

December 16, 2025

Emily Murai

Pioneer Design Group – Hawaii LLC



Re: Scoping Comments on Environmental Impact Statement Preparation Notice (EISPN)

Ho‘onani Village Mixed-Use Development

Docket No. A25-811

Dear Ms. Murai:

The following comments are submitted to assist in defining the scope of analysis for the Draft Environmental Impact Statement (Draft EIS) for the proposed Ho‘onani Village Mixed-Use Development. These comments are intended solely to identify subjects that warrant detailed evaluation under HRS Chapter 343 and HAR Chapter 11-200.1 so that decision-makers and the public are provided with a complete and transparent environmental review.

1. Prime Agricultural Lands (Impact and Significance Analysis)

The EISPN identifies portions of the project area as Prime Agricultural Lands of Importance to the State of Hawai‘i (ALISH) with Land Study Bureau (LSB) “A” soil classifications.

Building on this identification, the Draft EIS should analyze:

- The implications of converting the identified Prime agricultural lands in the context of island-wide agricultural resources.
- The relative scarcity and remaining extent of Prime agricultural soils on Maui.
- The cumulative implications of this conversion when considered alongside other past, present, and reasonably foreseeable land use changes affecting agricultural lands in Central Maui.

2. Urban Growth Boundary (UGB) Amendment

The EISPN indicates that amendments to the Maui Island Plan Directed Growth Boundary (UGB) and related land use designations are required.

The Draft EIS should evaluate:

- The growth-inducing effects associated with extending urban land use designations beyond the existing UGB.
- Secondary and cumulative development patterns that may result from such amendments.
- The relationship between the proposed action and adopted long-range growth management objectives.

3. Population, Housing, and Socioeconomic Effects

The project proposes a substantial residential component, with housing offered to households earning up to 140% of Area Median Income (AMI).



The Draft EIS should analyze:

- Projected population generation associated with full build-out of the proposed residential uses.
- The distribution of proposed housing units by affordability level and tenure, to the extent known at the time of analysis.
- Indirect socioeconomic effects associated with population growth, including potential changes to housing demand and community demographics in surrounding areas.

4. Water Resources and Wastewater Infrastructure

The EISPN identifies the development of an on-site wastewater treatment facility and off-site water system components.

The Draft EIS should include:

- Analysis of existing groundwater conditions relevant to the long-term operation of wastewater and drainage infrastructure.
- Evaluation of potential effects on groundwater and surface water resources from construction and operation of proposed systems.
- Assessment of cumulative water demand and wastewater generation in combination with other existing and planned developments in Central Maui.

5. Transportation and Mobility

The EISPN notes that a Traffic Impact Analysis Report (TIAR) will be prepared.

The Draft EIS should evaluate:

- Transportation impacts associated with full project build-out, including daily and peak-hour travel demand.
- Cumulative transportation impacts considering other existing and reasonably foreseeable development in the region.
- Existing and projected multimodal transportation conditions, including pedestrian, bicycle, and transit access.

6. Hazard Exposure and Emergency Response

The EISPN identifies flood, wildfire, and other hazard considerations.

The Draft EIS should include analysis of:

- Exposure of the project site and future occupants to wildfire, flooding, and other natural hazards.
- Evacuation and emergency access considerations associated with projected population levels.



- The relationship between project-related growth and emergency service capacity at build-out.

7. Cultural and Archaeological Resources

The EISPN indicates that archaeological and cultural studies will be conducted.

The Draft EIS should address:

- Identification of archaeological resources and traditional cultural practices associated with the project area and surrounding landscape.
- The extent to which project construction and operation may affect such resources and practices.
- Consultation efforts undertaken to inform the identification and evaluation of cultural resources.

8. Alternatives Analysis

The EISPN lists a range of potential alternatives, including no-action, agricultural, conservation, and alternative development configurations.

The Draft EIS should ensure that:

- Reasonable alternatives are fully described and evaluated using comparable levels of detail.
- Environmental impacts of each alternative are clearly disclosed to allow meaningful comparison.
- The no-action alternative is evaluated in a manner that reflects existing land use designations and reasonably foreseeable conditions.

9. Cumulative Impacts

Consistent with HAR §11-200.1-20, the Draft EIS should include a cumulative impacts analysis that:

- Identifies relevant past, present, and reasonably foreseeable actions in Central Maui.
- Evaluates the incremental contribution of the proposed project across resource areas when considered with those actions.

These comments are intended solely to assist in establishing a complete and transparent scope of review for the Draft EIS. Addressing these subjects will support informed decision-making and public participation as the environmental review proceeds.

Thank you for the opportunity to provide scoping input.

Sincerely,

Pacific Resource Partnership

