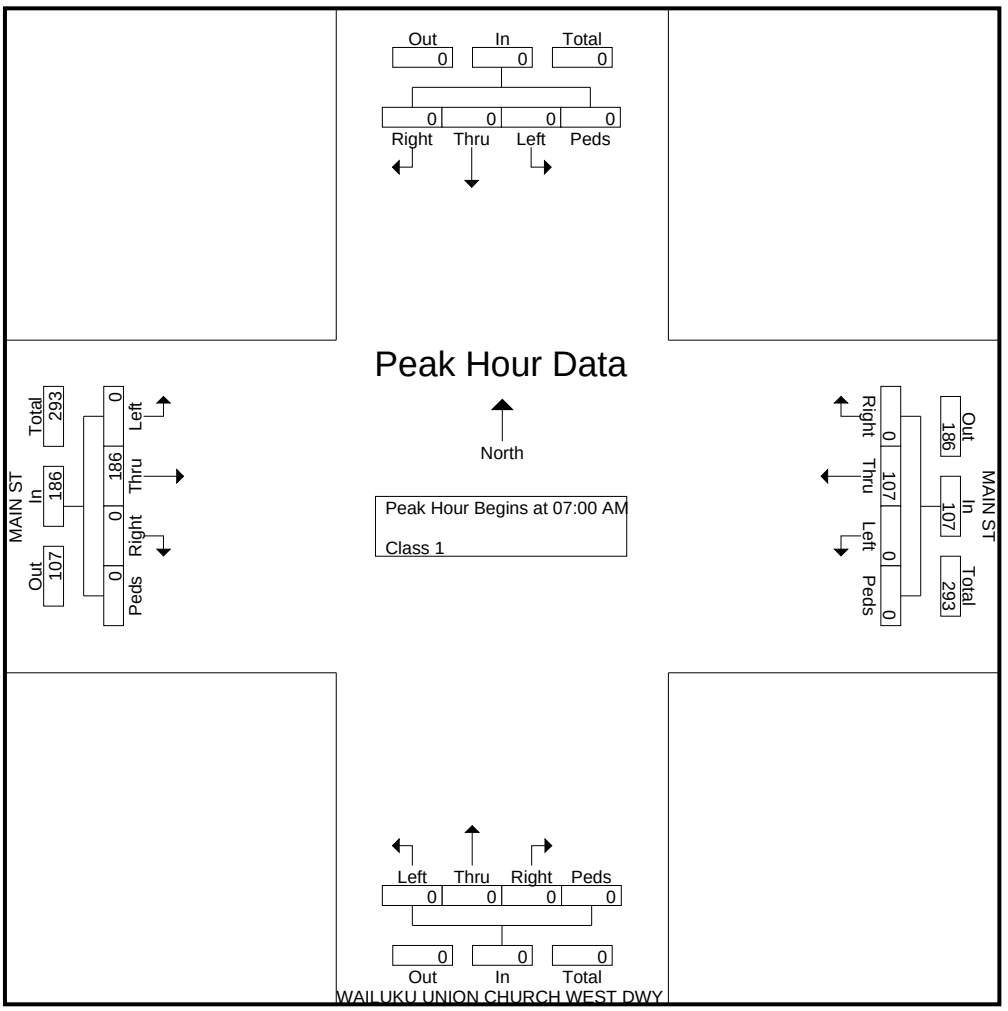
File Name : Wailuku Union Church West Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
Page No : 2

	Southbound					MAIN ST Westbound					WAILUKU UNION CHURCH WEST DWY Northbound					MAIN ST Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 07:45 AM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 07:00 AM																					
07:00 AM	0	0	0	0	0	0	20	0	0	20	0	0	0	0	0	0	38	0	0	38	58
07:15 AM	0	0	0	0	0	0	30	0	0	30	0	0	0	0	0	0	47	0	0	47	77
07:30 AM	0	0	0	0	0	0	21	0	0	21	0	0	0	0	0	0	62	0	0	62	83
07:45 AM	0	0	0	0	0	0	36	0	0	36	0	0	0	0	0	0	39	0	0	39	75
Total Volume	0	0	0	0	0	0	107	0	0	107	0	0	0	0	0	0	186	0	0	186	293
% App. Total	0	0	0	0		0	100	0	0		0	0	0	0		0	100	0	0		
PHF	.000	.000	.000	.000	.000	.000	.743	.000	.000	.743	.000	.000	.000	.000	.000	.000	.750	.000	.000	.750	.883



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File Name : Wailuku Union Church West Dwy - Main St
Site Code : 00000000
Start Date : 4/30/2025
Page No : 1

Groups Printed- Class 1

	Southbound				MAIN ST Westbound				WAILUKU UNION CHURCH WEST DWY Northbound				MAIN ST Eastbound				
Start Time	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Left	Thru	Right	Peds	Int. Total
03:30 PM	0	0	0	0	1	39	0	0	0	0	1	0	0	57	0	0	98
03:45 PM	0	0	0	0	0	44	0	0	0	0	1	0	0	39	0	0	84
Total	0	0	0	0	1	83	0	0	0	0	2	0	0	96	0	0	182
04:00 PM	0	0	0	0	0	41	0	0	0	0	1	0	0	31	1	0	74
04:15 PM	0	0	0	0	0	39	0	0	0	0	0	0	0	36	0	0	75
04:30 PM	0	0	0	0	1	30	0	0	0	0	1	0	0	39	0	0	71
04:45 PM	0	0	0	0	0	36	0	0	0	0	3	0	0	48	0	0	87
Total	0	0	0	0	1	146	0	0	0	0	5	0	0	154	1	0	307
05:00 PM	0	0	0	0	0	27	0	0	0	0	0	0	0	32	0	0	59
05:15 PM	0	0	0	0	0	22	0	0	0	0	0	0	0	32	0	0	54
Grand Total	0	0	0	0	2	278	0	0	0	0	7	0	0	314	1	0	602
Apprch %	0	0	0	0	0.7	99.3	0	0	0	0	100	0	0	99.7	0.3	0	
Total %	0	0	0	0	0.3	46.2	0	0	0	0	1.2	0	0	52.2	0.2	0	

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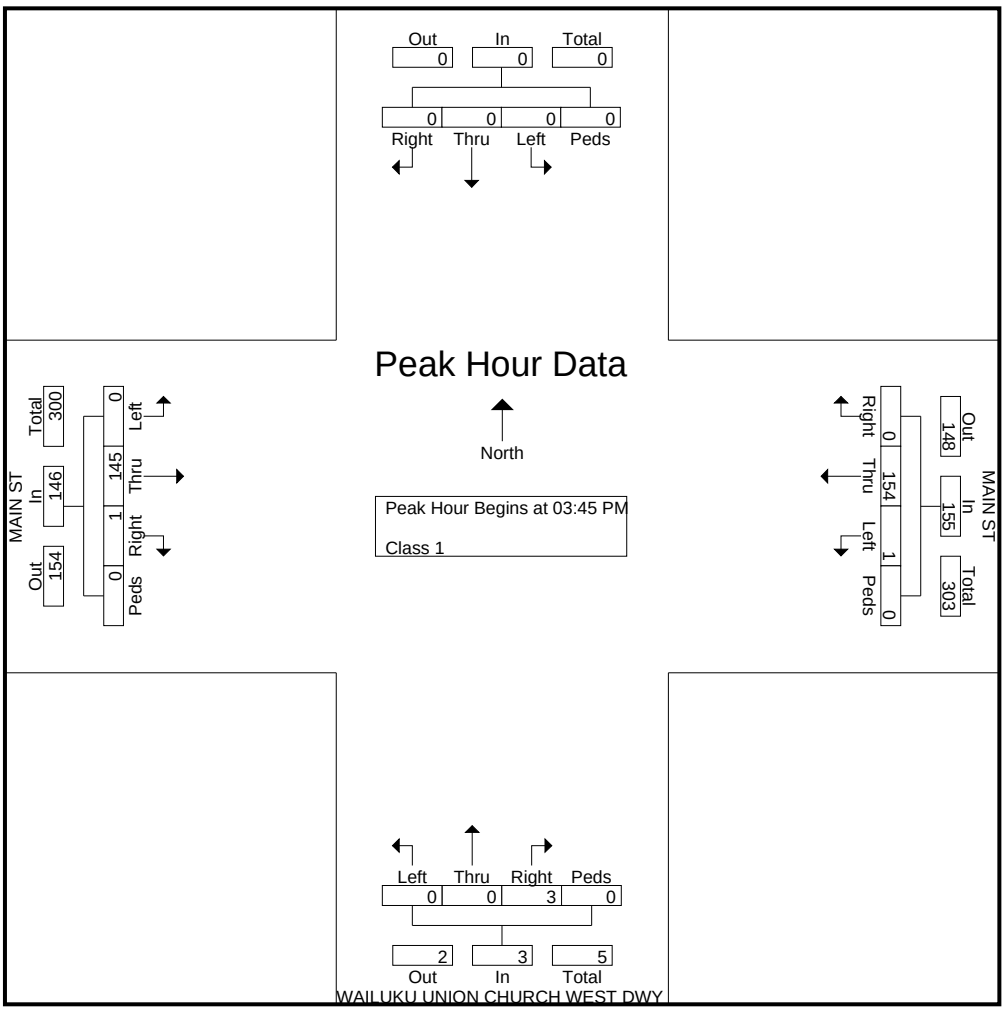
	Southbound					MAIN ST Westbound					WAILUKU UNION CHURCH WEST DWY Northbound					MAIN ST Eastbound					
Start Time	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Left	Thru	Right	Peds	App. Total	Int. Total
Peak Hour Analysis From 03:45 PM to 04:30 PM - Peak 1 of 1																					
Peak Hour for Entire Intersection Begins at 03:45 PM																					
03:45 PM	0	0	0	0	0	0	44	0	0	44	0	0	1	0	1	0	39	0	0	39	84
04:00 PM	0	0	0	0	0	0	41	0	0	41	0	0	1	0	1	0	31	1	0	32	74
04:15 PM	0	0	0	0	0	0	39	0	0	39	0	0	0	0	0	0	36	0	0	36	75
04:30 PM	0	0	0	0	0	1	30	0	0	31	0	0	1	0	1	0	39	0	0	39	71
Total Volume	0	0	0	0	0	1	154	0	0	155	0	0	3	0	3	0	145	1	0	146	304
% App. Total	0	0	0	0		0.6	99.4	0	0		0	0	100	0		0	99.3	0.7	0		
PHF	.000	.000	.000	.000	.000	.250	.875	.000	.000	.881	.000	.000	.750	.000	.750	.000	.929	.250	.000	.936	.905



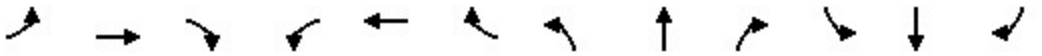
APPENDIX C

LOS WORKSHEETS

APPENDIX C

LOS WORKSHEETS

Existing Conditions – AM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	10	135	41	249	54	40	53	196	281	6	289	12
Future Volume (veh/h)	10	135	41	249	54	40	53	196	281	6	289	12
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	11	147	40	271	59	31	58	213	71	7	314	12
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	413	249	68	621	542	285	480	516	437	97	488	18
Arrive On Green	0.18	0.18	0.18	0.19	0.47	0.47	0.28	0.28	0.28	0.28	0.28	0.28
Sat Flow, veh/h	1307	1416	385	1781	1155	607	1054	1870	1585	13	1769	67
Grp Volume(v), veh/h	11	0	187	271	0	90	58	213	71	333	0	0
Grp Sat Flow(s),veh/h/ln	1307	0	1801	1781	0	1761	1054	1870	1585	1849	0	0
Q Serve(g_s), s	0.3	0.0	3.8	4.1	0.0	1.1	0.0	3.7	1.3	0.0	0.0	0.0
Cycle Q Clear(g_c), s	0.3	0.0	3.8	4.1	0.0	1.1	1.6	3.7	1.3	6.2	0.0	0.0
Prop In Lane	1.00		0.21	1.00		0.34	1.00		1.00	0.02		0.04
Lane Grp Cap(c), veh/h	413	0	316	621	0	827	480	516	437	604	0	0
V/C Ratio(X)	0.03	0.00	0.59	0.44	0.00	0.11	0.12	0.41	0.16	0.55	0.00	0.00
Avail Cap(c_a), veh/h	1214	0	1421	3000	0	4259	2604	4285	3631	4294	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	13.5	0.0	14.9	8.4	0.0	5.8	10.9	11.6	10.8	12.5	0.0	0.0
Incr Delay (d2), s/veh	0.0	0.0	1.8	0.8	0.0	0.1	0.1	0.6	0.2	0.9	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	0.0	1.5	1.3	0.0	0.3	0.3	1.3	0.4	2.3	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	13.5	0.0	16.7	9.2	0.0	5.9	11.0	12.2	11.0	13.4	0.0	0.0
LnGrp LOS	B		B	A		A	B	B	B	B		
Approach Vol, veh/h		198			361			342			333	
Approach Delay, s/veh		16.5			8.4			11.7			13.4	
Approach LOS		B			A			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		23.4		15.8	11.5	11.9		15.8				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		95.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		3.1		8.2	6.1	5.8		5.7				
Green Ext Time (p_c), s		1.0		2.6	1.9	1.2		2.1				

Intersection Summary		
HCM 7th Control Delay, s/veh	12.0	
HCM 7th LOS	B	

Intersection	
Int Delay, s/veh	1.8

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	54	19	504	267	30	518
Future Vol, veh/h	54	19	504	267	30	518
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	59	21	548	290	33	563

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1321	693	0	0	838	0
Stage 1	693	-	-	-	-	-
Stage 2	628	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	173	443	-	-	796	-
Stage 1	496	-	-	-	-	-
Stage 2	532	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	166	443	-	-	796	-
Mov Cap-2 Maneuver	166	-	-	-	-	-
Stage 1	496	-	-	-	-	-
Stage 2	510	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	30.51	0	0.53
HCM LOS	D		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	219	796	-
HCM Lane V/C Ratio	-	-	0.363	0.041	-
HCM Control Delay (s/veh)	-	-	30.5	9.7	-
HCM Lane LOS	-	-	D	A	-
HCM 95th %tile Q(veh)	-	-	1.6	0.1	-



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	191	66	1	705	569	3
Future Volume (veh/h)	191	66	1	705	569	3
Initial Q (Qb), veh	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	208	72	1	766	618	3
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	321	286	110	1076	1070	5
Arrive On Green	0.18	0.18	0.58	0.58	0.58	0.58
Sat Flow, veh/h	1781	1585	0	1870	1860	9
Grp Volume(v), veh/h	208	72	767	0	0	621
Grp Sat Flow(s),veh/h/ln	1781	1585	1870	0	0	1869
Q Serve(g_s), s	3.5	1.3	0.0	0.0	0.0	6.9
Cycle Q Clear(g_c), s	3.5	1.3	9.7	0.0	0.0	6.9
Prop In Lane	1.00	1.00	0.00			0.00
Lane Grp Cap(c), veh/h	321	286	1186	0	0	1075
V/C Ratio(X)	0.65	0.25	0.65	0.00	0.00	0.58
Avail Cap(c_a), veh/h	1687	1501	3020	0	0	2911
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.00	0.00	1.00
Uniform Delay (d), s/veh	12.5	11.5	5.0	0.0	0.0	4.4
Incr Delay (d2), s/veh	2.2	0.5	0.6	0.0	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	0.4	1.7	0.0	0.0	1.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	14.7	12.0	5.6	0.0	0.0	4.9
LnGrp LOS	B	B	A			A
Approach Vol, veh/h	280			767	621	
Approach Delay, s/veh	14.0			5.6	4.9	
Approach LOS	B			A	A	

Timer - Assigned Phs		2		4		6
Phs Duration (G+Y+Rc), s		22.8		9.9		22.8
Change Period (Y+Rc), s		4.0		4.0		4.0
Max Green Setting (Gmax), s		51.0		31.0		51.0
Max Q Clear Time (g_c+I1), s		11.7		5.5		8.9
Green Ext Time (p_c), s		7.2		0.9		5.2

Intersection Summary	
HCM 7th Control Delay, s/veh	6.7
HCM 7th LOS	A

Intersection	
Int Delay, s/veh	5.2

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	93	42	533	212	48	599
Future Vol, veh/h	93	42	533	212	48	599
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	101	46	579	230	52	651

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1335	579	0	-	579	0
Stage 1	579	-	-	-	-	-
Stage 2	755	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	169	515	-	0	994	-
Stage 1	560	-	-	0	-	-
Stage 2	464	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	156	515	-	-	994	-
Mov Cap-2 Maneuver	156	-	-	-	-	-
Stage 1	560	-	-	-	-	-
Stage 2	426	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	47.53	0	0.65
HCM LOS	E		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	156	515	994	-
HCM Lane V/C Ratio	-	0.65	0.089	0.052	-
HCM Control Delay (s/veh)	-	63.3	12.7	8.8	0
HCM Lane LOS	-	F	B	A	A
HCM 95th %tile Q(veh)	-	3.6	0.3	0.2	-

Intersection	
Int Delay, s/veh	0.4

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	1	1	59	742	454	251
Future Vol, veh/h	1	1	59	742	454	251
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1	1	64	807	493	273

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1565	630	766	0	-	0
Stage 1	630	-	-	-	-	-
Stage 2	935	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	123	482	847	-	-	-
Stage 1	531	-	-	-	-	-
Stage 2	382	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	113	482	847	-	-	-
Mov Cap-2 Maneuver	113	-	-	-	-	-
Stage 1	491	-	-	-	-	-
Stage 2	382	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	24.85	0.71	0
HCM LOS	C		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	847	-	184	-	-
HCM Lane V/C Ratio	0.076	-	0.012	-	-
HCM Control Delay (s/veh)	9.6	-	24.8	-	-
HCM Lane LOS	A	-	C	-	-
HCM 95th %tile Q(veh)	0.2	-	0	-	-

Intersection	
Int Delay, s/veh	0.3

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	186	0	12	107	0	1
Future Vol, veh/h	186	0	12	107	0	1
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	202	0	13	116	0	1

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	202	0	345	202
Stage 1	-	-	-	-	202	-
Stage 2	-	-	-	-	142	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1370	-	652	839
Stage 1	-	-	-	-	832	-
Stage 2	-	-	-	-	885	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1370	-	645	839
Mov Cap-2 Maneuver	-	-	-	-	645	-
Stage 1	-	-	-	-	832	-
Stage 2	-	-	-	-	876	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.77	9.3
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	839	-	-	1370	-
HCM Lane V/C Ratio	0.001	-	-	0.01	-
HCM Control Delay (s/veh)	9.3	-	-	7.7	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0	-	-	0	-

Intersection	
Int Delay, s/veh	0

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	186	0	0	107	0	0
Future Vol, veh/h	186	0	0	107	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	202	0	0	116	0	0

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	202	0	318	202
Stage 1	-	-	-	-	202	-
Stage 2	-	-	-	-	116	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1370	-	675	839
Stage 1	-	-	-	-	832	-
Stage 2	-	-	-	-	909	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1370	-	675	839
Mov Cap-2 Maneuver	-	-	-	-	675	-
Stage 1	-	-	-	-	832	-
Stage 2	-	-	-	-	909	-

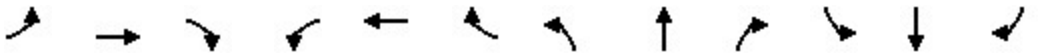
Approach	EB	WB	NB
HCM Control Delay, s/v	0	0	0
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	-	-	-	1370	-
HCM Lane V/C Ratio	-	-	-	-	-
HCM Control Delay (s/veh)	0	-	-	0	-
HCM Lane LOS	A	-	-	A	-
HCM 95th %tile Q(veh)	-	-	-	0	-

APPENDIX C

LOS WORKSHEETS

Existing Conditions – PM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	11	100	47	266	83	21	61	221	237	23	228	10
Future Volume (veh/h)	11	100	47	266	83	21	61	221	237	23	228	10
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	12	109	42	289	90	19	66	240	56	25	248	10
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	413	207	80	642	693	146	531	470	398	132	416	16
Arrive On Green	0.16	0.16	0.16	0.19	0.46	0.46	0.25	0.25	0.25	0.25	0.25	0.25
Sat Flow, veh/h	1284	1286	495	1781	1497	316	1121	1870	1585	81	1655	64
Grp Volume(v), veh/h	12	0	151	289	0	109	66	240	56	283	0	0
Grp Sat Flow(s),veh/h/ln	1284	0	1781	1781	0	1813	1121	1870	1585	1800	0	0
Q Serve(g_s), s	0.3	0.0	2.7	4.0	0.0	1.2	0.0	3.9	1.0	0.6	0.0	0.0
Cycle Q Clear(g_c), s	0.3	0.0	2.7	4.0	0.0	1.2	1.3	3.9	1.0	4.7	0.0	0.0
Prop In Lane	1.00		0.28	1.00		0.17	1.00		1.00	0.09		0.04
Lane Grp Cap(c), veh/h	413	0	287	642	0	839	531	470	398	564	0	0
V/C Ratio(X)	0.03	0.00	0.53	0.45	0.00	0.13	0.12	0.51	0.14	0.50	0.00	0.00
Avail Cap(c_a), veh/h	1345	0	1580	3367	0	4877	3137	4816	4082	4624	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	12.4	0.0	13.4	7.8	0.0	5.4	10.3	11.2	10.2	11.6	0.0	0.0
Incr Delay (d2), s/veh	0.0	0.0	1.5	0.5	0.0	0.1	0.1	0.9	0.2	0.7	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	0.0	1.0	1.1	0.0	0.3	0.3	1.4	0.3	1.6	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	12.4	0.0	14.9	8.3	0.0	5.4	10.4	12.1	10.3	12.2	0.0	0.0
LnGrp LOS	B		B	A		A	B	B	B	B		
Approach Vol, veh/h		163			398			362			283	
Approach Delay, s/veh		14.7			7.5			11.5			12.2	
Approach LOS		B			A			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		21.2		13.8	10.5	10.6		13.8				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		94.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		3.2		6.7	6.0	4.7		5.9				
Green Ext Time (p_c), s		0.7		2.1	0.9	0.9		2.1				

Intersection Summary		
HCM 7th Control Delay, s/veh	10.8	
HCM 7th LOS	B	

Intersection	
Int Delay, s/veh	4.6

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	104	43	518	117	16	557
Future Vol, veh/h	104	43	518	117	16	557
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	113	47	563	127	17	605

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1267	627	0	0	690	0
Stage 1	627	-	-	-	-	-
Stage 2	640	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	186	484	-	-	904	-
Stage 1	533	-	-	-	-	-
Stage 2	525	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	183	484	-	-	904	-
Mov Cap-2 Maneuver	183	-	-	-	-	-
Stage 1	533	-	-	-	-	-
Stage 2	515	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	41.29	0	0.25
HCM LOS	E		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	252	904	-
HCM Lane V/C Ratio	-	-	0.635	0.019	-
HCM Control Delay (s/veh)	-	-	41.3	9.1	-
HCM Lane LOS	-	-	E	A	-
HCM 95th %tile Q(veh)	-	-	3.9	0.1	-

Intersection	
Int Delay, s/veh	1

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	31	15	6	620	634	27
Future Vol, veh/h	31	15	6	620	634	27
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	75	-	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	34	16	7	674	689	29

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1391	704	718	0	-	0
Stage 1	704	-	-	-	-	-
Stage 2	687	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	157	437	883	-	-	-
Stage 1	491	-	-	-	-	-
Stage 2	499	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	155	437	883	-	-	-
Mov Cap-2 Maneuver	155	-	-	-	-	-
Stage 1	485	-	-	-	-	-
Stage 2	499	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	27.74	0.09	0
HCM LOS	D		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	883	-	155	437	-	-
HCM Lane V/C Ratio	0.007	-	0.218	0.037	-	-
HCM Control Delay (s/veh)	9.1	0	34.6	13.6	-	-
HCM Lane LOS	A	A	D	B	-	-
HCM 95th %tile Q(veh)	0	-	0.8	0.1	-	-

Intersection	
Int Delay, s/veh	1.6

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	40	35	568	75	19	638
Future Vol, veh/h	40	35	568	75	19	638
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	43	38	617	82	21	693

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1352	617	0	-	617	0
Stage 1	617	-	-	-	-	-
Stage 2	735	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	165	490	-	0	963	-
Stage 1	538	-	-	0	-	-
Stage 2	474	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	160	490	-	-	963	-
Mov Cap-2 Maneuver	160	-	-	-	-	-
Stage 1	538	-	-	-	-	-
Stage 2	458	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	25.14	0	0.26
HCM LOS	D		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	160	490	963	-
HCM Lane V/C Ratio	-	0.272	0.078	0.021	-
HCM Control Delay (s/veh)	-	35.8	13	8.8	0
HCM Lane LOS	-	E	B	A	A
HCM 95th %tile Q(veh)	-	1	0.3	0.1	-

Intersection	
Int Delay, s/veh	1.2

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	23	29	29	615	628	34
Future Vol, veh/h	23	29	29	615	628	34
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	25	32	32	668	683	37

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1433	701	720	0	-	0
Stage 1	701	-	-	-	-	-
Stage 2	732	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	148	439	882	-	-	-
Stage 1	492	-	-	-	-	-
Stage 2	476	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	142	439	882	-	-	-
Mov Cap-2 Maneuver	142	-	-	-	-	-
Stage 1	474	-	-	-	-	-
Stage 2	476	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	25.85	0.42	0
HCM LOS	D		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	882	-	229	-	-
HCM Lane V/C Ratio	0.036	-	0.247	-	-
HCM Control Delay (s/veh)	9.2	-	25.9	-	-
HCM Lane LOS	A	-	D	-	-
HCM 95th %tile Q(veh)	0.1	-	0.9	-	-

Intersection	
Int Delay, s/veh	0.1

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	145	1	1	154	0	3
Future Vol, veh/h	145	1	1	154	0	3
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	158	1	1	167	0	3

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	159	0	328	158
Stage 1	-	-	-	-	158	-
Stage 2	-	-	-	-	170	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1421	-	667	887
Stage 1	-	-	-	-	870	-
Stage 2	-	-	-	-	860	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1421	-	666	887
Mov Cap-2 Maneuver	-	-	-	-	666	-
Stage 1	-	-	-	-	870	-
Stage 2	-	-	-	-	860	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.05	9.07
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	887	-	-	1421	-
HCM Lane V/C Ratio	0.004	-	-	0.001	-
HCM Control Delay (s/veh)	9.1	-	-	7.5	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0	-	-	0	-

Intersection	
Int Delay, s/veh	0.1

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	145	1	1	154	0	3
Future Vol, veh/h	145	1	1	154	0	3
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	158	1	1	167	0	3

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	159	0	328	158
Stage 1	-	-	-	-	158	-
Stage 2	-	-	-	-	170	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1421	-	667	887
Stage 1	-	-	-	-	870	-
Stage 2	-	-	-	-	860	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1421	-	666	887
Mov Cap-2 Maneuver	-	-	-	-	666	-
Stage 1	-	-	-	-	870	-
Stage 2	-	-	-	-	860	-

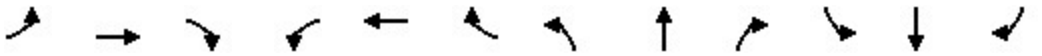
Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.05	9.07
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	887	-	-	1421	-
HCM Lane V/C Ratio	0.004	-	-	0.001	-
HCM Control Delay (s/veh)	9.1	-	-	7.5	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0	-	-	0	-

APPENDIX C

LOS WORKSHEETS

Base Year Conditions – AM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	17	140	57	323	60	41	82	283	403	6	320	13
Future Volume (veh/h)	17	140	57	323	60	41	82	283	403	6	320	13
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	18	152	54	351	65	33	89	308	179	7	348	13
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	390	236	84	652	581	295	417	534	452	83	505	19
Arrive On Green	0.18	0.18	0.18	0.23	0.50	0.50	0.29	0.29	0.29	0.29	0.29	0.29
Sat Flow, veh/h	1297	1318	468	1781	1170	594	1021	1870	1585	11	1770	65
Grp Volume(v), veh/h	18	0	206	351	0	98	89	308	179	368	0	0
Grp Sat Flow(s),veh/h/ln	1297	0	1786	1781	0	1763	1021	1870	1585	1847	0	0
Q Serve(g_s), s	0.5	0.0	4.9	6.2	0.0	1.4	0.0	6.5	4.2	0.0	0.0	0.0
Cycle Q Clear(g_c), s	0.5	0.0	4.9	6.2	0.0	1.4	3.9	6.5	4.2	8.1	0.0	0.0
Prop In Lane	1.00		0.26	1.00		0.34	1.00		1.00	0.02		0.04
Lane Grp Cap(c), veh/h	390	0	320	652	0	875	417	534	452	607	0	0
V/C Ratio(X)	0.05	0.00	0.64	0.54	0.00	0.11	0.21	0.58	0.40	0.61	0.00	0.00
Avail Cap(c_a), veh/h	1035	0	1209	2576	0	3658	2132	3676	3115	3668	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	15.6	0.0	17.4	9.3	0.0	6.1	13.1	14.0	13.2	14.6	0.0	0.0
Incr Delay (d2), s/veh	0.0	0.0	2.2	1.2	0.0	0.1	0.3	1.1	0.6	1.1	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	0.0	2.0	2.1	0.0	0.4	0.7	2.5	1.4	3.1	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	15.7	0.0	19.6	10.5	0.0	6.2	13.4	15.1	13.8	15.6	0.0	0.0
LnGrp LOS	B		B	B		A	B	B	B	B		
Approach Vol, veh/h		224			449			576			368	
Approach Delay, s/veh		19.3			9.6			14.4			15.6	
Approach LOS		B			A			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		27.7		18.1	14.5	13.2		18.1				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		95.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		3.4		10.1	8.2	6.9		8.5				
Green Ext Time (p_c), s		1.1		3.0	2.5	1.3		3.6				

Intersection Summary		
HCM 7th Control Delay, s/veh	14.0	
HCM 7th LOS	B	

Intersection	
Int Delay, s/veh	3.2

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	54	19	741	267	30	636
Future Vol, veh/h	54	19	741	267	30	636
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	59	21	805	290	33	691

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1707	951	0	0	1096	0
Stage 1	951	-	-	-	-	-
Stage 2	757	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	100	315	-	-	637	-
Stage 1	376	-	-	-	-	-
Stage 2	463	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	95	315	-	-	637	-
Mov Cap-2 Maneuver	95	-	-	-	-	-
Stage 1	376	-	-	-	-	-
Stage 2	440	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	73.2	0	0.49
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	126	637	-
HCM Lane V/C Ratio	-	-	0.631	0.051	-
HCM Control Delay (s/veh)	-	-	73.2	11	-
HCM Lane LOS	-	-	F	B	-
HCM 95th %tile Q(veh)	-	-	3.3	0.2	-



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	191	66	1	943	690	3
Future Volume (veh/h)	191	66	1	943	690	3
Initial Q (Qb), veh	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	208	72	1	1025	750	3
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	294	262	74	1253	1247	5
Arrive On Green	0.17	0.17	0.67	0.67	0.67	0.67
Sat Flow, veh/h	1781	1585	0	1870	1862	7
Grp Volume(v), veh/h	208	72	1026	0	0	753
Grp Sat Flow(s),veh/h/ln	1781	1585	1870	0	0	1869
Q Serve(g_s), s	5.4	1.9	0.0	0.0	0.0	10.8
Cycle Q Clear(g_c), s	5.4	1.9	19.4	0.0	0.0	10.8
Prop In Lane	1.00	1.00	0.00			0.00
Lane Grp Cap(c), veh/h	294	262	1327	0	0	1252
V/C Ratio(X)	0.71	0.28	0.77	0.00	0.00	0.60
Avail Cap(c_a), veh/h	1139	1013	2040	0	0	1965
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.00	0.00	1.00
Uniform Delay (d), s/veh	19.1	17.7	5.8	0.0	0.0	4.4
Incr Delay (d2), s/veh	3.1	0.6	1.0	0.0	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.7	4.4	0.0	0.0	2.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	22.3	18.3	6.9	0.0	0.0	4.9
LnGrp LOS	C	B	A			A
Approach Vol, veh/h	280			1026	753	
Approach Delay, s/veh	21.2			6.9	4.9	
Approach LOS	C			A	A	

Timer - Assigned Phs		2		4		6
Phs Duration (G+Y+Rc), s		36.5		12.0		36.5
Change Period (Y+Rc), s		4.0		4.0		4.0
Max Green Setting (Gmax), s		51.0		31.0		51.0
Max Q Clear Time (g_c+I1), s		21.4		7.4		12.8
Green Ext Time (p_c), s		11.0		0.8		6.9

Intersection Summary		
HCM 7th Control Delay, s/veh	8.1	
HCM 7th LOS	A	

Intersection	
Int Delay, s/veh	15.2

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	93	58	754	212	63	705
Future Vol, veh/h	93	58	754	212	63	705
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	101	63	820	230	68	766

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1723	820	0	-	820	0
Stage 1	820	-	-	-	-	-
Stage 2	903	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	~ 98	375	-	0	809	-
Stage 1	433	-	-	0	-	-
Stage 2	395	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	~ 84	375	-	-	809	-
Mov Cap-2 Maneuver	~ 84	-	-	-	-	-
Stage 1	433	-	-	-	-	-
Stage 2	337	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	163.8	0	0.81
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	84	375	809	-
HCM Lane V/C Ratio	-	1.21	0.168	0.085	-
HCM Control Delay (s/veh)	-	255.6	16.5	9.9	0
HCM Lane LOS	-	F	C	A	A
HCM 95th %tile Q(veh)	-	7.4	0.6	0.3	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	0.4

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	1	1	59	968	555	251
Future Vol, veh/h	1	1	59	968	555	251
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1	1	64	1052	603	273

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1920	740	876	0	-	0
Stage 1	740	-	-	-	-	-
Stage 2	1180	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	74	417	771	-	-	-
Stage 1	472	-	-	-	-	-
Stage 2	292	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	68	417	771	-	-	-
Mov Cap-2 Maneuver	68	-	-	-	-	-
Stage 1	433	-	-	-	-	-
Stage 2	292	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	36.49	0.58	0
HCM LOS	E		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	771	-	117	-	-
HCM Lane V/C Ratio	0.083	-	0.019	-	-
HCM Control Delay (s/veh)	10.1	-	36.5	-	-
HCM Lane LOS	B	-	E	-	-
HCM 95th %tile Q(veh)	0.3	-	0.1	-	-

Intersection	
Int Delay, s/veh	0

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	214	0	0	143	0	0
Future Vol, veh/h	214	0	0	143	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	233	0	0	155	0	0

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	233	0	388	233
Stage 1	-	-	-	-	233	-
Stage 2	-	-	-	-	155	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1335	-	615	807
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	873	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1335	-	615	807
Mov Cap-2 Maneuver	-	-	-	-	615	-
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	873	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0	0
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	-	-	-	1335	-
HCM Lane V/C Ratio	-	-	-	-	-
HCM Control Delay (s/veh)	0	-	-	0	-
HCM Lane LOS	A	-	-	A	-
HCM 95th %tile Q(veh)	-	-	-	0	-

Intersection	
Int Delay, s/veh	0

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	214	0	0	143	0	0
Future Vol, veh/h	214	0	0	143	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	233	0	0	155	0	0

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	233	0	388	233
Stage 1	-	-	-	-	233	-
Stage 2	-	-	-	-	155	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1335	-	615	807
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	873	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1335	-	615	807
Mov Cap-2 Maneuver	-	-	-	-	615	-
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	873	-

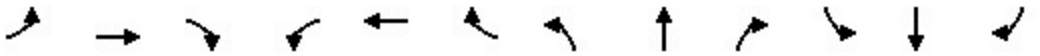
Approach	EB	WB	NB
HCM Control Delay, s/v	0	0	0
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	-	-	-	1335	-
HCM Lane V/C Ratio	-	-	-	-	-
HCM Control Delay (s/veh)	0	-	-	0	-
HCM Lane LOS	A	-	-	A	-
HCM 95th %tile Q(veh)	-	-	-	0	-

APPENDIX C

LOS WORKSHEETS

Base Year Conditions – PM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	16	108	93	459	88	22	90	301	357	24	282	12
Future Volume (veh/h)	16	108	93	459	88	22	90	301	357	24	282	12
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	17	117	85	499	96	20	98	327	167	26	307	12
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	362	174	127	705	789	164	379	521	441	92	437	16
Arrive On Green	0.17	0.17	0.17	0.27	0.53	0.53	0.28	0.28	0.28	0.28	0.28	0.28
Sat Flow, veh/h	1276	1007	732	1781	1501	313	1061	1870	1585	58	1571	59
Grp Volume(v), veh/h	17	0	202	499	0	116	98	327	167	345	0	0
Grp Sat Flow(s),veh/h/ln	1276	0	1739	1781	0	1814	1061	1870	1585	1689	0	0
Q Serve(g_s), s	0.6	0.0	5.5	10.2	0.0	1.7	0.0	7.8	4.3	1.8	0.0	0.0
Cycle Q Clear(g_c), s	0.6	0.0	5.5	10.2	0.0	1.7	5.5	7.8	4.3	9.5	0.0	0.0
Prop In Lane	1.00		0.42	1.00		0.17	1.00		1.00	0.08		0.03
Lane Grp Cap(c), veh/h	362	0	301	705	0	953	379	521	441	546	0	0
V/C Ratio(X)	0.05	0.00	0.67	0.71	0.00	0.12	0.26	0.63	0.38	0.63	0.00	0.00
Avail Cap(c_a), veh/h	918	0	1059	2317	0	3349	1958	3306	2802	3109	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	17.6	0.0	19.7	10.2	0.0	6.1	15.2	16.1	14.8	16.4	0.0	0.0
Incr Delay (d2), s/veh	0.1	0.0	2.6	1.3	0.0	0.1	0.4	1.3	0.5	1.2	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.2	0.0	2.3	3.4	0.0	0.5	0.9	3.2	1.5	3.4	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	17.7	0.0	22.3	11.6	0.0	6.2	15.6	17.3	15.4	17.6	0.0	0.0
LnGrp LOS	B		C	B		A	B	B	B	B		
Approach Vol, veh/h		219			615			592			345	
Approach Delay, s/veh		21.9			10.6			16.5			17.6	
Approach LOS		C			B			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		31.7		19.2	17.9	13.8		19.2				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		94.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		3.7		11.5	12.2	7.5		9.8				
Green Ext Time (p_c), s		0.8		2.6	1.8	1.3		3.4				

Intersection Summary												
HCM 7th Control Delay, s/veh			15.3									
HCM 7th LOS			B									

Intersection	
Int Delay, s/veh	20.3

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	104	43	695	112	16	849
Future Vol, veh/h	104	43	695	112	16	849
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	113	47	755	122	17	923

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1774	816	0	0	877	0
Stage 1	816	-	-	-	-	-
Stage 2	958	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	~ 91	377	-	-	770	-
Stage 1	435	-	-	-	-	-
Stage 2	373	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	~ 89	377	-	-	770	-
Mov Cap-2 Maneuver	~ 89	-	-	-	-	-
Stage 1	435	-	-	-	-	-
Stage 2	364	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	249.6	0	0.18
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	123	770	-
HCM Lane V/C Ratio	-	-	1.301	0.023	-
HCM Control Delay (s/veh)	-	-	249.6	9.8	-
HCM Lane LOS	-	-	F	A	-
HCM 95th %tile Q(veh)	-	-	10.4	0.1	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	1.9

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	31	15	6	849	927	27
Future Vol, veh/h	31	15	6	849	927	27
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	75	-	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	34	16	7	923	1008	29

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1958	1022	1037	0	-	0
Stage 1	1022	-	-	-	-	-
Stage 2	936	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	70	286	670	-	-	-
Stage 1	347	-	-	-	-	-
Stage 2	382	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	69	286	670	-	-	-
Mov Cap-2 Maneuver	69	-	-	-	-	-
Stage 1	340	-	-	-	-	-
Stage 2	382	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	73.6	0.07	0
HCM LOS	F		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	670	-	69	286	-	-
HCM Lane V/C Ratio	0.01	-	0.492	0.057	-	-
HCM Control Delay (s/veh)	10.4	0	100.3	18.3	-	-
HCM Lane LOS	B	A	F	C	-	-
HCM 95th %tile Q(veh)	0	-	2	0.2	-	-

Intersection	
Int Delay, s/veh	4

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	40	51	780	75	49	902
Future Vol, veh/h	40	51	780	75	49	902
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	43	55	848	82	53	980

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1935	848	0	-	848	0
Stage 1	848	-	-	-	-	-
Stage 2	1087	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	72	361	-	0	790	-
Stage 1	420	-	-	0	-	-
Stage 2	323	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	62	361	-	-	790	-
Mov Cap-2 Maneuver	62	-	-	-	-	-
Stage 1	420	-	-	-	-	-
Stage 2	275	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	74.76	0	0.51
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	62	361	790	-
HCM Lane V/C Ratio	-	0.706	0.153	0.067	-
HCM Control Delay (s/veh)	-	148.7	16.8	9.9	0
HCM Lane LOS	-	F	C	A	A
HCM 95th %tile Q(veh)	-	3.1	0.5	0.2	-

Intersection	
Int Delay, s/veh	1.9

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	23	29	29	828	891	34
Future Vol, veh/h	23	29	29	828	891	34
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	25	32	32	900	968	37

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1950	987	1005	0	-	0
Stage 1	987	-	-	-	-	-
Stage 2	963	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	71	300	689	-	-	-
Stage 1	361	-	-	-	-	-
Stage 2	370	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	68	300	689	-	-	-
Mov Cap-2 Maneuver	68	-	-	-	-	-
Stage 1	344	-	-	-	-	-
Stage 2	370	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v60.09		0.35	0
HCM LOS	F		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	689	-	119	-	-
HCM Lane V/C Ratio	0.046	-	0.475	-	-
HCM Control Delay (s/veh)	10.5	-	60.1	-	-
HCM Lane LOS	B	-	F	-	-
HCM 95th %tile Q(veh)	0.1	-	2.1	-	-

Intersection	
Int Delay, s/veh	0

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	204	0	0	190	0	0
Future Vol, veh/h	204	0	0	190	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	222	0	0	207	0	0

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	222	0	428	222
Stage 1	-	-	-	-	222	-
Stage 2	-	-	-	-	207	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1347	-	583	818
Stage 1	-	-	-	-	815	-
Stage 2	-	-	-	-	828	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1347	-	583	818
Mov Cap-2 Maneuver	-	-	-	-	583	-
Stage 1	-	-	-	-	815	-
Stage 2	-	-	-	-	828	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0	0
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	-	-	-	1347	-
HCM Lane V/C Ratio	-	-	-	-	-
HCM Control Delay (s/veh)	0	-	-	0	-
HCM Lane LOS	A	-	-	A	-
HCM 95th %tile Q(veh)	-	-	-	0	-

Intersection	
Int Delay, s/veh	0

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	204	0	0	190	0	0
Future Vol, veh/h	204	0	0	190	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	222	0	0	207	0	0

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	222	0	428	222
Stage 1	-	-	-	-	222	-
Stage 2	-	-	-	-	207	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1347	-	583	818
Stage 1	-	-	-	-	815	-
Stage 2	-	-	-	-	828	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1347	-	583	818
Mov Cap-2 Maneuver	-	-	-	-	583	-
Stage 1	-	-	-	-	815	-
Stage 2	-	-	-	-	828	-

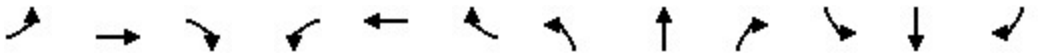
Approach	EB	WB	NB
HCM Control Delay, s/v	0	0	0
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	-	-	-	1347	-
HCM Lane V/C Ratio	-	-	-	-	-
HCM Control Delay (s/veh)	0	-	-	0	-
HCM Lane LOS	A	-	-	A	-
HCM 95th %tile Q(veh)	-	-	-	0	-

APPENDIX C

LOS WORKSHEETS

Future Year Conditions – AM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	19	163	68	323	67	41	85	283	403	6	320	14
Future Volume (veh/h)	19	163	68	323	67	41	85	283	403	6	320	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	21	177	66	351	73	35	92	308	177	7	348	14
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	409	261	97	633	607	291	401	528	448	80	499	20
Arrive On Green	0.20	0.20	0.20	0.22	0.51	0.51	0.28	0.28	0.28	0.28	0.28	0.28
Sat Flow, veh/h	1286	1299	484	1781	1195	573	1020	1870	1585	11	1765	70
Grp Volume(v), veh/h	21	0	243	351	0	108	92	308	177	369	0	0
Grp Sat Flow(s),veh/h/ln	1286	0	1783	1781	0	1767	1020	1870	1585	1846	0	0
Q Serve(g_s), s	0.6	0.0	6.0	6.3	0.0	1.5	0.0	6.7	4.3	0.0	0.0	0.0
Cycle Q Clear(g_c), s	0.6	0.0	6.0	6.3	0.0	1.5	4.4	6.7	4.3	8.5	0.0	0.0
Prop In Lane	1.00		0.27	1.00		0.32	1.00		1.00	0.02		0.04
Lane Grp Cap(c), veh/h	409	0	358	633	0	898	401	528	448	598	0	0
V/C Ratio(X)	0.05	0.00	0.68	0.55	0.00	0.12	0.23	0.58	0.40	0.62	0.00	0.00
Avail Cap(c_a), veh/h	986	0	1159	2476	0	3519	2036	3528	2990	3520	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	15.5	0.0	17.6	9.4	0.0	6.2	13.9	14.7	13.8	15.3	0.0	0.0
Incr Delay (d2), s/veh	0.1	0.0	2.3	1.3	0.0	0.1	0.3	1.1	0.6	1.1	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.2	0.0	2.5	2.1	0.0	0.5	0.7	2.7	1.4	3.3	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	15.5	0.0	19.9	10.7	0.0	6.3	14.2	15.8	14.4	16.4	0.0	0.0
LnGrp LOS	B		B	B		A	B	B	B	B		
Approach Vol, veh/h		264			459			577			369	
Approach Delay, s/veh		19.6			9.7			15.1			16.4	
Approach LOS		B			A			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		29.2		18.5	14.6	14.6		18.5				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		95.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		3.5		10.5	8.3	8.0		8.7				
Green Ext Time (p_c), s		1.3		3.0	2.5	1.6		3.7				

Intersection Summary		
HCM 7th Control Delay, s/veh	14.6	
HCM 7th LOS	B	

Intersection	
Int Delay, s/veh	3.4

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	54	20	743	267	32	645
Future Vol, veh/h	54	20	743	267	32	645
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	59	22	808	290	35	701

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1723	953	0	0	1098	0
Stage 1	953	-	-	-	-	-
Stage 2	771	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	98	314	-	-	636	-
Stage 1	375	-	-	-	-	-
Stage 2	456	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	93	314	-	-	636	-
Mov Cap-2 Maneuver	93	-	-	-	-	-
Stage 1	375	-	-	-	-	-
Stage 2	432	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	76.39	0	0.52
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	124	636	-
HCM Lane V/C Ratio	-	-	0.649	0.055	-
HCM Control Delay (s/veh)	-	-	76.4	11	-
HCM Lane LOS	-	-	F	B	-
HCM 95th %tile Q(veh)	-	-	3.4	0.2	-



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	193	68	1	943	699	3
Future Volume (veh/h)	193	68	1	943	699	3
Initial Q (Qb), veh	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	210	74	1	1025	760	3
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	296	264	74	1252	1246	5
Arrive On Green	0.17	0.17	0.67	0.67	0.67	0.67
Sat Flow, veh/h	1781	1585	0	1870	1862	7
Grp Volume(v), veh/h	210	74	1026	0	0	763
Grp Sat Flow(s),veh/h/ln	1781	1585	1870	0	0	1869
Q Serve(g_s), s	5.4	2.0	0.0	0.0	0.0	11.1
Cycle Q Clear(g_c), s	5.4	2.0	19.6	0.0	0.0	11.1
Prop In Lane	1.00	1.00	0.00			0.00
Lane Grp Cap(c), veh/h	296	264	1326	0	0	1251
V/C Ratio(X)	0.71	0.28	0.77	0.00	0.00	0.61
Avail Cap(c_a), veh/h	1134	1009	2031	0	0	1957
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.00	0.00	1.00
Uniform Delay (d), s/veh	19.2	17.7	5.9	0.0	0.0	4.5
Incr Delay (d2), s/veh	3.1	0.6	1.0	0.0	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.7	4.5	0.0	0.0	2.5
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	22.3	18.3	6.9	0.0	0.0	5.0
LnGrp LOS	C	B	A			A
Approach Vol, veh/h	284			1026	763	
Approach Delay, s/veh	21.3			6.9	5.0	
Approach LOS	C			A	A	

Timer - Assigned Phs		2		4		6
Phs Duration (G+Y+Rc), s		36.6		12.1		36.6
Change Period (Y+Rc), s		4.0		4.0		4.0
Max Green Setting (Gmax), s		51.0		31.0		51.0
Max Q Clear Time (g_c+I1), s		21.6		7.4		13.1
Green Ext Time (p_c), s		11.0		0.9		7.1

Intersection Summary	
HCM 7th Control Delay, s/veh	8.2
HCM 7th LOS	A

Intersection	
Int Delay, s/veh	15.9

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	93	59	753	212	65	714
Future Vol, veh/h	93	59	753	212	65	714
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	101	64	818	230	71	776

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1736	818	0	-	818	0
Stage 1	818	-	-	-	-	-
Stage 2	917	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	~ 96	376	-	0	810	-
Stage 1	434	-	-	0	-	-
Stage 2	389	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	~ 81	376	-	-	810	-
Mov Cap-2 Maneuver	~ 81	-	-	-	-	-
Stage 1	434	-	-	-	-	-
Stage 2	330	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/veh	71.51	0	0.82
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	81	376	810	-
HCM Lane V/C Ratio	-	1.241	0.171	0.087	-
HCM Control Delay (s/veh)	-	269.8	16.5	9.9	0
HCM Lane LOS	-	F	C	A	A
HCM 95th %tile Q(veh)	-	7.5	0.6	0.3	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	0.4

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	1	1	59	967	560	255
Future Vol, veh/h	1	1	59	967	560	255
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	1	1	64	1051	609	277

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1927	747	886	0	-	0
Stage 1	747	-	-	-	-	-
Stage 2	1179	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	73	413	764	-	-	-
Stage 1	468	-	-	-	-	-
Stage 2	292	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	67	413	764	-	-	-
Mov Cap-2 Maneuver	67	-	-	-	-	-
Stage 1	429	-	-	-	-	-
Stage 2	292	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	36.8	1	0.58	0
HCM LOS	E		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	764	-	115	-	-
HCM Lane V/C Ratio	0.084	-	0.019	-	-
HCM Control Delay (s/veh)	10.1	-	36.8	-	-
HCM Lane LOS	B	-	E	-	-
HCM 95th %tile Q(veh)	0.3	-	0.1	-	-

Intersection	
Int Delay, s/veh	0.5

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	235	0	4	149	2	14
Future Vol, veh/h	235	0	4	149	2	14
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	255	0	4	162	2	15

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	255	0	426	255
Stage 1	-	-	-	-	255	-
Stage 2	-	-	-	-	171	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1310	-	585	783
Stage 1	-	-	-	-	787	-
Stage 2	-	-	-	-	859	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1310	-	583	783
Mov Cap-2 Maneuver	-	-	-	-	583	-
Stage 1	-	-	-	-	787	-
Stage 2	-	-	-	-	856	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.2	9.91
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	751	-	-	1310	-
HCM Lane V/C Ratio	0.023	-	-	0.003	-
HCM Control Delay (s/veh)	9.9	-	-	7.8	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0.1	-	-	0	-

Intersection	
Int Delay, s/veh	0.7

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	214	1	6	145	2	21
Future Vol, veh/h	214	1	6	145	2	21
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	233	1	7	158	2	23

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	234	0	404	233
Stage 1	-	-	-	-	233	-
Stage 2	-	-	-	-	171	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1334	-	603	806
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	859	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1334	-	600	806
Mov Cap-2 Maneuver	-	-	-	-	600	-
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	855	-

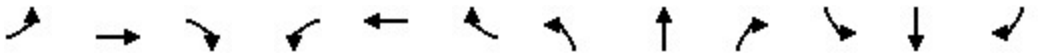
Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.31	9.75
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	783	-	-	1334	-
HCM Lane V/C Ratio	0.032	-	-	0.005	-
HCM Control Delay (s/veh)	9.8	-	-	7.7	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0.1	-	-	0	-

APPENDIX C

LOS WORKSHEETS

Future Year Conditions – PM Peak Hour



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	17	121	99	459	111	22	101	301	357	24	282	14
Future Volume (veh/h)	17	121	99	459	111	22	101	301	357	24	282	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	18	132	93	499	121	21	110	327	167	26	307	14
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	370	190	134	691	825	143	368	520	441	90	434	19
Arrive On Green	0.19	0.19	0.19	0.27	0.53	0.53	0.28	0.28	0.28	0.28	0.28	0.28
Sat Flow, veh/h	1246	1021	720	1781	1552	269	1059	1870	1585	58	1558	68
Grp Volume(v), veh/h	18	0	225	499	0	142	110	327	167	347	0	0
Grp Sat Flow(s),veh/h/ln	1246	0	1741	1781	0	1822	1059	1870	1585	1684	0	0
Q Serve(g_s), s	0.6	0.0	6.3	10.4	0.0	2.1	0.0	8.0	4.5	1.9	0.0	0.0
Cycle Q Clear(g_c), s	0.6	0.0	6.3	10.4	0.0	2.1	6.8	8.0	4.5	10.0	0.0	0.0
Prop In Lane	1.00		0.41	1.00		0.15	1.00		1.00	0.07		0.04
Lane Grp Cap(c), veh/h	370	0	324	691	0	968	368	520	441	542	0	0
V/C Ratio(X)	0.05	0.00	0.69	0.72	0.00	0.15	0.30	0.63	0.38	0.64	0.00	0.00
Avail Cap(c_a), veh/h	874	0	1028	2250	0	3264	1890	3208	2719	3014	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	17.6	0.0	19.9	10.4	0.0	6.3	16.1	16.6	15.3	17.0	0.0	0.0
Incr Delay (d2), s/veh	0.1	0.0	2.7	1.4	0.0	0.1	0.4	1.3	0.5	1.3	0.0	0.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.2	0.0	2.6	3.5	0.0	0.7	1.1	3.3	1.5	3.5	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	17.7	0.0	22.6	11.9	0.0	6.3	16.6	17.8	15.8	18.2	0.0	0.0
LnGrp LOS	B		C	B		A	B	B	B	B		
Approach Vol, veh/h		243			641			604			347	
Approach Delay, s/veh		22.2			10.6			17.0			18.2	
Approach LOS		C			B			B			B	

Timer - Assigned Phs		2		4	5	6		8				
Phs Duration (G+Y+Rc), s		32.9		19.6	18.1	14.8		19.6				
Change Period (Y+Rc), s		5.0		5.0	4.0	5.0		5.0				
Max Green Setting (Gmax), s		94.0		90.0	60.0	31.0		90.0				
Max Q Clear Time (g_c+I1), s		4.1		12.0	12.4	8.3		10.0				
Green Ext Time (p_c), s		1.0		2.6	1.8	1.4		3.5				

Intersection Summary	
HCM 7th Control Delay, s/veh	15.7
HCM 7th LOS	B

Intersection	
Int Delay, s/veh	21.5

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	104	45	704	112	17	854
Future Vol, veh/h	104	45	704	112	17	854
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	Stop	-	None	-	None
Storage Length	0	-	-	-	160	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	113	49	765	122	18	928

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1791	826	0	0	887	0
Stage 1	826	-	-	-	-	-
Stage 2	965	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	~ 89	372	-	-	763	-
Stage 1	430	-	-	-	-	-
Stage 2	370	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	~ 87	372	-	-	763	-
Mov Cap-2 Maneuver	~ 87	-	-	-	-	-
Stage 1	430	-	-	-	-	-
Stage 2	361	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/veh	$264.41	0	0.19
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	NBR	WBLn1	SBL	SBT
Capacity (veh/h)	-	-	121	763	-
HCM Lane V/C Ratio	-	-	1.337	0.024	-
HCM Control Delay (s/veh)	-	-	264.4	9.8	-
HCM Lane LOS	-	-	F	A	-
HCM 95th %tile Q(veh)	-	-	10.8	0.1	-

Notes			
~: Volume exceeds capacity	$: Delay exceeds 300s	+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	1.9

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	31	15	6	858	932	27
Future Vol, veh/h	31	15	6	858	932	27
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	75	-	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	34	16	7	933	1013	29

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1973	1028	1042	0	-	0
Stage 1	1028	-	-	-	-	-
Stage 2	946	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	68	284	667	-	-	-
Stage 1	345	-	-	-	-	-
Stage 2	378	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	67	284	667	-	-	-
Mov Cap-2 Maneuver	67	-	-	-	-	-
Stage 1	338	-	-	-	-	-
Stage 2	378	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	76.04	0.07	0
HCM LOS	F		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	667	-	67	284	-	-
HCM Lane V/C Ratio	0.01	-	0.503	0.057	-	-
HCM Control Delay (s/veh)	10.4	0	103.9	18.4	-	-
HCM Lane LOS	B	A	F	C	-	-
HCM 95th %tile Q(veh)	0	-	2	0.2	-	-

Intersection	
Int Delay, s/veh	4.1

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	40	53	787	75	50	905
Future Vol, veh/h	40	53	787	75	50	905
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	Free	-	None
Storage Length	0	50	-	-	-	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	43	58	855	82	54	984

Major/Minor	Minor1		Major1		Major2	
Conflicting Flow All	1948	855	0	-	855	0
Stage 1	855	-	-	-	-	-
Stage 2	1092	-	-	-	-	-
Critical Hdwy	6.42	6.22	-	-	4.12	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	-	-	2.218	-
Pot Cap-1 Maneuver	71	358	-	0	785	-
Stage 1	417	-	-	0	-	-
Stage 2	321	-	-	0	-	-
Platoon blocked, %			-			-
Mov Cap-1 Maneuver	60	358	-	-	785	-
Mov Cap-2 Maneuver	60	-	-	-	-	-
Stage 1	417	-	-	-	-	-
Stage 2	272	-	-	-	-	-

Approach	WB	NB	SB
HCM Control Delay, s/v	76.53	0	0.52
HCM LOS	F		

Minor Lane/Major Mvmt	NBT	WBLn1	WBLn2	SBL	SBT
Capacity (veh/h)	-	60	358	785	-
HCM Lane V/C Ratio	-	0.723	0.161	0.069	-
HCM Control Delay (s/veh)	-	155.4	17	9.9	0
HCM Lane LOS	-	F	C	A	A
HCM 95th %tile Q(veh)	-	3.1	0.6	0.2	-

Intersection	
Int Delay, s/veh	1.9

Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	23	29	29	835	894	34
Future Vol, veh/h	23	29	29	835	894	34
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	50	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	25	32	32	908	972	37

Major/Minor	Minor2		Major1		Major2	
Conflicting Flow All	1961	990	1009	0	-	0
Stage 1	990	-	-	-	-	-
Stage 2	971	-	-	-	-	-
Critical Hdwy	6.42	6.22	4.12	-	-	-
Critical Hdwy Stg 1	5.42	-	-	-	-	-
Critical Hdwy Stg 2	5.42	-	-	-	-	-
Follow-up Hdwy	3.518	3.318	2.218	-	-	-
Pot Cap-1 Maneuver	70	299	687	-	-	-
Stage 1	360	-	-	-	-	-
Stage 2	367	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	66	299	687	-	-	-
Mov Cap-2 Maneuver	66	-	-	-	-	-
Stage 1	343	-	-	-	-	-
Stage 2	367	-	-	-	-	-

Approach	EB	NB	SB
HCM Control Delay, s/v	61.36	0.35	0
HCM LOS	F		

Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR
Capacity (veh/h)	687	-	117	-	-
HCM Lane V/C Ratio	0.046	-	0.482	-	-
HCM Control Delay (s/veh)	10.5	-	61.4	-	-
HCM Lane LOS	B	-	F	-	-
HCM 95th %tile Q(veh)	0.1	-	2.2	-	-

Intersection	
Int Delay, s/veh	0.4

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	216	2	14	211	1	8
Future Vol, veh/h	216	2	14	211	1	8
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	235	2	15	229	1	9

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	237	0	496	236
Stage 1	-	-	-	-	236	-
Stage 2	-	-	-	-	260	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1330	-	533	803
Stage 1	-	-	-	-	803	-
Stage 2	-	-	-	-	784	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1330	-	526	803
Mov Cap-2 Maneuver	-	-	-	-	526	-
Stage 1	-	-	-	-	803	-
Stage 2	-	-	-	-	773	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.48	9.81
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	759	-	-	1330	-
HCM Lane V/C Ratio	0.013	-	-	0.011	-
HCM Control Delay (s/veh)	9.8	-	-	7.7	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0	-	-	0	-

Intersection	
Int Delay, s/veh	0.7

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	206	2	21	191	1	12
Future Vol, veh/h	206	2	21	191	1	12
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	224	2	23	208	1	13

Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	226	0	478	225
Stage 1	-	-	-	-	225	-
Stage 2	-	-	-	-	253	-
Critical Hdwy	-	-	4.12	-	6.42	6.22
Critical Hdwy Stg 1	-	-	-	-	5.42	-
Critical Hdwy Stg 2	-	-	-	-	5.42	-
Follow-up Hdwy	-	-	2.218	-	3.518	3.318
Pot Cap-1 Maneuver	-	-	1342	-	546	814
Stage 1	-	-	-	-	812	-
Stage 2	-	-	-	-	789	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1342	-	535	814
Mov Cap-2 Maneuver	-	-	-	-	535	-
Stage 1	-	-	-	-	812	-
Stage 2	-	-	-	-	774	-

Approach	EB	WB	NB
HCM Control Delay, s/v	0	0.77	9.68
HCM LOS			A

Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT
Capacity (veh/h)	783	-	-	1342	-
HCM Lane V/C Ratio	0.018	-	-	0.017	-
HCM Control Delay (s/veh)	9.7	-	-	7.7	0
HCM Lane LOS	A	-	-	A	A
HCM 95th %tile Q(veh)	0.1	-	-	0.1	-

Appendix I

Pre-assessment Consultation Comments and Responses

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAI'I | KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

JUN 2 0 2025

(P)25.084

Bradley Furuya
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484

Dear Bradley Furuya:

Subject: Pre-Assessment Consultation for an Environmental Assessment
Proposed Wailuku Mission Affordable Housing
Wailuku, Island of Maui, Hawaii

Thank you for the opportunity to comment on the subject project. We concur with the project but have no comments to offer at this time. The Department of Accounting and General Services' State Office Building No. 2 is adjacent to the subject project, and therefore, we request to be informed of any progress and review of future developments.

If you have any questions, your staff may call Dora Choy-Johnson of the Planning Branch at (808) 586-0488.

Sincerely,

GORDON S. WOOD
Public Works Administrator

DC:vca
c: Eric Agena, DAGS-MDO

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
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GREG NAKAI
Senior Associate

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Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Mr. Keith Regan, Comptroller
State of Hawai‘i
Department of Accounting & General Services
P.O. Box 119
Honolulu, HI 96810

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Regan,

Thank you for the Department of Accounting and General Services response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated June 20, 2025.

EAH Housing is the applicant for the EA. As the applicant’s planning consultant, we acknowledge that the Department of Accounting and General Services does not have any comments to offer at this time. We also note that the Project site is adjacent to the Department of Accounting and General Services’ State Office Building No. 2, and therefore, the applicant will keep the Department of Accounting and General Services informed of any progress and review of future developments.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Gordon S. Wood, Public Works Administrator
Dora Choy-Johnson, Planning Branch

1001 Bishop Street, Suite 650
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STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:

DIR0002072
STP 8.3947

July 11, 2025

VIA EMAIL: bfuruya@pbrhawaii.com

Mr. Bradley Furuya, AICP
Associate
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dear Mr.Furuya:

Subject: Pre-Assessment Consultation for an Environmental Assessment
Wailuku Mission Affordable Housing
Wailuku, Maui, Hawaii
Tax Map Key: (2) 3-4-014: 005

Thank you for your letter, dated June 12, 2025, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the proposed Wailuku Mission Affordable Housing project. HDOT understands that the Wailuku Union Church in partnership with EAH Housing, is proposing to develop 84 senior affordable rental apartments, 42 off-street parking spaces, and other various supporting improvements on their 2.66-acre property.

HDOT has the following comments:

1. The proposed residence project is approximately 3.01 miles from the property boundary of Kahului Airport (OGG). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOTAirports_08-01-2016.pdf

2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the

runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp. Please provide a copy of the FAA response to the Part 77 analysis to the HDOT Airport Planning Section.

3. Due to the proximity to OGG, the applicant and future residents should be aware of potential noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and are dependent on airport operations.

4. If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the approach path of aircrafts can create a hazardous condition for pilots due to possible glint and glare reflected from the PV panel array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT and/or FAA.

   The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The www.sandia.gov/glare website has information and guidance with the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the HDOT Airport Planning Section by the owner of the solar energy PV system.

   Solar energy PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the solar energy PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT and/or FAA.

Please submit land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

EDWIN H. SNIFFEN
Director of Transportation

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

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Senior Associate

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Senior Associate

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printed on recycled paper

May 8, 2026

Edwin H. Sniffen, Director
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Director Sniffen,

Thank you for the State of Hawai'i Department of Transportation's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 11, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

The proposed residence project is approximately 3.01 miles from the property boundary of Kahului Airport (OGG). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: https://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.

EAH Housing has reviewed the TAM for development activities within 5 miles of state airports and will follow its guidance. Development activities will be undertaken in a manner to avoid impacts on OGG operations.

Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp. Please provide a copy of the FAA response to the Part 77 analysis to the HDOT Airport Planning Section.

EAH Housing or a consultant to the applicant will submit FAA Form 7460-1 to the FAA. When received, the applicant will provide a copy of the FAA determination to the HDOT Airport Planning Section.

Due to the proximity to OGG, the applicant and future residents should be aware of potential noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and are dependent on airport operations.

EAH Housing acknowledges potential noise from aircraft operations due to the proximity to OGG. The applicant also acknowledges the potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. The applicant understands that these impacts may increase or decrease over time and are dependent on airport operations.

If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the aircraft's approach path can create a hazardous condition for pilots due to possible glint and glare reflected from the PV panel array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT and/or FAA.

The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The www.sandia.gov/glare website has information and guidance on the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the HDOT Airport Planning Section by the owner of the solar energy PV system.

Solar energy PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the solar energy PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT and/or FAA.

For any PV system that may be installed, the Project design team will specify non-glint and non-glare solar panels, follow FAA guidance, prepare a glint and glare analysis, and file FAA Form 7460-1 for proposed PV system. When received, EAH Housing will provide a copy of the FAA determination to the HDOT Airport Planning Section. EAH Housing acknowledges that if it is determined that its PV array creates hazardous conditions for pilots, it will take immediate action to mitigate the situation.

Please submit land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

We will submit future land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office

RICHARD T. BISSEN, JR.
Mayor

SHAYNE R. AGAWA, P.E.
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MICHAEL D. PETERSEN
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MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

CECILE POWELL, Acting Manager
Environmental Protection &
Sustainability Division



COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAI'I 96793

June 20, 2025

Mr. Bradley Furuya
PBR HAW All & Associates, Inc.
I 001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

DEMD2025-00002

Dear Mr. Furuya,

SUBJECT: WAILUKU MISSION AFFORDABLE HOUSING PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT WAILUKU DISTRICT, ISLAND OF MAUI, HAWAII TMK (2) 3-4-014:005

Thank you for the opportunity to provide early input regarding the subject Environmental Assessment (EA). The proposed project lies within the Central Maui sewer service area, with wastewater treated at the Wailuku/Kahului Wastewater Reclamation Facility. The EA should address the following items related to wastewater infrastructure and compliance:

1. Estimated wastewater flow rates (in gallons per day) generated by the project.
2. Proposed point of connection to the County's sewer system.
3. Confirmation that a sewer service manhole will be provided at the property line.
4. Plans for managing non-contact cooling water and condensates (e.g., from air-conditioning systems or equipment), which are prohibited from being discharged into the sewer system. Similarly, discharges from elevator sumps, swimming pools, and decorative water features are not allowed.
5. Compliance with County Pretreatment Program requirements (e.g., installation of grease interceptors for any community kitchen, and sand/lint traps for central laundry facilities, if applicable).

For any questions or additional coordination, please contact Scott Rollins at (808) 270-7417 in our Wastewater Reclamation Division.

Sincerely,

Shayne R Agawa

DN: cn=Shayne R. Agawa, o=Director of Dept. of Environmental Management, ou=County of Maui, email=shayne.agawa@co.maui.hi.us, c=US
Date: 2025.06.20 10:54:20 -10'00'

SHAYNE R. AGAWA, P.E.
Director of Environmental Management

SA:sr (20250620 WMGAH pre consult EA comments.docx)

PBR HAWAII
& ASSOCIATES, INC.

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COUNTY OF MAUI
DEPT. OF ENVIRONMENTAL MGMT.

June 12, 2025

Mr. Shayne Agawa
Director
County of Maui
Department of Environmental Management
Kalana O Maui Building
200 S High Street
Wailuku, HI 96793

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Agawa,

PBR HAWAII & Associates, Inc. is preparing a Chapter 343, Hawai'i Revised Statutes (HRS) Environmental Assessment (EA) for the proposed Wailuku Mission Affordable Housing in Wailuku, Maui. The 2.66-acre Wailuku Mission property is at 2307 Main Street in Wailuku and is identified by Tax Map Key (TMK) (2) 3-4-014:005 (see attached location map and TMK map).

In advance of preparing a Draft EA we are seeking your early comments regarding information that you think should be addressed in the EA.

Background

For over 150 years, Wailuku Union Church has served as a place of worship and hub of social activity in the community and continues to fulfill this vital role today as one of Hawai'i's oldest church congregations. In addition to its church site, the Church owns the property between Main Street and Aupuni Street referred to as the Mission Grounds. This property is one of the few places in central Wailuku available for new, infill affordable housing and includes the historic Alexander House and the Baybrook House along with the grounds behind both houses.

Summary

The Church is partnering with EAH Housing, an experienced nonprofit affordable housing provider and manager, to add 84 senior affordable rental apartments (studios and 1 bedrooms) on the property. The apartments will be rented to seniors aged 62 and older who earn 60% or less of the Area Median Income (AMI).

In addition to the senior affordable apartments, improvements will include:

- Restoration of Alexander House into a resident multipurpose center
- Restoration of Baybrook House into a management office
- A resident manager apartment (non-revenue generating)
- Approximately 42 off-street parking spaces
- A pickup and drop off area
- Landscaping that provides for resident enjoyment through active and passive uses while complementing the existing grounds' character

EAH Housing will design and construct all improvements in a historically appropriate manner that preserves the property's heritage in context with the Wailuku Historic District. This in-fill housing initiative places affordable homes in central Wailuku, where residents can walk to State and County government offices, restaurants, shops, and essential services.

The initiative addresses critical community affordable housing needs while preserving historic buildings.

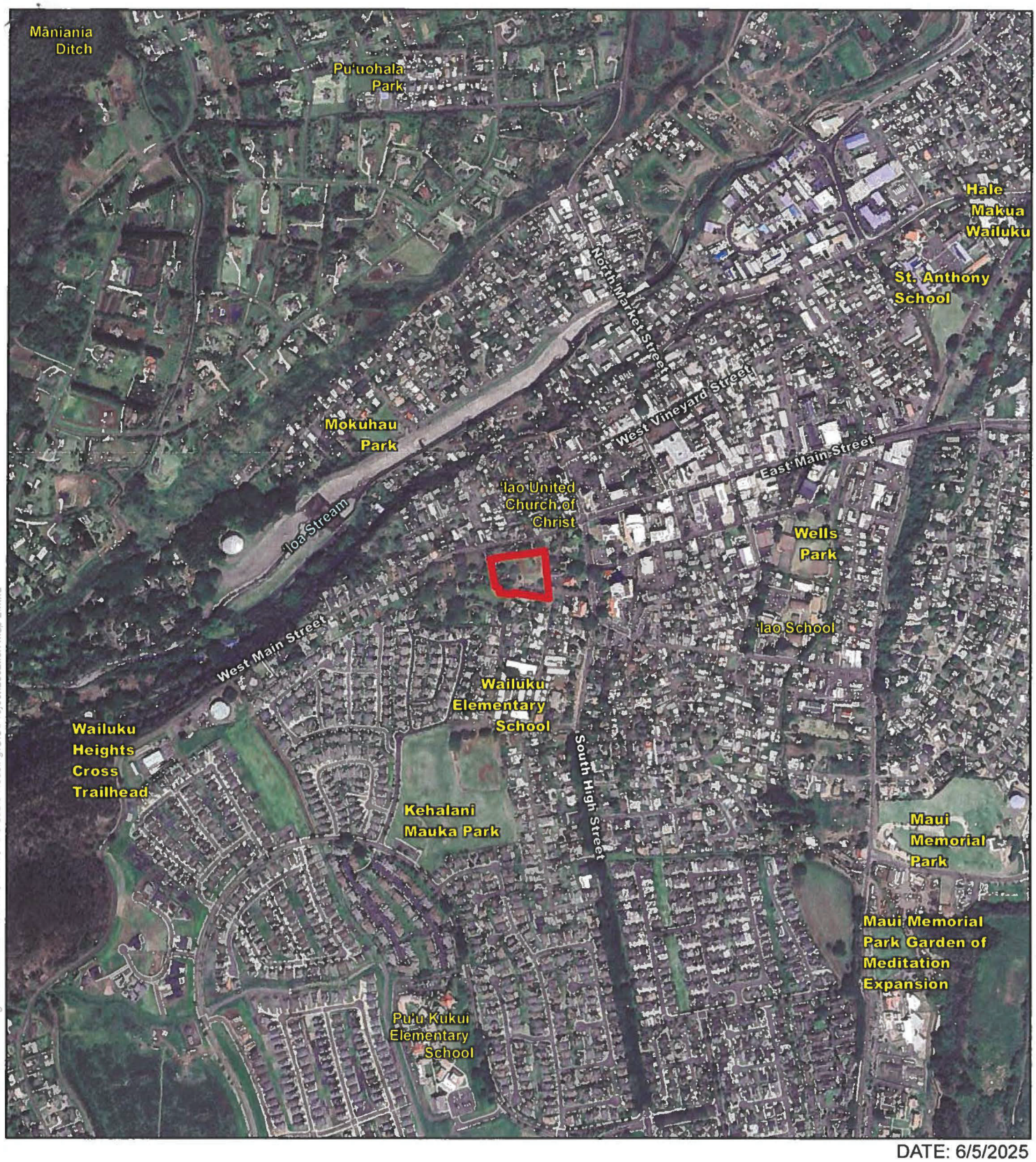
Please provide any comments by **July 11, 2025.** You may mail comments to PBR HAWAII at the address listed below or email directly to Bradley Furuya at bfuruya@pbrhawaii.com.

PBR HAWAII & Associates, Inc.
Attn: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

Aloha,

Bradley Furuya, AICP
Associate

Attachments: Location map
TMK map



Path: \\PBRFS06\Planning\Maui\Wailuku Mission Grounds Affordable Housing\GIS\ProjectLocation Map 2.mxd

DATE: 6/5/2025

Legend

Property

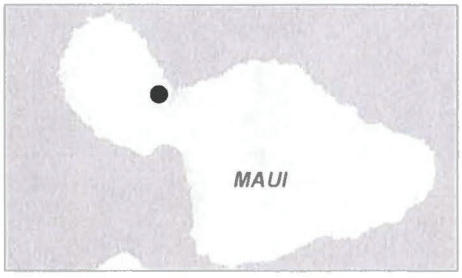


Figure 1: Location Map

Wailuku Mission Affordable Housing

EAH Housing — Island of Maui

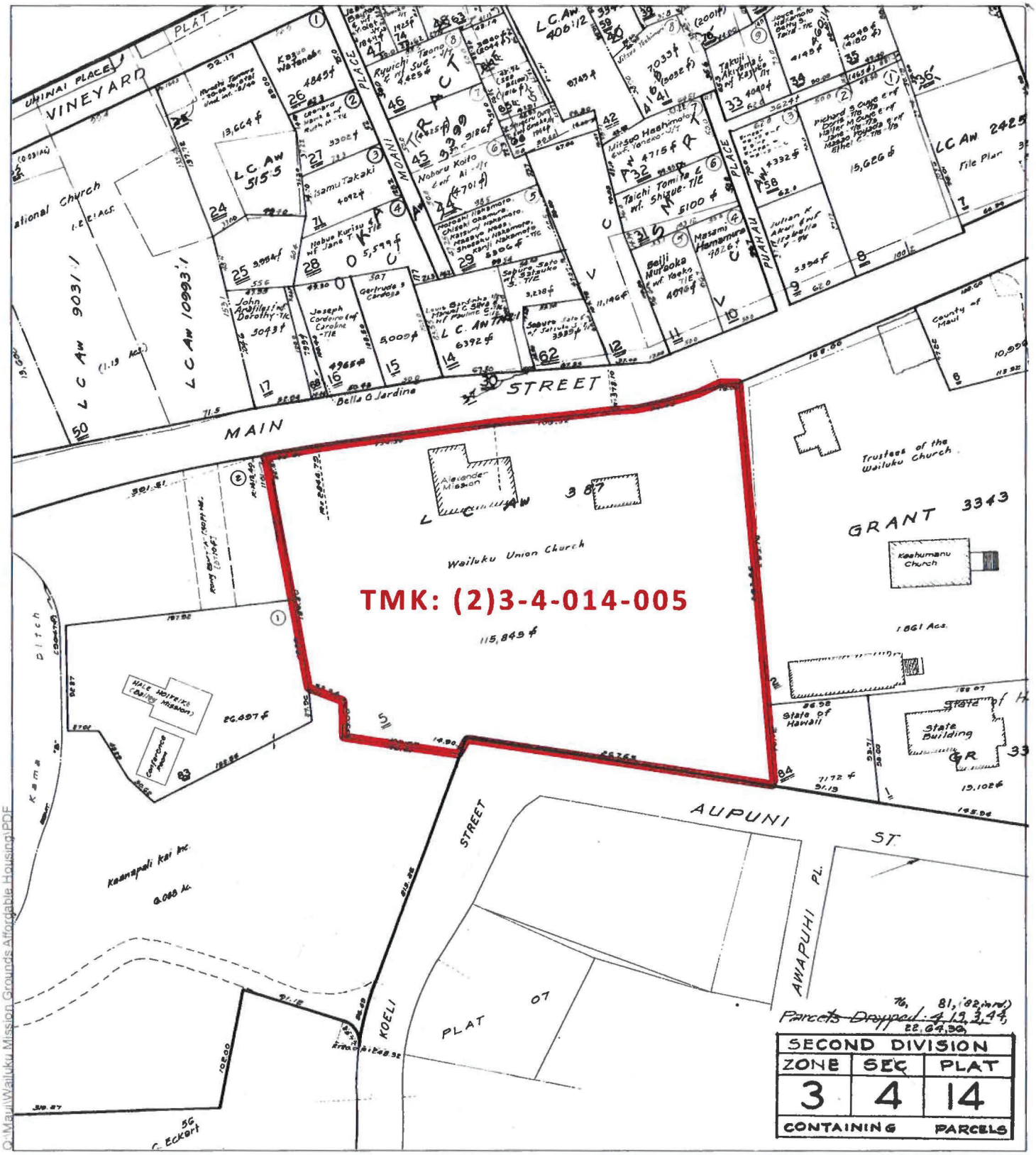
North — Linear Scale (feet)

0 500 1000

PBR HAWAII & ASSOCIATES, INC

Source: County of Maui, 2024. Google Earth, 2025

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



DATE: 6/3/2025

LEGEND

Property

Figure 2:
Tax Map Parcel

Wailuku Mission Affordable Housing

EAH Housing — Island of Maui

North

Source: Tax Maps Bureau, 1934

Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

PBR HAWAII & ASSOCIATES, INC.

Q:\Maui\Wailuku Mission Grounds Affordable Housing\PDF

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President / Chairperson

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W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Mr. Shayne Agawa, Director
County of Maui
Department of Environmental Management
Kalana O Maui Building
200 S. High Street
Wailuku, HI 96793

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Director Agawa,

Thank you for the Department of Environmental Management's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated June 20, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following response to your comments.

As suggested, the Draft EA will include the following information regarding wastewater infrastructure and compliance:

1. Estimated wastewater flow rates generated by the project;
2. Proposed point of connection to the County's sewer system;
3. Confirmation that a sewer service manhole will be provided at the property line;
4. Plans for managing non-contact cooling water and condensates (e.g., from air-conditioning systems or equipment), which are prohibited from being discharged into the sewer system; and
5. Compliance with applicable County Pretreatment Program requirements (e.g., installation of grease interceptors for any community kitchen, and sand/lint traps for central laundry facilities, as applicable).

We also acknowledge that discharges from elevator sumps, swimming pools, and decorative water features are not allowed.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Scott Rollins, Department of Environmental Management, Wastewater Reclamation Division

1001 Bishop Street, Suite 650
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JOSIAH K. NISHITA
Managing Director

PATRICK S. MCCALL
Director

SHANE T. DUDOIT
Deputy Director

DEPARTMENT OF PARKS AND RECREATION
COUNTY OF MAUI
700 HALI'A NAKOA STREET, UNIT 2
WAILUKU, MAUI, HAWAI'I 96793
www.mauicounty.gov

July 1, 2025

Mr. Bradley Furuya, Associate
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

Dear Mr. Furuya:

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI, TMK: (2) 3-4-014:005

Thank you for the opportunity to review the proposed Wailuku Mission Affordable Housing project. The Department of Parks and Recreation (DPR) reviewed the project in reference to satisfying the parks and playgrounds requirements per MCC 18.16.320. It was noted that the applicant is proposing to develop 84 senior affordable housing units, in addition to numerous improvements.

DPR will provide exemption from Maui County Code Section 18.16.320 Parks and Playgrounds after receipt of the fully executed residential workforce housing agreement with the Department of Housing.

Should you have any questions or concerns, please feel free to contact me or Samual A. Marvel, Chief of Planning and Development, at samual.marvel@co.maui.hi.us or (808) 270-6173.

Sincerely,

PATRICK S. MCCALL
Director of Parks and Recreation

c: Samual A. Marvel, Chief of Planning and Development

PSM:SAM:csa

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
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Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Mr. Patrick McCall, Director
County of Maui
Department of Parks and Recreation
P.O. Box 1405
Wailuku HI, 96793-6405

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. McCall,

Thank you for the Department of Parks and Recreation's (DPR) response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 1, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following response to the Department of Parks and Recreation's comments.

We appreciate and acknowledge DPR's comment that "DPR will provide exemption from Maui County Code Section 18. 16. 320 Parks and Playgrounds after receipt of the fully executed residential workforce housing agreement with the Department of housing."

The applicant intends to seek certain exemptions from the MCC pursuant to §201H-38, HRS, which the Maui County Council has the authority to approve pursuant to §201H-38(a)(1)(c), HRS. Regarding parks and playgrounds, the applicant is seeking:

- An exemption from Section 18.16.320, MCC, Parks and Playgrounds, to exempt the Project from park dedication requirements and assessment fees.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Samual Marvel, DPR, Chief of Planning and Development

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Managing Director

MARC I. TAKAMORI
Director

DIANE C. YOGI
Deputy Director

DEPARTMENT OF TRANSPORTATION
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAI'I 96793

TELEPHONE: (808) 270-7511
FAX: (808) 270-7505

July 9, 2025

PBR HAWAII & Associates, Inc.
ATTN: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813
Email: bfuruya@pbrhawaii.com

SUBJECT: Comments Regarding the Proposed Wailuku Mission Affordable Housing at 2307 Main Street, Wailuku, Maui, Hawai'i (TMK: (2) 3-4-014:005)

Dear Mr. Furuya:

The County of Maui Department of Transportation (MDOT) has reviewed the proposed project description for the Wailuku Union Church Senior Affordable Housing Project and offers the following comments for consideration during the preparation of the Environmental Assessment (EA). These comments reflect the County's priorities for safe, accessible, and multimodal transportation systems, as defined in the Hele Mai Maui 2045 Long-Range Transportation Plan (LRTP) and the Transportation Improvement Program (TIP) FFY 2025–2028 Revision #2.

1. Multimodal Access and Equity

The proposed development—84 senior affordable rental apartments in the Wailuku town core—strongly aligns with Hele Mai Maui 2045 goal 1: improve safety and promote health, goal 3: expand mobility choices to reduce traffic congestion, and goal 4: Connect and strengthen communities to improve quality of life. The walkable, central location presents a unique opportunity to reduce automobile dependence for seniors while enhancing access to transit, sidewalks, and essential services.

MDOT requests that the EA include the following considerations:

- Detailed analysis of pedestrian and transit access, including walking routes from the site to nearby bus stops, shops, and services. Evaluate existing sidewalk conditions, ADA compliance, and street crossings along Main Street and Aupuni Street.
- Assessment of first/last mile connectivity to Maui Bus routes, including whether upgrades such as benches, shelters, or curb ramps are warranted.

- Identify potential for mobility services (e.g., paratransit or microtransit pickup/drop-off) to use the proposed loading area safely and conveniently.

- We encourage the project team to work with MDOT and Maui Economic Opportunity (MEO) to evaluate ongoing accessibility needs for senior residents.

2. Vehicle Circulation, Parking, and Drop-Off Design

The project includes 42 off-street parking spaces and a designated drop-off area. Given the project's senior population and proximity to the Wailuku Civic Hub, design should prioritize safe, low-speed circulation, universal accessibility, and reduced reliance on personal vehicles.

MDOT recommends:

- Ensure the drop-off and pickup zone accommodates both private vehicles and accessible paratransit vans, with turning radii, clear signage, and shaded waiting areas.

- Explore shared or reduced parking strategies, as the project supports low-vehicle households and transit-friendly living.

- Include a loading and refuse collection circulation plan that avoids conflicts with pedestrian areas and paratransit services.

3. Support for TIP and Long-Range Projects

The project area lies within walking distance of several important projects in the FFY 2025–2028 TIP. These nearby investments underscore the need for coordinated development in Wailuku's core.

MDOT recommends:

- Coordination with the Department of Public Works to ensure site access and utility work complement nearby capital improvement projects, including those in the TIP.

- Advance communication with Maui MPO and State DOT to avoid construction conflicts and leverage opportunities for shared infrastructure improvements (e.g., crosswalks, signal timing).

4. Bicycle and Micromobility Considerations

While the primary residents may not be expected to bicycle regularly, caregivers, staff, and visitors may benefit from safe bicycle access. In addition, increasing micromobility use in Wailuku warrants inclusion of secure bike facilities.

MDOT recommends:

- Inclusion of bike racks or enclosed bicycle parking for visitors and support staff.

- Analysis of whether bicycle infrastructure exists or is needed along Aupuni Street or Main Street to safely access the site.

5. Resilience, Safety, and Long-Term Planning

Hele Mai Maui 2045 emphasizes the need for a resilient and safe transportation network, particularly for vulnerable populations such as seniors.

MDOT recommends:

- Include an assessment of emergency access and evacuation routes and how seniors with mobility limitations will be accommodated.
- Ensure that transportation infrastructure accounts for climate adaptation, such as stormwater management around drop-off areas and shaded pedestrian paths.

Summary of Recommendations for EA Inclusion

Topic Area	Recommendation
Multimodal Access	Evaluate pedestrian, ADA, and transit connections; include first/last mile access strategies.
Paratransit and Drop-Off Design	Design for accessible vehicle use, including paratransit vans and low-speed circulation.
TIP and Project Coordination	Coordinate with TIP projects and public agency work in the Wailuku core.
Bicycle and Micromobility	Provide bike parking; evaluate safe access routes.
Safety and Resilience	Consider evacuation needs and climate-resilient infrastructure.

The Department of Transportation supports this much-needed affordable housing project and looks forward to continued coordination to ensure safe and equitable access for all future residents.

If you have any questions, please feel free to reach out to Ignacio Filippini at ignacio.filippini@co.maui.hi.us or (808) 463-3124.

Sincerely,
Marc Takamori
Digitally signed by Marc Takamori
Date: 2025.07.09 14:29:58 -10'00'
MARC I. TAKAMORI
Director of Transportation

Cc: Marc I. Takamori, MDOT, Director, via email
Ignacio Filippini, MDOT, Transportation Planner, via email
Bradley Furuya, PBR HAWAII Inc., via email

PBR HAWAII
& ASSOCIATES, INC.

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Tel: (808) 521-5631
Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

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May 8, 2026

Mr. Marc Takamori, Director
County of Maui
Department of Transportation
110 Ala'ihi Street, Suite 210
Kahului, HI 96732

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Director Takamori,

Thank you for the County of Maui Department of Transportation's (MDOT) response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 9, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following response to your comments.

1. Multimodal Access and Equity

The proposed development—84 senior affordable rental apartments in the Wailuku town core—strongly aligns with Hele Mai Maui 2045 goal 1: improve safety and promote health, goal 3: expand mobility choices to reduce traffic congestion, and goal 4: Connect and strengthen communities to improve quality of life. The walkable, central location presents a unique opportunity to reduce automobile dependence for seniors while enhancing access to transit, sidewalks, and essential services.

MDOT requests that the EA include the following considerations:

- *Detailed analysis of pedestrian and transit access, including walking routes from the site to nearby bus stops, shops, and services. Evaluate existing sidewalk conditions, ADA compliance, and street crossings along Main Street and Aupuni Street.*
- *Assessment of first/last mile connectivity to Maui Bus routes, including whether upgrades such as benches, shelters, or curb ramps are warranted.*
- *Identify potential for mobility services (e.g., paratransit or microtransit pickup/drop-off) to use the proposed loading area safely and conveniently.*
- *We encourage the project team to work with MDOT and Maui Economic Opportunity (MEO) to evaluate ongoing accessibility needs for senior residents.*

We agree that the Project location near shops, restaurants, government services, religious and educational institutions, and public transportation make it uniquely suited to reduce automobile dependence for seniors.

- *Analysis of pedestrian and transit access*: The Draft EA will include information on pedestrian and transit access and proximity to Maui Bus routes and stops.

- *Assessment of first/last mile connectivity to Maui Bus routes*: The Project is within close proximity to Bus stops on High Street and Wells Street. Analysis of whether upgrades such as benches, shelters, or curb ramps are warranted would be better performed by: 1) MDOT, who is responsible for bus benches and shelters; and 2) DPW who would likely be responsible for curb ramps.

- *Identify potential for mobility services*: The Project will include parking areas with drop-off/pick-up areas to facilitate safe, comfortable, and convenient drop-offs/pick-ups, including paratransit or microtransit pick-up/drop-off.

- *Work with MDOT and Maui Economic Opportunity (MEO) to evaluate ongoing accessibility needs for senior residents*: The Project will include an on-site services staff (Resident Services Coordinator) to assist residents with determining eligibility for MEO Human Services transportation services, such as the Americans with Disabilities Act (ADA) Paratransit program for residents with disabilities.

In general response to the above comments, there are no sidewalks adjacent to the Project site on Main Street or Aupuni Street. Sidewalks are present along the east side of High Street in the vicinity of the Project. East of High Street there are sidewalks along both sides of Main Street, Wells Street, and Kaohu Street.
To address neighbors' concerns about parking and pedestrian access along Aupuni Street, the Project design does not enable vehicle, pedestrian, or bicycle access from Aupuni Street into the property. The Project includes a fence along Aupuni Street to ensure that all vehicles, pedestrians, and bicycles can only access the Project from Main Street. The fence will include a locked pedestrian gate for emergency access/egress requested by the Maui Department of Fire and Public Safety. In the event of an emergency the Fire Department explained they would cut the lock on the gate.

Because there are no sidewalks along Main Street from the Project site to High Street, or on the west side of High Street, pedestrian connectivity from the Project site to the bus stops on the east side of High Street and on Wells Street can be difficult. The lack of sidewalks along Main Street and along the west of High Street present unique challenges because these streets also form the north and east boundaries of Historic District No. 3. Along Main Street, in front of the Project site to High Street, there are historic rock walls resulting in limited—to no—right of way that can accommodate sidewalks in front of the rock walls without eliminating on-street parking. As the rock walls are within Historic District No. 3, removing them for a wider right-of-way is not a realistic option. Utility poles along Main Street may also pose an obstacle to providing sidewalks.

To provide better pedestrian connectivity from the Project site to High Street, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore the possibility of an internal shared walkway from the east side of the Project site through the Ka‘ahumanu Church property to High Street. This walkway would significantly enhance pedestrian connectivity from the Project site to Wailuku town and the bus stops on High Street and Wells Streets. This internal walkway would provide a safe alternative for Project residents who are not comfortable walking along unimproved portions of Main Street. Notably, this internal pedestrian walkway would not result in the loss of existing street parking along Main Street.

The *Central Maui Pedestrian & Bicycle Master Plan for 2030*, does not include plans for pedestrian and bicycle improvements to Main Street and Aupuni Street, fronting the Project site. The plan also does not mention specific pedestrian improvements along the west side of High Street. However, the plan's vision statement for Wailuku says:

> *By 2030 Wailuku will be a pedestrian and bicycle friendly community. Because of its unique historic buildings, charm and livability, Wailuku Town is a popular place for residents of all ages to live.*
>
> *Within the Town's civic and commercial districts – along High, Main, Vineyard, Church, Kaohu and Wells Streets – walking is the preferred mode of transportation for short trips. Residents who live and work in Wailuku walk between home and work because the town offers a safe and pleasant pedestrian experience.*

In addition, other County policies and planning efforts—including the County's Complete Streets policy, the *I Mua Central Maui Transportation Study*, and Downtown Wailuku revitalization concepts—support and may lead to future pedestrian/bicycle upgrades in and around Wailuku. Current project development such as the ‘Imi Kālā Street Extension (connecting to Lower Main Street) likewise aims to expand multimodal access consistent with these goals.

2. Vehicle Circulation, Parking, and Drop-Off Design

The project includes 42 off-street parking spaces and a designated drop-off area. Given the project's senior population and proximity to the Wailuku Civic Hub, design should prioritize safe, low-speed circulation, universal accessibility, and reduced reliance on personal vehicles.

MDOT recommends:

- *Ensure the drop-off and pickup zone accommodates both private vehicles and accessible paratransit vans, with turning radii, clear signage, and shaded waiting areas.*
- *Explore shared or reduced parking strategies, as the project supports low-vehicle households and transit-friendly living.*
- *Include a loading and refuse collection circulation plan that avoids conflicts with pedestrian areas and paratransit services.*

EAH Housing, in coordination with the Project architect, AMA A/E, and ATA, have designed the Project to prioritize safe, low-speed circulation, universal accessibility, and reduced reliance on personal vehicles.

- *Ensure the drop-off and pickup zone accommodates private vehicles and accessible paratransit vans*: The west parking area (near Alexander House) will provide 17 parking spaces and a drop-off/pick-up area. It is designed with circular vehicle flow, allowing vehicles to enter, circle around parking spaces, and then exit "head out." The east parking area (near Baybrook House) will provide 25 parking spaces and a drop-off/pick-up turnaround area to facilitate safe, comfortable, and convenient drop-offs/pick-ups. Both drop-off/pick-up areas are designed to accommodate private vehicles and accessible paratransit vans.

- *Explore shared or reduced parking strategies*: The Draft EA and the TIAR will include parking demand management strategies appropriate for this senior affordable housing project.

- *Include loading and refuse collection circulation plan that avoids conflicts*: The west parking area (near Alexander House) is designed with circular vehicle flow, allowing vehicles (including refuse collection trucks) to enter, circle around parking spaces, and then exit "head out" thus avoiding "K-turns" and minimizing conflicts with pedestrian areas and paratransit services.

3. Support for TIP and Long-Range Projects

The project area lies within walking distance of several important projects in the FFY 2025–2028 TIP. These nearby investments underscore the need for coordinated development in Wailuku's core.

MDOT recommends:

- *Coordination with the Department of Public Works to ensure site access and utility work complement nearby capital improvement projects, including those in the TIP.*
- *Advance communication with Maui MPO and State DOT to avoid construction conflicts and leverage opportunities for shared infrastructure improvements (e.g., crosswalks, signal timing).*

We acknowledge the need for coordinated development in Wailuku's core. Thank you for your thoughtful comments regarding the Wailuku Mission Senior Affordable Housing project's proximity to important transportation improvement projects in the FFY 2025-2028 TIP.

We have reviewed the TIP Report FFY 2025-2028 Fall 2025 Revision 3 and identified six transportation projects within walking distance of the Project site at 2307 Main Street:

1. **MC11 - Lower Main Street Resurfacing** ($6.2M, FFY 2025): Resurfacing pavement from Kahului Beach Road to Hala Place, reconstructing curb ramps and sidewalks to be ADA compliant,

implementing a "road diet" to improve safety, and adding bike lanes to support multimodal transportation.

2. **MC40 - 'Imi Kālā Street Extension** ($9.8M, FFY 2030): Extending 'Imi Kālā Street between Kahekili Highway and Lower Main Street, including a bridge crossing Wailuku River, bicycle and pedestrian route improvements, and intersection improvements.
3. **MC36 - 'Īao Bridge Repairs** ($5.0M, FFY 2026): Completing structural, roadway, and scour repairs to 'Īao Bridge along with pavement reconstruction and rail replacement.
4. **MC23 - Urbanized Area - Kahului** ($49.0M, FFY 2025-2030): Providing grants for public transportation capital, planning, job access and reverse commute projects, and operating expenses in the Kahului urbanized area.
5. **MC21 - Bus and Bus Facility (Small Urban)** ($4.7M, FFY 2025-2030): Capital projects to replace, rehabilitate, and purchase buses, vans, and related equipment, and to construct bus-related facilities, including modifications for low- or no-emission vehicles.
6. **MS21 - Hāna Highway Shared-Use Path, Ka'ahumanu Avenue to Ulupua Place** ($9.6M, FFY 2028-2029): Constructing a new 5-mile-long shared-use path along the makai side of the road, with culverts and bridges where needed.

These transportation improvements—including multimodal connectivity enhancements, transit service upgrades, pedestrian safety improvements, and regional connectivity projects—will be excellent additions to Wailuku's infrastructure. The future residents of the senior affordable housing project will particularly benefit from the enhanced walkability, ADA-compliant sidewalks, bike lanes, and improved transit service that these TIP projects will provide.

- *Coordination with the Department of Public Works*: As the Project moves forward through design and construction EAH Housing, its Project architect (AMA A/E), transportation consultant (ATA), and civil engineer (Goto Engineering LLC) will coordinate with the Department of Public Works regarding site access and utility work and in context with nearby capital improvement projects, including those in the Transportation Improvement Program (TIP). Additionally, EAH Housing will coordinate with the Maui Metropolitan Planning Organization (MPO) and State Department of Transportation (DOT) to avoid construction conflicts and leverage opportunities for shared infrastructure improvements.

- *Advance communication with Maui MPO and State DOT*: We acknowledge the need for coordinated development in Wailuku's core. EAH Housing and the project team will communicate with the MPO and State DOT as appropriate to support construction coordination and avoid conflicts with ongoing transportation improvement projects in the area. The project team is committed to working cooperatively with relevant agencies to ensure the project integrates appropriately with Wailuku's transportation infrastructure improvements.

We appreciate MDOT's thoughtful comments and look forward to the successful implementation of this affordable housing project and supporting the important transportation improvements planned for Wailuku's core.

4. Bicycle and Micromobility Considerations

While the primary residents may not be expected to bicycle regularly, caregivers, staff, and visitors may benefit from safe bicycle access. In addition, increasing micromobility use in Wailuku warrants inclusion of secure bike facilities.

MDOT recommends:

- *Inclusion of bike racks or enclosed bicycle parking for visitors and support staff.*
- *Analysis of whether bicycle infrastructure exists or is needed along Aupuni Street or Main Street to safely access the site.*

Secure bike parking is proposed within the rehabilitated Alexander House. The Draft EA will include information on existing bicycle infrastructure along Main Street to safely access the Project site. Based on neighbor comments and preferences, there will not be vehicle, bicycle, and pedestrian access to the Project site from Aupuni Street except for an emergency fire access gate as recommended by the Maui Department of Fire and Public Safety.

5. Resilience, Safety, and Long-Term Planning

Hele Mai Maui 2045 emphasizes the need for a resilient and safe transportation network, particularly for vulnerable populations such as seniors.

MDOT recommends:

- *Include an assessment of emergency access and evacuation routes and how seniors with mobility limitations will be accommodated.*
- *Ensure that transportation infrastructure accounts for climate adaptation, such as stormwater management around drop-off areas and shaded pedestrian paths.*

We acknowledge the need for a resilient and safe transportation network, particularly for vulnerable populations such as seniors.

- *Assessment of emergency access and evacuation routes*: The Project is designed for independent living seniors, not as an assisted living or care facility. Residents will be independent individuals who meet the income and age qualifications for senior affordable housing. As with any residential development, residents with mobility limitations will evacuate during emergencies in the same manner as other community members with similar needs.

  The project will comply with all applicable ADA requirements, ensuring accessible pathways within the development and to all project entrances. These accessibility features will serve residents during both day-to-day use and emergency situations.

  Emergency evacuation procedures will follow standard protocols established by the County of Maui and the State of Hawai‘i for multi-family residential developments. The project’s access points, along Lower Main Street and pedestrian gate along Aupuni Street for emergency access/egress requested by the Maui Department of Fire and Public Safety, provide adequate egress capacity for the Project.

- *Ensure that transportation infrastructure accounts for climate adaptation*: The Project’s transportation-related infrastructure will account for climate adaptation by including stormwater management design features around drop-off areas and shaded pedestrian walking paths.

We value your participation in the environmental review process. Your comments and this response will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Ignacio Filippini, Department of Transportation, Transportation Planner

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director

JOHN STUFFLEBEAN, P.E.
Director

JAMES A. LANDGRAF
Deputy Director

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAI'I 96793
http://www.mauicounty.gov/water



July 22, 2025

PBR Hawaii & Associates, Inc.
Attn: Bradley Furuya
1001 Bishop Street
Suite 650
Honolulu, HI 96813

RE: Pre-Assessment Consultation for Environmental Assessment (EA) for the Proposed Wailuku Mission Affordable Housing Project. TMK: (2)3-4-014:005

Dear Mr. Furuya,

The Department of Water Supply (DWS) Water Resources and Planning Division appreciates the opportunity to comment on the proposed Wailuku Mission Affordable Housing project application.

Source of Water
The project is served by the DWS. The major source of water in the central area is Iao aquifer with a sustainable yield of 20 million gallons per day (MGD).

The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. Given this condition, requests for water service that exceed 1,200 gpd are considered a "large quantity of water" and are subject to the limitations described in §16-201-04 of the County of Maui Administrative Rules. However, §16- 201-03(g)(1) exempts projects comprised of 100 percent residential workforce housing units, as defined in section 2.96.020, Maui County Code, evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

Consumption Guideline
Based on Water Systems Standards (2002, State of Hawai'i), the projected water demand for the project is 560 gpd per multi-family residential unit, or 47,600 gpd (84 senior affordable rental apartments plus one manager's apartment). Actual consumption

may vary depending upon the design and maintenance of units, landscaping, and multi-purpose center.

Water Conservation Best Management Practices (BMPs) - Indoor
DWS recommends the following indoor conservation measures be implemented:

- Install Environmental Protection Agency (EPA) Water Sense labeled plumbing fixtures and EPA Energy Star and the American Society of Heating, Refrigeration and Air-Conditioning Engineers certified appliances;
- Install high-efficiency (HE) faucet aerators in all plumbing fixtures wherever possible;
- Install dual flush toilets with HE models that use 1.28 gallons per flush or less;
- Install HE showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 pounds per square inch (psi);
- Install HE bathroom sink faucets with fixtures that do not exceed 1 gpm at 60 psi. Laundry facilities and/or individual unit machines should use Energy Star labeled washers; and
- Install recirculating indoor water features with solar photovoltaic when practical.

Water Conservation BMPs – Outdoor
DWS recommends the following outdoor conservation measures be implemented:

- Install high-efficiency irrigation systems and products. Examples include evapotranspiration irrigation controllers, drip irrigation, soaker hoses, misters, and punch-in and micro-sprinklers that only direct irrigation to intended areas without causing run-off;
- Apply graywater to tolerant native and non-native landscaping with subsurface drip irrigation, including courtyards and other applicable areas with vegetation whenever possible and only when permitted and applied using the Hawaii State Department of Health guidelines;
- Install recirculating outdoor water features with solar photovoltaic when practical;
- Install drip irrigation or combine drought tolerant landscaping with gravel and rocks at narrow medians to reduce run-off, where applicable;
- Use mulching in landscaped areas to help retain soil moisture. Set irrigation timers for early morning or evening to limit high evaporation;
- Reduce and replace underutilized lawn areas with native plants to save water and reduce the heat island effect;
- Use native, climate-adapted, plants for landscaping whenever possible;

- Limit watering or irrigation of lawn, landscape, or other vegetated areas to the hours before 9:00 a.m. and after 5:00 p.m;
- Limit landscape irrigation for no more than three days per week, except where stricter irrigation requirements apply during a water shortage declaration;
- Avoid spray irrigation during excessively windy days; and
- Avoid irrigation during rain events

Water Waste
Water waste includes, but is not limited to, the following actions:

- Applying water in quantities to landscapes, and for yard maintenance or other outdoor activities that overflows or sprays onto adjacent property to pool or to obstruct public thoroughfare, and to potentially cause erosion; and
- Disregard for high volume water loss occurring by chronic wastefulness or by not fixing leaks in a reasonable amount of time. Not adhering to Chapter 14.06A, Water Conservation and Control of Water Usage During Water Shortage

To avoid water waste, DWS recommends the following remedies to prevent wasting water:

- Applying drip irrigation, soaker hoses, or rotating micro-spray emitters for trees, plants and shrubs;
- Properly adjusting and targeting water-efficient sprinkler heads, bubblers and emitter;
- Regularly monitoring and maintaining irrigation systems and setting efficient watering schedules with timers or using a smart central irrigation controller;
- Using a hand-held bucket or similar container, a hand-held hose equipped with a shut-off nozzle, or by using a low volume, high-pressure washer to clean vehicles, boats, or equipment on impervious surfaces to minimize incidental run-off onto adjacent property or the public right-of-way;
- Clearing yard waste or debris from driveways and sidewalks with an electric blower;
- Not irrigating turf and landscapes during rain and postponing irrigation during high winds; and
- Fixing indoor and outdoor water leaks

Water waste does not apply to:

- Cleaning outdoor impervious surfaces with water necessary for public health, safety or when other cleaning methods are impractical and dangerous; and
- Backwashing and periodic draining of swimming pools and spas for sanitary water balancing and necessary pool maintenance.

Water Reuse
DWS recommends the following water reuse measure be implemented for new landscaped design projects:

- All new ornamental water features, such as ponds and fountains shall be free of water leaks, use a water recirculating system with optimally regulated water pumps.

Should you have any questions please reach out to staff planner Geovanna Torres at (808) 463-3104 or via email at Geovanna.Torres@co.maui.hi.us.

Sincerely,

John Stufflebean, P.E.
Digitally signed by John Stufflebean, P.E.
Date: 2025.07.22 13:04:05 -10'00'

John Stufflebean, P.E.
DWS Director
GT

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PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

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Executive Vice-President / Principal

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Cultural Sustainability Planner

ETSUYO KILA
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BRADLEY FURUYA, AICP
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C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
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THOMAS S. WITTEN, FASLA
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printed on recycled paper

May 8, 2026

John Stufflebean, Director
County of Maui
Department of Water Supply
200 South High Street
Wailuku, Hawai'i 96793

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Director Stufflebean,

Thank you for the County of Maui Department of Water Supply's (DWS) response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 22, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following response to your comments.

Source of Water

The Project is served by the DWS. The major source of water in the central area is Iao aquifer with a sustainable yield of 20 million gallons per day (MGD).

The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. Given this condition, requests for water service that exceed 1,200 gpd are considered a "large quantity of water" and are subject to the limitations described in §16-201-04 of the County of Maui Administrative Rules. However, §16-201-03(g)(1) exempts projects comprised of 100 percent residential workforce housing units, as defined in section 2.96.020, Maui County Code, evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

We understand that:

- The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity.
- The projected water demand for Project would be considered a "large quantity of water" and may be subject to limitations described in §16-201-04 of the County of Maui Administrative Rules (MAR)
- However, §16-201-03(g)(1), MAR exempts water limitations for projects comprised of 100 percent residential workforce housing units, as evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

Consumption Guideline

Based on Water Systems Standards (2002, State of Hawai'i), the projected water demand for the project is 560 gpd per multi-family residential unit, or 47,600 gpd (84 senior affordable rental apartments plus one manager's apartment). Actual consumption may vary depending upon the design and maintenance of units, landscaping, and multi-purpose center.

Thank you for providing the estimated water consumption for the proposed Project. The Project's civil engineer, Goto Engineering LLC, prepared a Preliminary Engineering Report (PER), which is included as an Appendix in the Draft EA. According to the PER, the Project is anticipated to consume approximately 47,600 gallons per day (gpd), while peak flow is estimated at 142,800 gpd. A Reservation of Available Service Capacity will be submitted to DWS to confirm the existing water system can accommodate the Project.

Water Conservation Best Management Practices (BMPs) - Indoor

DWS recommends the following indoor conservation measures be implemented:

- *Install Environmental Protection Agency (EPA) Water Sense labeled plumbing fixtures and EPA Energy Star and the American Society of Heating, Refrigeration and Air-Conditioning Engineers certified appliances;*
- *Install high-efficiency (HE) faucet aerators in all plumbing fixtures wherever possible;*
- *Install dual flush toilets with HE models that use 1.28 gallons per flush or less;*
- *Install HE showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 pounds per square inch (psi);*
- *Install HE bathroom sink faucets with fixtures that do not exceed 1 gpm at 60 psi. Laundry facilities and/or individual unit machines should use Energy Star labeled washers; and*
- *Install recirculating indoor water features with solar photovoltaic when practical.*

Thank you for these indoor water conservation BMPs. The Project will incorporate these indoor water conservation features where feasible.

Water Conservation BMPs – Outdoor

DWS recommends the following outdoor conservation measures be implemented:

- *Install high-efficiency irrigation systems and products. Examples include evapotranspiration irrigation controllers, drip irrigation, soaker hoses, misters, and punch-in and micro-sprinklers that only direct irrigation to intended areas without causing run-off;*
- *Apply graywater to tolerant native and non-native landscaping with subsurface drip irrigation, including courtyards and other applicable areas with vegetation whenever possible and only when permitted and applied using the Hawaii State Department of Health guidelines;*
- *Install recirculating outdoor water features with solar photovoltaic when practical;*
- *Install drip irrigation or combine drought tolerant landscaping with gravel and rocks at narrow medians to reduce run-off, where applicable;*
- *Use mulching in landscaped areas to help retain soil moisture. Set irrigation timers for early morning or evening to limit high evaporation;*
- *Reduce and replace underutilized lawn areas with native plants to save water and reduce the heat island effect;*
- *Use native, climate-adapted, plants for landscaping whenever possible;*
- *Limit watering or irrigation of lawn, landscape, or other vegetated areas to the hours before 9:00 a.m. and after 5:00 p.m;*
- *Limit landscape irrigation for no more than three days per week, except where stricter irrigation requirements apply during a water shortage declaration;*

- *Avoid spray irrigation during excessively windy days; and*
- *Avoid irrigation during rain events*

Thank you for these outdoor water conservation BMPs. The Project will incorporate water-saving fixtures such as surface bioretention planters to manage runoff and prevent offsite overflows. Additionally, native and drought-tolerant plants will be incorporated into the Project's landscaping, particularly those that are adapted to the area's climatic conditions.

Water Waste

Water waste includes, but is not limited to, the following actions:

- *Applying water in quantities to landscapes, and for yard maintenance or other outdoor activities that overflows or sprays onto adjacent property to pool or to obstruct public thoroughfare, and to potentially cause erosion; and*
- *Disregard for high volume water loss occurring by chronic wastefulness or by not fixing leaks in a reasonable amount of time. Not adhering to Chapter 14.06A, Water Conservation and Control of Water Usage During Water Shortage*

To avoid water waste, DWS recommends the following remedies to prevent wasting water:

- *Applying drip irrigation, soaker hoses, or rotating micro-spray emitters for trees, plants and shrubs;*
- *Properly adjusting and targeting water-efficient sprinkler heads, bubblers and emitter;*
- *Regularly monitoring and maintaining irrigation systems and setting efficient watering schedules with timers or using a smart central irrigation controller;*
- *Using a hand-held bucket or similar container, a hand-held hose equipped with a shut-off nozzle, or by using a low volume, high-pressure washer to clean vehicles, boats, or equipment on impervious surfaces to minimize incidental run-off onto adjacent property or the public right-of-way;*
- *Clearing yard waste or debris from driveways and sidewalks with an electric blower;*
- *Not irrigating turf and landscapes during rain and postponing irrigation during high winds; and*
- *Fixing indoor and outdoor water leaks*

Water waste does not apply to:

- *Cleaning outdoor impervious surfaces with water necessary for public health, safety or when other cleaning methods are impractical and dangerous; and*
- *Backwashing and periodic draining of swimming pools and spas for sanitary water balancing and necessary pool maintenance.*

Thank you for this information on water waste and recommendations on how to reduce water waste. The Project will incorporate the above recommendations wherever feasible.

Water Reuse
DWS recommends the following water reuse measure be implemented for new landscaped design projects:

- *All new ornamental water features, such as ponds and fountains shall be free of water leaks, use a water recirculating system with optimally regulated water pumps.*

Thank you for this recommendation on how to reuse water. The Project is not expected to include new ornamental water features such as ponds or fountains.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Geovanna Torres, DWS, Staff Planner

POLICE DEPARTMENT
COUNTY OF MAUI
55 MAHALANI STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE: (808) 244-6400
FAX: (808) 244-6411

JOHN PELLETIER
CHIEF OF POLICE

WADE M. MAEDA
DEPUTY CHIEF OF POLICE

June 27, 2025

PBR HAWAII & Associates, Inc.
Attention: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

RE: REVIEW AND RESPONSE FOR PRE-ASSESSMENT CONSULTATION FOR A PROPOSED WAILUKU MISSION AFFORDABLE HOUSING (ENVIRONMENTAL ASSESSMENT) 2307 MAIN STREET, WAILUKU, MAUI

Dear Ms. Furuya,

We are writing in response to the June 12, 2025 letter concerning the Draft Environmental Assessment (EA) for the proposed affordable housing project in Wailuku.

Thank you for the opportunity to review the proposed project. From a public safety perspective, our primary concerns relate to traffic and pedestrian safety. The area is already congested during school hours, and increased population and vehicle use may worsen this. We recommend exploring alternative access points to reduce reliance on Main, High, and Aupuni Streets.

We also recommend applying Crime Prevention Through Environmental Design (CPTED) principles to enhance safety. This includes proper lighting, clear sightlines, controlled access, and visible public areas to deter criminal activity.

Construction impacts such as noise, dust, debris, and equipment storage should be minimized, with consideration given to how vehicle movement will affect the surrounding area during the project.

At this time, we have no objections to the project moving forward.

Sincerely,

Assistant Chief Keola Tom
For: JOHN PELLETIER
Chief of Police

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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printed on recycled paper

May 8, 2026

Chief John Pelletier
Chief of Police
County of Maui
Police Department
55 Mahalani Street
Wailuku HI 96793

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Chief Pelletier,

Thank you for the Police Department's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on June 30, 2025, at 9:11 AM.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to the Police Department's comments.

From a public safety perspective, our primary concerns relate to traffic and pedestrian safety. The area is already congested during school hours, and increased population and vehicle use may worsen this. We recommend exploring alternative access points to reduce reliance on Main, High, and Aupuni Streets.

As the Project site is bound by Main Street to the north, Aupuni Street to the south, and private property to the east and west, the Project must be accessed via either Main Street or Aupuni Street. In consulting with the Project's traffic engineer (Austin, Tsutsumi & Associates, Inc.), Main Street was determined to be the preferred location for vehicle access to the Project site as it would have a lesser traffic impact compared to driveways on Aupuni Street.

EAH Housing and Wailuku Union Church are also working closely with Kaʻahumanu Church to explore the possibility of an internal walkway from the east end of the Project site through the Kaʻahumanu Church property that would provide pedestrian access from the Project site to High Street. This walkway would significantly enhance pedestrian connectivity from the Project site to the Wailuku core and the bus stop on High Street and provide an alternative route for pedestrians not comfortable walking along unimproved portions of Main Street. Notably, this internal pedestrian walkway would not result in the loss of existing street parking.

As described in the Project's Traffic Impact Analysis Report (TIAR) included in the Draft EA as an Appendix, the Project will not have a significant impact on traffic conditions in the surrounding area relative to present day conditions. This is primarily because there are two existing driveways in the approximate location of the proposed driveway that currently provide vehicle access to the Project site. Nevertheless, to mitigate any traffic impacts, the Project will incorporate transportation demand management strategies such as:

- Onsite pick-up and drop-off areas to allow family, friends, and ride-share services to pick up and drop off residents
- Preference to residents who do not own a personal vehicle
- An on-site EAH Resource Services Coordinator to assist residents in arranging Maui Economic Opportunity, Inc. (MEO) Human Services transportation services, such as the ADA Paratransit program for residents with disabilities

We also recommend applying Crime Prevention Through Environmental Design (CPTED) principles to enhance safety. This includes proper lighting, clear sightlines, controlled access, and visible public areas to deter criminal activity.

Thank you for the recommendation. The Project will incorporate the following CPTED features:

- Appropriate exterior and parking area LED lighting where feasible;
- Resident gardening and gathering areas that are visible from Main Street, Aupuni Street, and parking areas to provide "eyes on the street" monitoring;
- Perimeter fences to discourage unauthorized access and increase security; and
- Low-growing plants and well-spaced trees to preserve open sightlines.

Construction impacts such as noise, dust, debris, and equipment storage should be minimized with consideration given to how vehicle movement will affect the surrounding area during the project.

Thank you for highlighting the importance of minimizing construction-related impacts. Noise, dust, and debris control strategies are in place, including the use of dust suppression methods and adherence to noise regulations. Equipment and materials will be stored in designated areas away from the neighboring residential areas to reduce visual and physical disruption during non-working hours.

At this time, we have no objection to the project moving forward.

We acknowledge that the Police Department has no objections to the Project moving forward.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Keola Tom, Assistant Chief, Police Department

From:	Amanda Perron
To:	Bradley Furuya
Cc:	Amanda Perron
Subject:	PRE-ASSESSMENT CONSULTATION - PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, MAUI
Date:	Thursday, July 10, 2025 10:55:00 AM

Aloha,
In regard to the PROPOSED WAILUKU MISSION AFFORDABLE HOUSING, in WAILUKU MAUI
I'd like to provide the following comments:

Housing for elderly is eminent. I think the location and size (84 units) is appropriate and comparable to other apartment complexes or low-rise condos in the area. I appreciate the upgrades to existing historical sites.

However the number of proposed parking stalls (42) is problematic. The reality is people will need more (even the elderly) and will take up more of the street parking in the area.
Street parking downtown is already an issue for government workers, and the public. This will make it impossible for everyone since retirees rarely move their cars.
Please be realistic and either focus on more parking (1:1 ratio for the 84 units) or reduce the units to match the parking.

logo

Amanda Lei Perron
Branch Manager | Wailuku & Salt Lake-Moanalua Public Libraries

Hawai'i State Public Library System
Ph: 808-831-6833
Email: amanda.perron@librarieshawaii.org
Web: librarieshawaii.org

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May 8, 2026

Amanda Lei Perron
Wailuku Public Library
Hawai'i State Public Library System
251 S. High Street
Wailuku, HI 96793

Via email: amanda.perron@librarieshawaii.org

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Perron,

Thank you for Wailuku Public Library's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 10, 2025 at 10:55 am.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

Housing for elderly is eminent. I think the location and size (84 units) is appropriate and comparable to other apartment complexes or low-rise condos in the area. I appreciate the upgrades to existing historical sites.

We acknowledge and appreciate your support for the proposed Project that will bring needed senior affordable housing to Wailuku.

However the number of proposed parking stalls (42) is problematic. The reality is people will need more (even the elderly) and will take up more of the street parking in the area. Street parking downtown is already an issue for government workers, and the public. This will make it impossible for everyone since retirees rarely move their cars. Please be realistic and either focus on more parking (1:1 ratio for the 84 units) or reduce the units to match the parking.

The Project provides 42 off-street parking spaces in two surface lots accessed from Main Street, with drop-off and pick-up areas in each lot. The parking supply reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership generally declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for this project.

The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no access is provided from Aupuni Street. Construction activities will, where feasible, be scheduled to avoid AM and PM peak traffic hours near Wailuku Elementary School. For more information, refer to Sections 2.1.3 (Location Analysis), 4.3.1 (Roadways and Traffic), and 4.3.5 (Parking) of the Draft EA and Appendix H (TIAR).

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

6/28/2025

[Via Email Only]
Mr. Bradley Furuya, AICP
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484
bfuruya@prhawaii.com

Subject: Wailuku Mission Affordable Housing
Pre-Assessment Consultation for an Environmental Assessment
2307 Main Street
Wailuku, Maui, Hawaii
Tax Map Key: (2) 3-4-014:005

Dear Mr. Furuya,

Thank you for allowing us to comment on the subject project.

In reviewing our records and the information received, Hawaiian Electric Company has no comments or objections to the subject project at this time. We highly encourage the customer's electrical consultant to advise our company of the anticipated electrical loads to be added and the project timeline.

Should you have any other questions or concerns, please feel free to call me at (808-871-2321).

Sincerely,

X Luttrell-Paet, Madison

Digitally signed by Luttrell-Paet, Madison
DN: CN="Luttrell-Paet, Madison", OU=ActiveLH, OU=Users, OU=MECO, DC=hawaiianelectric, DC=net
Date: 2025.06.30 07:19:14-10'00'

Madison Luttrell-Paet
T&D Engineering Supervisor

Hawaiian Electric Company – Maui County

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W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Madison Luttrell-Paet
T&D Engineering Supervisor
Hawaiian Electric Company – Maui County
P.O. Box 398
Kahului, HI 96732
Via email: madison.paet@hawaiianelectric.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Luttrell-Paet,

Thank you for Hawaiian Electric Company's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on June 30, 2025, at 7:22 AM.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we acknowledge that Hawaiian Electric Company has no comments or objections to the proposed Wailuku Mission Affordable Housing Project. As recommended, the Project's electrical engineering consultant (Goto Engineering LLC) will advise Hawaiian Electric Company of the anticipated electrical loads and Project timeline.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

1001 Bishop Street, Suite 650
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From: Yonamine, Connie E <Connie.Yonamine@charter.com>
Sent: Tuesday, June 17, 2025 10:15 AM
To: Bradley Furuya
Cc: Yasui, Kellee A
Subject: RE: [EXTERNAL] RE: Wailuku Mission Affordable Housing Environmental Assessment

Hi Bradley,
Thank you for taking the time to talk to me.
After my review, this parcel for the Wailuku Mission Affordable Housing in Wailuku, will have no impact on our existing Cable plant.
Please feel free to contact my should you have any questions or concerns.

Respectfully,

Connie Yonamine | Construction Coordinator | O-808.442.4831
158 Ma'a St | Kahului HI 96732

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Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Mitchell Miyoshi
VP, Field Engineering
Spectrum
200 Akamainui Street
Mililani, HI 96789
Via email: mitch.miyoshi@charter.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Miyoshi,

Thank you for Spectrum's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on June 17, 2025, at 10:15 AM.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we acknowledge that the Wailuku Mission Affordable Housing Project site will have no impacts on Spectrum's existing facilities. EAH Housing will work closely with Spectrum to arrange for connections to Spectrum's existing facilities and the provision of internet service to the Project site.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813-3484
Tel: (808) 521-5631
Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

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From: Corey Vianzos <Corey.Vianzos@hawaiiantel.com>
Sent: Tuesday, June 17, 2025 4:03 PM
To: HT-Plan Reviews; sysadmin
Cc: Bradley Furuya; Jon Lui-Kwan
Subject: RE: Wailuku Mission Affordable Housing Environmental Assessment Pre-Assessment Consultation_HT-PR-25061201BS

Aloha,

In our initial review we can confirm that our HT facilities run over head on Main st but is located on the opposite side of the road. There is no underground facilities that enter the project site either. Our main facilities should have no impact on your project.

The only concern you might have is there are service poles that is located on or near the property, however these are owned by Hawaiian Electric.

Mahalo!



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Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Corey Vianzos
Hawaiian Telcom
Via email: Corey.Vianzos@hawaiiantel.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Vianzos,

Thank you for Hawaiian Telcom's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on June 17, 2025, at 4:03 PM.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following response.

Thank you for confirming that Hawaiian Telcom facilities run overhead on the north side of Main Street, and that there are no underground facilities that connect to the Project site. We acknowledge that Hawaiian Telcom's facilities should have no impact on the proposed Wailuku Mission Affordable Housing project. EAH Housing will work closely with Hawaiian Telcom to arrange for connection to Hawaiian Telcom's facilities and the provision of telephone service to the Project site.

We also appreciate the information that the service poles along the north and west boundaries of the Project site are owned and operated by Hawaiian Electric, the parent company of the Maui Electric Company. EAH Housing will work closely with the Maui Electric Company to arrange for connection to their facilities and the provision of electricity service to the Project site.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813-3484
Tel: (808) 521-5631
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HAWAIʻIGAS
THE CLEAN ENERGY COMPANY

June 27, 2025

Mr. Bradley Furuya, AICP
Associate
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Furuya:

Subject: Pre-Assessment Consultation for an Environmental Assessment for The Proposed Wailuku Mission Affordable Housing, Wailuku Wailuku District, Island and County of Maui Plan Review and Comment

In response to your letter dated June 12, 2025, it has been determined that the area is currently clear of utility gas facilities.

Thank you for the opportunity to comment on the Environmental Assessment for The Proposed Wailuku Mission Affordable Housing Project. Should there be any questions, or if additional information is desired, please call Christian Feria at (808) 596-1269.

Sincerely,

Hawaii Gas

Keith K. Yamamoto
Manager, Engineering

KKY:krs

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W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Mr. Keith Yamamoto, Manager
Hawaiʻi Gas
Engineering Department
P.O. Box 3000
Honolulu, HI 96802

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Yamamoto,

Thank you for Hawaiʻi Gas's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated June 27, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we appreciate the determination that the area is currently clear of utility gas facilities.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Christian Feria, Hawaiʻi Gas

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680 Iwilei Road Suite 690, Honolulu HI 96817 • (808) 523-2900 • preservation@historichawaii.org • www.historichawaii.org

July 11, 2025

Bradley Furuya
Associate
PBR Hawai'i & Associates
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

Re: Pre-Consultation for HRS Chapter 343 Environmental Assessment
Proposed Wailuku Mission Affordable Housing
Wailuku, Wailuku District, Island and County of Maui
TMK: (2)3-4-014-005

Dear Mr. Furuya,

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) under Chapter 343 of the Hawai'i Revised statutes. HHF received the notice of June 12, 2025 requesting pre-consultation on issues to consider when preparing the Environmental Assessment.

Historic Hawai'i Foundation is a statewide nonprofit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i. HHF is an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties.

HHF confirms our intention to participate in the Environmental Assessment (EA) consultation process in accordance with Hawai'i Revised Statutes (HRS) Chapter 343.

Background and Historic Context

For over 150 years, Wailuku Union Church has served as a place of worship and hub of social activity in the community and continues to fulfill this vital role today as one of Hawai'i's oldest church congregations. In addition to its church site, the Church owns the property between Main Street and Aupuni Street referred to as the Mission Grounds.

In 1970, the County of Maui designated the area between Main Street and Aupuni Street from South High Street to the westerly boundary of the Wailuku Sugar Manager's property as Historic District No. 3. "The purpose of this district is to preserve and protect the several well preserved historic structures and sites now

existing, which are deemed to be of great value because they are closely identified with the early history of Maui county." [1]

"The historic district ordinance identifies the following historic properties: the 1830-1850 Bailey House (also known as **Hale Hōʻikeʻike**), and the 1837 former **Wailuku Female Seminary dining hall** (identified in the ordinance as the Bailey House Annex), the 1836 **Alexander House**, and the 1876 **Kaʻahumanu Church**. The thread that binds these properties is their association with Protestant missionaries who arrived in Hawaiʻi from New England in 1820 and established an official mission station in Wailuku as early as 1832. While not explicitly named in the ordinance, the district also includes: several **plantation-era dwellings** associated with the Alexander and Bailey houses and Kaʻahumanu Church; a 1974 canoe hale and restroom building associated with the Bailey House; an **early twentieth century hall** associated with Kaʻahumanu Church; the **1931 Territorial Office Building**; a **cemetery**; and several other historic properties."[2]

Also located in the Historic District is the Kama ʻAuwai, an important Hawaiian irrigation system which predates the establishment of the mission grounds. " ʻAuwai employed throughout Hawaiʻi to carry water from streams to loʻi and varied in length and width. Larger ʻauwai were often named after an aliʻi nui (as was the case for Kama ʻAuwai) or the land with which they were most closely associated."[3]

Several properties in this district are also listed in the National Register of Historic Places, including Kaʻahumanu Church, Bailey House (also known as Hale Hōʻikeʻike), and the Territorial Office Building.[4]

Project Scope: The project proposes to add 84 senior affordable rental apartments (studios and 1 bedrooms) on the property. The apartments will be rented to seniors aged 62 and older who earn 60% or less of the Area Median Income (AMI).

Project Area: The site referenced in the pre-assessment consultation letter as "Mission Grounds" (TMK (2) 3-4-014-005) lies entirely within Historic District Number 3.

Proposed Action: In addition to the 84 proposed senior affordable apartments, improvements will include:

- Restoration of Alexander House into a resident multipurpose center
- Restoration of Baybrook House into a management office
- A resident manager apartment (non-revenue generating)
- Approximately 42 off-street parking spaces
- A pickup and drop off area
- Landscaping that provides for resident enjoyment through active and passive uses

[1] Maui County Code, Article III. Maui County Historic Districts, Chapter 19.50
[2] HALS No. HI-35 Kama ʻ*Auwai* and Aqueduct, page 2
[3] Ibid. page 8
[4] HABS No. HI-664 Wailuku Sugar Company Manager's Residence

while complementing the existing grounds' character

Historic Hawai'i Foundation supports the plan components that involve rehabilitation and adaptive use for the historic buildings Alexander House and Baybrook House.

We also appreciate that the proposal does not appear to include demolition of historic buildings, although it is unclear if other site features or contributing structures would be demolished.

Additionally, HHF is strongly concerned with the potential adverse effect to historic properties that could be caused by the proposed type and intensity of new construction in a historic district that is characterized by its viewsheds, open space and mature trees.

HHF is particularly concerned about the potential effect on significant historic resources from specific elements in the proposed action, including:

1. Historic Setting and Open Space: Multi-family housing is not a use by right in Maui County Historic District No. 3. The land use regulations allow for residential planned developments if and only if they meet specific building height and special spacing regulations.

   The pre-assessment consultation letter indicated a proposed number of rental apartments and other auxiliary uses, but did not provide a conceptual site plan, elevations, landscape plan or other means to convey how the development could meet the regulatory restrictions for the historic district. The proposed density appears to be inconsistent with the limitations on open space, scale, height and setbacks.

   > "To preserve the historical setting and the open space around the historic structures, all new construction shall be limited to building heights of two stories and not more than thirty-five feet in height or one story and not more than twenty feet in height; provided, that they are separated from the historic buildings designated in section 19.50.030 by a distance of at least one hundred feet for two-story buildings and sixty feet for one-story buildings, respectively." (19.52.100 Regulations for Historic District No. 3, emphasis added).

2. Density: Applying the setback and separation requirements of Historic District No.3 and subtracting areas for parking and loading, roughly a third of the site remains available for development of housing. Dividing the net acreage by 84 units results in a density of 96 units per acre. This is almost five times the accepted standard for this type of development (an accepted rule of thumb for two-story attached residential neighborhoods is 20 units per acre). Clearly, this proposed development would not achieve the appropriate character for the setting.

3. Loss of park setting: Converting the Historic District's open park-like setting around multiple National Register and locally-designated historic properties into private space for residential uses is inappropriate. This would take public open space and convert it to private or semi-private use.

4. The intent of Historic District No. 3 is to preserve and protect the historic structures and site that tell the story of Maui's early history. By inserting the proposed apartment development in the middle of the Historic District, the proposed development would separate the oldest missionary church, parsonage,

cemetery and Territorial Courthouse from the Bailey Mission and seminary annex, thus destroying the context of the "Mission Grounds".

5. Appropriate Infill in a Historic District: The Maui County Code requires new construction within the historic district to "meet the Secretary of the United States Department of the Interior's standards for infill construction"[5] (Maui County Historic Districts: 19.52.010 Architectural style). The National Park Service addresses appropriate infill as follows (emphasis added):
    - In properties with multiple historic buildings, the historic relationship between buildings must also be protected. Contributing buildings must not be isolated from one another by the insertion of new construction.
    - When visible and in close proximity to historic buildings, the new construction must be subordinate to these buildings.
6. Preservation of Significant Trees: The Maui Code requires the preservation of "the many fine trees that now exist in the historic area and that are deemed invaluable to the historical setting of this district." It is unclear how many trees would be affected by the proposed new buildings and site modifications.

The Draft Environmental Assessment needs to provide information on how the site plan, landscape plan, architectural footprint, scale, height, style, materials, detailing and other plan components will be consistent and compatible with the historic district character and the regulations developed to protect. We look forward to learning more and seeing the proposed plan, but we strongly suspect that the proposed number of units will need to be reduced to meet the site conditions and regulations, as well as other modifications in order to be appropriate for this setting.

Thank you for the opportunity to comment.

Very truly yours,

Kiersten Faulkner

Kiersten Faulkner, FAICP
Executive Director

[5] https://www.nps.gov/subjects/taxincentives/new-construction-in-historic-properties.htm

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May 8, 2026

Ms. Kiersten Faulkner, FAICP
Executive Director
Historic Hawai'i Foundation
680 Iwilei Road, Suite 690
Honolulu, HI 96817

Via email: Kiersten@historichawaii.org

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Faulkner:

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 11, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we appreciate the background and historic context provided in your letter. This information will be included in the Draft EA. We note and share HHF's stated support for the rehabilitation and adaptive use of the Alexander House and Baybrook House, which is an integral component of the Project. Additionally, we offer the following responses to your comments.

1. Historic Setting and Open Space: Multi-family housing is not a use by right in Maui County Historic District No. 3. The land use regulations allow for residential planned developments if and only if they meet specific building height and special spacing regulations. The pre-assessment consultation letter indicated a proposed number of rental apartments and other auxiliary uses, but did not provide a conceptual site plan, elevations, landscape plan or other means to convey how the development could meet the regulatory restrictions for the historic district. The proposed density appears to be inconsistent with the limitations on open space, scale, height and setbacks.

"To preserve the historical setting and the open space around the historic structures, all new construction shall be limited to building heights of two stories and not more than thirty-five feet in height or one story and not more than twenty feet in height; provided, that they are separated from the historic buildings designated in section 19.50.030 by a distance of at least one hundred feet for two-story buildings and sixty feet for one-story buildings, respectively." (19.52.100 Regulations for Historic District No. 3, emphasis added).

2. Density: Applying the setback and separation requirements of Historic District No. 3 and subtracting areas for parking and loading, roughly a third of the site remains available for development of housing. Dividing the net acreage by 84 units results in a density of 96 units per acre. This is almost five times the accepted standard for this type of development (an accepted rule of thumb for two-story attached residential neighborhoods is 20 units per acre). Clearly, this proposed development would not achieve the appropriate character for the setting.

The Draft EA includes a conceptual site plan, architectural plans (including elevations) and a landscape plan. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, well below the 35-foot height limit for two-story buildings in Historic District No. 3. The buildings are set approximately 60 feet behind the Alexander House and Baybrook House and observe the required 15-foot front yard setback and 10-foot rear and side yard setbacks. Importantly, the Project includes the rehabilitation of Alexander House and Baybrook House in accordance with the Secretary of the Interior's Standards for Rehabilitation, thereby preserving the character-defining features of both State Register-listed buildings.

Pursuant to Section 201H-38, Hawai‘i Revised Statutes (HRS), the applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code (MCC): the requirement for Cultural Resources Commission (CRC) approval of a residential planned development, and the 100-foot separation requirement between new two-story buildings and designated historic structures. The Maui County Council would approve these exemptions through adoption of a County 201H Resolution.

The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with the district's architectural style standards or its other land use and development requirements. Notably, although the applicant intends to seek the exemptions described above, the State Historic Preservation Division and the Maui County CRC will have the opportunity to review and comment on the Project.

The 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House as a multipurpose community center and Baybrook House as an on-site management office in accordance with the Secretary of the Interior's Standards for Rehabilitation.

Rehabilitation of these two State Register-listed historic structures is an integral component of the proposed action and a key differentiator from all alternatives considered. Lower-density alternatives, including 20-unit and 46-unit concepts, were determined to be financially unviable and could not support the rehabilitation of the historic structures. An alternative design at 84 units was also considered but rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3.

Without the organizational capacity and revenue provided by a functioning affordable housing project, no mechanism exists to fund the rehabilitation of Alexander House and Baybrook House. Under the No Action Alternative evaluated in the Draft EA, both State Register-listed structures would remain without active stewardship and would continue to deteriorate. The Project is the only alternative considered that provides the financial means to preserve these historic resources through rehabilitation in accordance with the Secretary of the Interior's Standards for Rehabilitation.

For more information, refer to the Draft EA: Sections 2.2 (Purpose and Need), 4.1 (Archaeological and Historic Resources), 5.3.5 (Historic District No. 3), Chapter 6 (Alternatives), Figure 5 (Conceptual Site Plan & Landscape Plan), Figure 21 (Alternatives), Appendix B (Conceptual Architectural Plans), Appendix C (Landscape Plan & Plant Palette).

3. Loss of park setting: Converting the Historic District's open park-like setting around multiple National Register and locally-designated historic properties into private space for residential uses is inappropriate. This would take public open space and convert it to private or semi-private use.

6. Preservation of Significant Trees: The Maui Code requires the preservation of "the many fine trees that now exist in the historic area and that are deemed invaluable to the historical setting of this district." It is unclear how many trees would be affected by the proposed new buildings and site modifications.

The Project site is privately owned by Wailuku Union Church and is not public open space. The Project is designed to retain the park-like character of the Mission Grounds and larger Historic District No. 3. Approximately 70 percent of the Project site will be preserved as open space, including landscaped pathways, resident gathering areas, a community garden, and a dog run. The Project site does not contain any exceptional trees as defined in the MCC. Four mature trees will be preserved and 16 will be removed. To complement the retained trees and enhance the park-like setting of Historic District No. 3, the landscape plan incorporates 54 new trees and Native Hawaiian plantings. The Project's open site design, the preserved view corridors, and the rehabilitation of the Alexander House as a multipurpose community center will maintain the visual and pedestrian character that contributes to Historic District No. 3.

Regarding the potential demolition of other site features, the Project does not involve the demolition of any historic structure identified in Section 19.50.030, MCC. Two existing buildings on the site, Kennan House and ʻĪao House, are proposed for demolition. As documented in the reconnaissance-level survey prepared by MASON Architects, Inc., Kennan House has deteriorated to the point of uninhabitability, and ʻĪao House is not eligible for listing on the historic register.

For more information, refer to the Draft EA: Sections 4.1 (Archaeological and Historic Resources), 4.7 (Visual Resources), 5.3.5 (Historic District No. 3) Figure 5 (Conceptual Site Plan & Landscape Plan), Appendix B (Conceptual Architectural Plans), Appendix C (Landscape Plan & Plant Palette).

4. The intent of Historic District No. 3 is to preserve and protect the historic structures and site that tell the story of Maui's early history. By inserting the proposed apartment development in the middle of the Historic District, the proposed development would separate the oldest missionary church, parsonage, cemetery and Territorial Courthouse from the Bailey Mission and seminary annex, thus destroying the context of the "Mission Grounds".

5. Appropriate Infill in a Historic District: The Maui County Code requires new construction within the historic district to "meet the Secretary of the United States Department of the Interior's standards for infill construction" (Maui County Historic Districts: 19.52.010 Architectural style). The National Park Service addresses appropriate infill as follows (emphasis added):

- *In properties with multiple historic buildings, the historic relationship between buildings must also be protected. Contributing buildings must not be isolated from one another by the insertion of new construction.*
- *When visible and in close proximity to historic buildings, the new construction must be subordinate to these buildings.*

The Draft Environmental Assessment needs to provide information on how the site plan, landscape plan, architectural footprint, scale, height, style, materials, detailing and other plan components will be consistent and compatible with the historic district character and the regulations developed to protect. We look forward to learning more and seeing the proposed plan, but we strongly suspect that the proposed number of units will need to be reduced to meet the site conditions and regulations, as well as other modifications in order to be appropriate for this setting.

Regarding preservation of the relationship between historic buildings, the three new residential buildings are sited in the largely undeveloped rear portion of the Project site, approximately 60 feet behind the Alexander House and Baybrook House, rather than inserted between contributing buildings of Historic District No. 3. The Alexander House and Baybrook House remain at the front of the site along Main Street, preserving their historical prominence and their visual relationship with other historic structures in the district. The offset north-south orientation of the new buildings preserves sight lines from Main Street to Aupuni Street and maintains visual connectivity across the Mission Grounds.

Regarding subordination to the historic buildings, the three new residential buildings reach a maximum height of approximately 28 feet, comparable in scale to the Alexander House and below the 35-foot height limit for two-story construction. The new buildings will also be constructed at a lower elevation than Alexander House and Baybrook House, further ensuring these historic structures remain visually prominent. Subtle massing offsets in plan and elevation break the long facades into three distinct sections, and a slightly recessed first floor, dark brown composite siding, board and batten second-floor siding, a muted color palette, and non-reflective materials minimize the visual prominence of the new buildings. Placement behind the Alexander House and Baybrook House keeps the historic buildings as the dominant visual features from both Main Street and Aupuni Street. This approach is consistent with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation.

As an integral part of the Project, the Alexander House will be rehabilitated as a multipurpose community center, and the Baybrook House will be rehabilitated as an on-site management office. Both rehabilitations will preserve the buildings' character-defining features. EAH Housing is working with historic architect MASON Architects, Inc. (MASON) on the rehabilitation approach and plans.

As requested, the Draft EA provides information on how the site plan, landscape plan, architectural footprint, scale, height, style, materials, detailing and other plan components are consistent and compatible with Historic District No. 3 and the requirements of Section 19.52.100, MCC. The Draft EA also describes alternative plans, designs, and unit counts that did not include the rehabilitation of the Alexander House and the Baybrook House and an iteration was revised in response to community feedback, illustrating how the Project's design has improved over time to be more compatible with Historic District No. 3.

For more information, refer to the Draft EA: Sections 4.1 (Archaeological and Historic Resources), 4.7 (Visual Resources), 5.3.5 (Historic District No. 3) Figure 5 (Conceptual Site Plan & Landscape Plan), Figure 21 (Alternatives), Appendix B (Conceptual Architectural Plans), Appendix C (Landscape Plan & Plant Palette).

Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

WAILUKU COMMUNITY ASSOCIATION
PO BOX 1966 WAILUKU, HI 96793
808-283-1212

July 2, 2025

PBR HAWAII & Associates, Inc.
Attn: Bradley Fukuya
1010 Bishop Street, Suite 650
Honolulu, HI 96813

To Whom It May Concern:

The Wailuku Community Association is writing in strong support of the proposed **Wailuku Mission Affordable Housing Project**. As an organization dedicated to the vitality and well-being of our community, we believe this project represents a much-needed investment in our kūpuna, our families, and the future of Wailuku Town.

There is a critical shortage of senior housing in our area, and this project directly addresses that need. Centrally located near civic offices, medical services, and public amenities, this site is ideal for seniors and longtime residents seeking to remain in the community without the burden of maintaining a single-family home. As families reach a point where yard work and home upkeep become more difficult, having the option to transition into a more manageable and supportive living environment—without leaving the neighborhood they've called home for decades—is essential.

We are especially encouraged that this project honors the character of Wailuku. It respects the historical and cultural significance of the area and complements its surroundings. In particular, the proximity to Imua Family Services' Discovery Garden offers a special opportunity for intergenerational connection between kūpuna and keiki—something that strengthens the social fabric of our community.

As we embrace necessary change, we do so with respect for the past and a vision for a sustainable future. Thoughtful, well-designed development is a cornerstone of Wailuku's revitalization. This project aligns with that goal by providing appropriate, community-minded housing that enhances—not detracts from—our unique town character.

We recognize that growth must come with solutions. To address concerns such as parking and mobility, we encourage the implementation of a small community shuttle service. Providing transportation alternatives will not only reduce the dependence on cars but also support the independence and quality of life for our aging residents.

In summary, the Wailuku Community Association supports this project as a forward-thinking, respectful, and necessary addition to our town. It is a model of how we can plan for the future while preserving the heart of our community.

Mahalo,

Kristin M. Holmes

Kristin Holmes
WCA President

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& ASSOCIATES, INC.

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Founding Partner

May 8, 2026

Kristin Holmes
Wailuku Community Association
P.O. Box 1966
Wailuku, HI 96793
Via email: wca96793@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Holmes,

Thank you for Wailuku Community Association's response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA)for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 2, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we very much appreciate Wailuku Community Association's strong support of the proposed Wailuku Mission Affordable Housing Project.

As noted in your letter, the Project provides much needed affordable housing in close proximity to a range of complementary uses including government offices, social services, public transportation, medical facilities, churches, schools, a public library, and retail stores; all while rehabilitating the Alexander House and Baybrook House, both of which are listed on the State Register of Historic Places and have been submitted for listing on the National Register of Historic Places.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

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IMUA
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June 23, 2025

Bradley Furuya, AICP
Associate
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3484

Re: Pre-Assessment Consultation for an Environmental Assessment for the Proposed Wailuku Mission Affordable Housing, Wailuku, Wailuku District, Island and County of Maui

Dear Bradley,

Imua Family Services is in receipt of your letter dated June 12, 2025, directed to Dean Wong, Executive Director. I am responding on behalf of Dean Wong and the Board of Directors.

Imua Family Services unequivocally supports the proposed Wailuku Mission affordable housing project. More specifically, we are in favor of and have no objection to the proposed senior affordable apartments or improvements outlined in your letter.

On another note, so we don't miss any of your future correspondence, moving forward please send all correspondence to Dean Wong at Imua Family Services office address, located at 161 S. Wakea Avenue, Kahului HI 96732. Thanks so much.

Please let me know if you need anything else. You can reach me at pmorton@discoverimua.com or 808-357-6622.

Warmest Aloha,

Patricia Morton
Campaign Manager, Imua Discovery Garden

EXECUTIVE DIRECTOR
Dean Wong

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W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Dean Wong
Executive Director
Imua Family Services
161 S. Wākea Avenue
Kahului, HI 96732
Via email: dwong@discoverimua.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Wong,

Thank you for Imua Family Services' response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated June 23, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we very much appreciate Imua Family Services' unequivocal support of the proposed Wailuku Mission Affordable Housing Project.

As requested, moving forward, we will send all correspondence to you at Imua Family Services office address (161 S. Wākea Avenue, Kahului, HI 96732). We will be sure to keep Imua Family Services informed of any future project updates.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing
Patricia Morton, Campaign Manager, Imua Discovery Garden

1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813-3484
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From: Virginia Suddath
To: Bradley Furuya
Subject: Wailuku Union Church / Senior Housing
Date: Friday, July 11, 2025 5:25:06 PM

July 11,, 2025

PBR Hawaii & Associates
Attn: Bradley Furuya

Dear PBR Hawaii and Mr. Furuya:

Thank you for this opportunity to comment on the housing project proposed by Wailuku Union Church.

My husband and I are residents on Awapuhi Place. We understand the need for affordable housing for seniors in our community. We also support the need for Wailuku Union Church to model responsible stewardship of their property and believe that construction of affordable senior housing fits this need.

Because of time constraints this letter will be short. However I have read a number of the comments submitted by my neighbors and am in full agreement with the reservations they have forwarded.

My primary concern was discussed by many residents during the community meetings. The development as planned does not provide the necessary number of parking spaces for the proposed number of units. One space for every two units will not meet the needs for residents who will continue to maintain an active life with family, friends, grocery shopping, and other obligations beyond their living quarters.

In addition, without adequate on-site parking the neighboring streets will become even more congested with cars needing to park nearby. Already we have Wailuku Elementary, County buildings, and library employees and patrons who need those spaces. I urge you to consider more seriously the needs of those who are already residents as you move forward in your planning.

Thank you.

Virginia Suddath
260 Awapuhi Place
Wailuku

Sent from my iPhone

PBR HAWAII
& ASSOCIATES, INC.

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May 8, 2026

Virginia Suddath
260 Awapuhi Place
Wailuku, HI 96793
Via email: virginia.suddath@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Suddath,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 11, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

My primary concern was discussed by many residents during the community meetings. The development as planned does not provide the necessary number of parking spaces for the proposed number of units. One space for every two units will not meet the needs for residents who will continue to maintain an active life with family, friends, grocery shopping, and other obligations beyond their living quarters.

In addition, without adequate on-site parking the neighboring streets will become even more congested with cars needing to park nearby. Already we have Wailuku Elementary, County buildings, and library employees and patrons who need those spaces. I urge you to consider more seriously the needs of those who are already residents as you move forward in your planning.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project also includes drop-off and pick-up areas in each parking lot. A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project.

With respect to your concern about overflow parking onto neighboring streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety. Because all vehicle access is from Main Street, the Project is designed to prevent overflow parking onto Aupuni Street and the surrounding residential streets that currently serve Wailuku Elementary School, County employees, and library patrons.

The Project site's central location in Wailuku is among its most important attributes for senior affordable housing. As documented in Section 2.1.3 (Location Analysis) of the Draft EA, the site is near healthcare services, government offices, and Maui Bus stops with free service for riders age 55 and older. For more information, refer to Section 4.3.5 (Parking) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 10, 2025

PBR Hawaii & Associates
Attn: Bradley Furuya

Dear PBR Hawaii and Mr. Furuya:

Thank you for the opportunity to comment on the proposed Wailuku Mission Affordable Housing project. I understand and support the need for affordable senior housing on the island of Maui. However, I do have a few concerns on the current proposed plan and how it will directly impact the normally quiet neighborhood.

Here are a few of my comments/concerns that I have for this project and how it will impact the neighborhood:

- The project does not provide enough parking stalls for their residents. They are proposing 82 units with only 42 parking stalls. Many seniors at 62+ still drive and own a car. There will also be a need for visitor, caretakers, and staff parking. The existing neighborhood street parking is already burdened with workers from the County Building and surrounding businesses, library, and from teachers and staff from Wailuku Elementary School.
- The project is located in the last remaining historic district in Maui county, Historic District No, 3. All projects planned in this area must follow the rules that apply to Historic District No. 3.
- This is a residential neighborhood so please consider the increased density and traffic that this project will have in a neighborhood already impacted by the school and surrounding government and businesses in the area.

Thank you for giving me the opportunity to provide my comments.

Sincerely,

Ryan Hashizume

243 Koeli Street

Wailuku, HI 96793

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

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printed on recycled paper

May 8, 2026

Ryan Hashizume
243 Koeli Street
Wailuku, HI 96793
Via email: rth808@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. Hashizume,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your comments via email dated July 10, 2025. EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

The project does not provide enough parking stalls for their residents. They are proposing 82 units with only 42 parking stalls. Many seniors at 62+ still drive and own a car. There will also be a need for visitor, caretakers, and staff parking. The existing neighborhood street parking is already burdened with workers from the County Building and surrounding businesses, library, and from teachers and staff from Wailuku Elementary School.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

The project is located in the last remaining historic district in Maui county, Historic District No, 3. All projects planned in this area must follow the rules that apply to Historic District No. 3.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple iterations in response to community feedback; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback.

The 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House and Baybrook House. Alternatives with fewer than 84 units would not be able to fund the rehabilitation of these historic structures. Alexander House and Baybrook House will be rehabilitated in accordance with the Secretary of the Interior Standards, preserving their character-defining features. The State Historic Preservation Division will review the Project, and the Maui County Cultural Resources Commission will have the opportunity to review and comment on the Project.

The applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code, pursuant to Section 201H-38, HRS: the requirement for Cultural Resources Commission approval of a residential planned development, and the requirement that new two-story buildings be separated from historic buildings by at least 100 feet. The Maui County Council would approve the Project through adoption of a County 201H Resolution. The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with the district's architectural style standards or its other land use and development requirements. For more information, refer to Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of the Draft EA.

This is a residential neighborhood so please consider the increased density and traffic that this project will have in a neighborhood already impacted by the school and surrounding government and businesses in the area.

The TIAR prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

We appreciate your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

From: custom metalcreations
To: Bradley Furuya
Subject: Wailuku Union Church affordable housing project in Wailuku, Maui
Date: Tuesday, July 8, 2025 3:37:04 PM

July 8, 2025

RE: Pre-assessment consultation for an environment assessment for the proposed Wailuku mission affordable housing project, Wailuku, Maui

Dear: Bradley Furuya PBR Hawaii & Associates

We are writing to respectfully express our concerns about the potential impact of the proposed affordable housing project on the historic Wailuku neighborhood. We believe the current plan presents several challenges that warrant reconsideration.

While we fully understand and support the need for affordable housing, we would like to highlight a specific concern: it has been verbally stated that this project is intended to serve as senior housing. However, this important detail is not reflected in any of the written documentation submitted to date. We believe that clarification on this matter is essential, as the nature of the project — particularly whether it is designated for seniors — significantly influences how it may affect the character, infrastructure, and overall planning of the neighborhood. We respectfully request that the documentation clearly reflect the intended purpose of the project.

Here are some other concerns we have about the impact this housing project will have:

• Parking Constraints: The proposed development includes only 42 parking stalls for 84 residential units. Parking in central Wailuku is already limited, and the additional strain could significantly affect local residents, professionals, state and county employees.. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to better align with the area's existing infrastructure.

• Pedestrian Safety: There are references to tenants walking down Main Street; however, the stretch of Main above High Street lacks adequate sidewalks and poses a serious safety risk to pedestrians. Any development in this area should take pedestrian access and public safety into careful consideration.

• Infrastructure Capacity: It remains unclear how the proposed 6-inch water line will be sourced or how wastewater from approximately 360 new fixtures will be managed. Given the age and capacity limits of Wailuku's existing infrastructure, we respectfully request further clarification and planning to ensure the systems can support the increased demand without negatively impacting current residents. We appreciate your efforts to address housing needs and hope our feedback contributes to a more thoughtful and sustainable approach to this project.

Thank you for your attention to these matters.
Sincerely,
Jerry & Eryn Cook
253 Awapuhi pl Wailuku, Hawaii 96793

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

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May 8, 2026

Jerry and Eryn Cook
253 Awapuhi Pl.
Wailuku, HI 96793
Via email: custom.metal1@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. and Mrs. Cook,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 8, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

While we fully understand and support the need for affordable housing, we would like to highlight a specific concern: it has been verbally stated that this project is intended to serve as senior housing. However, this important detail is not reflected in any of the written documentation submitted to date. We believe that clarification on this matter is essential, as the nature of the project — particularly whether it is designated for seniors — significantly influences how it may affect the character, infrastructure, and overall planning of the neighborhood. We respectfully request that the documentation clearly reflect the intended purpose of the project.

All 84 residential units will be rented exclusively to independent-living senior households, with all members aged 62 years or older, at incomes at or below 60 percent of the Area Median Income (AMI). To address your concern, the word "senior" was incorporated into the Project name and the title of the Draft EA. The age and income restrictions apply to all 84 residential units. For more information, refer to Sections 2.4 (Project Description) and 2.2 (Purpose and Need) of the Draft EA.

Parking Constraints: The proposed development includes only 42 parking stalls for 84 residential units. Parking in central Wailuku is already limited, and the additional strain could significantly affect local residents, professionals, state and county employees. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to better align with the area's existing infrastructure.

The Project provides 42 off-street parking spaces in two surface areas accessed from Main Street. The amount parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot, and all vehicle access is from Main Street, with no access from Aupuni Street.

The Project provides 42 off-street parking spaces in two surface areas accessed from Main Street. The amount parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot, and all vehicle access is from Main Street, with no access from Aupuni Street.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluated parking demand and concludes that the proposed parking supply and management strategies discussed in the EA are appropriate for this Project. For more information, refer to Sections 2.1.3 (Location Analysis), 6 (Alternatives), and 4.3.5 (Parking) of the Draft EA.Regarding the suggestion to reduce the number of units, the 84-unit program reflects the minimum scale necessary for the Project to be financially viable; alternative designs with fewer units were evaluated during Project development and determined to be financially unviable or insufficient to address Maui County's documented shortage of affordable senior rental housing. The parking supply was increased from 30 stalls in earlier design concepts to 42 stalls in response to community feedback.

Pedestrian Safety: There are references to tenants walking down Main Street; however, the stretch of Main above High Street lacks adequate sidewalks and poses a serious safety risk to pedestrians. Any development in this area should take pedestrian access and public safety into careful consideration.

As you note, there are no existing sidewalks along the stretch of Main Street above High Street or along Aupuni Street adjacent to the Project site. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore an internal shared walkway from the Project site to High Street. This walkway would provide an alternative route for residents who are not comfortable walking along unimproved portions of Main Street.

Within the Project site, all buildings will be connected by ADA-accessible pathways. The on-site Resident Services Coordinator will assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

Infrastructure Capacity: It remains unclear how the proposed 6-inch water line will be sourced or how wastewater from approximately 360 new fixtures will be managed. Given the age and capacity limits of Wailuku's existing infrastructure, we respectfully request further clarification and planning to ensure the systems can support the increased demand without negatively impacting current residents. We appreciate your efforts to address housing needs and hope our feedback contributes to a more thoughtful and sustainable approach to this project.

The Draft EA evaluates the Project's water, wastewater, and drainage infrastructure requirements based on a Preliminary Engineering Report (PER) prepared by Goto Engineering LLC. The Project will connect to the existing County of Maui Department of Water Supply (DWS) system via a new 3-inch compound meter on Main Street. Estimated water demand is approximately 47,600 gallons per day, and a Reservation of Available Service Capacity will be submitted to DWS to confirm the existing system can accommodate the Project. Water-saving fixtures and other conservation measures will be incorporated consistently with DWS recommendations.

Regarding wastewater, the Project will connect to the County's municipal sewer system via a new on-site sanitary sewer network connecting to the existing sewer main along Aupuni Street. The estimated average wastewater flow is approximately 23,715 gallons per day, and a Process Request Checklist was submitted to the County Department of Environmental Management (DEM) to confirm sewer system capacity. For more information, refer to Sections 4.8.1 (Water System) and 4.8.2 (Wastewater System) of the Draft EA.

We appreciate your thoughtful comments and your support for addressing housing needs in Wailuku. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 7, 2025

PBR Hawaii & Associates
Attn: Bradley Furuya

Dear PBR Hawaii and Mr. Furuya:

Thank you for the opportunity to comment on the proposed Wailuku Mission Affordable Housing project. I understand the importance of affordable senior housing for our Maui residents and am generally supportive of a project in our neighborhood. However, my support is with the understanding that the project is done right, in a way that does not unduly burden our longstanding residential neighborhood and is consistent with its location in historic district no. 3.

I have the following comments, which I note are "early comments" as referred to in your letter of June 12, 2025, and may have additional comments as the process continues:

- The project as planned does not provide sufficient parking. There are 82 units planned, and only 42 parking spaces. Many seniors (especially with an age floor of only 62) continue to drive and will own/use vehicles. One parking space per every two units is insufficient for the project. In addition, there does not appear to be parking planned for visitors or staff. Seniors, especially if they do not have a car, will have caretakers and other visitors.

  Without sufficient parking, our quiet, residential neighborhood, which already has very limited street parking, will be significantly impacted. There are multiple users from the County Building and other surrounding offices, the library, and Wailuku Elementary School already. The streets will overflow with parked cars and with drivers circling looking for parking.

  This limited parking plan also takes away the independence from the many seniors who do drive and need convenient access to their cars. If you take away their cars you are severely impacting their quality of life.

- The project is located in historic district no.3, the last remaining intact historic district in Maui County. It is a very special place and must be preserved. Any project planned for this area must follow all rules that apply to this historic district, including review and approval by the Maui County Cultural Resources Commission. It is not appropriate to use any affordable housing exemptions to avoid these or

other State and County requirements and I would strongly oppose the use of any exemptions in such an important historic district.

- Any structures built must be in keeping with the historic nature of the area. The buildings need to match the surrounding architecture and should not be modern, high-rise, or gaudy structures. This is a beautiful neighborhood with numerous historic buildings; the project architecture must be seamless and additive to the historic neighborhood.
- The project location currently provides beautiful open space in a historic neighborhood and the project should be designed to preserve as much of that open space and historic nature as possible. Appropriate landscaping should be provided, including trees, open space and street views consistent with the existing location's character.
- Consideration must be given to the increased density, traffic and other impacts on the neighborhood and surrounding community. This is a residential neighborhood that is already impacted by Wailuku Elementary School and surrounding businesses. There also has already been increased crime in our neighborhood and increasing the number of people in the area is a concern.

I am elderly and am not able to access much information online. Please send me written notification of future actions, especially when the draft Environmental Assessment is filed and where I would be able to access it.

Thank you again for the opportunity to provide my comments.

Sincerely,

Janis Nakamura

Janis Nakamura
240 Koeli Street
Wailuku, HI 96793
Janis5659@yahoo.com

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
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May 8, 2026

Janis Nakamura
240 Koeli Street
Wailuku, HI 96793
Via email: janis5659@yahoo.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Nakamura,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 7, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

The project as planned does not provide sufficient parking. There are 82 units planned, and only 42 parking spaces. Many seniors (especially with an age floor of only 62) continue to drive and will own/use vehicles. One parking space per every two units is insufficient for the project. In addition, there does not appear to be parking planned for visitors or staff. Seniors, especially if they do not have a car, will have caretakers and other visitors.

Without sufficient parking, our quiet, residential neighborhood, which already has very limited street parking, will be significantly impacted. There are multiple users from the County Building and other surrounding offices, the library, and Wailuku Elementary School already. The streets will overflow with parked cars and with drivers circling looking for parking.

This limited parking plan also takes away the independence from the many seniors who do drive and need convenient access to their cars. If you take away their cars you are severely impacting their quality of life.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluated parking demand and concluded that proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

The project is located in historic district no.3, the last remaining intact historic district in Maui County. It is a very special place and must be preserved. Any project planned for this area must follow all rules that apply to this historic district, including review and approval by the Maui County Cultural Resources Commission. It is not appropriate to use any affordable housing exemptions to avoid these or other State and County requirements and I would strongly oppose the use of any exemptions in such an important historic district.

As the Project is in the Historic District No. 3 zoning district, the State Historic Preservation Division (SHPD) will review the Project, and the Maui County Cultural Resources Commission (CRC) will have the opportunity to review and comment on the Project. The applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code (MCC), pursuant to Section 201H-38, HRS: the requirement for CRC approval of a residential planned development, and the requirement that new two-story buildings be separated from historic buildings by at least 100 feet. The Maui County Council would approve the Project through adoption of a County 201H Resolution. The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with the district's architectural standards or its other land use and development requirements. For more information, refer to Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of the Draft EA.

Any structures built must be in keeping with the historic nature of the area. The buildings need to match the surrounding architecture and should not be modern, high-rise, or gaudy structures. This is a beautiful neighborhood with numerous historic buildings; the project architecture must be seamless and additive to the historic neighborhood.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple iterations in response to community feedback; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback. Alexander House and Baybrook House will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. For more information, refer to Sections 4.1 (Archaeological and Historic Resources), 4.7 (Visual Resources), and 5.3.5 (Historic District No. 3) of the Draft EA.

The project location currently provides beautiful open space in a historic neighborhood and the project should be designed to preserve as much of that open space and historic nature as possible. Appropriate landscaping should be provided, including trees, open space and street views consistent with the existing location's character.

Approximately 70 percent of the 2.66-acre Project site will be retained as open space, including landscaped pathways, community gardens, a dog run, and resident gathering areas. The three new residential buildings are sited to preserve view corridors to Alexander House and Baybrook House from Main Street and Aupuni Street, and the landscape plan includes 54 new trees. Tree impacts have been evaluated in the context of MCC requirements for Historic District No. 3, which require preservation of significant trees deemed invaluable to the historical setting of the district. For more information, refer to Sections 4.1 (Archaeological and Historic Resources), 4.7 (Visual Resources), and 5.3.5 (Historic District No. 3) of the Draft EA.

Consideration must be given to the increased density, traffic and other impacts on the neighborhood and surrounding community. This is a residential neighborhood that is already impacted by Wailuku Elementary School and surrounding businesses. There also has already been increased crime in our neighborhood and increasing the number of people in the area is a concern.

The TIAR prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. The Project incorporates Crime Prevention Through Environmental Design (CPTED) features, including LED lighting, resident gathering areas that provide natural surveillance, low-growing plants to preserve open sightlines, perimeter fencing, and security cameras. The proposed action provides age-restricted housing for independent-living seniors aged 62 and older, a population not expected to generate demands on public safety services beyond those typical of residential infill development. For more information, refer to Sections 4.3.1 (Roadways and Traffic) and 4.10.2 (Police, Fire, and Medical Services) of the Draft EA.

I am elderly and am not able to access much information online. Please send me written notification of future actions, especially when the draft Environmental Assessment is filed and where I would be able to access it.

PBR HAWAII will provide written notification of future Project actions, including notice of the publication of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 10, 2025

PBR Hawaii & Associates
Attn: Bradley Furuya
bfuruya@pbrhawaii.com

Dear PBR Hawaii and Mr. Furuya:

My mother, Janis Nakamura, shared a copy of your June 12, 2025 letter with me. While I do not live on Maui any longer, my family has lived on Koeli Street since my grandparents built the home in the 1950's. My children and I visit often, and the intent is to keep the property in the family going forward. Accordingly, I felt compelled to send in my comments on the proposed Wailuku Mission Affordable Housing project as well.

The proposed project is in a very special area of Maui – in the last intact historic district on the island, and in a quiet, longstanding residential neighborhood. Affordable senior housing for our Maui residents is a worthy cause but must be done in a way that not only supports seniors but also respects the historic location and surrounding residential neighborhood in which it is hoping to join.

Here are my major concerns; I may have additional comments as the process continues:

- There is only about one parking space per every two units, which is insufficient for the project. In addition, there does not appear to be parking planned for visitors or staff. Present day seniors remain active, and many of them still have cars. And if they do not, they will have caretakers and visitors. Without sufficient parking, the surrounding neighborhoods will be significantly impacted as those who cannot park on property look for offsite parking. My mother and many others that live in the surrounding area are elderly and should be able to enjoy their homes without having to face a neighborhood filled with parked cars and increased traffic.
- The project is in historic district no.3, the last remaining intact historic district in Maui County, and is subject to applicable zoning rules. It is imperative that any project planned for this area follows all rules that apply to this historic district, including review and approval by the Maui County Cultural Resources Commission and specific architectural design rules. It is not appropriate to use any affordable housing exemptions to avoid these or other State and County requirements.
- The proposed project's effect on density, traffic and other impacts on the neighborhood and surrounding community must be taken into consideration. This is a residential neighborhood that is already impacted by Wailuku Elementary School

and surrounding businesses. Again, this is an elderly neighborhood with vulnerable citizens.

- Last, there have been concerns expressed that the affordable housing project may ultimately not be for seniors. A firm commitment to only developing a senior affordable housing project is important and would provide meaningful comfort and clarity.

I sincerely hope that community comments can be addressed and that any proposed project can be something the neighborhood can support and be proud of. Thank you again for the opportunity to provide comments.

Best regards,
Alyson Nakamura
Alynakamura808@gmail.com

PBR HAWAII
& ASSOCIATES, INC.

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May 8, 2026

Alyson Nakamura
Via email: alynakamura808@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Nakamura,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

There is only about one parking space per every two units, which is insufficient for the project. In addition, there does not appear to be parking planned for visitors or staff. Present day seniors remain active, and many of them still have cars. And if they do not, they will have caretakers and visitors. Without sufficient parking, the surrounding neighborhoods will be significantly impacted as those who cannot park on property look for offsite parking. My mother and many others that live in the surrounding area are elderly and should be able to enjoy their homes without having to face a neighborhood filled with parked cars and increased traffic.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

The project is in historic district no.3, the last remaining intact historic district in Maui County, and is subject to applicable zoning rules. It is imperative that any project planned for this area follows all rules that apply to this historic district, including review and approval by the Maui County Cultural Resources Commission and specific architectural design rules. It is not appropriate to use any affordable housing exemptions to avoid these or other State and County requirements.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple iterations in response to community feedback; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback.

Alexander House and Baybrook House will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. The State Historic Preservation Division will review the Project, and the Maui County Cultural Resources Commission (CRC) will have the opportunity to review and comment on the Project. The applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code, pursuant to Section 201H-38, HRS: the requirement for CRC approval of a residential planned development, and the requirement that new two-story buildings be separated from historic buildings by at least 100 feet. The Maui County Council would approve the Project through adoption of a County 201H Resolution. The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with the district's architectural standards or its other land use and development requirements. For more information, refer to Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of the Draft EA.

The proposed project's effect on density, traffic and other impacts on the neighborhood and surrounding community must be taken into consideration. This is a residential neighborhood that is already impacted by Wailuku Elementary School and surrounding businesses. Again, this is an elderly neighborhood with vulnerable citizens.

The TIAR prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

The 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House as a multipurpose community center and Baybrook House as an on-site management office in accordance with the Secretary of the Interior's Standards for Rehabilitation. Lower-density alternatives were determined to be financially unviable and could not support the rehabilitation of the historic structures. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, and approximately 70 percent of the Project site will be retained as open space. For more information, refer to Sections 2.2 (Purpose and Need) and 6 (Alternatives) of the Draft EA.

Last, there have been concerns expressed that the affordable housing project may ultimately not be for seniors. A firm commitment to only developing a senior affordable housing project is important and would provide meaningful comfort and clarity.

All 84 residential units will be rented exclusively to independent-living senior households, with all members aged 62 years or older, at incomes at or below 60 percent of the Area Median Income (AMI). PBR HAWAII and EAH Housing are aware that some neighbors questioned whether the Project would be restricted to seniors or open to any affordable housing applicant regardless of age. To address this concern, the word "senior" was incorporated into the Project name and the title of the Draft EA. The age and income restrictions apply to all 84 residential units. For more information, refer to Sections 2.4 (Project Description) and 2.2 (Purpose and Need) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 1, 2025

PBR HAWAII & Associates, Inc.
Attn: Bradley Furuya
1001 Bishop Street Suite 650
Honolulu, HI 96813

RE: Letter of Support – Wailuku Mission Affordable Housing Project

To Whom It May Concern,

I am writing in strong support of the proposed Wailuku Mission Affordable Housing project, an exemplary infill development that meets the urgent need for senior affordable housing in central Wailuku. Located near the civic core, the project site — owned by Wailuku Union Church — represents a prime opportunity to transform long-underutilized land into a vibrant, community-serving residential asset.

I am especially inspired to see that the historic Alexander House and Baybrook House are planned to be restored and thoughtfully integrated into the overall design of the project. These buildings are not only architectural treasures, but also cultural touchstones that help tell the story of Wailuku's past. Preserving and incorporating them into the housing project honors the legacy of this neighborhood while adding richness and depth to the community experience. It's a meaningful approach that reflects a true understanding of place.

My support for this project is not just professional — it is deeply personal. My maternal grandfather, Enos Vincent, was a prominent attorney in Wailuku for over 60 years. He and my grandmother were married at the Alexander House in 1910. My grandmother was also part of the original group that helped establish the Wailuku Public Library, located just across the street from the project site. With my grandfather's law office and the courthouse nearby, I can easily envision my grandparents walking through this very neighborhood as part of their daily lives. My great-grandmother is buried in the nearby Vineyard Street cemetery, adding yet another layer of generational connection to this place. These are the kinds of livable, walkable communities we need to recreate for current and future families.

On my paternal side, my grandparents lived in Wailuku in the 1930s and early 1940s. My grandfather, Rev. Jerome Holmes, served as minister at Wailuku Union Church, and later at I'ao Congregational Church during World War II. The church parsonage at the north end of the project site was their home during that time — a home where my

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

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CATIE CULLISON, AICP
Senior Vice-President / Principal

TOM SCHNELL, AICP
Vice-President / Principal

MARC SHIMATSU, PLA, ASLA
Vice-President / Principal

RAYMOND T. HIGA, PLA, ASLA
Associate Principal

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Associate Principal

NATHALIE RAZO
Associate Principal

ANN MIKIKO BOUSLOG, PhD
Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
Chairman Emeritus

RUSSELL Y. J. CHUNG, PLA, FASLA
Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

May 8, 2026

Kristin Holmes
Via email: holmes.kmh@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Holmes,

Thank you for your letter dated July 1, 2025, expressing support for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. PBR HAWAII is the planning consultant for EAH Housing, the applicant for the Environmental Assessment (EA). We appreciate your support for the proposed Project and offer the following response.

Your deep personal and family connections to Wailuku, including to Wailuku Union Church, the Alexander House, Wailuku Public Library, and ʻĪao Congregational Church, reflect the kind of generational ties to place that this Project seeks to honor. As you note, the Project site is one of the few large parcels in central Wailuku available for infill development, and is near government offices, social services, public transit, medical facilities, churches, schools, a public library, and retail stores. The Project would provide 84 affordable senior rental units plus one resident manager unit while rehabilitating the historic Alexander House as a multipurpose community center and the Baybrook House as an on-site management office.

EAH Housing and Wailuku Union Church share your belief that the Project represents an opportunity to "invest in a neighborhood that matters, while respecting the cultural, architectural, and spiritual legacy that defines Wailuku." As one of the oldest church congregations in Hawaiʻi, Wailuku Union Church has served as a place of worship and hub of social activity in the community for over 150 years. The Church's partnership with EAH Housing reflects its longstanding commitment to serving the community through the provision of affordable housing and related community-oriented uses.

For more information on the Project's location advantages for senior residents, refer to Section 2.1.3 (Location Analysis) of the Draft EA. For more information on the rehabilitation of historic structures, refer to Section 4.1 (Archaeological and Historic Resources) of the Draft EA. We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813-3484
Tel: (808) 521-5631
Fax: (808) 523-1402
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To Bradley Furuya and PBR HAWAII & Associates,

I am writing to express my concerns about the Wailuku Mission Affordable Housing project. I am concerned that the property you are considering (2307 Main Street) is not appropriate for a large housing complex. The Wailuku Historic District is already overcrowded, and the street infrastructure simply cannot accommodate another housing complex.

The introduction of 42 new cars will contribute to an already very serious congestion issue in the area. During rush hour, the traffic issue is so severe that a traffic officer is required during the school year to manage the congestion. Aupuni Street is too narrow and cannot accommodate the traffic of another housing complex. Although your plans include a parking structure for residents, Aupuni and Main Street are already overcrowded and do not have any extra parking for guests or visitors. If there are any medical emergencies in the complex, it would be very difficult for emergency vehicles to clear the congestion and access Aupuni Street.

Another concern is that the property is located uphill from High street, and there are no sidewalks that lead to High Street or run along that side of High Street. It would be unsafe for seniors and seniors with disabilities to walk to town from the property. The crosswalk in front of the Wailuku Library is already a difficult crossing for seniors to navigate, as traffic will not always slow and allow them to pass. There have been many near misses with pedestrians, and I have personally witnessed pets being hit along that stretch of the street.

As a resident of Wailuku and a professional that works on High Street, these concerns are of personal interest to me and many others who live and work in the area. The construction of the complex alone is cause for concern. Long term construction in the area will add to the congestion and street closures will cause significant issues for state workers, businesses, the families that attend the elementary school, and to nearby residents.

Thank you,
Jody Arthur

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

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May 8, 2026

Jody Arthur
Via email: jcarthur@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Arthur,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 9, 2025. EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

I am writing to express my concerns about the Wailuku Mission Affordable Housing project. I am concerned that the property you are considering (2307 Main Street) is not appropriate for a large housing complex. The Wailuku Historic District is already overcrowded, and the street infrastructure simply cannot accommodate another housing complex. The introduction of 42 new cars will contribute to an already very serious congestion issue in the area. During rush hour, the traffic issue is so severe that a traffic officer is required during the school year to manage the congestion. Aupuni Street is too narrow and cannot accommodate the traffic of another housing complex. Although your plans include a parking structure for residents, Aupuni and Main Street are already overcrowded and do not have any extra parking for guests or visitors. If there are any medical emergencies in the complex, it would be very difficult for emergency vehicles to clear the congestion and access Aupuni Street.

A Traffic Impact Assessment Report (TIAR) was prepared for the Project and evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety. The TIAR evaluates the parking demand and concludes that proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

Another concern is that the property is located uphill from High Street, and there are no sidewalks that lead to High Street or run along that side of High Street. It would be unsafe for seniors and seniors with disabilities to walk to town from the property. The crosswalk in front of the Wailuku Library is already a difficult crossing for seniors to navigate, as traffic will not always slow and allow them to pass. There have been many near misses with pedestrians, and I have personally witnessed pets being hit along that stretch of the street.

As you note, there are no existing sidewalks along Main Street and High Street. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore an internal shared walkway from the Project site to High Street. Within the Project site, all buildings will be connected by ADA-accessible pathways.

The Project includes a fence along Aupuni Street with a locked pedestrian gate for emergency use only, so that all access to and from the Project site is via Main Street. Because Project residents cannot easily walk from the Main Street entrances to Aupuni Street, this design also limits the potential for residents to park on Aupuni Street and surrounding neighborhood streets. An on-site Resident Services Coordinator will assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

From:	Patricia Feiteira
To:	Bradley Furuya
Subject:	ENVIRONMENTAL ASSESSMENT FOR THE WAILUKU MISSION AFFORDABLE HOUSING PROJECT SITUATED IN THE WAILUKU DISTRICT, COUNTY OF MAUI, HAWAII.
Date:	Thursday, July 10, 2025 2:42:25 PM

ATTENTION: Bradley Furuya, PBR Hawaii & Associates

FROM: The Feiteira Ohana, 281 Awapuhi Pl, Wailuku. HI 96793

As residents for 19 years, these are our concerns:

1. **Any project that contributes to the already outdated roads and highways in Wailuku is a big concern. In a small town as Wailuku is, we are already burdened with traffic and while 84 units may not be adding that much more to our traffic problems, consider the current Hawaiian homes Phase 1 that is now under construction that will have 161 homes, and Phase 2 that will begin in summer of 2026 that will add another 200+ homes and the Spencer project which is on the Wailuku side of Maalaea are all overwhelming road infrastructure.**
2. **Parking is a problem! Awapuhi Pl. is a right of way for residents whose homes were not demolished to make room for Iao Grade School to expand. Now we get traffic for those going into the school including delivery trucks, garbage collectors, construction vehicles, heavy equipment being delivered, utility trucks etc. Our lane has parking on the ride side which is used by residents and employees of the County, Court House, State Offices and sometimes we are blocked in because people will park on the left side leaving no room for us to pass. Aupuni St. has the same problem with parking because of workers and so will residents of your planned project. In addition, sidewalks on Aupuni only go up to Awapuhi Pl., so you need to provide safe walking for seniors of your project and car entry and exits should be done on Main St.**
3. **Aupuni St. becomes a one-way street from 7am to 8am and 1pm to 2:30pm while school is in session. Traffic is gridlocked at this time. I'm sure your Pre-School is aware of this situation also. My granddaughter goes to Iao Intermediate which is a block away but we can't let her walk because of the impatient and irate drivers who have to drive in Wailuku daily.**
4. **Water is also another concern. We live at the base of Iao Valley where our water is stored, but we are always on restrictions. Currently, and it's been the last several months, if your house number ends in an odd number, you can only water on Tuesdays and Thursday; if even number Wednesday and Friday, and other 3 days are for commercial businesses. We share our water with half the island as far away as Makena.**

While we applaud what you are doing for Seniors who need housing, we want you to know and understand the changes that have occurred in our tiny neighborhood which was once mostly retirees. Now younger families are moving in with parents or taking over homes parents have left and children can no longer roam or ride their bikes in a safe environment. We live in a historical town where the road structure will never change. Please take into consideration what these Seniors will be facing.

PBR HAWAII
& ASSOCIATES, INC.

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May 8, 2026

Patricia Feiteira
281 Awapuhi Pl
Wailuku, HI 96793
Via email: patricia96793maui@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Feiteira,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

Any project that contributes to the already outdated roads and highways in Wailuku is a big concern. In a small town as Wailuku is, we are already burdened with traffic and while 84 units may not be adding that much more to our traffic problems, consider the current Hawaiian homes Phase 1 that is now under construction that will have 161 homes, and Phase 2 that will begin in summer of 2026 that will add another 200+ homes and the Spencer project which is on the Wailuku side of Maalaea are all overwhelming road infrastructure.

A Traffic Impact Assessment Report (TIAR) prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area, including nearby projects in various stages of development. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. Using conservative trip generation rates for non-age-restricted multifamily housing, the Project is anticipated to generate 51 AM peak-hour trips and 60 PM peak-hour trips, representing a 0.9 percent increase on High Street and a 13 percent increase on Main Street relative to existing conditions. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

Parking is a problem! Awapuhi Pl. is a right of way for residents whose homes were not demolished to make room for Iao Grade School to expand. Now we get traffic for those going into the school including delivery trucks, garbage collectors, construction vehicles, heavy equipment being delivered, utility trucks etc. Our lane has parking on the ride side which is used by residents and employees of the County, Court House, State Offices and sometimes we are blocked in because people will park on the left side leaving no room for us to pass. Aupuni St. has the same problem with parking because of workers and so will residents of your planned project. In addition, sidewalks on Aupuni only go up to Awapuhi Pl., so you need to provide safe walking for seniors of your project and car entry and exits should be done on Main St.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot. The Draft EA also includes discussion of additional parking demand strategies.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety. Because Project residents cannot easily walk from the Main Street entrances to Aupuni Street, this design also limits the potential for residents to park on Aupuni Street and surrounding neighborhood streets. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

Regarding pedestrian safety, you are correct that there are no existing sidewalks along Main Street or Aupuni Street adjacent to the Project site. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka'ahumanu Church to explore an internal shared walkway from the Project site to High Street. Within the Project site, all buildings will be connected by ADA-accessible pathways. An on-site Resident Services Coordinator will also assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

Aupuni St. becomes a one-way street from 7am to 8am and 1pm to 2:30pm while school is in session. Traffic is gridlocked at this time. I'm sure your Pre-School is aware of this situation also. My granddaughter goes to Iao Intermediate which is a block away but we can't let her walk because of the impatient and irate drivers who have to drive in Wailuku daily.

The TIAR acknowledges that the school's traffic circulation plan converts streets around campus into one-way roads during drop-off and pick-up periods, and that morning peak hour traffic conditions are heavily influenced by Wailuku Elementary School operations. As noted above, there will be no Project access from Aupuni Street. All vehicle access will be from Main Street, and construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

Water is also another concern. We live at the base of Iao Valley where our water is stored, but we are always on restrictions. Currently, and it's been the last several months, if your house number ends in an odd number, you can only water on Tuesdays and Thursday; if even number Wednesday and Friday, and other 3 days are for commercial businesses. We share our water with half the island as far away as Makena.

The Draft EA addresses water supply capacity in the Central Maui service area. The County of Maui Department of Water Supply (DWS) advised during pre-assessment consultation that the three-year demand projection for the Central Maui system is currently between 98 percent and 100 percent of the system's maximum reliable capacity. The Project's estimated average daily water demand represents roughly 0.24 percent of the 'Īao Aquifer's sustainable yield. The Project will incorporate water-saving measures, including low-flow plumbing fixtures, drought-tolerant and native plant landscaping, and efficient irrigation systems, consistent with DWS recommendations. A Reservation of Available Service Capacity

will be submitted to DWS to confirm that the existing water system can accommodate the Project prior to construction. For more information, refer to Section 4.8.1 (Water System) of the Draft EA.

While we applaud what you are doing for Seniors who need housing, we want you to know and understand the changes that have occurred in our tiny neighborhood which was once mostly retirees. Now younger families are moving in with parents or taking over homes parents have left and children can no longer roam or ride their bikes in a safe environment. We live in a historical town where the road structure will never change. Please take into consideration what these Seniors will be facing.

We appreciate your observations, support for senior housing, and concern for the well-being of future residents. Maui County faces an acute shortage of affordable housing for low-income seniors, a population that is growing rapidly; by 2040, one in four elderly Maui residents is projected to be age 85 or older. Market rents in Wailuku are more than double what a senior earning 60 percent or less of the Area Median Income (AMI) can afford, and 28 percent of Maui households are severely cost-burdened. The Project directly responds to this need by providing 84 permanently affordable rental units for independent-living residents age 62 and older. The Project site's central location in Wailuku is among its most important attributes for senior affordable housing. As documented in the Draft EA, the site is near healthcare services, government offices, and Maui Bus stops with free service for riders age 55 and older. The Project also appropriately rehabilitates the historic Alexander House and Baybrook House, thereby preserving the character of the neighborhood you describe.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 10, 2025

RE: Pre-assessment consultation for an environment assessment for the proposed Wailuku mission affordable housing project in Wailuku, Maui

Dear: Bradley Furuya, PBR Hawaii & Associates

My ‘ohana and I are writing to respectfully express our concerns about the potential impact of the proposed affordable housing project on this historic Wailuku neighborhood.

We believe the current plan presents several challenges that warrant reconsideration. While we fully understand and support the need for affordable housing on Maui, we would like to highlight a particular concern of ours. It has been verbally stated that this project is intended to serve as senior housing. However, this important detail is not reflected in all of the written documentation submitted to date. We believe that clarification on this matter is essential, as the nature of the project — particularly whether it is designated for seniors — significantly influences and impacts how it may affect the character, infrastructure, and overall planning of this neighborhood. We respectfully request that the documentation clearly reflect the intended purpose of the project.

Here are some other concerns we have about the impact this housing project will have:

- **Parking Constraints**: The proposed development includes only 42 parking stalls for 84 residential units. Parking in central Wailuku is already limited, and the additional strain will significantly affect local residents, professionals, state and county employees. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to meet the project needs.
- **Pedestrian Safety**: There are references to tenants walking down Main Street; however, the stretch of Main above High Street lacks adequate sidewalks and poses a serious safety risk to pedestrians. Any development in this area should take pedestrian access and public safety into careful consideration.
- **Infrastructure Capacity**: It remains unclear how the proposed 6-inch water line will be sourced or how wastewater from approximately 360 new fixtures will be managed. Given the age and capacity limits of Wailuku's existing infrastructure, we respectfully request further clarification and planning to ensure the systems can support the increased demand without negatively impacting current residents.

We appreciate your efforts to address housing needs and hope our feedback contributes to a more thoughtful and sustainable approach to this project. Thank you for your attention to these matters.

Sincerely,
Lori Feiteira & ‘Ohana
281 Awapuhi Pl
Wailuku, Hawaii 96793

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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MARC SHIMATSU, PLA, ASLA
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NATHALIE RAZO
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Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
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printed on recycled paper

May 8, 2026

Lori Feiteira
281 Awapuhi Pl
Wailuku, HI 96793
Via email: patricia96793maui@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Feiteira,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

We believe the current plan presents several challenges that warrant reconsideration. While we fully understand and support the need for affordable housing on Maui, we would like to highlight a particular concern of ours. It has been verbally stated that this project is intended to serve as senior housing. However, this important detail is not reflected in all of the written documentation submitted to date. We believe that clarification on this matter is essential, as the nature of the project, particularly whether it is designated for seniors, significantly influences and impacts how it may affect the character, infrastructure, and overall planning of this neighborhood. We respectfully request that the documentation clearly reflect the intended purpose of the project.

All 84 residential units will be rented exclusively to independent-living senior households, with all members aged 62 years or older, at incomes at or below 60 percent of the Area Median Income (AMI). To address your concern, the word "senior" was incorporated into the Project name and the title of the Draft EA. The age and income restrictions apply to all 84 residential units. For more information, refer to Sections 2.4 (Project Description) and 2.2 (Purpose and Need) of the Draft EA.

Parking Constraints: The proposed development includes only 42 parking stalls for 84 residential units. Parking in central Wailuku is already limited, and the additional strain will significantly affect local residents, professionals, state and county employees. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to meet the project needs.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

Pedestrian Safety: There are references to tenants walking down Main Street; however, the stretch of Main above High Street lacks adequate sidewalks and poses a serious safety risk to pedestrians. Any development in this area should take pedestrian access and public safety into careful consideration.

As you note, there are no existing sidewalks along Main Street above High Street. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore an internal shared walkway from the Project site to High Street. Within the Project site, all buildings will be connected by ADA-accessible pathways.

Additionally, EAH Housing’s on-site Resident Services Coordinator will assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

Infrastructure Capacity: It remains unclear how the proposed 6-inch water line will be sourced or how wastewater from approximately 360 new fixtures will be managed. Given the age and capacity limits of Wailuku’s existing infrastructure, we respectfully request further clarification and planning to ensure the systems can support the increased demand without negatively impacting current residents.

The Draft EA includes a Preliminary Engineering Report (PER) that evaluates the capacity of existing water, wastewater, drainage, and utility infrastructure to serve the Project. The Project will connect to the County of Maui Department of Water Supply (DWS) system via a new 3-inch compound water meter on Main Street, with an estimated water demand of approximately 47,600 gallons per day. A Reservation of Available Service Capacity will be submitted to DWS to confirm system capacity. The Project will also connect to the County sewer system, with estimated average wastewater flows of 23,715 gallons per day. A Process Request Checklist has been submitted to the Department of Environmental Management to confirm sewer system capacity. The Project incorporates water-saving fixtures, including low-flow plumbing fixtures and efficient irrigation systems, as well as native and drought-tolerant landscaping to minimize water demand. For more information, refer to Section 4.8 (Infrastructure and Utilities) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 10, 2025

Dear Bradley Furuya of PBR Hawaii & Associates,

I am writing to express my concerns about the potential impact of the proposed affordable senior housing project in the historic Wailuku neighborhood on Maui.

While I do understand the need for affordable senior housing on Maui and generally do support this, I do have a few concerns for this neighborhood that I have been so fortunate to call my home for nearly 14 years.

Parking: With the proposed 84 units and only 42 parking stalls- this creates the visitor, and tenant overflow to spill out along Aupuni St, Awapuhi Pl, and Koeli St- which is already impacted by Wailuku Elementary School, Imua Discovery Garden, county jobs, and local businesses. Also a concern- what if residents need caregivers and where would these caregivers park?

Safety/ Security: Safety is already a concern with lack of sidewalks along the church side of High Street and Aupuni St. How will this be addressed? Crime has already skyrocketed in our neighborhood and now with homeless sleeping in their vehicles along the road and at the Elementary school park. More people in this area will lead to more crime.

Traffic congestion- there is already congestion along main street and the road from Aupuni St to High St during peak school traffic and normal work hours Monday- Friday. This is something that will need to be addressed. People 62 and older now don't all have the luxury of being retired and many work into their 70's.

Thank you for the opportunity to express my concerns and thank you for reading this. I am a born and raised resident of Maui. Over the last decade growth on Maui has boomed. Everything is changing and I realize there is nothing we can do about that. However, I believe we should continue to fight to preserve our last remaining historic district after the devastating Lahaina fires- which is Wailuku.

Sincerely,

Jenna Sheehan

231 Koeli St

Wailuku, HI 96793

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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CATIE CULLISON, AICP
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TOM SCHNELL, AICP
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Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

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W. FRANK BRANDT, FASLA
Founding Partner

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Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

printed on recycled paper

May 8, 2026

Jenna Sheehan
231 Koeli Street
Wailuku, HI 96793
Via email: jennamarin22@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Sheehan,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

Parking: With the proposed 84 units and only 42 parking stalls- this creates the visitor, and tenant overflow to spill out along Aupuni St, Awapuhi Pl, and Koeli St- which is already impacted by Wailuku Elementary School, Imua Discovery Garden, county jobs, and local businesses. Also a concern- what if residents need caregivers and where would these caregivers park?

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot to accommodate visitors, caregivers, and ride-share services.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

Safety/Security: Safety is already a concern with lack of sidewalks along the church side of High Street and Aupuni St. How will this be addressed? Crime has already skyrocketed in our neighborhood and now with homeless sleeping in their vehicles along the road and at the Elementary school park. More people in this area will lead to more crime.

There are no existing sidewalks along Main Street or Aupuni Street adjacent to the Project site, and historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore an internal shared walkway from the Project site to High Street. This walkway would significantly enhance pedestrian connectivity from the Project site to Wailuku town and the bus stops on High Street and provide a safe alternative route for residents who are not comfortable walking along unimproved portions of Main Street. Within the Project site, all buildings will be connected by ADA-accessible pathways. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

The Project incorporates Crime Prevention Through Environmental Design (CPTED) features, including LED lighting, resident gathering areas that provide natural surveillance, low-growing plants to preserve open sightlines, perimeter fencing, and security cameras. The Project is served by the Wailuku Police Station. The proposed action provides age-restricted housing for independent-living seniors aged 62 and older, a population not expected to generate demands on public safety services beyond those typical of residential infill development. For more information, refer to Section 4.10.2 (Police, Fire, and Medical Services) of the Draft EA.

Traffic congestion- there is already congestion along main street and the road from Aupuni St to High St during peak school traffic and normal work hours Monday- Friday. This is something that will need to be addressed. People 62 and older now don’t all have the luxury of being retired and many work into their 70’s.

The Traffic Impact Assessment Report (TIAR) prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. For more information, refer to Section 4.3.1 (Roadways and Traffic) of the Draft EA and Appendix H (TIAR).

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

From:	Tammy C
To:	Bradley Furuya
Subject:	Comments Re: Wailuku Mission Affordable Housing Project
Date:	Thursday, July 10, 2025 10:12:35 PM

To Bradley Furuya and PBR Hawaii & Associates, Inc.:

I live and work in Wailuku, and am writing to express my concerns about the planned Wailuku Mission Affordable Housing project located at 2307 Main Street. I live, work, and walk daily in the immediate area of this proposed development, and feel that as a large-scale housing complex, this project is not appropriate for the Wailuku Historic District for reasons detailed below:

1. The Wailuku Historic District is already overcrowded, and the street infrastructure cannot accommodate another housing complex.

Adding 42 new cars will contribute to an already major congestion issue in the area. A traffic control officer is already necessary during the school year to manage rush hour congestion. Since Aupuni Street is already too narrow to accommodate current traffic flow, this issue will only be exacerbated by an additional housing complex. Additionally, during peak times, residents of this complex, like all residents on Aupuni Street, will also be unable to get onto the street.

Wailuku Town already suffers from a lack of parking in the Civic area, and while you have planned parking for residents, further development in this area will likely eliminate any available street parking for workers, and other area residents and visitors.

2. Construction of the complex itself is cause for concern. The amount of construction for grading, adding necessary utilities, and later building will create noise and dust pollution, and add to the traffic congestion. Probable street closures would also cause significant issues for area workers, businesses, Wailuku Elementary School families, and nearby residents.

3. The site is not safe for seniors, especially those with mobility issues. The site is located uphill with uneven terrain, in a high traffic area without sidewalks. While services may be "nearby" and appear walkable on a map, it is not safe, especially for seniors. I've heard many screeching tires, fender benders, and people remarking how scary it is to cross High Street, even using the crosswalk fronting the library.

I strongly urge you to take these concerns (and those of any other residents) into consideration before continuing forward with this project, as a project of this scale will have major lasting impacts on residents of and visitors to the Wailuku Historic District in the future.

Thank you,
Tammy Ching

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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Tel: (808) 521-5631
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E-mail: sysadmin@pbrhawaii.com

printed on recycled paper

May 8, 2026

Tammy Ching
Via email: tammy.akiyama@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Ching,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

1. The Wailuku Historic District is already overcrowded, and the street infrastructure cannot accommodate another housing complex.

Adding 42 new cars will contribute to an already major congestion issue in the area. A traffic control officer is already necessary during the school year to manage rush hour congestion. Since Aupuni Street is already too narrow to accommodate current traffic flow, this issue will only be exacerbated by an additional housing complex. Additionally, during peak times, residents of this complex, like all residents on Aupuni Street, will also be unable to get onto the street.

Wailuku Town already suffers from a lack of parking in the Civic area, and while you have planned parking for residents, further development in this area will likely eliminate any available street parking for workers, and other area residents and visitors.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) prepared for the Project evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. The TIAR also evaluated parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis), 4.3.1 (Roadways and Traffic), and 4.3.5 (Parking) of the Draft EA.

2. Construction of the complex itself is cause for concern. The amount of construction for grading, adding necessary utilities, and later building will create noise and dust pollution, and add to the traffic congestion. Probable street closures would also cause significant issues for area workers, businesses, Wailuku Elementary School families, and nearby residents.

Construction will result in temporary impacts typical of urban infill development, including noise, dust, and construction traffic. Standard mitigation measures will be implemented, including dust suppression, compliance with State Department of Health (DOH) noise regulations, and construction scheduling that avoids peak traffic hours near Wailuku Elementary School where feasible. For more information, refer to Sections 4.4 (Noise) and 4.5 (Air Quality) of the Draft EA.

3. The site is not safe for seniors, especially those with mobility issues. The site is located uphill with uneven terrain, in a high traffic area without sidewalks. While services may be "nearby" and appear walkable on a map, it is not safe, especially for seniors. I've heard many screeching tires, fender benders, and people remarking how scary it is to cross High Street, even using the crosswalk fronting the library.

As you note, there are no existing sidewalks along Main Street or Aupuni Street adjacent to the Project site. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Kaʻahumanu Church to explore an internal shared walkway from the Project site to High Street. Within the Project site, all buildings will be connected by Americans with Disabilities Act (ADA)-accessible pathways. An on-site Resident Services Coordinator will assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

The Project site's central location in Wailuku is among its most important attributes for senior affordable housing. As documented in Section 2.1.3 (Location Analysis) of the Draft EA, the site is near healthcare services, government offices, and Maui Bus stops with free service for riders age 55 and older. Additional transportation options for residents with mobility limitations include ADA paratransit, the MEO Senior Transportation Program, Kaunoa Senior Services, and the Da Bee free shuttle. For more information, refer to Section 4.3.3 (Transit Facilities) of the Draft EA.

Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 11, 2025

PBR Hawaii & Associates
Attn: Bradley Furuya
1001 Bishop Street, Suite 650
Honolulu, HI, 96813-3484

Dear Bradley Furuya,

I am writing to express my concerns regarding the proposed housing development project in historic Wailuku town. While I understand the need for new and affordable housing units, I believe there are several critical issues that need to be addressed to ensure the safety and well-being of the community.

Firstly, the lack of parking for the 84 housing units is a significant concern. It is essential to consider the impact of insufficient parking on the overall traffic flow and the quality of life for the new and existing residents. Parking in central Wailuku is already limited, and the additional strain could significantly affect the surrounding neighborhood, professionals, state, and county employees. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to better align with the area's existing infrastructure.

Secondly, pedestrian safety is a major issue due to the lack of sidewalks in the area. The absence of proper walkways puts pedestrians at risk, especially children and the elderly. Safe and accessible sidewalks are crucial for promoting a walkable community and ensuring the safety of all residents.

Thirdly, the infrastructure capacity of historic Wailuku town is a concern. The existing infrastructure is aged and may not be able to support the additional load from the new housing units. It is important to assess the capacity limits and make necessary upgrades to avoid overburdening the infrastructure, which could lead to service disruptions and other issues.

Furthermore, given the frequent need for medical assistance in senior housing, providing amenities specifically designed to assist first responders is highly recommended. Easily accessible building layouts, clear and visible labeled entrances, building numbers, apartment numbers, and directional signage can help first responders quickly locate where help is needed. Having on-site support staff who can assist first responders with initial assessment and guidance can significantly improve response efficiency, which is vital for the safety and well-being of the senior residents. These amenities not only improve the safety and well-being of residents by enabling faster and more effective care but also can alleviate the strain on emergency services. While the upfront investment may be a consideration, the long-term benefits in terms of resident care, reduced hospitalizations, and first responder efficiency make it a worthwhile endeavor for senior housing developers.

Moreover, I would like to inquire if there will be opportunities for community connection with seniors and the nearby preschool and elementary school. Having a dedicated space for such community interactions is vital for the development and well-being of both seniors and children. These connections can foster a sense of community, provide mutual support, and enhance the overall quality of life for all residents.

Lastly, it is vital to uphold the historic district's integrity, as Wailuku town is the last historic district on Maui. Preserving the unique character and charm of this area is essential for maintaining its cultural heritage and attracting visitors. Any development planned for this area must follow all rules that

apply to this historic district, including review and approval by the Maui County Cultural Resource Commission. It is not appropriate to use any affordable housing exemptions to avoid these or other State and County requirements and I would strongly oppose the use of any exemptions in such an important historic district.

I urge you to consider these concerns and take appropriate measures to address them before proceeding with the development. Ensuring adequate parking, pedestrian safety, infrastructure capacity, providing proper senior amenities, and preserving the historic district will help maintain the quality of life for the residents and preserve the charm of historic Wailuku town.

Mahalo nui for your attention to this matter. I look forward to your response.

Me ka ha'aha'a,

Ryan & Michele Murakami
230 Awapuhi Place
Wailuku, HI, 96793
ryan.mura@gmail.com
michelekealoha@gmail.com

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

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Associate Principal

DACHENG DONG, LEED® AP
Associate Principal

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May 8, 2026

Ryan & Michele Murakami
230 Awapuhi Place
Wailuku, HI 96793
Via email: michelekealoha@gmail.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Mr. and Mrs. Murakami,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via letter dated July 11, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

Firstly, the lack of parking for the 84 housing units is a significant concern. It is essential to consider the impact of insufficient parking on the overall traffic flow and the quality of life for the new and existing residents. Parking in central Wailuku is already limited, and the additional strain could significantly affect the surrounding neighborhood, professionals, state, and county employees. We encourage the project team to consider reducing the number of units or incorporating additional off-street parking to better align with the area's existing infrastructure.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The parking supply reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety. A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that proposed parking supply and management strategies discussed in the Draft Ea are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

The 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House as a multipurpose community center and Baybrook House as an on-site management office in accordance with the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation of these two State Register-listed historic structures is an integral component of the proposed action and a key differentiator from all alternatives considered. Lower-density alternatives, including 20-unit and 46-unit concepts, were determined to be financially unviable and could not support the rehabilitation of the historic structures. An alternative design at 84 units was also considered but rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3. For more information, refer to Sections 2.2 (Purpose and Need) and 6 (Alternatives) of the Draft EA.

Secondly, pedestrian safety is a major issue due to the lack of sidewalks in the area. The absence of proper walkways puts pedestrians at risk, especially children and the elderly. Safe and accessible sidewalks are crucial for promoting a walkable community and ensuring the safety of all residents.

As you note, there are no existing sidewalks along Main Street or Aupuni Street adjacent to the Project site. Historic rock walls and utility poles present constraints to adding sidewalks. To improve pedestrian connectivity, EAH Housing and Wailuku Union Church are working with Ka‘ahumanu Church to explore an internal shared walkway from the Project site to High Street. Within the Project site, all buildings will be connected by ADA-accessible pathways. Additionally, an on-site Resident Services Coordinator will assist residents with limited mobility in accessing paratransit and other transportation alternatives. For more information, refer to Section 4.3.2 (Pedestrian Facilities) of the Draft EA.

Thirdly, the infrastructure capacity of historic Wailuku town is a concern. The existing infrastructure is aged and may not be able to support the additional load from the new housing units. It is important to assess the capacity limits and make necessary upgrades to avoid overburdening the infrastructure, which could lead to service disruptions and other issues.

The Draft EA includes a Preliminary Engineering Report (PER) and evaluates the capacity of existing water, wastewater, drainage, electrical, and telecommunications infrastructure to accommodate the Project. The Project will connect to existing County water and sewer mains. A Reservation of Available Service Capacity has been submitted to the County of Maui Department of Water Supply (DWS) to confirm the water system can accommodate the estimated average demand of 47,600 gallons per day. A Process Request Checklist was submitted to the County of Maui Department of Environmental Management (DEM) to confirm sewer system capacity for the estimated average wastewater flow of 23,715 gallons per day. For more information, refer to Section 4.8 (Infrastructure and Utilities) of the Draft EA.

Furthermore, given the frequent need for medical assistance in senior housing, providing amenities specifically designed to assist first responders is highly recommended. Easily accessible building layouts, clear and visible labeled entrances, building numbers, apartment numbers, and directional signage can help first responders quickly locate where help is needed. Having on-site support staff who can assist first responders with initial assessment and guidance can significantly improve response efficiency, which is vital for the safety and well-being of the senior residents. These amenities not only improve the safety and well-being of residents by enabling faster and more effective care but also can alleviate the strain on emergency services. While the upfront investment may be a consideration, the long-term benefits in terms of resident care, reduced hospitalizations, and first responder efficiency make it a worthwhile endeavor for senior housing developers.

The Project is designed with first responder access in mind. EAH Housing coordinated with the County of Maui Department of Fire and Public Safety during the design process. Vehicle access from Main Street via two driveways will accommodate fire trucks and other emergency vehicles. As requested by the Fire Department, the perimeter fence along Aupuni Street includes a locked pedestrian gate for emergency access and egress. Building layouts, entrances, unit numbers, and directional signage will be designed to facilitate efficient emergency response. The on-site Resident Services Coordinator will assist residents and can support coordination with first responders. For more information, refer to Section 4.10.2 (Police, Fire, and Medical Services) of the Draft EA.

Moreover, I would like to inquire if there will be opportunities for community connection with seniors and the nearby preschool and elementary school. Having a dedicated space for such community interactions is vital for the development and well-being of both seniors and children. These connections can foster a sense of community, provide mutual support, and enhance the overall quality of life for all residents.

Although programming for residents has not been finalized, the Project includes the rehabilitation of the Alexander House into a multipurpose center with a lounge, computer lab, library, meeting room, kitchen, fitness room, and bike room. Community gardening spaces and outdoor gathering areas provide additional space for residents and their guests to socialize and recreate. EAH Housing's on-site Resident Services Coordinator will implement programs addressing seniors' specific needs, including community gatherings, partnerships with local schools, and coordination of health, wellness, and social services. For more information, refer to Section 4.10.1 (Recreational Facilities) of the Draft EA.

Lastly, it is vital to uphold the historic district's integrity, as Wailuku town is the last historic district on Maui. Preserving the unique character and charm of this area is essential for maintaining its cultural heritage and attracting visitors. Any development planned for this area must follow all rules that apply to this historic district, including review and approval by the Maui County Cultural Resource Commission. It is not appropriate to use any affordable housing exemptions to avoid these or other State and County requirements and I would strongly oppose the use of any exemptions in such an important historic district.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple documented iterations in response to community feedback; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback.

Alexander House and Baybrook House will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. The State Historic Preservation Division (SHPD) will review the Project, and the Maui County Cultural Resources Commission (CRC) will have the opportunity to review and comment on the Project.

The applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code (MCC), pursuant to Section 201H-38, HRS: the requirement for CRC approval of a residential planned development, and the requirement that new two-story buildings be separated from historic buildings by at least 100 feet. The Maui County Council would approve the Project through adoption of a County 201H Resolution. The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with the district's architectural style standards or its other land use and development requirements. For more information, refer to Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of the Draft EA.

Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

July 8, 2025

Bradley Furuya, AICP
PBR HAWAII and Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813-3484

Dear PBR Hawaii and Mr. Furuya,

I appreciate the opportunity to submit limited comments on the construction of Wailuku Union Church's proposed Affordable Housing project.

There are several issues I would like to see addressed:

1. Inadequate Number of On Site Parking Spaces
2. Inappropriate Architecture
3. Overbuilding

- **The ON SITE PARKING is inadequate**
  Proposed: 84 units, 42 parking spaces with 3 visitor spaces and a drop off area.
  42 tenants will have a parking space. your other 42 tenants, your staff, maintenance people, professional therapists, family and friends will be parking in our neighborhoods, overflowing into the entire High Street area. This will change the daily life movement of everyone in the area.
  On the Aupuni, Awapuhi and Koeli Streets, there are roughly 89 parking spaces. The residents share those spaces with Imua Services in the mornings, Wailuku Elementary School, County employees and with people having business with the County throughout the day. This kind of demand/need will result in deadlock, long term parking, if only for fear of never securing another spot.

- **INAPPROPRIATE ARCHITECTURE**
  Images of the 84 units is this lot make this historical lot both ugly and bulky, unlike the graceful "New England" lines of the current and structures currently on property, the Bailey Museum and the Wailuku Sugar Manager's House.

- **OVERBUILDING**
  The number of units should correspond with the number of parking spaces possible. When asked about reducing the number of buildings in this project to comply with normal County requirements for 1 parking space or each proposed unit, the response from the Reverend was that they needed that number to accommodate their income goals.

We are hoping that you will consider the importance of maintaining proper, safe and reasonable occupancy for public roads, parking areas and fire protection and not move forward with density exemptions without a greater public input period and the Planning Commission' scrutiny.

We are also hoping that you will continue to respect and acknowledge the rules of the Maui Historic District to only allow changes that are consistent with our precious history.

It matters. These decisions will go with the land for many generations.

I support the concept of Senior Housing; and if this same project was going to be located in an unpopulated area on Maui, you could do anything that is convenient and produces the most money but this is the LAST Historic District on our dear Island, and there will be great efforts made to preserve it by all of us native Maui people.

Thank you for all you effort and we look forward to working with you.

Sandy Takishita
225 Koeli Street
Wailuku, HI 96793

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
Executive Vice-President / Principal

CATIE CULLISON, AICP
Senior Vice-President / Principal

TOM SCHNELL, AICP
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printed on recycled paper

May 8, 2026

Sandy Takishita
225 Koeli Street
Wailuku, HI 96793
Via email: sandy@howardsnurseriesmaui.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Takishita,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 10, 2025.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

The ON SITE PARKING is inadequate. Proposed: 84 units, 42 parking spaces with 3 visitor spaces and a drop off area. 42 tenants will have a parking space. Your other 42 tenants, your staff, maintenance people, professional therapists, family and friends will be parking in our neighborhoods, overflowing into the entire High Street area. This will change the daily life movement of everyone in the area. On the Aupuni, Awapuhi and Koeli Streets, there are roughly 89 parking spaces. The residents share those spaces with Imua Services in the mornings, Wailuku Elementary School, County employees and with people having business with the County throughout the day. This kind of demand/need will result in deadlock, long term parking, if only for fear of never securing another spot.

The Project provides 42 off-street parking spaces in two parking areas accessed from Main Street. The number of parking spaces reflects a location-efficient design approach appropriate for a senior affordable housing project in central Wailuku, where residents are near essential services and transit, Maui County's Fare-Free Transit Program eliminates transit costs for riders age 55 and older, and car ownership declines with age. EAH Housing will give preference to applicants who do not own a personal vehicle. The Project includes drop-off and pick-up areas in each parking lot.

To prevent overflow parking onto Aupuni Street and surrounding neighborhood streets, the Project includes a fence along Aupuni Street that eliminates all vehicle, pedestrian, and bicycle access to and from the Project site from Aupuni Street. The fence includes a locked pedestrian gate for emergency access and egress only, as requested by the County of Maui Department of Fire and Public Safety.

A Traffic Impact Assessment Report (TIAR) was prepared for the Project and evaluated existing and projected traffic conditions at study intersections in the surrounding area. The TIAR concludes that Project-generated trips will not cause any study intersection to worsen from Base Year 2028 conditions to Future Year 2028 with the Project. All vehicle access is from Main Street; no vehicle access is provided from Aupuni Street. Construction hours will, where feasible, avoid AM and PM peak traffic hours. The TIAR also evaluates parking demand and concludes that the proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis), Section 4.3.1 (Roadways and Traffic), and 4.3.5 (Parking) of the Draft EA.

OVERBUILDING. The number of units should correspond with the number of parking spaces possible. When asked about reducing the number of buildings in this project to comply with normal County requirements for 1 parking space for each proposed unit, the response from the Reverend was that they needed that number to accommodate their income goals.

The 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House as a multipurpose community center and Baybrook House as an on-site management office in accordance with the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation of these two State Register-listed historic structures is an integral component of the proposed action and a key differentiator from other alternatives considered. Lower-density alternatives, including 20-unit and 46-unit concepts, were determined to be financially unviable and could not support the rehabilitation of the historic structures. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, and approximately 70 percent of the Project site will be retained as open space. For more information, refer to Sections 2.2 (Purpose and Need) and 6 (Alternatives) of the Draft EA.

INAPPROPRIATE ARCHITECTURE. Images of the 84 units is this lot make this historical lot both ugly and bulky, unlike the graceful "New England" lines of the current and structures currently on property, the Bailey Museum and the Wailuku Sugar Manager's House.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple iterations; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback. Alexander House and Baybrook House will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, preserving their character-defining features. For more information, refer to Sections 4.1 (Archaeological and Historic Resources), 4.7 (Visual Resources), and 5.3.5 (Historic District No. 3) of the Draft EA.

We are hoping that you will consider the importance of maintaining proper, safe and reasonable occupancy for public roads, parking areas and fire protection and not move forward with density exemptions without a greater public input period and the Planning Commission's scrutiny. We are also hoping that you will continue to respect and acknowledge the rules of the Maui Historic District to only allow changes that are consistent with our precious history.

As noted above, after analyzing the Project's impact on roads, parking, and public services, including fire protection, the Draft EA concludes that the Project is unlikely to have significant environmental impacts. Refer to Sections 4.3.1 (Roadways and Traffic), 4.3.5 (Parking), 4.10.2 (Police, Fire, and Medical Services), and 7 (Findings and Anticipated Determination) of the Draft EA.

To provide 84 permanently affordable rental homes for seniors aged 62 and older earning 60 percent or less of the AMI—thereby addressing Maui's well-documented shortage of affordable housing for seniors—the applicant intends to seek exemptions from two specific requirements of Section 19.52.100, Maui County Code (MCC), pursuant to Section 201H-38, HRS: the requirement for Cultural Resources Commission (CRC) approval of a residential planned development, and the requirement that new two-story buildings be separated from historic buildings by at least 100 feet. The Maui County Council would approve the Project through adoption of a County 201H Resolution. The Project otherwise complies with all applicable requirements of Historic District No. 3, and these exemptions do not affect the Project's consistency with

the district's architectural style standards or its other land use and development requirements. The State Historic Preservation Division will review the Project, and the CRC will have the opportunity to review and comment on the Project. For more information, refer to Sections 4.1 (Archaeological and Historic Resources) and 5.3.5 (Historic District No. 3) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII

Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing

From: Lianne Malapit
To: Bradley Furuya
Subject: Wailuku Union Church- Housing Project
Date: Saturday, July 12, 2025 12:11:17 AM

Aloha Bradley,

Thank you for your time in hearing the input of surrounding neighbors regarding Wailuku Union church's proposed housing project.

There are many residents who live in the surrounding neighborhood, which is notably, a neighborhood residing in Maui's last historical district. Preserving Maui's last historical district needs to be properly guarded and protected for future generations, especially after much of Lahaina's historical district was lost in the fire.

The rendered drawings of the proposed Wailuku Union church's housing project look modern and do not comply with Wailuku's historical district's guidelines. Street parking is also limited in the area around the proposed housing project. Congestion and safety will be a concern for neighboring residents should parking for the housing project spill out onto the streets and in front of their homes.

Perhaps a smaller scaled project would better suite the area. Building in compliance with the guidelines of this historical district should also be followed.

Thank you for hearing our concerns.

Lianne Malapit

PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

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printed on recycled paper

May 8, 2026

Lianne Malapit
Via email: lifewaykauai1@icloud.com

SUBJECT: PRE-ASSESSMENT CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAILUKU MISSION SENIOR AFFORDABLE HOUSING, WAILUKU, WAILUKU DISTRICT, ISLAND AND COUNTY OF MAUI

Dear Ms. Malapit,

Thank you for your response to our letter dated June 12, 2025, regarding pre-assessment consultation for an Environmental Assessment (EA) for the proposed Wailuku Mission Senior Affordable Housing project in Wailuku, Maui. We received your response via email on July 12, 2025 at 12:11 A.M. As your email was received after the close of the 30-day pre-assessment consultation period, this is a courtesy response.

EAH Housing is the applicant for the EA. As the applicant's planning consultant, we offer the following responses to your comments.

There are many residents who live in the surrounding neighborhood, which is notably, a neighborhood residing in Maui's last historical district. Preserving Maui's last historical district needs to be properly guarded and protected for future generations, especially after much of Lahaina's historical district was lost in the fire.

The rendered drawings of the proposed Wailuku Union church's housing project look modern and do not comply with Wailuku's historical district's guidelines… Perhaps a smaller scaled project would better suite the area. Building in compliance with the guidelines of this historical district should also be followed.

The Project's architectural design has been developed to achieve compatibility with Historic District No. 3 while clearly differentiating new construction from the existing historic structures, consistent with the Secretary of the Interior's Standards for Rehabilitation. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, sited approximately 60 feet behind Alexander House and Baybrook House to maintain sight lines from Main Street and Aupuni Street. The design went through multiple iterations in response to community feedback; an earlier alternative design at the same unit count was rejected in part because community feedback found it insufficiently compatible with the architectural character of Historic District No. 3, and the current Project design directly addresses that feedback.

Regarding Project scale, the 84-unit program reflects the scale necessary for the Project to be financially viable and to fund the full rehabilitation of Alexander House and Baybrook House in accordance with the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation of these two State Register-listed historic structures is an integral component of the proposed action and a key differentiator from all alternatives considered. Lower-density alternatives, including 20-unit and 46-unit concepts, were determined to be financially unviable and could not support the rehabilitation of the historic structures. The three new residential buildings are two-story structures with a maximum height of approximately 28 feet, and approximately 70 percent of the Project site will be retained as open space. For more information, refer to Sections 6 (Alternatives), 4.7 (Archaeological and Historic Resources), 4.7 (Visual Resources), and 5.3.5 (Historic District No. 3) of the Draft EA.

Street parking is also limited in the area around the proposed housing project. Congestion and safety will be a concern for neighboring residents should parking for the housing project spill out onto the streets and in front of their homes.

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A Traffic Impact Assessment Report (TIAR) evaluates parking demand and concludes that proposed parking supply and management strategies discussed in the Draft EA are appropriate for the Project. For more information, refer to Sections 2.1.3 (Location Analysis) and 4.3.5 (Parking) of the Draft EA.

We value your participation in the environmental review process. Your comments and this response letter will be reproduced in the Draft EA.

Sincerely,

PBR HAWAII



Bradley Furuya, AICP
Associate

cc: Marian Gushiken, EAH Housing