



MAUI TOMORROW

Protecting Maui's Future

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RE: Comments on the Ho'onani Village EISPN

Aloha,

Maui Tomorrow Foundation (MTF) submits these comments on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Ho'onani Village project in Pu'unēnē.

We acknowledge the severe housing need facing Maui residents and have historically supported housing projects that are appropriately sited, infrastructure-ready, and consistent with long-range planning principles. However, calling a project "affordable housing" does not suspend evidence-based planning, environmental review, or ethical responsibility.

As acknowledged in the EISPN, the Land Use Commission has already determined that a full Environmental Impact Statement (EIS) is required pursuant to HRS §343-5(e) and HAR §11-200.1-14(d)(2), based on its judgment and experience that the proposed action is likely to have significant environmental impacts (EISPN at pp. 55-56). Having made this determination, the scope of the forthcoming EIS must fully address all reasonably foreseeable impacts, infrastructure commitments, alternatives, and cumulative effects, and may not be constrained or segmented.

Based on the project's location directly beneath the Kahului Airport flight path, its reliance on speculative and project-enabled infrastructure solutions, its conflict with adopted planning

documents, and its disproportionate impacts on low-income residents, the proposed action clearly triggers multiple significance criteria under HAR Chapter 11-200.1 and therefore requires a full, robust Environmental Impact Statement. The scope and level of detail required in the forthcoming Ho‘onani Village EIS must be comparable to other large-scale, master-planned developments in Central Maui. For example, the Waikapū Country Town Environmental Impact Statement, which conducted a comprehensive review across multiple chapters, included detailed project description and phasing, land-use and plan-consistency analysis, airport and aviation impacts, noise, traffic, water and wastewater infrastructure, public services, socio-economic and fiscal impacts, cumulative and irreversible effects, and a rigorous evaluation of alternatives.

These comments are intended to ensure that no issues are improperly excluded from EIS scope, consistent with HAR §11-200.1-18 (scope of EIS) and §11-200.1-13 (significance criteria).

The following statutory and regulatory provisions are referenced throughout these comments, as they pertain to the required scope and content of the forthcoming EIS:

- HAR §11-200.1-13(b) – Significance criteria, including:
 - (b)(4) economic and social welfare
 - (b)(5) public health and safety
 - (b)(6) consistency with adopted plans
 - (b)(8) commitment to larger or phased actions
 - (b)(10) hazardous conditions
 - (b)(11) ambient noise
- HAR §11-200.1-18 – Scope of EIS
- HAR §11-200.1-23 – Early consultation with agencies
- HAR §11-200.1-24 – Required contents of an EIS
- HAR §11-200.1-10 – Treatment of multiple or phased actions

Consultation with Agencies Having Jurisdiction and/or Relevant Expertise

The Land Use Commission (LUC) has elected to serve as the accepting authority for the EIS. In that role, the LUC bears an affirmative obligation to ensure early and substantive consultation with agencies having jurisdiction or relevant expertise over areas of potential significant impact, including aviation safety and aircraft noise, pursuant to HAR §11-200.1-23(b) and §11-200.1-24(a), (g), and (l).

The EISPN acknowledges that the proposed action is a phased, master-planned, mixed-use development, consisting of approximately 1,608 residential units together with commercial, office, light industrial, hospitality, civic, and recreational uses, supported by project-enabled water and wastewater infrastructure (EISPN at p. 25). Because these components are described as part of an integrated project, the EIS must evaluate the full build-out scenario as a single action, consistent with HAR §11-200.1-10.

The project lies directly beneath active landing and takeoff flight paths for Kahului Airport, with aircraft passing at approximately 200 feet above the proposed housing. These impacts fall squarely within the jurisdiction and technical expertise of the Hawai‘i Department of Transportation (HDOT) Airports Division, the Federal Aviation Administration (FAA), and the Environmental Protection Agency (EPA).

Under HAR §11-200.1-23(b), consultation with agencies having jurisdiction or expertise must occur prior to filing a draft EIS, not deferred until after key determinations are made. In addition, HAR §11-200.1-24(a) requires a draft EIS to provide a full and accurate disclosure of environmental impacts, while §11-200.1-24(g) and (l) require discussion of objectives, phasing, secondary impacts, and cumulative impacts sufficient to inform decisionmakers and the public.

Accordingly, the EIS must include, at a minimum:

- Written consultation and substantive responses from HDOT Airports Division, the FAA, and the EPA regarding topics including aircraft safety, flight-path compatibility, and noise exposure;
- Analysis based on current operational aviation data, not outdated noise contours; and
- Identification of any constraints, prohibitions, or mitigation requirements imposed or recommended by aviation authorities.

Aircraft Noise Exposure and Public Health

The EISPN identifies noise as a scoped environmental topic (p. 43) and acknowledges proximity to Kahului Airport (pp. 27-28) . Given this context, aircraft noise exposure must be analyzed with rigor.

The proposed Ho'onani Village project will expose future residents to chronic aircraft noise levels that trigger multiple significance criteria under HAR §11-200.1-13(b), including substantial adverse effects on public health (§11-200.1-13(b)(5)) and substantial adverse effects on ambient noise levels (§11-200.1-13(b)(11)). The project also raises serious social welfare concerns, particularly for households with fewer resources to mitigate noise exposure, implicating §11-200.1-13(b)(4) (substantial adverse effect on economic welfare, social welfare, or cultural practices).

Peer-reviewed public health literature has consistently linked chronic aircraft noise exposure to sleep disruption and nighttime awakenings, impaired learning and academic performance in children, increased stress and anxiety, and elevated risks of cardiovascular disease, including hypertension. These effects occur even where average noise levels nominally comply with regulatory thresholds, particularly in communities subject to frequent, high-intensity overflight events.

The EPA's recommends a maximum of noise level of 55 dBA Ldn, and the FAA's land-use compatibility guideline is 65 dBA Ldn. Because Ldn is a 24-hour average, it can mask the severity, frequency, and health consequences of louder single-event overflights, particularly during Kona wind conditions when will takeoffs occur directly over the site, and particularly at night when these events can cause sleep disturbance.

Under HAR §11-200.1-24(a) and §11-200.1-24(l), the draft EIS must fully disclose the environmental implications of the proposed action and analyze probable impacts, including direct and indirect effects, interrelationships, and cumulative impacts. The EIS must therefore include, at a minimum:

- Single-event aircraft noise analysis (e.g., SEL, LAmax and frequency of events), not solely averaged Ldn contours;
- Evaluation of nighttime and early-morning operations, including cargo and long-distance flight patterns;

- Analysis of single-event and Ldn noise measurements during Kona wind operational scenarios;
- Assessment of the impacts of outdoor noise exposure (recognizing residents must use outdoor spaces); and
- Evaluation of cumulative health impacts, for people of multiple ages, over the lifetime of the project.

The adequacy of noise reduction measures as mitigation needs to take into account health effects (including mental health), and needs to address outdoor exposure, nighttime awakenings, and long-term health risks. Under HRS §11-200.1-24(m), the EIS must also evaluate the relationship between local short-term uses and the maintenance and enhancement of long-term productivity, including whether purported housing benefits are achieved at the expense of long-term public health and quality of life.

Aircraft Safety and Crash Risk

The site is located in an area long recognized as inappropriate for residential use due to flight-path hazards associated with Kahului Airport. These conditions raise significant concerns under HAR §11-200.1-13(b), including substantial adverse effects on public health and safety (§11-200.1-13(b)(5)) and substantial risks associated with hazardous conditions (§11-200.1-13(b)(10)).

Pursuant to HAR §11-200.1-24(a) and (l), the Environmental Impact Statement must fully disclose and analyze the foreseeable safety risks associated with placing residential development beneath active aircraft landing and takeoff paths. At a minimum, the EIS must include:

- Identification and analysis of aircraft accident risk zones and historical incident data;
- Evaluation of emergency response capability for aircraft accidents that could impact people living within the proposed development, including emergency hospital bed capacity, and aircraft access constraints for first responders under crash, fuel-spill and fuel-dumping scenarios;
- Evaluation of hospital capacity on Maui, and the impact that medical facilities filled to capacity with victims of aircraft accidents on the proposed site will have on the health care needs of all Maui residents.
- Analysis of evacuation constraints for residents, particularly children, kūpuna, and persons with disabilities; and
- Disclosure of the foreseeable consequences of knowingly siting family housing beneath flight paths.
- These risks are not speculative and must be evaluated as part of the project's baseline conditions rather than dismissed as low-probability events.

Environmental Justice Implications

The proposed project raises serious environmental justice concerns by concentrating low-income households in a location subject to multiple, overlapping environmental burdens, triggering significance criteria under HAR §11-200.1-13(b)(4) (substantial adverse effects on economic or social welfare), §11-200.1-13(b)(5) (public health), and §11-200.1-13(b)(11) (ambient noise).

Future residents would be disproportionately exposed to:

- Chronic aircraft noise;
- Air pollution from aviation and nearby industrial uses;
- Proximity to existing and planned industrial operations; and
- Elevated long-term health risks associated with cumulative exposure.

Of particular relevance to the cumulative impact analysis is the proposed E&K Aloha 'Āina, LLC "Maui Aloha 'Āina Project," a waste-to-fuels facility proposed at the same Pūlehu Road–Hansen Road intersection immediately adjacent to the Ho'onani Village site. As proposed, that facility would process substantial quantities of municipal solid waste and plastics through a gasification/incineration process, generating air emissions and residual ash. Given the prevailing northeastern trade winds, the proximity of this proposed industrial use to the Ho'onani Village site raises issues that must be evaluated as part of the cumulative air quality, health, and environmental justice analysis.

Pursuant to HAR §11-200.1-24(l), the EIS must analyze cumulative and secondary impacts and may not isolate individual stressors and may not isolate individual stressors or consider proposed residential development in a vacuum. The EIS must therefore evaluate whether the combined effects of airport-related noise and emissions, adjacent industrial uses, and proposed future facilities result in disproportionate environmental and health burdens on populations with limited ability to avoid or mitigate such impacts.

The EIS must explicitly evaluate whether the project shifts environmental and health burdens onto populations least able to avoid or mitigate them, and whether such impacts are avoidable through alternative siting or project design.

Furthermore, the Ho'onani EIS must include a detailed planning context section addressing historical land use, existing land uses, surrounding industrial and airport-related activities, site photographs, and the project's relationship to the Maui Island Plan Directed Growth framework. Any discussion of housing need or market demand must be tied to site suitability and constraints, not treated as a stand-alone justification. The Ho'onani EIS must also evaluate impacts to both the natural and human environment, including but not limited to climate, natural hazards, air quality, noise, cultural and archaeological resources, visual resources, agricultural resources, population and housing, economic and fiscal impacts, public services (fire, police, schools, medical), solid waste, drainage and flooding, and infrastructure systems, including airport-related impacts.

Water Supply Uncertainty

The project site lacks an existing water source and cannot connect to County water infrastructure. The proposal relies on:

- Drilling a well approximately 4.5 miles mauka, and
- Constructing new transmission pipelines.

The EIS needs to discuss unresolved issues, commitments to larger or phased actions, and hazardous or uncertain conditions.

Under HAR §11-200.1-24(g) and (l), the EIS must disclose and analyze:

- Whether the proposed well is hydrologically connected to the South Maui aquifer system;

- Cumulative impacts on existing groundwater users and public water planning;
- Energy requirements, vulnerability, and long-term resilience of long-distance water conveyance; and
- Climate-driven uncertainty, including drought risk and reduced recharge.

Speculative infrastructure proposals cannot be deferred or assumed feasible without analysis.

Wastewater and Phased Infrastructure Commitments

Because the EISPN does not identify an existing wastewater service provider and anticipates project-enabled wastewater infrastructure as development is phased (EISPN at p. 25), the EIS must evaluate all reasonably foreseeable wastewater service configurations, including any future connections, expansions, or facility changes, as part of a single action under HAR §11-200.1-10.

Infrastructure commitments made now may:

- Enable future expansions not yet disclosed;
- Increase treatment capacity demands beyond current permits; and
- Foreclose alternative land-use outcomes.

Thus, the EIS must evaluate the full build-out and cumulative conditions, including all reasonably foreseeable wastewater demands and associated environmental impacts, rather than segmenting review.

Traffic and Transportation Impacts

The project proposes 1,608 units, equating to approximately 5,000 residents, in an area already heavily burdened by industrial traffic.

Hansen Road and Pūlehu Road are:

- Critical connectors between East Maui and South Maui,
- Heavily used by Upcountry residents,
- Used for landfill access, and possibly the trucks that would supply the proposed E&K Aloha 'Āina, LLC "Maui Aloha 'Āina Project," a waste-to-fuels facility proposed at the same Pūlehu Road–Hansen Road intersection immediately adjacent to the Ho'onani Village site.
- Already constrained and hazardous in places.

Assertions that residents will remain "self-contained" within the Ho'onani community are not credible. Under HAR §11-200.1-24(a) and (l), the EIS must analyze foreseeable travel demand, congestion and safety risks, including daily travel by residents to schools, employment, medical care, shopping, and recreation.

Deferring traffic analysis until later approvals would undermine informed decision-making and violate Chapter 343's disclosure requirements.

In sum the EIS must include a full project description, including the master plan concept; land use plan; neighborhood pattern and urban design; transportation systems (vehicular,

pedestrian, bicycle, and transit); parks and open space; sustainability strategies; phasing plan; and infrastructure and public facility development plans.

Inconsistency with Adopted Planning Documents

The Maui Island Plan's Urban Growth Boundary intentionally excluded this site due to airport hazards. This was a deliberate planning decision, not an oversight.

Approving housing here directly contradicts:

- The Maui Island Plan,
- Community planning rationale, and
- Long-standing recognition that this area is better suited for industrial and other non-residential uses.

Under HAR §11-200.1-13(b)(6) (consistency with adopted plans), the EIS must fully disclose and evaluate these conflicts.

Economic and Public Subsidy Concerns

The proposed project is expected to rely on public subsidy and other governmental actions to enable development, despite being structured as a for-profit, mixed-use project. Under HAR §11-200.1-24(l) and (m), the EIS must evaluate:

- Opportunity costs of public subsidy;
- Whether equivalent or greater housing benefit could be achieved through direct County land acquisition or homeownership assistance; and
- Long-term public costs associated with infrastructure, traffic, and health externalities.

Level of Analysis, Including Alternatives Analysis

At a minimum, the scope of the Ho'onani Village Environmental Impact Statement must integrate and fully analyze the issues discussed above within a comprehensive, project-wide framework, rather than as isolated topic-specific evaluations. The EIS must present a complete project description, including the master plan concept, land-use program, development phasing, and full build-out scenario, and must evaluate all environmental, public health, infrastructure, and socio-economic impacts on a cumulative basis.

Consistent with HAR §11-200.1-24(d) and HAR §11-200.1-13(b), the EIS must include a robust alternatives analysis that meaningfully compares feasible alternatives and does not limit consideration to minor design variations. The scope and level of detail of the alternatives analysis must be suitable to enable a robust discussion of the impacts of various alternatives to the proposed large-scale, master-planned development that would profoundly affect Central Maui, and indeed, all of Maui.

At a minimum, the alternatives analysis must rigorously evaluate:

- Alternative sites not subject to airport flight-path hazards or incompatible adjacent industrial uses;

- Reduced-density and siting alternatives that materially lessen noise exposure, traffic generation, and infrastructure demands;
- Non-residential alternatives consistent with surrounding industrial land uses, such as County baseyard, logistics, or other industrial functions;
- Design and infrastructure alternatives that materially reduce exposure to environmental and public health risks; and
- A No-Action Alternative that preserves adopted plans and avoids foreseeable environmental and public health impacts.

The alternatives analysis must also evaluate alternative infrastructure strategies, including different water supply, wastewater, drainage, and transportation configurations, rather than assuming a single infrastructure approach as a baseline condition.

Conclusion

For the reasons discussed above, the scope of the Ho‘onani Village Environmental Impact Statement must include all analyses necessary to fully disclose the project’s direct, indirect, and cumulative impacts, consistent with HRS Chapter 343 and HAR Chapter 11-200.1.

Finally, MTF urges decisionmakers to conduct on-site visits to experience existing aircraft noise, industrial activity, and surrounding land-use conditions firsthand, including during Kona weather when aircraft under full jet thrust will be taking off directly over the proposed development.

This EIS must stand as a clear public record demonstrating that the environmental, public health, and equity implications of the proposed action were known, disclosed, and considered prior to any irreversible commitments of land or public resources. That record matters—to future residents, to affected communities, and to the integrity of Maui’s planning and environmental review process.

Mahalo.