STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES | KA 'OIHANA KUMUWAIWAI 'ĀINA
COMMISSION ON WATER RESOURCE MANAGEMENT | KE KAHUWAI PONO
P O BOX 621
HONOLULU, HAWAII 96809

Jan 6, 2026

REF RFD.6590 6

TO Ms. Lauren Yasaka, Acting Administrator
Land Division

FROM Ciara W K Kahahane, Deputy Director
Commission on Water Resource Management

SUBJECT: Ho'onani Village LLC

FILE NO RFD.6590.6
TMK NO (2) 3-8-006 001, (2) 3-8-006 0040003, (2) 3-8-006 0040005

Thank you for the opportunity to review the subject document The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code) Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171 These documents are available via the Internet at http //dlnr hawaii gov/cwrm.

Our comments related to water resources are checked off below

[X] 1 We recommend coordination with the county to incorporate this project into the next update of the county's Water Use and Development Plan (WUDP) Please contact the respective Planning Department and/or Department of Water Supply for further information.

[ ] 2 We recommend coordination with the Engineering Division of the State of Hawai'i, Department of Land and Natural Resources (DLNR) to incorporate this project into the next update of the State Water Projects Plan (SWPP).

[ ] 3. We recommend coordination with the State of Hawai'i, Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the associated agricultural water demands into the State's Agricultural Water Use and Development Plan (AWUDP) Please contact the HDOA for more information at https //hdoa hawaii.gov/contact/

[X] 4 We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the project to reduce the increased demand on the area's freshwater resources Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification More information on LEED certification is available at http //www usgbc org/leed A listing of fixtures certified by the EAP as having high water efficiency can be found at http //www epa gov/watersense

[X] 5 We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project on the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events Stormwater management BMPs may earn credit toward LEED certification More information on stormwater BMPs can be found at http //planning hawaii gov/czm/initiatives/low-impact-development/

[X] 6 We recommend the use of alternative water sources, wherever practicable

[X] 7 We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner The program description can be found online at http.//energy hawaii gov/green-business-program

[X] 8 We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawai'i. These practices can be found online at

https //hawaiiscape com/index php Additional information can be found at https //dlnr hawaii gov/cwrm/planning/conservation/

[X] 9 There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health (HDOH) and the acceptance of any resulting requirements related to water quality

[ ] 10 The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments

[ ] 11 The Hawai'i Water Plan is directed toward the achievement of the utilization of reclaimed water for uses other than drinking and for potable water needs in one hundred per cent of State and County facilities by December 31, 2045 (§174C-31(g)(6), Hawaii Revised Statutes) We strongly recommend that this project consider using reclaimed water for its non-potable water needs, such as irrigation Reclaimed water may include, but is not limited to, recycled wastewater, gray water, and captured rainwater/stormwater Please contact the Hawai'i Department of Health, Wastewater Branch, for more information on their reuse guidelines and the availability of reclaimed water in the project area Contact information can be found at https //health hawaii gov/about/contact/

[X] 12 A Well Construction Permit(s) is (are) are required before the commencement of any well construction work

[X] 13 A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project

[ ] 14 There is (are) well(s) located on or adjacent to this project If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed A permit for well abandonment must be obtained

[ ] 15 Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment

[ ] 16 A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel

[ ] 17 A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered

[ ] 18 A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water

[ ] 19 The planned source of water for this project has not been identified in this report Therefore, we cannot determine what permits or petitions are required by CWRM, or whether there are potential impacts to water resources

[X] 20 The proposed water source(s) and projected water demands for the project, both potable and non-potable, should be identified If the project will be provided water by a local water system we recommend consultation with them to ensure that system capacity is available to supply water for this project

[X] OTHER Planning -
The proposed water source(s) and projected water demands for the project, both potable and non-potable, should be identified and the calculations used to estimate demands should be provided A discussion of the potential impacts on water resources and other public trust uses of water should be included, and any proposed mitigation measures described Water conservation and efficiency measures to be implemented should also be discussed.

Please consider onsite reclamation and reuse that supports development of a dual water system for the project and the use of nonpotable water to meet nonpotable needs The Commission strongly encourages the use of xeriscaping or drought-tolerant plantings, the incorporation of low impact design features, and the use of water efficient fixtures throughout the development We recommend onsite reclamation and reuse where appropriate

Groundwater -
Impacts to ground water dependent ecosystems are becoming an emerging issue as impacts to these are related to impacts to traditional & customary practices of sustenance from these ecosystems We recommend consultation with the region's (moku) Aha Moku Council on whether a land use conversion or project that uses water will impact any traditional & customary practices

If you have any questions, please contact Ryan Imata of the Groundwater Regulation Branch at (808) 587-0225 or Katie Roth of the Planning Branch (808) 587-0216