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January 5, 2026

TO: Accepting Authority: State of Hawai'i Land Use Commission  
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TO: Consultant: Pioneer Design Group, Hawai'i, LLC  
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TO: Maui Planning Director  
Ms. Kate Blystone [kate.blystone@mauicounty.gov](mailto:kate.blystone@mauicounty.gov)



FROM: Prof. Richard "Dick" Mayer [dickmayer@earthlink.net](mailto:dickmayer@earthlink.net)

## RE: Ho'onani Village Mixed-Use Development - EIS Preparation Notice

### Introduction

I very much appreciate having the opportunity to provide you with information regarding the Ho'onani Village Environmental Impact Statements Preparation Notice (EISPN), and for allowing me to make recommendations on the potential environmental impacts that will need to be discussed in detail in the Ho'onani Village project Draft-EIS.

It is commendable that you wish to establish a housing project for 1,608 households in the Central Maui area. These houses, and in particular your effort to make many of the rental units available to low-income families, are exactly what Maui needs.

However, **the chosen location for these houses is terrible for one very significant reason. The 1,608 housing units lie directly under the flight path of planes landing at Kahului Airport.** The aircraft fly only 200 feet above the houses. Even worse, about 10% to 20% of the time (during Kona weather) those houses would be under the even noisier, take-off flight path from the airport. Each of us should ask: a) Would we like to live there? and b) Is it responsible and morally appropriate for us to place 1,608 households in that location?

We must constantly keep in mind that although we desperately need more affordable housing, it must be done correctly for the project's new residents and it must be done in the right location. Are there better alternative sites?

We must keep in mind that this Ho'onani property will have **1,608 residential units and approximately 5,000 residents**, plus many industrial, commercial and office facilities on the property. This is large and complex project will have many impacts.

There are numerous matters that will need to be discussed for both potential impacts and the necessary **mitigation measures** to make life not just acceptable, but enjoyable for the residents who live there, for the businesses that operate there, and for the customers who will come to the stores and offices.

We need to make sure that the housing units meet the needs of the future residents. The project's Draft-Environmental Impact Statement should provide details on the **types of housing**. To determine potential impacts, we will need to know: building heights; number of floors in each building; solar roofs which could provide cheap electricity, but also interfere (glare) with airplane landings; will there be elevators in every multi-story building; provision for disabled/handicapped; laundry facilities; adequate size of residential units (especially the affordable rentals); square footage; number of bedrooms; parking spaces (one or two cars per unit) for every unit; parking for visitors; parking for adjacent businesses and offices; etc.

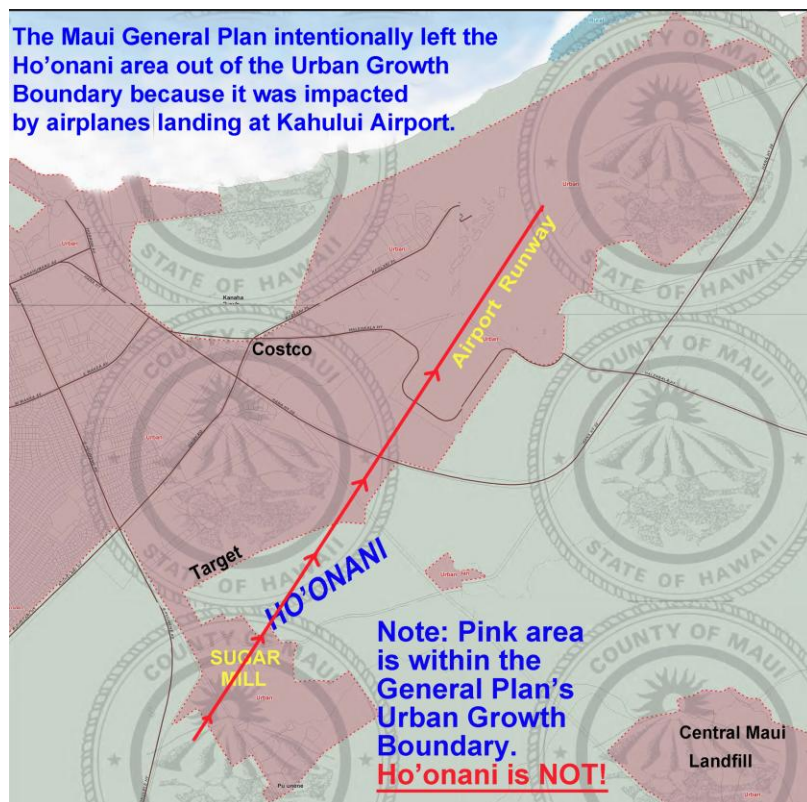
### Affordable vs. Market Priced Homes

The **sequencing of the affordable homes** in relationship to the market units. Which will come first. How will **future residents be selected** to move into the units? Who will have priority? Who will get the opportunity to purchase and who will get the opportunity to rent? How will local Maui residents who are in need of housing be given preference? All of these matters will need to be discussed to avoid future problems when the units are constructed.

### Kahului Airport Operations and its Flight Path

When the present Maui Island Plan was developed and reviewed by the General Plan Advisory Committee, the Maui Planning Commission, and the Maui County Council, it was decided to exclude the lands where this project is located from being placed within the Urban Growth Boundary because it was directly under the low-level flight path leading into Kahului Airport. Maui General Plan's Maui Island Plan intentionally excluded this property from being within the Urban growth Boundary.

I was the Vice-Chair of the Maui Island General Plan Advisory Committee, and can certify that the preceding statement is the rationale for NOT including the project's site within the Urban Growth Boundary. Nothing has happened to make a change towards inclusion within the UGB.



**Figure 1. Showing the Maui Island Plan's Urban Growth Boundary's effort to exclude the Ho'onani site from urban development because of potential noise disturbances.**

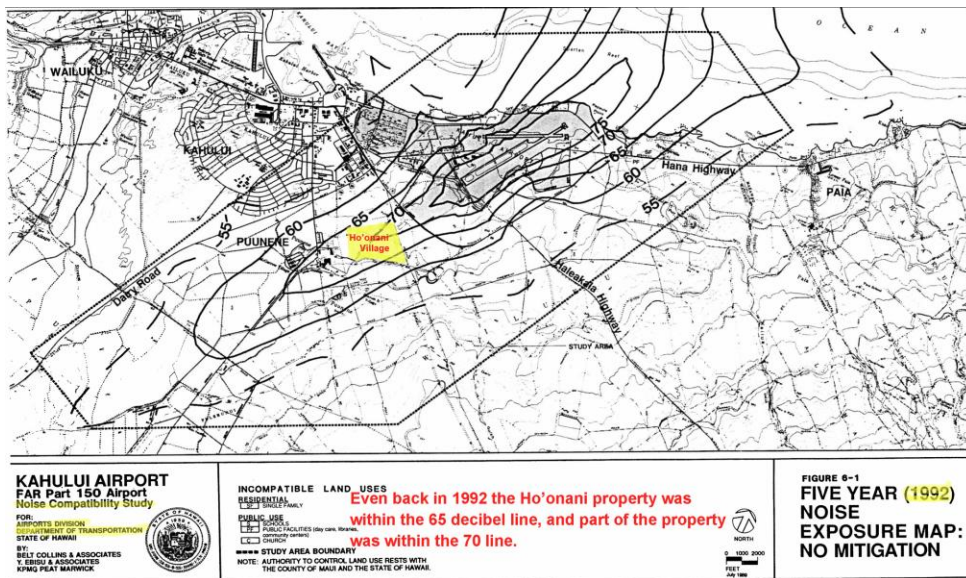


Figure 2 The most

*recent 1992 Noise Level study (compiled for the Dept of Transportation-Airports) concerning noise levels around Kahului Airport. The noise levels today would be much higher, especially at night when residents would want to be sleeping.*

Since the Maui Island Plan was developed, the situation has only gotten worse for this land parcel. When the Maui Island Plan was approved there was only one late night flight. Now there are many more passenger flights from the mainland USA and Canada coming into Kahului Airport between 9pm and mid-night. And from midnight to 6am, there are several freight flights being operated by Amazon, Aloha Airlines freight, FedEx, etc. These flights could be very sleep disturbing.

The Draft-EIS must make a major effort to address the project's proximity to Kahului Airport and the **low-level landing flight path** leading into the airport and the considerable noise resulting from planes passing directly over the proposed residential housing units. Planes land at Kahului Airport and even more noisily take off during Kona weather. (Please see the attached map that shows the flight path directly over the proposed project.) These night operations could be a major noise nuisance and make sleep and life in the Ho'onani Village unbearable.

With the same level of detail that is included in a traffic TIAR, the Draft-EIS must include full disclosure of the number of daily flights during each hour of the day and night. Special disclosure should be included for the night-time period between 8pm and 7am each day, because children and working people will need a good sleeping environment free of disturbing noise.

**The Draft-EIS should contain an impartial noise study by the Hawaii Department of Transportation's Airports Division and a certification by the Airport management that the project will not interfere with present and future airport operations and plans.**



**Figure 3** *The usual flight path would impact virtually all of the Ho'onani Village residential units multiple times each night.*

## **INFRASTRUCTRE IMPACTS**

### **Education**

One of the important impacts of this project will be the large number of young children who will be living in the 1,608 housing units. There will probably be approximately 400 to 600 children of school age. Unfortunately, this project is located far from any school and there will be a need to transport all the children to elementary, middle and high schools. Please include within the Draft-EIS a comprehensive report written by the Department of Education on how school enrollments will be handled with such a large influx of new students in a concentrated area. Do not make the assumption that the children will be merely moving from one part of Kahului into this project area. Many of the students will be coming from other parts of Maui.

### **Health Care**

Ho'onani Village will be a very large project and there will be a considerable need for health-care for the many residents and workers on the project site. Please include a health clinic or urgent-care clinic in the plans and if none is to be provided, indicate how disabled and handicapped people will be provided their needed healthcare.

### **Parks and Recreation**

One of the biggest impacts will be the total lack of parks and recreation facilities in proximity to the Ho'onani Village project. There will be a need to provide these facilities for the many children, adults, and the elderly. The project is located too far and across too many busy highways to expect that children will go to recreational facilities and parks in the existing Kahului and Maui Lani area.

### Wastewater

The wastewater treatment plant at Kahului Harbor is probably close to capacity and there will be a need to provide a wastewater treatment plant for this large housing, industrial, and commercial project. Indicate where the wastewater treatment plant will be located, its impacts, and how will the wastewater and filtered waste will be disposed of.

### Water Quality and Water Quantity

The EIS Prep Notice indicates the use of a well up above the project. On Pulehu Road. Please include in the Draft-EIS detailed data on the expected quantities of water that will be obtained and quality of the water. This is particularly important because for over 100 years the land above the well site has had considerable amounts of fertilizer, pesticides, and herbicides placed on the agricultural land. It is absolutely critical to have a reliable water source that will not depend on the Maui County Department of Water Supply. Past studies have shown that water from the lands under the former sugar plantation had excessive amounts of nitrates and nitrites due to the heavy fertilization practice by HC&S. What are the pollution levels? How will the fertilizer, pesticides, and herbicides that are found in the well water be mitigated?

If the well is already drilled and tested, provide the water quality results. If a well has not yet been drilled, the Draft EIS acceptance should await the results from a test of the well water. Clearly indicate the quality of water available for this project.

**Maui Landfill** A major consideration should be the fact that this proposed well is located close to and immediately below the very large Central Maui landfill site. It will be very important to examine any effects and impacts of the landfill on the proposed potable water source.

In addition to portable water, there will be extensive need for non-portable water for both landscaping and the numerous industrial uses. The Draft-EIS should indicate the water source and water amounts for these non-residential activities.

### Traffic

The maps provided in the Preparation Notice indicate that there would be only two exits from the project: onto Hansen Road and on to Pulehu Road. The TIAR for the proposed project should very carefully examine the traffic on both of these roads, in particular, the traffic on Hansen Road, which includes not only the major link between East Maui and South Maui, but also the route used by the County's solid-waste trucks on their way to/from the landfill.

Because this project is very large, there should be an internal study of the traffic patterns within the project site itself. That would include sidewalks, street lights, traffic signage, parking, fire and emergency vehicles, etc. That would make it possible for the many residents to feel comfortable and safe walking as pedestrians within the project.

### Post-construction Management of this project

A significant socio-economic impact of this project will be the need to maintain the property, provide security, collect rents, and the usual services provided by a Homeowner Association. The draft environmental impact statement should clearly indicate how this project will be managed after it is constructed and in operation. Will there be a homeowner association? Management by the construction company? Management by the developer of this project?

What will be the ability of the owners of property and the renters to make decisions about maintenance, security rental charges? The need to clarify this matter at an early stage is increased by the fact that the landowner of this project site is in South Dakota, far distant from the people who will be occupying and utilizing the project.

### Impacts on Government

There has been just some discussion that the County and or the state may provide funding to make infrastructure improvements. It is absolutely essential that the Draft-EIS make it very clear what the expectations are for Maui County to provide personnel, facilities and a budget allocation for this project. What would be the impact on Maui County's operations? For example, Who will widen Hansen Road to the needed 4 lanes? The developer or the government?

The same issues need to be clarified for the State of Hawaii government. What will be the impacts of this project on the state's Budget, keeping in mind that the State provides educational services, transportation facilities, etc.

### Alternatives to this project

After compiling information on the various impacts and the costs of mitigation, there may be a realization that this project will have too many significant impacts that cannot be mitigated. It may become necessary to look at alternatives locations to fill the housing needs of Central Maui. In fact, it may become obvious that there are far better sites to provide the needed residential units, leaving this site available for the planned NON-residential, commercial, industrial, and office uses. These uses and activities would be less affected by night noise from low-flying planes, and have no need for educational, school bus, park or recreational facilities.

Fortunately, there are several other land parcels that may be available for these 1,608 homes in better locations and not under the noisy flight path. When discussing alternatives to this proposal, please consider the following potentially available housing sites to meet the needs of Maui's affordable housing and market housing demands.

I strongly urge you to consider them as alternatives for this well-intentioned, but mis-located project. These recommended locations are all within the Urban Growth Boundary and already have multiple land-use and zoning entitlements, thus allowing development to happen much sooner.

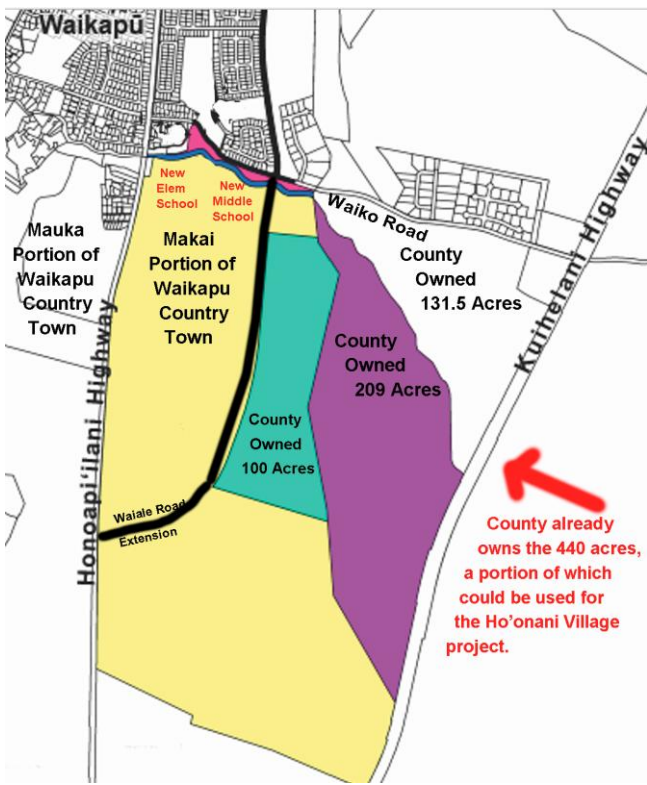
Instead of the County providing expensive infrastructure improvements to Ho'onani Village, the funds could provide incentives to accelerate these alternatives. Property tax waivers/credits may be helpful to accelerate these projects that are near existing and adequate infrastructure. Here are 5 alternatives that should be considered.

#1 **Kahului** The proposed apartments across from Sears store and the Maui Beach hotel could be incentivized.

#2 **Kahului** The many housing units planned on the recently approved Kaahumanu Shopping Center site. These units have multiple entitlements and could be built quite soon.

#3 **Kahului** Create a housing project on the large almost vacant block where the Old Kahului Shopping Center was located.

#4 **Waikapu** The County owns 440 acres of land just makai of the soon-to-be-built Waiale Road Extension in Waikapu. These lands would be adjacent to the already entitled Waikapu Country Town and its village center. This site may also be able to use water from the existing Waikapu wells, and the land is within the Urban Growth Boundary.



**Figure 4 The Maui County owned lands in Waikapu that could provide the needed housing.**

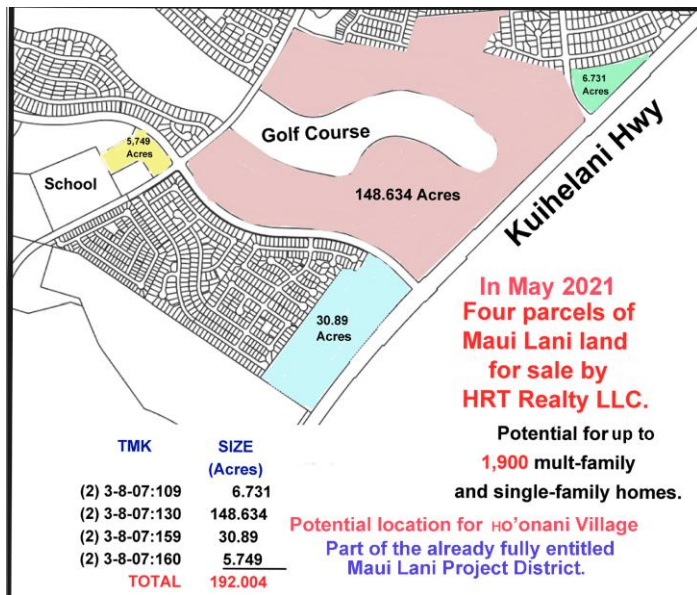
It would also have a significant advantage of being in close proximity to the new Waikapu Country Town’s two proposed public schools, a primary and middle school with attached recreational areas. Unfortunately, the Ho’onani Village presently being proposed site is extremely far from both schools and from any recreational/park and ball-field areas. These are important considerations for a project with 1,608 household with many children,

**#5 Maui Lani** Here is a possible alternative site with many locational advantages. It may be a preferred location for these much-needed 1,608 units. It is in Maui Lani, near the former Dunes Restaurant and the golf course. The land is already designated and **fully entitled for residential housing**, unlike the proposed Ho’onani Village project location, which will need a State Land Use change, a Maui Island Plan Urban Growth Boundary revision, plus community plan and zoning changes.

It has an area of approximately 192 acres and is close to both schools and the large Central Maui playground area. It has good transportation access to both Wailuku and Kahului. It would complete the original Maui Lani Master Plan. Furthermore, the landowner recently (2021) tried to sell this land.

When these properties were assessed by the county’s Real Property Tax division, the land owner appealed and said that the lands were worth less than they were being assessed. Therefore, a developer could make a good case to purchase these lands at a fair market price.

This area is outside of the airport flight path. The presently proposed Ho’onani village lands could be better utilized for future business, commercial, and industrial uses that would be less impacted by the nighttime flights in and out of Kahului Airport.



**Figure 5 Possible alternative land site for much-needed Central Maui housing. Fully entitled for a large residential development with proximity to infrastructure (roads, schools, transportation, etc.)**