

APPENDIX 'G' – EISPN COMMENT LETTERS AND RESPONSES

[EXTERNAL] Comments for the proposed Ho'onani Village Mixed-Use Development Project, Kahului, Maui

From Gary, Deena T <deena_gary@fws.gov>

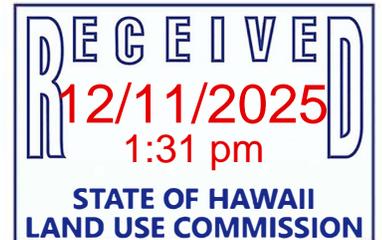
Date Wed 12/10/2025 3:19 PM

To emurai@pdg-hawaii.com <emurai@pdg-hawaii.com>; DBEDT LUC <dbedt.luc.web@hawaii.gov>

Cc Javar-Salas, Chelsie <chelsie_javar-salas@fws.gov>

 1 attachment (1 MB)

IPaC Info Letter_Species List Instructions_PIFWO_20Apr2022_Final.pdf;



Hello,

In addition to the flora and fauna survey that will be done as part of the environmental review process, I recommend obtaining an Official Species List (OSL) in our new Information for Planning and Consultation (IPaC) online tool by accessing this link: <https://ipac.ecosphere.fws.gov/>.

Please see the attached pdf with detailed directions on how you obtain an OSL in IPaC.

Once you have entered your basic project information, including a map of the project (you can use the map drawing tool or upload a GIS polygon that contains the project area(s)), you will need to formally submit the OSL. A copy will automatically be sent to our office. Each submitted project is assigned a unique Project Code in IPaC. This Project Code should be provided to our office with any correspondence relating to a given project.

Your IPaC generated OSL will include all federally listed species, critical habitat, migratory birds, and wetland habitat that occurs, or may transit through, the project area(s). Each species on your OSL will have a link directly below it that provides the Service's recommended avoidance and minimization measures (AMMs) for that species.

Please note, an Official Species List is valid for only 90 days because the status of a species can change and new occurrences of federally listed species could be found.

A few IPAC tips:

- If you choose the option to upload a polygon for your project area, please include all TMKs/sites in a single polygon. Otherwise, you will get a different project code for every TMK/site. However, if your project spans distinct habitat types, you may want to obtain a separate OSL for each site to better distinguish which species/critical habitat/migratory birds/wetland habitat are present at, or may transit through, each site.
- At this time, unless you are a federal agency with a programmatic consultation with us, you can ignore any requests to further your consultation in IPaC and prompts to utilize D Keys. The only thing you need to do is enter your basic project information and submit for an OSL.
- Additional background information on IPaC:
 - Your official IPaC species list is based on species' ranges. IPaC generates a list of all federally listed species and other trust resources that are or could potentially be in the project area.

- If your IPaC species list includes a species you do not think occurs in or will transit through the project area, explain why in your consultation letter.
- Implementing surveys is a good way to determine if a species is present or not.
- We recommend our partners incorporate all the species and their associated AMMs in their impacts analysis.
- The AMMS are there to help you avoid and minimize effects to listed species, critical habitat, migratory birds, and wetland habitat.

Please do not hesitate to contact me if you need additional assistance.

Deena Gary
Fish and Wildlife Biologist
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850
Phone: 808-460-7709
Email: Deena_Gary@fws.gov



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

Subject: IPaC generated official species list for the Pacific Islands Fish and Wildlife Office

Dear Action Agency or Applicant:

The Pacific Islands Fish and Wildlife Office (PIFWO) is transitioning to the Information for Planning and Consultation (IPaC) online portal, <https://ipac.ecosphere.fws.gov/> for federal action agencies and non-federal agencies or individuals to obtain official species lists, including threatened and endangered species, designated critical habitat, and avoidance and minimization measures to consider in your general project design. IPaC has been used by continental USFWS offices to provide official species lists and avoidance and minimization guidance since 2017. Using IPaC expedites the process for species list distribution. Obtaining a species list in IPaC is relatively straightforward and takes minimal time to complete. Step by step instructions are included below.

Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of your species list should be verified after 90 days. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change the species list. Verification can be completed by visiting the IPaC website at regular intervals during project planning and implementation. An updated list may be requested through the IPaC system by completing the same process used to obtain the initial species list.

We hope this process provides efficiencies to our partners in obtaining a species list. For federal action agencies, it also opens additional IPaC functionality that the PIFWO office is still working on, such as the use of Determination Keys for informal section 7 programmatic consultations. We will let our agency partners know when that functionality becomes available.

If you have questions about a species list obtained through the IPaC system or need assistance in completing an IPaC species list request, please contact the Service at 808-792-9400 or via email at pifwo_admin@fws.gov. We appreciate your efforts to conserve listed species across the Pacific Islands.

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA*, OREGON*, WASHINGTON

*PARTIAL

INTERIOR REGION 12
PACIFIC ISLANDS

AMERICAN SĀMOA, GUAM, HAWAI'I, NORTHERN
MARIANA ISLANDS

Instructions for Action Agencies and partners to obtain an official species list in IPaC

- Navigate to <https://ipac.ecosphere.fws.gov/>
- You can get an unofficial species list without logging in. However, if you want an official species list you will need to log in first using your Login.gov account. If you don't have an IPaC account, they are easy to create.

Log in ×

LOGIN.GOV LOGIN
You can use your Login.gov profile as your IPaC account. You will need to allow IPaC to read your [basic profile information](#).

LOG IN WITH  LOGIN.GOV

IPAC LOGIN
> [Why do I need an IPaC account?](#)

Select Log in with Login.gov and sign in using your email and password.

Email address

Password Show password

Sign in

Create an account

[Sign in with your government employee ID](#)

If you have a PIV or CAC card, you can sign in using that method as well.

Sign in with your PIV or CAC

Make sure you have a [Login.gov](#) account and you've set up PIV/CAC as a two-factor authentication method.

[Insert your PIV/CAC](#)

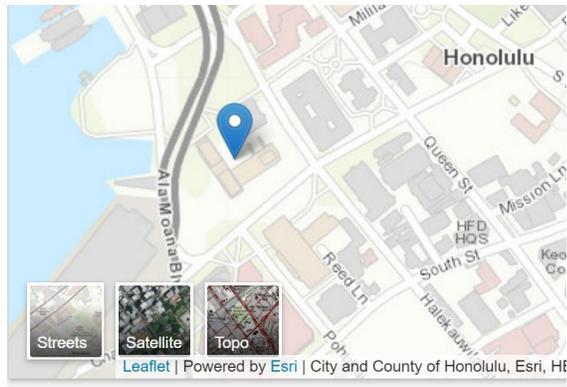
[Cancel](#)

- Once you log in, select “Get Started”.

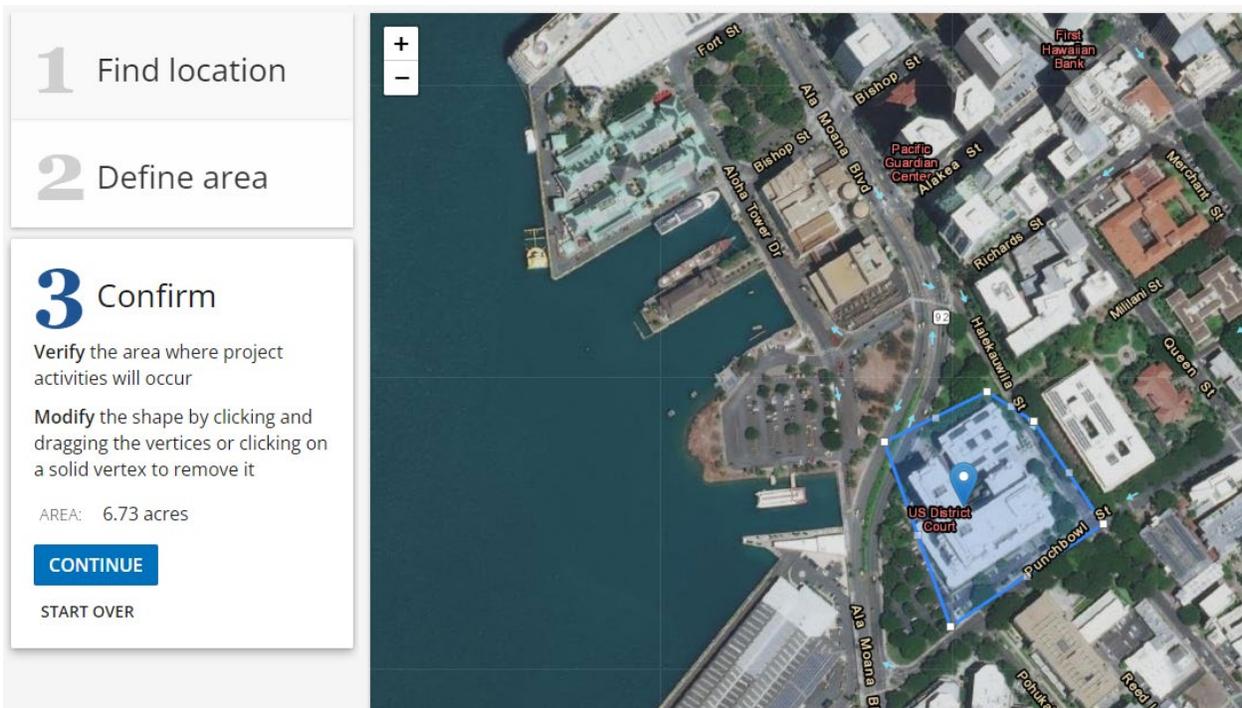
The screenshot shows the IPaC homepage. At the top, there is a navigation bar with the U.S. Fish & Wildlife Service logo, the text "U.S. Fish & Wildlife Service", and the user name "EMMA GOSLINER". Below this is the main header "IPaC Information for Planning and Consultation" with the subtext "Powered by ECOS - the Environmental Conservation Online System". The main content area features a large image of a coastal landscape with a lighthouse. Overlaid on this image is the text "IPaC is a project planning tool that streamlines the USFWS environmental review process". At the bottom of this image are two buttons: "GET STARTED" (highlighted in blue) and "MY PROJECTS".

- Define the action area: Identify the location of the proposed action by uploading an existing shapefile or by entering an address or coordinates of the action area. Once identified on the map, you can manually draw the action area using the drawing tools.

The screenshot shows the "Define area" step in the IPaC tool. The interface is divided into three main sections. On the left, there is a sidebar with two steps: "1 Find location" and "2 Define area". The "Find location" step includes a search box labeled "Find a place" and options to "UPLOAD SHAPE FILE" or "SELECT BY STATE OR COUNTY". The "Define area" step is currently active. The main content area is titled "2 Define area" and contains the instruction "Draw the area where activities will occur". Below this, there are three drawing tool options: "SKETCH" (with a pencil icon), "POLYGON" (with a black polygon icon), and "LINE" (with a line icon). At the bottom, there are "Other options:" which include "UPLOAD SHAPE FILE" and "SELECT BY STATE OR COUNTY". On the right side, there is a map showing a street grid in Honolulu, with a blue location pin placed on a street.



To help identify your action area you can choose between multiple base maps available.



Press continue when you have finished drawing or uploading the action area location.

- The species information on the page that follows is not official. However, it identifies the project County, local Fish and Wildlife Field Office, species covered under NOAA Fisheries as well as Migratory Bird Treaty Act species. The list can be viewed in Thumbnail or List format.
- Once the species list populates you will see images of the species that may occur on, near, or transgress across your project. Click on SPECIES GUIDELINES on your top right to see Avoidance and Minimization measures to incorporate into your General Project Design Guidelines.

Explore location
 LOCAL OFFICE: PACIFIC ISLANDS FISH AND WILDL. OFC

LOCATION: Honolulu County, Hawaii
 CHANGE LOCATION

Resources

- ENDANGERED SPECIES 20
- MIGRATORY BIRDS 5
- FACILITIES
- WETLANDS !

PRINT RESOURCE LIST

What's next?
 Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.
 DEFINE PROJECT

Endangered species

Listed species (1) and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries (2)).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

Additional information on endangered species data is provided [below](#).

The following species are potentially affected by activities in this location:

THUMBNAILS LIST SPECIES GUIDELINES

Mammals

Endangered



Hawaiian Hoary Bat
Lasiurus cinereus semotus
 Wherever found

- Continue with the following steps to comply with the requirements of ESA section 7 to obtain an **official species list**.
- Select Define Project

Define project

Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.

Project name

Project description
 Describe the location, size, scope, and timing of this project.

 OPTIONAL

Enter the Project Name and a brief description of the project (a description is not mandatory, but recommended for future coordination with the Service). Click SAVE at bottom of page.

- At the bottom of the What's next box on the right, click Request Species List

Test Project

Testing



LOCATION Honolulu County, Hawaii

CREATED March 17, 2022

1 MEMBER 2 DOCUMENTS

What's next?

ESA REVIEW

Review this project's effects on listed species pursuant to the Endangered Species Act (ESA), as part of the overall regulatory review.

START REVIEW

SPECIES LIST

Requesting an official species list is now part of IPaC's ESA Review.

REQUEST SPECIES LIST

Local office

Pacific Islands Fish And Wildlife Office

- on the following screen, click Yes, Request Species List

Endangered Species Act Review

← BACK
EXIT REVIEW

1 Request an official species list

— **2** Evaluate determination keys

No Dkeys for project

— **3** Analyze project (optional)

— **4** Download documentation

Step 1: Request an official species list

An official species list is a letter from the local U.S. Fish and Wildlife Service field office that assists in the evaluation of potential impacts of your project. It includes a list of species that should be considered under [Section 7](#) of the Endangered Species Act, a project tracking number, and other pertinent information from the field office.

Does this project require an official species list?

Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action" ([Section 7](#) of the Endangered Species Act).

This requirement applies to projects that are **conducted, permitted, funded, or licensed** by any Federal agency.

YES, REQUEST A SPECIES LIST
SKIP / DOES NOT APPLY

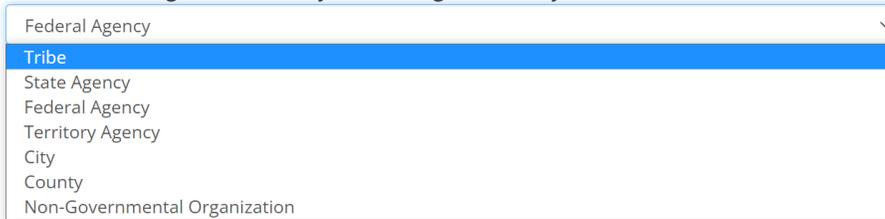
- Fill out the contact information for yourself or your agency. Contractors, state partners, and any other project proponents may request a species list and should be covered using the dropdown menus.

Tell us about the project and your organization or agency

Is this project being conducted, permitted, funded, or licensed by a Federal agency?

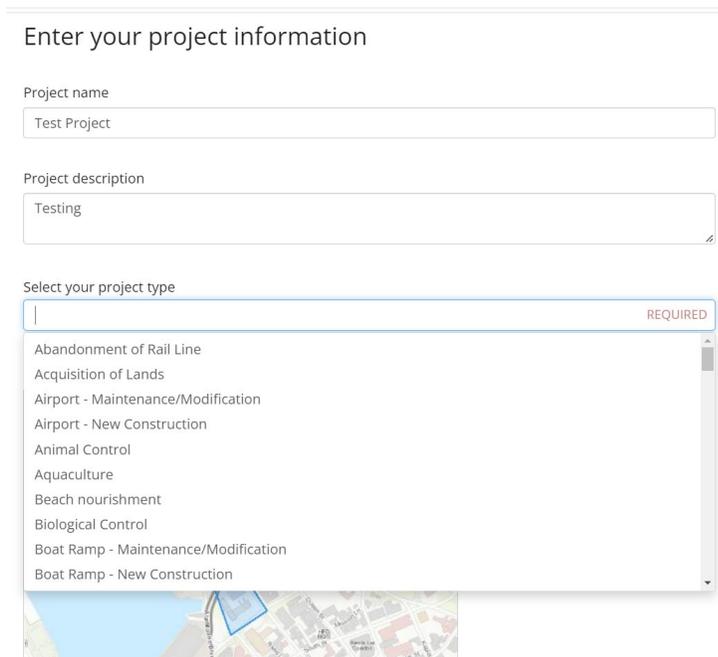
- Yes
 No

What kind of organization are you working for directly?



Federal Agency
Tribe
State Agency
Federal Agency
Territory Agency
City
County
Non-Governmental Organization

- From the pull-down menu for Classify Type of Project, select the project type that best fits the proposed action.



Enter your project information

Project name
Test Project

Project description
Testing

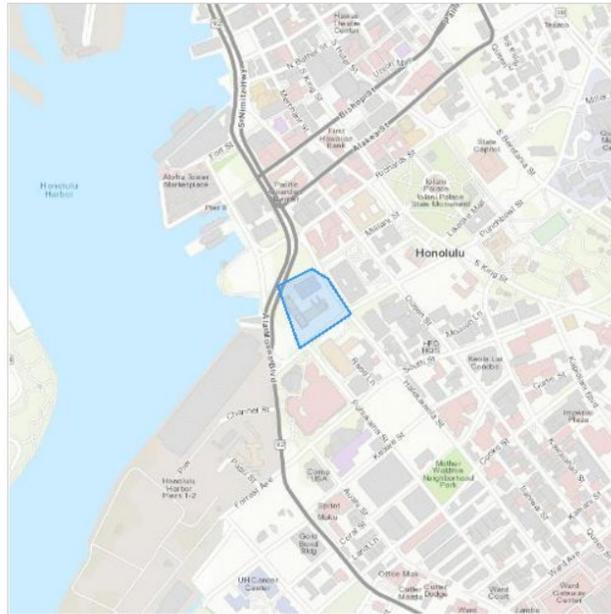
Select your project type REQUIRED

- Abandonment of Rail Line
- Acquisition of Lands
- Airport - Maintenance/Modification
- Airport - New Construction
- Animal Control
- Aquaculture
- Beach nourishment
- Biological Control
- Boat Ramp - Maintenance/Modification
- Boat Ramp - New Construction



- Once all required sections are filled out, press **SUBMIT OFFICIAL SPECIES LIST REQUEST**

Location



[SUBMIT OFFICIAL SPECIES LIST REQUEST](#)

- An Official Species List should be generated and available for download in a couple of seconds.
- If you need additional information on a species, click on their name that is hot-linked to their species information page. A brief overview of the species' status, description and critical habitat will appear as well as a link to their ECOS species profile.

Resources

- ENDANGERED SPECIES 20
- MIGRATORY BIRDS 5
- FACILITIES
- WETLANDS !

[PRINT RESOURCE LIST](#)

What's next?
Define a project at this location to evaluate potential impacts, get an official species list, and make species determinations.

[DEFINE PROJECT](#)

ʻIiwi

Drepanis coccinea



STATUS Threatened: A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range.

DESCRIPTION The liwi is an Hawaiian forest bird in the endemic honeycreeper subfamily of the Fringillidae (finch family). Iiwi are medium-sized forest birds (total body length is approximately 14 centimeters (cm) (5.5 inches (in)) with bright scarlet feathers, black wings and tail, and a small white patch on the inner secondary flight feathers. The bill is long, deeply

Endangered



Hawaii Akepa
Akoxops coccineus
Wherever found



March 13, 2026

Via email: deena_gary@fws.gov

Deena Gary
Fish and Wildlife Biologist
Pacific Islands Fish and Wildlife Office
300 Ala Moana Blvd. Room 3-122
Honolulu, HI 96850

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i, IPaC Project Code: 2026-0012172

Aloha Deena Gary,

Thank you for your comments dated December 10, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comments:

In addition to the flora and fauna survey that will be done as part of the environmental review process, I recommend obtaining an Official Species List (OSL) in our new Information for Planning and Consultation (IPaC) online tool by accessing this link: <https://ipac.ecosphere.fws.gov/>.

Please see the attached pdf with detailed directions on how you obtain an OSL in IPaC.

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Please note, an Official Species List is valid for only 90 days because the status of a species can change and new occurrences of federally listed species could be found.

A few IPaC tips:

- *If you choose the option to upload a polygon for your project area, please include all TMKs/sites in a single polygon. Otherwise, you will get a different project code for every TMK/site. However, if your project spans distinct habitat types, you may want to obtain a separate OSL for each site to better distinguish which species/critical habitat/migratory birds/wetland habitat are present at, or may transit through, each site.*
- *At this time, unless you are a federal agency with a programmatic consultation with us, you can ignore any requests to further your consultation in IPaC and prompts to utilize D Keys. The only thing you need to do is enter your basic project information and submit for an OSL.*
- *Additional background information on IPaC:*
- *Your official IPaC species list is based on species' ranges. IPaC generates a list of all federally listed species and other trust resources that are or could potentially be in the project area.*
- *If your IPaC species list includes a species you do not think occurs in or will transit through the project area, explain why in your consultation letter.*
- *Implementing surveys is a good way to determine if a species is present or not.*
- *We recommend our partners incorporate all the species and their associated AMMs in their impacts analysis.*
- *The AMMS are there to help you avoid and minimize effects to listed species, critical habitat, migratory birds, and wetland habitat.*

Response:

Thank you for the recommendation and guidance to obtain an OSL from the USFWS. An OSL, flora/fauna surveys, and the Service's recommended avoidance and minimization measures will be included and discussed in the Draft EIS, which will be provided to the USFWS for review.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared for this project. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai'i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho'onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai'i Land Use Commission

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF DEFENSE
KA 'OIHANA PILI KAUA
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

STEPHEN F. LOGAN
MAJOR GENERAL
ADJUTANT GENERAL
KA 'AKUKANA KENELALA

PHILLIP L. MALLORY III
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL
KA HOPE 'AKUKANA KENELALA

December 16, 2025



Emily Murai
Pioneer Design Group- Hawaii
711 Kapiolani Blvd, Suite 1450
Honolulu, Hawaii 96813
Email: emurai@pdg-hawaii.com

SUBJECT: Environmental Impact Statement Notice for the Ho'onani Village
Mixed-Use Development Project, Kahului, Maui, Hawaii
TMK (2) 3-8-006: 001, 0003, 004, and 005

Aloha Ms. Murai,

Thank you for your letter dated December 5, 2025 regarding the above subject project.
The State of Hawaii, Department of Defense has no comments to offer at this time.

Should there be any questions, please contact Major Randall Duldulao at 808-369-3487
or randall.s.duldulao@hawaii.gov.

Best Wishes,

A handwritten signature in black ink, appearing to read "Shao Yu Lee".

Shao Yu Lee, R.A.
Major, Hawaii National Guard
Chief Engineering Officer



CIVIL ENGINEERING • PLANNING • CONSTRUCTION MANAGEMENT

711 Kapiolani Blvd., Suite 1450
Honolulu, HI 96813
808.400.5959 www.pdg-hawaii.com

March 13, 2026

Shao Yu Lee, R.A.
Major, Hawai'i National Guard
Chief Engineering Officer
State of Hawai'i
Department of Defense
3949 Diamond Head Road
Honolulu, HI 96813

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho'onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai'i

Aloha Major Shao Yu Lee,

Thank you for your comment letter, dated December 16, 2025, regarding the proposed Ho'onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho'onani Development, LLC, we thank you for confirming the State of Hawai'i, Department of Defense does not have comments to offer at this time.

Your comment letter and this response will be included in the Draft Environmental Impact Statement being prepared for this project. Should you have any questions or require additional information, you may contact me at 808-400-5959.

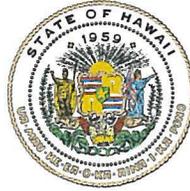
Sincerely,
Pioneer Design Group – Hawai'i LLC.

A handwritten signature in black ink that reads 'Emily Ballard'.

Emily Ballard
Project Planner

cc: Greg Sado, Ho'onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai'i Land Use Commission

JOSH GREEN, M.D.
GOVERNOR



KEITH T. HAYASHI
SUPERINTENDENT

STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804



OFFICE OF FACILITIES AND OPERATIONS

January 7, 2026

Ms. Emily Murai
Pioneer Design Group Hawaii
711 Kapiolani Boulevard, Suite 1450
Honolulu, HI 96813

Re: Environmental Impact Statement Preparation Notice for the Hoonani Village
Mixed-Use Development Project, Tax Map Key No.: (2) 3-8-006:004, Kahului,
Maui, Hawaii

Dear Ms. Murai:

Thank you for your letter dated December 5, 2025. The Hawaii State Department of Education (Department) has reviewed the information provided and offers the following comments on the proposed Hoonani Village Mixed-Use Development Project (Project).

Based on the proposed location, the Department has determined that the Project will be served by Kahului Elementary School, Maui Waena Intermediate School, and Maui High School, all of which are currently operating below their design capacity.

The State of Hawaii Board of Education established the Central Maui School Impact Fee District in November 2010. Pursuant to Act 245, from the 2007 Hawaii State Legislature, proposed residential units within an established school impact fee district must pay impact fees before obtaining a county building permit. The Department has confirmed that the Project falls within the Central Maui School impact fee district.

Pursuant to Section 7 of Act 72 (2020), the Hawaii School Facilities Authority (HISFA) currently manages daily operations of the School Impact Fee Program. The project developer is encouraged to meet with the HISFA to discuss the requirements of Act 245. Kindly contact HISFA at (415) 226-6837 or at impactfees@hisfa.org.

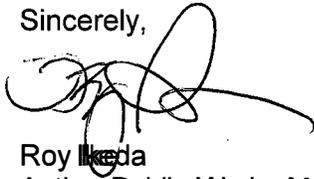
AN EQUAL OPPORTUNITY EMPLOYER

Ms. Emily Murai
January 7, 2026
Page 2

We look forward to providing additional comments when the draft Environmental Impact Statement is released for public agency comments. Should you have any questions, please contact Holly Fujishige, Work Program Specialist of the Facilities Development Branch, Planning Section, at (808) 784-5081 or via email at holly.fujishige@k12.hi.us.

We appreciate the opportunity to comment.

Sincerely,



Roy Ikeda
Acting Public Works Manager
Planning Section

RI:hf

c: Lori Yatsushiro, Complex Area Superintendent, Baldwin-Kekaulike-Kulanihakoi-Maui
Complex Area
Hawaii School Facilities Authority
Facilities Development Branch



March 6, 2026

Via email: holly.fujishige@k12.hi.us

Roy Ikeda, Acting Public Works Manager
State of Hawai'i
Department of Education
Office of Facilities and Operations
2200 Main Street, Suite 315
Wailuku, HI 96793

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho'onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai'i

Aloha Roy Ikeda:

Thank you for providing the Department's comments, dated January 7, 2026, regarding the proposed Ho'onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho'onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

Based on the proposed location, the Department has determined that the Project will be served by Kahului Elementary School, Maui Waena Intermediate School, and Maui High School, all of which are currently operating below their design capacity.

Response:

Thank you for confirming the schools that would service the project and that the schools are currently operating below design capacity.

Comment No. 2:

The State of Hawaii Board of Education established the Central Maui School Impact Fee District in November 2010. Pursuant to Act 245, from the 2007 Hawaii State Legislature, proposed residential units within an established school impact fee district must pay impact fees before obtaining a county building permit. The Department has confirmed that the Project falls within the Central Maui School impact fee district.

Response:

Thank you for this information. We acknowledge that the project is within the Central Maui School Impact fee district.

Comment No. 3:

Pursuant to Section 7 of Act 72 (2020), the Hawaii School Facilities Authority (HISFA) currently manages daily operations of the School Impact Fee Program. The project developer is encouraged to meet with the HISFA to discuss the requirements of Act 245. Kindly contact HISFA at (415) 226-6837 or at impactfees@hisfa.org

Response:

We confirm that the HISFA has been consulted on this project regarding potential school impact fees.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

From: [DOH.CABPASS](#)
To: [Emily Murai](#)
Subject: CAB Comments: Ho'onani Village Mixed-Use Development Environmental impact statement (EISPN)
Date: Monday, December 8, 2025 1:32:14 PM



Aloha Emily Murai,
Pioneer Design Group- Hawaii LLC,

Thank you for the opportunity to review the Ho'onani Village Mixed-Use Development Environmental impact statement preparation notice (EISPN) published in the December 08, 2025 edition of The Environmental Notice. Please visit the Clean Air Branch (CAB) website to download and reference our Standard Comments for Land Use Reviews. The link is provided below.

<https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/>

Mahalo,
Lisa

Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health
July 3, 2024

All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1.

If your proposed project:

Requires an Air Pollution Control Permit

- You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.
- Permit application forms can be found here: <https://health.hawaii.gov/cab/permit-application-forms/>

Has the potential to generate fugitive dust

- You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.
- Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.
- You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:
 - Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
 - Providing an adequate water source at the site prior to start-up of construction activities;
 - Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
 - Minimizing airborne, visible fugitive dust from shoulders and access roads;
 - Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
 - Controlling airborne, visible fugitive dust from debris being hauled away from the project site.
- If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: <https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf>.

Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials

- Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: <https://health.hawaii.gov/irhb/>

Increases the population and potential number of vehicles in an area

- The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.
- Ensure that drivers keep vehicle idling times to three (3) minutes or less.
- Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible.

If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.



March 13, 2026

Via email: doh.cabpass@doh.hawaii.gov

State of Hawai'i
Clean Air Branch
2827 Waimano Home Road, #130
Pearl City, HI 96782

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho'onani Village Mixed-Use Development Project, Kahului, Maui, Hawai'i,

Aloha,

Thank you for providing us with your standard review comments on December 8, 2025, regarding the proposed Ho'onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho'onani Development LLC, we offer the following information in response to the comments received.

Comment No. 1:

If your proposed project: Requires an Air Pollution Control Permit

- *You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.*
- *Permit application forms can be found here:*
<https://health.hawaii.gov/cab/permitapplication-forms/>

Response:

Construction of the proposed project is not expected to require an Air Pollution Control Permit. Should future commercial or light industrial uses require an Air Pollution Control Permit, a permit will be sought at the time when specific uses are identified.

Comment No 2:

If your proposed project: Has the potential to generate fugitive dust

- *You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies*

and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does not require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.

- *Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.*
- *You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:*
 - o Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;*
 - o Providing an adequate water source at the site prior to start-up of construction activities;*
 - o Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;*
 - o Minimizing airborne, visible fugitive dust from shoulders and access roads;*
 - o Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities;*
 - and o Controlling airborne, visible fugitive dust from debris being hauled away from the project site.*
- *If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: <https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf>.*

Response:

We confirm that the project will comply with Hawaii Administrative Rules §11-60.1-33. An Air Quality and Climate Change Study was prepared for the project and will be included in the Draft Environmental Impact Statement (EIS). The project will implement reasonable and effective dust control measures consistent with the DOH Fugitive Dust Fact Sheet, including watering, stabilizing exposed soils, minimizing disturbed areas, covering haul trucks, and maintaining clean access roads. A dust control management plan will be prepared to identify dust-generating activities and outline site-specific mitigation strategies, including establishment of buffer zones where feasible. These measures will ensure that airborne, visible fugitive dust is properly controlled throughout all phases of construction.

Comment No 3:

If your proposed project: Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials

• *Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: <https://health.hawaii.gov/irhb/>*

Response:

The proposed project will not involve potential asbestos or lead containing materials. An Environmental Site Inspection conducted for the project will be included and discussed in the Draft EIS. As documented in the Environmental Site Inspection, the site is vacant with no permanent structures onsite. As such, no asbestos or lead containing materials are known to be present on site.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared for this project. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

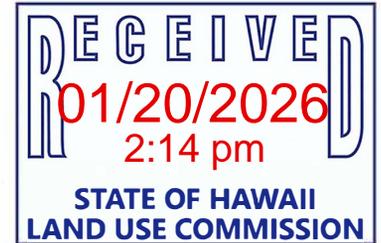
SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809



January 13, 2026

Emily Murai, Project Planner
Pioneer Design Group
711 Kapiolani Blvd., Suite 1450
Honolulu, Hawaii'i 96813

via email: emurai@pdg-hawaii.com

SUBJECT: Review and Comment on the proposed Ho'onani Village LLC Mixed Use Development Environmental Impact Statement Preparation Notice (EISPN); TMK (2) 3-8-006:004: 0005; (2) 3-8-006:001; (2) 3-8-006:004: 0003; Pulehu Road; Hansen Road, Kahului, Maui -Transmittal of Late Comments

Dear Ms. Murai:

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request to the DLNR Divisions for their review and comments.

We did receive the attached comment from the Commission on Water Resources Management dated January 6, 2026, but we apologize for not delivering the letter sooner due to staff errors in project filing.

If you have any questions, please contact Raymond Severn at (808) 587-0554 or email raymond.severn@hawaii.gov.

Sincerely,



Lauren E. Yasaka,
Acting Administrator

Enclosures
cc: Central Files



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
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 *Ciara Kahahane*
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

- 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 Hawaii, 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 Hawaii, 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/>
- 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 EPA as having high water efficiency can be found at <http://www.epa.gov/watersense>
- 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/>
- 6 We recommend the use of alternative water sources, wherever practicable
- 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>
- 8 We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. 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/>

- 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/>
- 12 A Well Construction Permit(s) is (are) are required before the commencement of any well construction work
- 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 stream 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
- 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

- 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.

Mr Ian Hirokawa
Page 3
January 6, 2026

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



March 13, 2026

Via email: dlnr.land@hawaii.gov and Raymond.severn@hawaii.gov

Lauren E. Yasaka, Acting Administrator
State of Hawai‘i
Department of Land and Natural Resources
869 Punchbowl Street
Honolulu, HI 96813

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i, REF RFD.6590 6

Aloha Acting Administrator Yasaka:

Thank you for providing us with the Department of Land and Natural Resources (DLNR) Commission on Water Resource Management (CWRM) comments, dated January 6, 2026, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 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.

Response:

Thank you for the recommendation to incorporate the project into the County’s WUDP update. There will be ongoing coordination with the County of Maui Department of Water Supply (DWS) and Planning Department throughout the project’s planning and development process.

Comment No 2:

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](http://www.epa.gov/watersense)

Response:

Thank you for the recommendations and resources for water efficient fixtures and practices. We confirm that water efficient fixtures and practices will be implemented whenever feasible.

Comment No 3:

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/>.

Response:

Thank you for the recommendation to use BMPs for stormwater management. A Preliminary Engineering and Drainage Report has been prepared for the project and drainage improvements and BMPs will be implemented to minimize impacts from stormwater runoff.

Comment No 4:

We recommend the use of alternative water sources, wherever practicable.

Response:

We acknowledge this comment and note that alternative water sources will be used whenever practicable. While there is currently no alternative water service to the project site, the project proposes to construct an onsite wastewater treatment plant (WWTP), which will produce R-1 water for irrigation use.

Comment No 5:

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>

Response:

Thank you for the recommendation and information on the Hawaii Green Business Program.

Comment No 6:

We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii'i. These practices can be found online at [https //hawaiiscape com/mdex php](https://hawaiiscape.com/mdex.php). Additional information can be found at [https//dlnr hawaii gov/cwrp/planning/conservation/](https://dlnr.hawaii.gov/cwrp/planning/conservation/).

Response:

Thank you for the information on landscape irrigation BMPs. This information will be shared with the project team for review and implementation as feasible.

Comment No 7:

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

Response:

We acknowledge this recommendation and note that the HDOH has been consulted and all applicable rules and regulations will be followed.

Comment No 8:

A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.

Response:

We acknowledge that a well construction permit is required for any well construction work.

Comment No 9:

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

Response:

We acknowledge that a pump installation permit is required prior to ground water source development.

Comment No 10:

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.

Response:

The project intends to develop a future municipal water source for the County of Maui through modifications to an existing water source referred to as Pu‘unēnē Pump 6. A Water Resource Assessment was completed by Tom Nance Water Resource Engineering (TNWRE) to analyze the impact of the water demand to serve the project on the Kahului Aquifer. Based on the Department of Water Supply (DWS) Domestic Consumption Guidelines the project will have a max daily demand of around 1.65 MGD with an approximate net withdrawal from the Kahului aquifer of 0.896 MGD.

With the Maui County Council’s adoption of [Ordinance 5759](#), the Department of Water Supply now bases an individual property's domestic water demand and development impact fees on projected daily water use rather than counting individual water fixtures. The new method measures water demand with a standard daily unit called an Equivalent Single Dwelling (ESD), which is equal to 300 gallons of water per day. One ESD represents estimated daily water use for a typical home based on the number of bedrooms and bathrooms. As this method has recently been adopted, the applicant is working with the County of Maui’s Department of Water Supply on whether this method can be utilized to size the water system to serve the proposed project as this method provides a more accurate and realistic representation of water use for the residential units. If this method was utilized for only the residential uses in the proposed project, the project’s total average daily demand would be reduced to 649,067 GPD. The final methodology for the sizing of the system will be confirmed prior to the design and approval of the water system.

Additionally, as the intent is to create a water supply that the County of Maui will accept and serve various users in the local community that includes the residents and visitors of the Ho‘onani Village project, the applicant is working with the County of Maui and Mahi Pono on agreements for water service. Following initial conversations with these entities, the approximate pumpage amount will be around 3.7 MGD. The final pumpage amounts will be finalized prior to the design and submittal to the CWRM. Additional pump testing and water sampling may also be completed after the final pumpage amount is confirmed.

The Preliminary Engineering Report and Water Resource Assessment are attached as Appendices in the EIS. The applicant is currently consulting with the DWS on the potential municipal system. This comment will be addressed through the finalized agreements and the design phase of the project.

Comment No 11:

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 xenscapmg 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.

Response:

We acknowledge the Commission's comments and appreciate the recommendations regarding water resources. The Draft EIS will include a Preliminary Engineering Report (PER) and will identify the proposed water source(s) and projected potable and non-potable water demands for the project. The Draft EIS will also describe the assumptions and calculations used to estimate water demand under phased and full build-out conditions.

The Draft EIS will describe the proposed on-site wastewater treatment plant (WWTP), which is anticipated to produce R-1 recycled water for irrigation and other allowable non-potable uses, supporting a dual-water system and reducing reliance on potable water supplies. In addition, the Draft EIS will provide general discussion of design approaches intended to support efficient water use, including landscape and site planning concepts, without committing to specific measures that will be refined during later design and permitting stages.

Comment No 12:

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.

Response:

The comment regarding potential impacts to groundwater-dependent ecosystems and associated traditional and customary practices is acknowledged. The Draft EIS will include

a Water Resource Assessment, which will be incorporated into and discussed in the Draft EIS. This analysis will evaluate groundwater use associated with the proposed project and will provide information relevant to understanding potential effects on groundwater-dependent resources. In addition, the Aha Moku Council has been consulted on the project and will also receive the Draft EIS.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission
Raymond Severn, DLNR

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA**

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHAHANE
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

December 21, 2026

Emily Murai
Pioneer Design Group – Hawai'i LLC
711 Kapi'olani Street, 1450
Honolulu, Hawai'i 96813
emurai@pdg-hawaii.com

Greg Sado
Hoonani Development, LLC
427 Ala Makani Street
Kahului, Hawai'i 96732
greg@alphahawaii.com

IN REPLY REFER TO:
Project No: 2026PR01368
Doc No: 2601NG01
History & Culture



Aloha e Emily and Greg,

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN), Ho'onani Village Mixed-Use Development, Wailuku Ahupua'a, Pū'ali Komohana District, Island of Maui, TMKs: (2) 3-8-006:001; (2) 3-8-006:003; (2) 3-8-006:004; (2) 3-8-006:005

Thank you for the opportunity to review the Environmental Impact Statement Preparation Notice (EISPN) for the subject property located at Tax Map Key Nos. (2) 3-8-006:001; (2) 3-8-006:003; (2) 3-8-006:004; (2) 3-8-006:005 on the island of Maui. The EISPN was prepared by Pioneer Design Group – Hawai'i, LLC at the request of Ho'onani Development LLC. The Hawaii State Historic Preservation Division (SHPD) has reviewed the above cited EISPN and provides the following comments:

- SHPD looks forward to receiving the Archaeological Literature Review and Assessment submission on HICRIS for this project.
- SHPD notes the presence of historic sites in or near the project area:
 - SIHP 50-50-05-07622 (secondary deposit of human remains)
 - SIHP 50-50-05-00056 (Papanene Heiau)

The State of Hawai‘i Office of Planning and Sustainable Development is the office of record for this environmental review. Please maintain a copy of this letter with your environmental review record. Please contact Noah Gomes, SHPD ethnographer at (808) 987-5001 or by email at noah.gomes@hawaii.gov, for matters regarding this letter.

Mahalo,



Jessica L. Puff
State Historic Preservation Administrator
Deputy State Historic Preservation Officer



March 13, 2026

Jessica Puff, Administrator
State of Hawai'i
State Historic Preservation Division
601 Kamokila Blvd.
Kapolei, HI 96707

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho'onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai'i (Project No: 2026PR01368)

Aloha Administrator Puff:

Thank you for providing us with your comments, dated December 21, 2026, regarding the proposed Ho'onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho'onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

SHPD looks forward to receiving the Archaeological Literature Review and Assessment submission on HICRIS for this project.

Response:

The Archaeological Literature Review and Assessment (ALRA) will be included in the Draft EIS. Future submittal of the ALRA to HICRIS is anticipated to occur once Hawai'i Revised Statutes (HRS) Chapter 6E is triggered.

Comment No. 2:

SHPD notes the presence of historic sites in or near the project area:

- SIHP 50-50-05-07622 (secondary deposit of human remains)
- SIHP 50-50-05-00056 (Papanene Heiau)

Response:

Thank you for information on nearby historic sites. These sites are included in the Archaeological Literature Review and Assessment that will be appended to the Draft EIS. We confirm that the Archaeological Literature Review and Assessment analysis determined that these sites are outside of the project area.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai‘i LLC.

A handwritten signature in black ink that reads "Emily Ballard". The signature is written in a cursive, flowing style.

Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

January 7, 2026

EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'OKELE

Deputy Directors
Nā Hope Luna Ho'okele
DREANALEE K. KALILI
TAMMY L. LEE
CURT T. OTAGURO
ROBIN K. SHISHIDO

IN REPLY REFER TO

STP 00965.25
STP 8.4016

VIA EMAIL: emurai@pdg-hawaii.com
dbedt.luc.web@hawaii.gov

Ms. Emily Murai
Pioneer Design Group – Hawaii LLC
711 Kapiolani Boulevard, Suite 1450
Honolulu, Hawaii 96813



Dear Ms. Murai:

Subject: Environmental Impact Statement (EIS) Preparation Notice
Hoonani Village Mixed-Use Development
Kahului, Maui, Hawaii
Tax Map Keys: (2) 3-8-006: 004

Thank you for the letter, dated December 5, 2025, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. The HDOT understands Hoonani Development LLC is proposing to build a mixed-use development located in the Puunene area near the Kahului Airport (OGG).

The HDOT has the following comments:

1. The proposed project is approximately 0.15 miles from the property boundary of OGG and under an existing flight path for arrivals on Runway 2. All projects within 5 miles of 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-DOT-Airports_08-01-2016.pdf
2. As the airport sponsor and the recipient of Federal Aviation Administration (FAA) Grants, the HDOT must comply with the FAA Grant Assurances, which include ensuring compatible land use for the safe landing and take-off of aircraft near the airport. The project site is located within the 55-75 Day-Night Average Sound Level (DNL) noise contours of the attached Base Year 1993 OGG Noise Exposure Map (NEM). The HDOT recommends relocating noise-sensitive land uses in the proposed project to avoid noise-sensitive areas defined by the noise contours of the Base Year 1993 OGG NEM. Specifically, all housing should be relocated outside of the 65 DNL or greater contours. In addition, Noise Level Reduction measures such as air conditioning, dual-pane windows, and concrete masonry walls should be incorporated throughout the project's design for housing and buildings where the public is received to achieve interior levels of 45 DNL or less. Please refer to the attached noise compatibility land use chart

from the 1995 OGG Noise Compatibility Program for more guidance on recommended land uses within noise contours.

3. Due to the nature of the development, the HDOT requests that the property owner grant a noise and aviation easement to the HDOT.
4. Due to the proximity to OGG, the applicant, future residents, and users should be aware of potential single-event 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.
5. The project site is approximately 5,016 feet from the end of Runway 2 at OGG. The 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 submission criteria 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.
6. The HDOT requires that the proposed development project shall not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. Standing water also has the potential to become a wildlife attractant. Please review the [FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports](#), for guidance. If the development creates a wildlife attractant, the developer shall immediately mitigate the hazard upon notification by the HDOT and/or the FAA.
7. 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 aircraft 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 the FAA.

The FAA requires a glint-and-glare analysis for all solar energy PV systems near airports. 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 the FAA.

8. Multiple access points will be provided from Pulehu Road, Hansen Road, and Pakaula Street, all of which are within County jurisdiction. Three of the primary access driveways are proposed on Pulehu Road, Hansen Road (eastside), and Hansen Road (westside).

The following project intersections connecting to our state highways may be impacted in the near future:

- a. Hansen Road (westside) via the Maui Veterans Highway, Route 311 (formerly Mokulele Road).
 - b. Pulehu Road and Hansen Road (eastside) with Hana Highway.
9. Based on the large-scale development proposed in proximity to the state-owned Maui Veterans Highway, Kuihelani Highway, and Hana Highway, the HDOT anticipates a potential direct or regional adverse impact on the State highway facilities. Therefore, the Draft Environmental Impact Statement should include a Traffic Impact Analysis Report (TIAR) prepared and stamped by a licensed engineer and shall include the following:
 - a. An analysis should be provided in the TIAR to identify potential local and regional impacts to State highway facilities. The study should also include a Conclusion and Recommendation section listing recommended mitigation measures to be implemented by the project at no cost to the State.
 - b. The study should also include an analysis of the intersections stated below:
 - i. Puunene Avenue/Maui Veterans Highway and Hookele Street.
 - ii. Puunene Avenue/Kuihelani Highway/Mayor Cravalho Way.
 - iii. Mayor Cravalho Way/Pakaula Street
 - c. Since the project construction is phased over multiple years, interim horizon years should be analyzed for the completion of each phase.
 - d. A discussion of multimodal transportation strategies should be included in the TIAR. The study should provide detailed plans for bicycle and pedestrian paths within the proposed site and connectivity to the rest of the area.
 10. Describe strategies to reduce carbon emissions from the project, if any. Suggestions include:
 - a. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.
 - b. Implement energy-efficient technologies and practices, such as light-emitting diode lighting.

Ms. Emily Murai
January 7, 2026
Page 4

STP 8.4016

- c. Use sustainable, recycled, or low-emission materials in construction and manufacturing.

Please submit any subsequent 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.

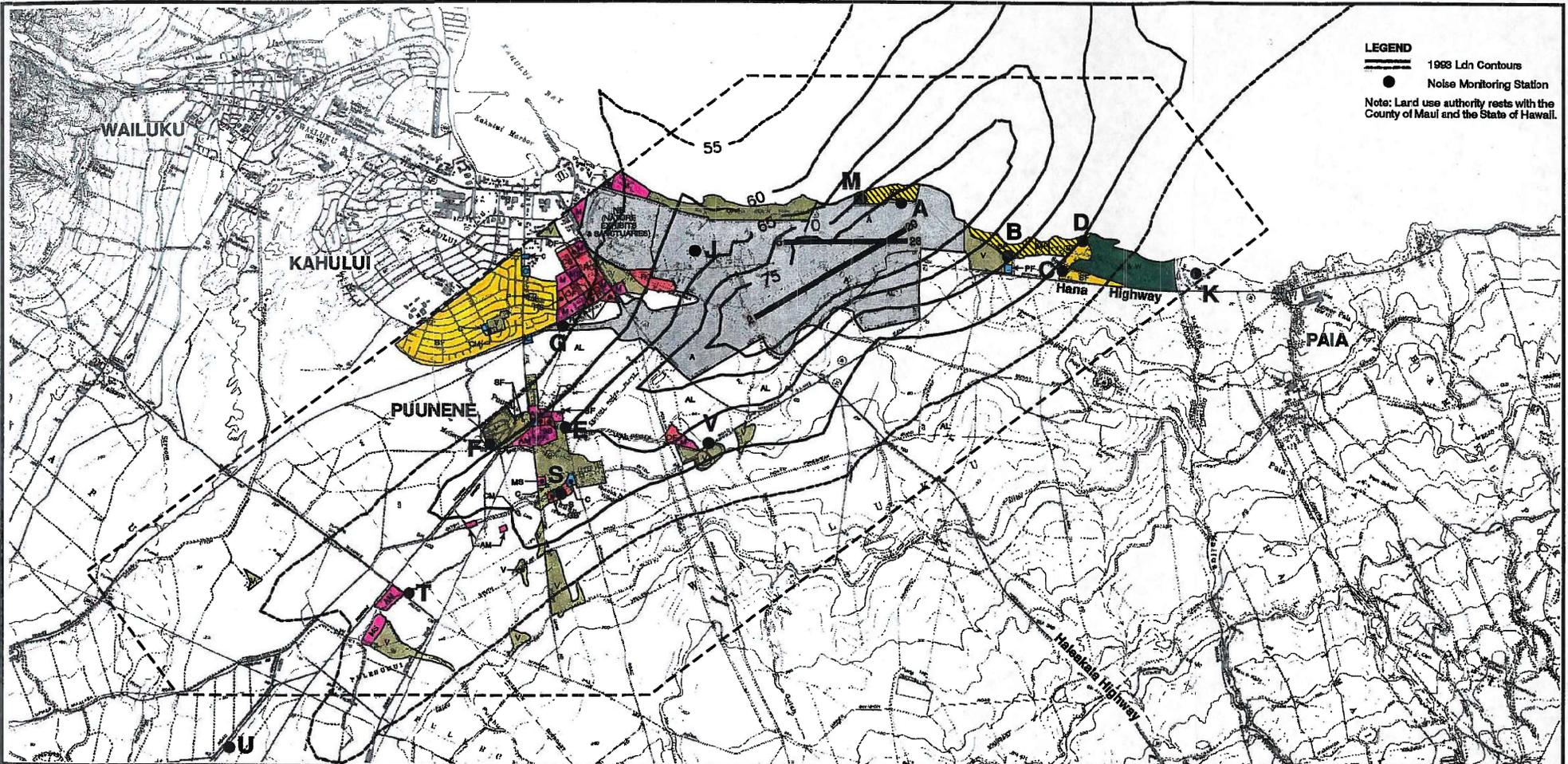
Sincerely,



EDWIN H. SNIFFEN
Director of Transportation

Attachments

441.1300001-2 R.25.05



KAHULUI AIRPORT
 FAR Part 150 Airport
 Noise Compatibility Program

Prepared For:
 Airports Division
 Department of Transportation
 State of Hawaii

Prepared By:
 Belt Collins Hawaii
 Y. Eblsu & Associates
 1995



LAND USE CLASSIFICATION

- COMMERCIAL AND GOVERNMENT USE
- RC RETAIL COMMERCIAL OF BUSINESS/PROFESSIONAL OFFICES
- AC AIRPORT BUSINESSES (car rental agencies, tours, lei stands)
- RS RETAIL STORAGE (warehouses)
- CS COMMERCIAL SERVICES
- GB GOVERNMENT BUILDING
- RESIDENTIAL
- SF SINGLE FAMILY
- MF MULTIPLE FAMILY

- PUBLIC USE
- S SCHOOL
- H HOSPITALS (clinics, health care facilities, nursing homes)
- PF PUBLIC FACILITIES (day care, libraries, community centers)
- C CHURCH
- MANUFACTURING, PRODUCTION & STORAGE
- M LIGHT/HEAVY MANUFACTURING
- AM AGRICULTURAL MANUFACTURING
- MS MANUFACTURING WAREHOUSES
- AL AGRICULTURAL LAND

- RECREATIONAL
- OR OUTDOOR RECREATION
- NE NATURE EXHIBITS & SANCTUARIES
- G&W GOLF COURSES, GARDENS, WATER RECREATION
- OPEN SPACE
- CM CEMETERY
- P PARK
- V VACANT OR UNDEVELOPED LAND
- STUDY AREA BOUNDARY
- AIRPORT PROPERTY
- AREA OF INCOMPATIBLE LAND USE

Figure 5-1
BASE YEAR (1993)
NOISE EXPOSURE MAP:
KAHULUI AIRPORT



0 2000 4000 8000
 SCALE IN FEET

Table 4-2 State Department of Transportation Recommendations for Local Land Use Compatibility Expressed in Yearly Day-Night Average Sound Levels (Ldn)

TYPE OF LAND USE	Yearly Day-Night Average Sound Level					
	< 60	60-65	65-70	70-75	75-80	80-85
RESIDENTIAL:						
Low density residential, resorts, & hotels (w/ outdoor facil)	Y(a)	N(b)	N	N	N	N
Low density apartment w/ moderate outdoor use	Y	N(b)	N	N	N	N
High density apartment with limited outdoor use	Y	N(b)	N(b)	N	N	N
Transient lodgings (w/ limited outdoor use)	Y	N(b)	N(b)	N	N	N
PUBLIC USE:						
Schools, day care centers, libraries, and churches	Y	N(c)	N(c)	N(c)	N	N
Hospitals, nursing homes, clinics, and health facilities	Y	Y(d)	Y(d)	Y(d)	N	N
Indoor auditoriums and concert halls	Y(c)	Y(c)	N	N	N	N
Government services and office bldgs. serving the public	Y	Y	Y(d)	Y(d)	N	N
Transportation and parking	Y	Y	Y(d)	Y(d)	Y(d)	Y(d)
COMMERCIAL AND GOVERNMENT USE:						
Offices—government, business, and professional	Y	Y	Y(d)	Y(d)	N	N
Wholesale & Retail: bldg. mater., hardware, & heavy equip..	Y	Y	Y(d)	Y(d)	Y(d)	Y(d)
Airport businesses—car rental, ticketing, lei stands, etc..	Y	Y	Y(d)	Y(d)	N	N
Retail trade, restaurants, shp. centers, financial institute. etc.	Y	Y	Y(d)	Y(d)	N	N
Power plants, sewage treatment plants, & base yards.	Y	Y	Y(d)	Y(d)	Y(d)	N
Studios w/o outdoor sets, broadcasting & Production facil.	Y(c)	Y(c)	N	N	N	N
MANUFACTURING, PRODUCTION AND STORAGE:						
Manufacturing, general	Y	Y	Y(d)	Y(d)	Y(d)	N
Photographic and optical	Y	Y	Y(d)	Y(d)	N	N
Agriculture (except livestock) and forestry	Y	Y(e)	Y(e)	Y(e)	Y(e)	Y(e)
Livestock farming and breeding	Y	Y(e)	Y(e)	N	N	N
Mining and fishing, resource production and extraction	Y	Y	Y	Y	Y	Y
RECREATIONAL USE:						
Outdoor sports arenas and spectator sports	Y	Y(f)	Y(f)	N	N	N
Outdoor music shells, amphitheaters	Y(f)	N	N	N	N	N
Nature exhibits and zoos, neighborhood parks	Y	Y	Y	N	N	N
Amusements, beach parks, active playgrounds, etc.	Y	Y	Y	Y	N	N
Public golf courses, riding stables, cemeteries, gardens, etc.	Y	Y	N	N	N	N
Professional/resort sports facil., media event facil., etc.	Y(f)	N	N	N	N	N
Extensive natural wildlife and recreation areas	Y(f)	N	N	N	N	N



Note: Letters in parentheses refer to following notes.

- (a) A noise level of 60 Ldn does not eliminate all risks of adverse noise impacts from aircraft noise. However, the 60 Ldn planning level has been selected by the State Airports Division as an appropriate compromise between the minimal risk level of 55 Ldn and the significant risk level of 65 Ldn.
- (b) Where the community determines that these uses should be allowed, Noise Level Reduction (NLR) measures to achieve interior levels of 45 Ldn or less should be incorporated into building codes and be considered in individual approvals. Normal local construction employing natural ventilation can be expected to provide an average NLR of approximately 9 dB. Total closure plus air conditioning may be required to provide additional outdoor to indoor NLR, but will not eliminate outdoor noise problems.
- (c) Because the Ldn noise descriptor system represents a 24-hour average of individual aircraft noise events, each of which can be unique in respect to amplitude, duration, and tonal content, the NLR requirements should be evaluated for the specific land use, interior acoustical requirements, and properties of the aircraft noise events. NLR requirements should not be based solely upon the exterior Ldn exposure level.
- (d) Measures to achieve required NLR must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas, or where the normal noise level is low.
- (e) Residential buildings require NLR. Residential buildings should not be located where exterior noise is greater than 65 Ldn.
- (f) Impact of amplitude, duration, frequency, and tonal content of aircraft noise events should be evaluated.

Abbreviations:

Y(Yes) = Land Use and related structures compatible without restrictions.
 N(No) = Land Use and related structures are not compatible and should be prohibited.

Source: Airports Division, Department of Transportation, State of Hawaii



March 13, 2026

Via email: DOT.LandUse@hawaii.gov.

Director Edwin H. Sniffen
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho'onani Village Mixed-Use Development Project, Kahului, Maui, Hawai'i, STP 00965.25; STP 8.4016

Aloha Director Sniffen:

Thank you for providing us with your comments, dated December 12, 2025, regarding the proposed Ho'onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho'onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

The proposed project is approximately 0.15 miles from the property boundary of OGG and under an existing flight path for arrivals on Runway 2. All projects within 5 miles of 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-DOT-Airports_08-01-2016.pdf

Response:

Thank you for confirming the approximate location of the project in relation to the property boundary of the Kahului Airport (OGG). The TAM will be reviewed for guidance on applicable reviews and permits.

Comment No 2:

As the airport sponsor and the recipient of Federal Aviation Administration (FAA) Grants, the HDOT must comply with the FAA Grant Assurances, which include ensuring compatible land use for the safe landing and take-off of aircraft near the airport. The project site is located within the 55-75 Day-Night Average Sound Level (DNL) noise contours of the attached Base Year 1993 OGG Noise Exposure Map (NEM). The HDOT recommends relocating noise-sensitive land uses in the proposed project to avoid noise-

sensitive areas defined by the noise contours of the Base Year 1993 OGG NEM. Specifically, all housing should be relocated outside of the 65 DNL or greater contours. In addition, Noise Level Reduction measures such as air conditioning, dual-pane windows, and concrete masonry walls should be incorporated throughout the project's design for housing and buildings where the public is received to achieve interior levels of 45 DNL or less. Please refer to the attached noise compatibility land use chart from the 1995 OGG Noise Compatibility Program for more guidance on recommended land uses within noise contours.

Response:

The Applicant acknowledges the proximity of the project site to Kahului Airport and the importance of ensuring that development within the airport influence area remains compatible with airport operations and aviation safety. An Environmental Noise Assessment prepared by D.L. Adams Associates has been completed for the Project and will be included in the Draft Environmental Impact Statement (EIS). The assessment evaluates aircraft noise exposure, existing ambient noise conditions, and potential noise impacts associated with the proposed development.

Consultation with agencies having jurisdiction and expertise over airport operations has occurred during preparation of the Draft EIS. A meeting with Marvin Moniz, Maui District Airports Manager, was held on March 2, 2026, and a meeting with HDOT Director Ed Sniffen was held on March 6, 2026, to discuss the Project, its location relative to Kahului Airport operations, and applicable airport compatibility considerations.

As noted by HDOT, the 1993 Kahului Airport Noise Exposure Map (NEM) remains the FAA-accepted contour map for land use compatibility determinations associated with Kahului Airport. As the airport sponsor and a recipient of Federal Aviation Administration (FAA) grants, the Hawai'i Department of Transportation must comply with FAA Grant Assurances, including those related to the protection of compatible land uses near airports to ensure the safe landing and takeoff of aircraft. Accordingly, the Draft EIS references the Base Year 1993 OGG Noise Exposure Map and associated Noise Compatibility Program (1995) as the applicable regulatory framework for evaluating land use compatibility.

Based on the 1993 NEM, the project site lies within the 55–75 Day-Night Average Sound Level (DNL) noise contours, with portions of the site within the 60–65 DNL contour range and limited areas approaching the 65 DNL contour. These contours are therefore used as the baseline reference for evaluating potential aircraft noise exposure and applicable design considerations.

While the 1993 NEM remains the FAA-recognized map for regulatory purposes, it is also acknowledged that commercial aircraft fleets have become substantially quieter since preparation of the 1993 contours, largely due to the nationwide phase-out of older Stage 2 aircraft and the transition to quieter Stage 3 and Stage 4 aircraft. As documented in the Environmental Noise Assessment prepared for the Project, field monitoring conducted in April 2025 indicates that measured aircraft-related noise levels at the site are generally

lower than those represented in the historic contour mapping, although the contours remain the accepted planning framework for compatibility analysis.

The Environmental Noise Assessment included as an Appendix in the Draft EIS, therefore evaluates aircraft noise exposure using both the 1993 NEM contours and site-specific noise monitoring data to provide a comprehensive understanding of existing conditions. Under FAA land use compatibility guidance (14 CFR Part 150), residential land uses are generally considered compatible in areas exposed to aircraft noise levels below 65 DNL, although the incorporation of sound insulation measures may be recommended where noise levels exceed 60 DNL. Consistent with this guidance, and with the recommendations of HDOT and the Kahului Airport Noise Compatibility Program, the Project will consider the incorporation of Noise Level Reduction design measures for residential and other noise-sensitive uses.

Potential design features may include enhanced building envelope construction, such as dual-pane or acoustically rated windows, concrete masonry or similarly insulated wall assemblies, and mechanical ventilation or air-conditioning systems that allow windows to remain closed. These types of design measures are commonly used for residential development located within airport influence areas and are capable of achieving interior noise levels of approximately 45 DNL or less, consistent with HDOT guidance for residential uses within the 60–65 DNL contour range.

Through the incorporation of these potential design considerations and continued coordination with HDOT during project planning and design, the Project can be developed in a manner that remains compatible with ongoing airport operations while addressing aircraft noise exposure for future occupants

Comment No 3:

Due to the nature of the development, the HDOT requests that the property owner grant a noise and aviation easement to the HDOT.

Response:

The Applicant owner will coordinate with HDOT on a grant of noise and aviation easement.

Comment No 4:

Due to the proximity to OGG, the applicant, future residents, and users should be aware of potential single-event 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.

Response:

The Applicant is aware and will ensure future residents and tenants are made aware of the potential for noise and other impacts from flight operations.

Comment No 5:

The project site is approximately 5,016 feet from the end of Runway 2 at OGG. The 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 submission criteria 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.

Response:

We confirm that the FAA Form 7460-1 Notice of Proposed Construction or Alteration will be completed prior to construction and HDOT will be notified, as well.

Comment No 6:

The HDOT requires that the proposed development project shall not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. Standing water also has the potential to become a wildlife attractant. Please review the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports, for guidance. If the development creates a wildlife attractant, the developer shall immediately mitigate the hazard upon notification by the HDOT and/or the FAA

Response:

The FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports has been shared with the landscape architect for guidance. We confirm that the proposed landscaping is not contrary to the FAA guidance and there will no water features that could create a wildlife attraction. It is acknowledged that the project includes detention ponds, which are designed to function as large infiltration basins without any permanent pools, wetlands or water features. These basins will allow stormwater to percolate through the topsoil and will not hold runoff longer than the design storm drawdown period. The side slopes of the basin will be designed to discourage wildlife loafing and nesting, and the vegetation will consist of local grasses that do not provide a habitat for hazardous wildlife. Property management will follow the final operations and maintenance plan for maintaining the detention basins to address any issues with wildlife activity that may pose an aviation hazard. With these measures, the project's stormwater detention basins will

function solely as temporary drainage facilities and will not constitute as hazardous wildlife attractant as defined within the FAA Advisory Circular 150/5200-33C

Comment No 7:

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 aircraft 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 the FAA.

The FAA requires a glint-and-glare analysis for all solar energy PV systems near airports. 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 the FAA.

Response:

We confirm that should a PV system be proposed, FAA will be consulted for required submittals and analysis.

Comment No 8:

Multiple access points will be provided from Pulehu Road, Hansen Road, and Pakaula Street, all of which are within County jurisdiction. Three of the primary access driveways are proposed on Pulehu Road, Hansen Road (eastside), and Hansen Road (westside). The following project intersections connecting to our state highways may be impacted in the near future:

- a. Hansen Road (westside) via the Maui Veterans Highway, Route 311 (formerly Mokulele Road).*
- b. Pulehu Road and Hansen Road (eastside) with Hana Highway.*

Response:

Thank you for this information. An updated TIAR will be included and discussed in the Draft EIS, which will be sent to HDOT for review.

Comment No 9:

Based on the large-scale development proposed in proximity to the state-owned Maui Veterans Highway, Kuihelani Highway, and Hana Highway, the HDOT anticipates a potential direct or regional adverse impact on the State highway facilities. Therefore, the Draft Environmental Impact Statement should include a Traffic Impact Analysis Report (TIAR) prepared and stamped by a licensed engineer and shall include the following:

- a. An analysis should be provided in the TIAR to identify potential local and regional impacts to State highway facilities. The study should also include a Conclusion and Recommendation section listing recommended mitigation measures to be implemented by the project at no cost to the State.*
- b. The study should also include an analysis of the intersections stated below:
 - i. Puunene Avenue/Maui Veterans Highway and Hookele Street.*
 - ii. Puunene Avenue/Kuihelani Highway/Mayor Cravalho Way.*
 - iii. Mayor Cravalho Way/Pakaula Street**
- c. Since the project construction is phased over multiple years, interim horizon years should be analyzed for the completion of each phase.*
- d. A discussion of multimodal transportation strategies should be included in the TIAR. The study should provide detailed plans for bicycle and pedestrian paths within the proposed site and connectivity to the rest of the area.*

Response:

The TIAR evaluates potential transportation impacts associated with the proposed development under Existing (2024), Year 2042 No Project, and Year 2042 Plus Project conditions. The analysis includes evaluation of potential impacts to State highway facilities, including Maui Veterans Highway, Kūihelani Highway, and Hāna Highway, and identifies recommended mitigation measures where applicable.

The TIAR includes detailed operational analysis of key State-controlled intersections in the project vicinity, including:

- Kūihelani Highway / Maui Veterans Highway / Mayor Elmer F. Cravalho Way / Pu‘unē Avenue
- Maui Veterans Highway / Ho‘okele Street

These intersections represent the primary regional access points between the State highway system and the project area. Where cumulative operational impacts were identified, the TIAR provides recommended mitigation measures, including lane reconfiguration, signal phasing adjustments, and potential turn-lane improvements.

The intersection of Mayor Elmer F. Cravalho Way and Pakaula Street was not included in the TIAR analysis because a direct connection between the project site and Pakaula Street is not confirmed at this time. Establishing such a connection would require access across privately owned property that is not under the control of the project applicant. As a result, the current project access plan does not rely on Pakaula Street, and the TIAR focuses on the roadway network that will directly serve the project site, including Hansen Road and Pūlehu Road.

With respect to project phasing, the TIAR evaluates transportation conditions at full project buildout, which represents the most conservative scenario for assessing potential transportation impacts. Phasing schedules and development timing may vary depending on market conditions and infrastructure availability. As individual development phases proceed through permitting and construction, additional traffic analysis may be conducted if required by the County of Maui or HDOT based on prevailing traffic conditions at that time.

The TIAR also includes discussion of multimodal transportation considerations. The project incorporates pedestrian and bicycle infrastructure consistent with the County of Maui Street Design Manual and applicable Complete Streets principles. Planned improvements include sidewalks, bicycle lanes, and pedestrian connectivity within the project site and along the Hansen Road and Pūlehu Road frontages. These improvements will enhance pedestrian and bicycle connectivity in an area where such facilities are currently limited and will improve multimodal access between the project and surrounding employment and commercial areas.

Comment No 10:

Describe strategies to reduce carbon emissions from the project, if any. Suggestions include:

- a. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.*
- b. Implement energy-efficient technologies and practices, such as light-emitting diode lighting.*
- c. Use sustainable, recycled, or low-emission materials in construction and manufacturing.*

Response:

Thank you for the recommended strategies. As previously noted, multi-modal transportation strategies are discussed in the TIAR and Draft EIS. Energy efficient technologies and sustainable construction materials will also be implemented, as feasible.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and

comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai‘i LLC.

A handwritten signature in black ink that reads "Emily Ballard". The signature is written in a cursive, flowing style.

Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission
Fehr & Peers

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director



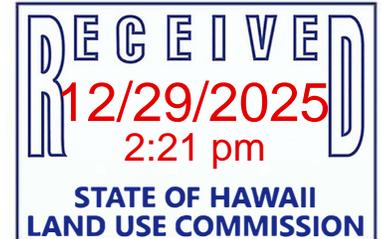
MARC I. TAKAMORI
Director

DIANE C. YOGI
Deputy Director

DEPARTMENT OF TRANSPORTATION
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793

TELEPHONE: (808) 270-7511
FAX: (808) 270-7505

December 26, 2025



Mr. Jeffrey Ueoka
2145 Wells Street Suite 406
Wailuku, HI 96793

SUBJECT: ZPA2025-00011 – Comments Regarding Proposed Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i. TMK: (2) 3-8-006:004-0005

Dear Mr. Ueoka:

Mahalo for the opportunity to provide comment on the subject request. The Maui Department of Transportation (MDOT) is submitting the following comments in light of the Disaster Recovery, International Affairs, and Planning (DRIP) Committee discussion on November 5, 2025, regarding the proposed Ho‘onani Village mixed-use development and associated legislative actions to amend the Maui Island Plan, the Wailuku–Kahului Community Plan, and zoning for approximately 166.5 acres in Kahului. The following comments are provided in addition to the comments provided to the DRIP Committee on October 31, 2025.

MDOT acknowledges and appreciates the Planning Department’s testimony and the technical points raised by Planning Director Kate Blystone, particularly regarding the quality of agricultural soils, the State Land Use District designation, and the parcel’s location outside the Maui Island Plan Urban Growth Boundary. In MDOT’s view, these factors warrant careful consideration to ensure that this significant investment is built upon a foundation of sound land-use policy and long-term community resilience.

From a transportation perspective, MDOT continues to support the Ho‘onani Village concept, as it reflects many of Maui’s long-range transportation objectives. The project’s mixed-use form, internal street network, and emphasis on multi-modal connectivity such as walking and bicycling are highly consistent with the goals of the Hele Mai Maui 2045 Long Range Transportation Plan. MDOT views these design elements as a positive model for future development on Maui.

However, to ensure the project’s success, MDOT believes it is essential to harmonize these transportation merits with the Planning Director’s concerns. The land’s designation as “Prime”

Agricultural Land of Importance to the State of Hawai'i (ALISH) designated by the State Department of Agriculture with high-quality "A" rated soils by The University of Hawai'i's Land Study Bureau, combined with its current exclusion from the Urban Growth Boundary, creates important policy questions. The urgent need for housing – which MDOT strongly supports – is best served by a thorough evaluation that balances development with the protection of high-productivity agricultural assets.

MDOT also recognizes the Planning Department's concern that Maui already has a substantial number of entitled or planned housing units within the existing Urban Growth Boundary that have not yet been constructed. While market conditions, infrastructure timing, and other constraints may delay these projects, the significant number of entitlements that have failed to move into construction underscores the importance of addressing barriers to implementation, rather than expanding into undeveloped agricultural land. Improving infrastructure delivery, streamlining permitting where appropriate, and resolving financing and phasing challenges may help unlock housing that is already planned and entitled, without needing to expand the Urban Growth Boundary. At the same time, MDOT recognizes that new proposals like Ho'onani Village offer modern, multi-modal design principles that are specifically intended to reduce long-term infrastructure strain. The applicant is therefore encouraged to demonstrate how this project's unique design and housing contributions provide a compelling case for expansion that aligns with the County's broader growth and safety goals.

Ultimately, MDOT advocates for a process that respects the established order of operations for land-use decision-making. This includes careful evaluation through the Environmental Impact Statement (EIS) process and due consideration by the State Land Use Commission regarding any proposed District Boundary Amendment. Working through these critical regulatory steps ensures that all state and county land-use policies are fully integrated and that the project is positioned for success.

In closing, MDOT emphasizes support for the development of new housing and recognizes that Ho'onani Village reflects many positive transportation and urban design principles. While fundamental land use questions regarding the site's location and agricultural status remain, MDOT remains committed to the realization of sustainable housing solutions. MDOT looks forward to continued coordination with the Planning Department, the Maui Planning Commission, the State Land Use Commission, and the applicant as these issues are further evaluated.

If you have any questions, please feel free to reach out to Ignacio Filippini at (808) 463-3124 or ignacio.filippini@mauicounty.gov.

Sincerely,



MARC I. TAKAMORI
Director of Transportation

Cc: Marc I. Takamori, MDOT, Director, via email
Kate Blystone, Planning Department, Director, via email
Danny Dias, Planning Department, Planning Program Administrator, via email
Kurt Wollenhaupt, Planning Department, Land Use Planning Supervisor, via email
Ignacio Filippini, MDOT, Transportation Planner, via email
Emily Murai, Pioneer Design Group-Hawai'i, via email
Martina Segura, State of Hawai'i, Land Use Commission, via email



March 13, 2026

Marc I. Takamori, Director
County of Maui
200 South High Street
2145 Kaohu Street, Suite 102
Wailuku, HI 96793

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i

Aloha Director Takamori:

Thank you for providing us with your comments, dated December 26, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development LLC, we offer the following information in response to the comments received.

Comment No. 1:

MDOT acknowledges and appreciates the Planning Department’s testimony and the technical points raised by Planning Director Kate Blystone, particularly regarding the quality of agricultural soils, the State Land Use District designation, and the parcel’s location outside the Maui Island Plan Urban Growth Boundary. In MDOT’s view, these factors warrant careful consideration to ensure that this significant investment is built upon a foundation of sound land-use policy and long-term community resilience.

From a transportation perspective, MDOT continues to support the Ho‘onani Village concept, as it reflects many of Maui’s long-range transportation objectives. The project’s mixed-use form, internal street network, and emphasis on multi-modal connectivity such as walking and bicycling are highly consistent with the goals of the Hele Mai Maui 2045 Long Range Transportation Plan. MDOT views these design elements as a positive model for future development on Maui.

Response:

The Applicant acknowledges and appreciates MDOT’s support for the proposed Ho‘onani Village concept and its consistency with long-range transportation objectives. The Draft EIS will describe the project’s mixed-use form, internal street network, and emphasis on multimodal connectivity, including walking and bicycling, and will evaluate how these design features support adopted transportation goals, including those articulated in the Hele Mai Maui 2045 Long Range Transportation Plan. The Draft EIS will also address the

anticipated impacts of the limited expansion of the current UGB to incorporate the project and related land use policy considerations.

Comment No 2:

However, to ensure the project's success, MDOT believes it is essential to harmonize these transportation merits with the Planning Director's concerns. The land's designation as "Prime" Agricultural Land of Importance to the State of Hawai'i (ALISH) designated by the State Department of Agriculture with high-quality "A" rated soils by The University of Hawai'i's Land Study Bureau, combined with its current exclusion from the Urban Growth Boundary, creates important policy questions. The urgent need for housing – which MDOT strongly supports – is best served by a thorough evaluation that balances development with the protection of high-productivity agricultural assets.

Response:

The comment regarding the site's designation as Prime Agricultural Land of Importance to the State of Hawai'i (ALISH), Land Study Bureau "A" soils, and its location outside the Maui Island Plan Urban Growth Boundary is acknowledged. The Draft EIS will include a detailed land use and agricultural resources analysis that addresses soil quality, agricultural suitability, and the policy considerations associated with conversion of agricultural land.

Comment No 3:

MDOT also recognizes the Planning Department's concern that Maui already has a substantial number of entitled or planned housing units within the existing Urban Growth Boundary that have not yet been constructed. While market conditions, infrastructure timing, and other constraints may delay these projects, the significant number of entitlements that have failed to move into construction underscores the importance of addressing barriers to implementation, rather than expanding into undeveloped agricultural land. Improving infrastructure delivery, streamlining permitting where appropriate, and resolving financing and phasing challenges may help unlock housing that is already planned and entitled, without needing to expand the Urban Growth Boundary. At the same time, MDOT recognizes that new proposals like Ho'onani Village offer modern, multi-modal design principles that are specifically intended to reduce long-term infrastructure strain. The applicant is therefore encouraged to demonstrate how this project's unique design and housing contributions provide a compelling case for expansion that aligns with the County's broader growth and safety goals.

Response:

The comment regarding the existence of entitled or planned housing units within the existing Urban Growth Boundary that have not yet been constructed is acknowledged. The Draft EIS will place the proposed project within a broader housing and planning context, including discussion of barriers to housing delivery such as infrastructure timing, financing, and phasing. While the Draft EIS will not evaluate or prioritize unrelated third-party projects, it will describe how the proposed project's design, infrastructure approach,

and phasing are intended to address long-term housing needs and reduce infrastructure strain.

Comment No 4:

Ultimately, MDOT advocates for a process that respects the established order of operations for land-use decision-making. This includes careful evaluation through the Environmental Impact Statement (EIS) process and due consideration by the State Land Use Commission regarding any proposed District Boundary Amendment. Working through these critical regulatory steps ensures that all state and county land-use policies are fully integrated and that the project is positioned for success.

In closing, MDOT emphasizes support for the development of new housing and recognizes that Ho‘onani Village reflects many positive transportation and urban design principles. While fundamental land use questions regarding the site’s location and agricultural status remain, MDOT remains committed to the realization of sustainable housing solutions. MDOT looks forward to continued coordination with the Planning Department, the Maui Planning Commission, the State Land Use Commission, and the applicant as these issues are further evaluated.

Response:

The Applicant acknowledges MDOT’s emphasis on following the established order of operations for land-use decision-making. The Draft EIS is being prepared to support informed review by the public and government agencies. The Applicant recognizes that approval of land use amendments and any District Boundary Amendment are discretionary decisions subject to separate review processes, and the EIS will provide the necessary environmental disclosure to inform those decisions.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



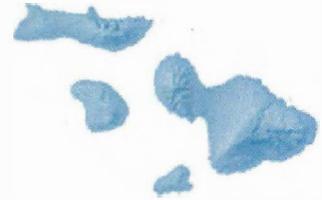
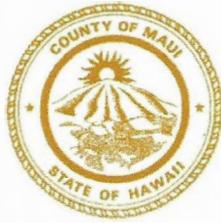
Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

RICHARD T. BISSEN, JR.
Mayor

RICHARD E. MITCHELL, ESQ.
Director

SAUMALU MATA‘AFA
Deputy Director



DEPARTMENT OF HOUSING
COUNTY OF MAUI
2065 MAIN STREET, SUITE 108
WAILUKU, MAUI, HAWAI‘I 96793
PHONE: (808) 270-7351
FAX: (808) 270-6284

December 23, 2025



Ms. Emily Murai
Pioneer Design Group – Hawai‘i
711 Kapiolani Blvd, Suite 1450
Honolulu, Hawai‘i 96813
emurai@pdg-hawaii.com

Ms. Martina Segura
State of Hawai‘i, Land Use Commission
P.O. Box 2359
Honolulu, Hawai‘i 96813
dbedt.luc.web@hawaii.gov

Dear Ms. Murai and Ms. Martina,

SUBJECT: COMMENTS ON ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE, HO‘ONANI VILLAGE MIXED-USE DEVELOPMENT PROJECT, KAHULUI ISLAND OF MAUI, HAWAI‘I

We appreciate the opportunity to review and provide input on the Environmental Impact Statement Preparation Notice for the Ho‘onani Village Mixed-Use Development project.

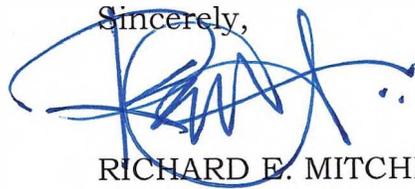
The Department of Housing’s (Department) mission is to expand affordable housing opportunities for low- and moderate-income families and develop housing for residents with special needs. We partner with community organizations to create long-term affordable rental units, increase homeownership opportunities, and provide special needs housing with appropriate support services.

In line with these priorities, the Department supports the proposed Ho‘onani Village project, which aims to deliver approximately 1,608 housing units and mixed-use amenities including commercial, office, recreation, and hospitality spaces. This vision aligns strongly with our objectives to address Maui’s critical housing shortage and foster integrated, authentic communities.

As preparation of the Environmental Impact Statement moves forward, we encourage thorough evaluation of infrastructure capacity, traffic impacts, public services, and strategies to ensure long-term affordability and resilience.

We look forward to reviewing the Draft Environmental Impact Statement when available and continuing to work together to advance affordable housing opportunities for our community.

Please do not hesitate to reach out should you require any further assistance.

Sincerely,


RICHARD E. MITCHELL, ESQ.
Director of Housing

cc: Housing and Community Development Administrator



March 13, 2026

Director Richard E. Mitchell, Esq.
County of Maui
Department of Housing
2065 Main Street, Suite 108
Wailuku, HI 96793

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i

Aloha Director Mitchell:

Thank you for providing us with your comments, dated December 23, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

The Department of Housing's (Department) mission is to expand affordable housing opportunities for low- and moderate-income families and develop housing for residents with special needs. We partner with community organizations to create long-term affordable rental units, increase homeownership opportunities, and provide special needs housing with appropriate support services.

In line with these priorities, the Department supports the proposed Ho'onani Village project, which aims to deliver approximately 1,608 housing units and mixed-use amenities including commercial, office, recreation, and hospitality spaces. This vision aligns strongly with our objectives to address Maui's critical housing shortage and foster integrated, authentic communities.

Response:

Thank you for confirming that the Project’s proposal of providing 1,608 housing and mixed-use amenities aligns with the Department’s priorities to address Maui’s critical housing shortage and create integrated, authentic communities.

Comment No 2:

As preparation of the Environmental Impact Statement moves forward, we encourage thorough evaluation of infrastructure capacity, traffic impacts, public services, and strategies to ensure long-term affordability and resilience.

We look forward to reviewing the Draft Environmental Impact Statement when available and continuing to work together to advance affordable housing opportunities for our community.

Response:

We confirm that the EIS will contain an evaluation of infrastructure capacity, traffic impacts, public services and strategies for housing affordability and resilience.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



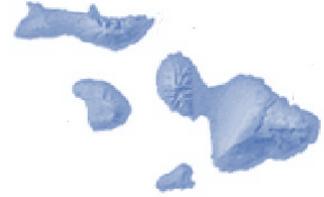
Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

RICHARD T. BISSEN, JR.
Mayor

KATE L. K. BLYSTONE
Director

ANA LILLIS
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

December 23, 2025



Ms. Emily Murai
Pioneer Design Group Hawai'i
711 Kapi'olani Blvd, Suite 1450
Honolulu, Hawai'i 96813

Dear Ms. Murai:

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT NOTICE AND PRELIMINARY COMMENTS FOR THE HO'ONANI VILLAGE MIXED-USE DEVELOPMENT PROJECT, KAHULUI, MAUI, HAWAII; TMK: (2) 3-8-006:004

Thank you for the opportunity to provide comments regarding the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Ho'onani Village Mixed-Use Development Project located in Kahului, Maui.

The Department of Planning (Department) notes the following areas of concern:

TRAFFIC

Traffic in Kahului will be affected with this Project. In the draft EIS, include details on the traffic impacts on the greater Kahului area, and how the project will impact traffic to and from South Maui, Central Maui, West Maui, and North Shore/Upcountry (including but not limited to Veteran's Highway, Hāna Highway, Kūihelani Highway, Dairy Road, and Mayor Carvalho Highway). In addition to addressing the effects upon a larger area of Maui within the EIS, the May 23, 2025, Transportation Impact Analysis Report (TIAR) prepared for the project should be updated/revised to address the following additional comments:

- The proposed project identified in the TIAR assumes a certain development scenario of residential, commercial, and industrial uses. The requested Change in Zoning for the property will not guarantee the development proposal analyzed in the TIAR. The TIAR should be revised to analyze multiple development scenarios including the most impactful (from a traffic

generation standpoint) development scenario based upon the permitted uses and development standards allowed within the M-1 Light Industrial zoning district.

For example, if the project were developed with only residential uses at a density permitted within the M-1 zoning district, does that change the traffic generation and impact analysis to roadways and intersections?

If only commercial or industrial uses were developed in accordance with the development standards of the M-1 zoning district, does that change the impact analysis to roadways and intersections related to an anticipated increase in truck deliveries?

- The TIAR analysis was evaluated during weekday morning and evening peak hours for existing conditions in May 2024. The analysis should be expanded to account for weekend conditions as well as during high-visitor conditions when Hansen Road is often used as a bypass to access east and upcountry Maui from residents and visitor destination areas of west and south Maui.
- The TIAR should expand its intersection impact analysis beyond the six existing study intersections in the immediate vicinity of the project to address a broader impact analysis as described above. At minimum, it should also include an intersection impact analysis of the following intersections: Kūihelani Highway/Maui Veterans Highway; Pākaula Street/Dairy Road/Mayor Elmer F. Cravalho Way; Dairy Road/Hāna Highway; intersection of Pākaula Street, and the ingress/egress driveways of Walmart and Home Depot.
- The TIAR does not provide any analysis of roadway widths and need for expansion to account for the additional 20,000+ daily trips. Additionally, it does not identify any recommendations for pedestrian and bicycle facilities along roadways that service the project and connectivity to existing regional pedestrian and bicycle facilities. In addition to identifying specific proposed pedestrian and bicycle facilities which may require roadway widening, the study should at a minimum address the following two-lane roadways to determine if roadway widening is necessary to address any anticipated impacts: Hansen Road, Pūlehu Road, Pākaula Street and Ho‘okele Street.

CULTURAL RESOURCES

Include archaeological study and mitigation requirements in the draft EIS. Please obtain comments from the Department of Land and Natural Resources and Office of Hawaiian Affairs on the EIS.

AIRPORT PROXIMITY

A Safety study and a separate Noise study should be prepared that addresses all hours that Kahului Airport is in operation, and on days with patterns/direction light wind, no wind, and days of southerly winds that affect take-off and landing patterns direction. Please describe construction details and costs to mitigate air traffic noise. Will these costs be passed on to residents and/or affect the affordability component of the project? Please coordinate EIS review and obtain comments from the FAA and Hawai'i State Department of Transportation – Airports Division. Any safety and/or noise impacts and subsequent mitigation measures identified from the impact analysis or from these agencies should be incorporated into the EIS. In addition, please address the 2002 Wailuku-Kahului Community Plan – Land Use objective #9:

9. *Maintain the existing Kahului Airport district boundaries, as defined in the Community Plan Land Use Map and continue to evaluate the air transportation needs of the County to determine future air transportation facility requirements. Create a direct control overlay district in and around Kahului Airport due to the public investment and the economic importance of the facility. The boundaries of this district shall be generally defined by the 60 Ldn isoline (60 decibels, day/night average) of the FAA approved noise contour map for the airport. The intent of this district shall be to establish specific guidelines for development within the area which would define uses compatible with the airport and appropriate design standards, particularly with respect to noise attenuation to reduce interior noise levels to the 45 Ldn level or less. Total closure of structures, as well as air-conditioning, are generally required for this purpose. Residential uses should be discouraged within the 60 Ldn isoline.*

SCHOOLS

Adding 1,600 dwelling units will increase school attendance. Please include impacts of this project on the public school system.

LOSS OF AGRICULTURAL LANDS

Please coordinate with and include comments from Maui County Department of Agriculture, Hawai'i State Department of Agriculture, and the State Land Use Commission regarding loss of class "A" prime agricultural lands.

INFRASTRUCTURE

Please include details about all infrastructure requirements, including, but not limited to the provision of water, sewage disposal, solid waste disposal, backup plans for redundancy, and meeting system standards requirements. Please describe development costs and who will pay for

Ms. Emily Murai
December 23, 2025
Page 4

maintenance and operation if water and wastewater will be private systems. If only one well is planned, describe how water will be provided when the well is down for maintenance or system failure.

Thank you for the opportunity to comment on the EISPN. If you have any questions, please contact the Current Division of the Planning Department at (808)270-8205.

Sincerely,



KATE L. K. BLYSTONE
Director

cc: Danny A. Dias, Planning Program Administrator (PDF)
Gregory Pfof, Administrative Planning Manager (PDF)
Martina Segura, State of Hawai'i, Land Use Commission (PDF)

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March 13, 2026

Via email: planning@mauicounty.gov

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i,

Aloha Acting Director Takakura:

Thank you for providing us with your comments, dated December 23, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1 Traffic

Traffic in Kahului will be affected with this Project. In the draft EIS, include details on the traffic impacts on the greater Kahului area, and how the project will impact traffic to and from South Maui, Central Maui, West Maui, and North Shore/Upcountry (including but not limited to Veteran’s Highway, Hāna Highway, Kūihelani Highway, Dairy Road, and Mayor Carvalho Highway). In addition to addressing the effects upon a larger area of Maui within the EIS, the May 23, 2025, Transportation Impact Analysis Report (TIAR) prepared for the project should be updated/revise to address the following additional comments:

Response: The Traffic Impact Analysis Report (TIAR) for the project was revised in February 2026 and prepared by Fehr & Peers. The updated TIAR evaluates traffic conditions under Existing (2024), Year 2042 No Project, and Year 2042 Plus Project conditions to assess both local and regional transportation impacts.

The analysis includes a study area consisting of 13 intersections that represent key connections between the project site and the regional transportation network serving Central Maui, South Maui, West Maui, and Upcountry. These intersections include major State highway facilities such as Maui Veterans Highway, Kūihelani Highway, and Hāna Highway, as well as important collector roadways such as Pūlehu Road, Hansen Road, and Ho‘okele Street.

The analysis concludes that the majority of study intersections are projected to operate at acceptable levels of service under Year 2042 Plus Project conditions. However, cumulative operational impacts were identified at three intersections:

- Kūihelani Highway / Maui Veterans Highway
- Maui Veterans Highway / Ho‘okele Street
- Hāna Highway / Hansen Road

Mitigation measures are identified for these locations, including turn-lane modifications and signal phasing adjustments at the Maui Veterans Highway intersections and signalization at Hāna Highway / Hansen Road. With implementation of these improvements and the assumed County roundabout at Hansen Road / Pūlehu Road, the regional roadway network is expected to accommodate project-generated traffic.

Comment No. 2 Traffic

The proposed project identified in the TIAR assumes a certain development scenario of residential, commercial, and industrial uses. The requested Change in Zoning for the property will not guarantee the development proposal analyzed in the TIAR. The TIAR should be revised to analyze multiple development scenarios including the most impactful (from a traffic generation standpoint) development scenario based upon the permitted uses and development standards allowed within the M-1 Light Industrial zoning district.

For example, if the project were developed with only residential uses at a density permitted within the M-1 zoning district, does that change the traffic generation and impact analysis to roadways and intersections?

If only commercial or industrial uses were developed in accordance with the development standards of the M-1 zoning district, does that change the impact analysis to roadways and intersections related to an anticipated increase in truck deliveries?

Response: The TIAR analyzes a development program that includes a combination of residential, commercial, and employment uses consistent with the project proposal. This mixed-use configuration represents a conservative traffic generation scenario because it includes substantial commercial and employment uses in addition to residential development.

Trip generation estimates were prepared using the Institute of Transportation Engineers Trip Generation Manual (12th Edition) and further refined using the Fehr & Peers/EPA Mixed-Use Development (MXD) model. The MXD model accounts for internal trip capture and reductions associated with mixed-use developments where trips occur between uses within the project rather than on the external roadway network.

Alternative development scenarios consisting of only residential or only industrial uses could produce different traffic patterns; however, the mixed-use scenario analyzed in the TIAR includes a broad range of land uses and therefore represents a reasonable and conservative basis for evaluating potential traffic impacts.

Comment No. 3 Traffic

The TIAR analysis was evaluated during weekday morning and evening peak hours for existing conditions in May 2024. The analysis should be expanded to account for weekend conditions as well as during high-visitor conditions when Hansen Road is often used as a

bypass to access east and upcountry Maui from residents and visitor destination areas of west and south Maui.

Response: The TIAR evaluates traffic operations during weekday AM and PM peak periods, which represent the standard analysis periods used in traffic impact studies and typically reflect the most constrained operating conditions for commuter-oriented roadway networks. These peak periods correspond with the highest traffic volumes associated with work commuting and school travel.

Weekend traffic patterns in the Kahului area generally reflect different travel characteristics associated with shopping and visitor activities; however, weekday peak periods remain the most critical periods for evaluating intersection operations and roadway capacity.

The study area includes major highways such as Maui Veterans Highway, Hāna Highway, and Kūihelani Highway that accommodate traffic traveling between Central Maui, South Maui, and Upcountry. The analysis incorporates future background growth assumptions to account for increases in regional travel demand over time. As a result, the Year 2042 No Project scenario reflects anticipated regional traffic growth, including visitor-related traffic patterns.

Comment No. 4 Traffic

The TIAR should expand its intersection impact analysis beyond the six existing study intersections in the immediate vicinity of the project to address a broader impact analysis as described above. At minimum, it should also include an intersection impact analysis of the following intersections: Kūihelani Highway/Maui Veterans Highway; Pākaula Street/Dairy Road/Mayor Elmer F. Cravalho Way; Dairy Road/Hāna Highway; intersection of Pākaula Street, and the ingress/egress driveways of Walmart and Home Depot.

Response: The revised TIAR expands the study area to include 13 study intersections, representing key regional connections between the project site and the surrounding roadway network. These intersections include:

- Kūihelani Highway / Maui Veterans Highway / Mayor Elmer F. Cravalho Way / Pu‘unēnē Avenue
- Maui Veterans Highway / Ho‘okele Street
- Ho‘okele Street / Pakaula Street
- Ho‘okele Street / Pūlehu Road
- Hāna Highway / Ho‘okele Street
- Pūlehu Road / Project Driveway intersections
- Hansen Road / Project Driveway intersections
- Hansen Road / Pūlehu Road
- Hāna Highway / Hansen Road

These intersections were selected because they represent the primary regional routes through which project traffic would travel.

Intersections along Dairy Road and the Pakaula Street commercial access area were not included because the current project access plan does not include a confirmed connection to Pakaula Street. Establishing such a connection would require access across privately owned property that is not under the control of the project applicant. As a result, the TIAR focuses on the roadway network that will directly serve the project, including Hansen Road and Pūlehu Road.

Comment No. 5 Traffic

The TIAR does not provide any analysis of roadway widths and need for expansion to account for the additional 20,000+ daily trips. Additionally, it does not identify any recommendations for pedestrian and bicycle facilities along roadways that service the project and connectivity to existing regional pedestrian and bicycle facilities. In addition to identifying specific proposed pedestrian and bicycle facilities which may require roadway widening, the study should at a minimum address the following two-lane roadways to determine if roadway widening is necessary to address any anticipated impacts: Hansen Road, Pūlehu Road, Pākaula Street and Ho‘okele Street.

Response: The TIAR includes evaluation of roadway characteristics and identifies improvements necessary to accommodate project traffic and improve multimodal connectivity. Hansen Road and Pūlehu Road currently function as two-lane collector roadways and lack continuous pedestrian and bicycle facilities in several segments. To address these conditions, the project includes frontage improvements along Hansen Road and Pūlehu Road consistent with the County of Maui Street Design Manual. These improvements include:

- Half-street roadway widening
- Right-of-way dedication
- Construction of curb and gutter
- Installation of sidewalks
- Installation of bicycle lanes along the project frontage

These improvements will enhance pedestrian and bicycle connectivity in an area where such facilities are currently limited and improve overall roadway safety. The TIAR concludes that with these frontage improvements and the assumed roundabout at Hansen Road / Pūlehu Road, the roadway network can accommodate project traffic without requiring widening of regional roadways beyond the project frontage.

Comment No. 6 Cultural Resources

Include archaeological study and mitigation requirements in the draft EIS. Please obtain comments from the Department of Land and Natural Resources and Office of Hawaiian Affairs on the EIS.

Response:

We confirm that the Archaeological Literature Review Assessment will be included in the Draft EIS. Mitigation measures will be identified through the §6E, HRS process. The

Department of Land and Natural Resources and Office of Hawaiian Affairs has been consulted and any comments received and responses will be included in the Draft EIS.

Comment No. 7: Airport Proximity

A Safety study and a separate Noise study should be prepared that addresses all hours that Kahului Airport is in operation, and on days with patterns/direction light wind, no wind, and days of southerly winds that affect take-off and landing patterns direction. Please describe construction details and costs to mitigate air traffic noise. Will these costs be passed on to residents and/or affect the affordability component of the project? Please coordinate EIS review and obtain comments from the FAA and Hawai'i State Department of Transportation – Airports Division. Any safety and/or noise impacts and subsequent mitigation measures identified from the impact analysis or from these agencies should be incorporated into the EIS. In addition, please address the 2002 Wailuku-Kahului Community Plan – Land Use objective #9:

9. Maintain the existing Kahului Airport district boundaries, as defined in the Community Plan Land Use Map and continue to evaluate the air transportation needs of the County to determine future air transportation facility requirements. Create a direct control overlay district in and around Kahului Airport due to the public investment and the economic importance of the facility. The boundaries of this district shall be generally defined by the 60 Ldn isoline (60 decibels, day/night average) of the FAA approved noise contour map for the airport. The intent of this district shall be to establish specific guidelines for development within the area which would define uses compatible with the airport and appropriate design standards, particularly with respect to noise attenuation to reduce interior noise levels to the 45 Ldn level or less. Total closure of structures, as well as air-conditioning, are generally required for this purpose. Residential uses should be discouraged within the 60 Ldn isoline.

Response:

We acknowledge that the project site is located within the Kahului Airport district boundary and within the vicinity of Federal Aviation Administration (FAA) and State-identified aircraft noise contours. An Environmental Noise Assessment was prepared for the project to evaluate existing and future noise conditions associated with aircraft operations, roadway traffic, and construction activities during all hours of airport operation and under representative operating conditions. The findings of this study will be included and discussed in the Draft EIS.

The noise study evaluated aircraft noise exposure using long-term on-site monitoring and adopted FAA and Hawai'i Department of Transportation (HDOT) Airports Division noise compatibility criteria. Results indicate that while the project site lies within the 60 Ldn noise contour, it is outside the 65 Ldn contour, and that interior noise levels can be reduced to 45 Ldn or less through incorporation of building design and construction measures. Recommended mitigation measures include enhanced exterior wall assemblies, upgraded glazing, controlled building ventilation, and air-conditioning to allow for closed-window conditions, consistent with HDOT Airports Division and FAA land use compatibility

guidance. These mitigation measures will be identified in the Draft EIS and reflected in project design standards.

The Applicant will coordinate with the FAA and the HDOT Airports Division. The HDOT Airports division has provided preliminary guidance and comments on the project. Any safety- or noise-related recommendations from these agencies will be incorporated into the Draft EIS and subsequent project approvals, as applicable.

With respect to construction costs and affordability, the project's affordability objectives will be evaluated holistically, and the inclusion of noise mitigation measures would not preclude the commitment of affordable and workforce housing

The Draft EIS will also discuss consistency with the 2002 Wailuku–Kahului Community Plan, including Land Use Objective #9. The project will be evaluated for compatibility with airport operations through adherence to noise attenuation standards, coordination with aviation agencies, and incorporation of design measures intended to reduce interior noise exposure to acceptable levels.

Comment No. 6: Schools

Adding 1,600 dwelling units will increase school attendance. Please include impacts of this project on the public school system.

Response:

Consultation with the State of Hawai'i Department of Education (DOE) Facilities Branch and the Hawai'i School Facilities Authority has been initiated. The DOE has indicated that enrollment in public schools that would serve the site are operating at below design capacity. The School Facilities Authority noted there have been recent shifts in enrollment and associated redistricting in Central Maui. As such, the Applicant will continue coordination with the State to reduce impacts on the public school system.

Comment No. 7: Loss of Agricultural Lands

Please coordinate with and include comments from Maui County Department of Agriculture, Hawai'i State Department of Agriculture, and the State Land Use Commission regarding loss of class "A" prime agricultural lands.

Response:

The Maui County Department of Agriculture, Hawai'i State Department of Agriculture, and the State Land Use Commission have all been consulted on the project. Any comments received and responses to comments will be included in the Draft EIS.

Comment No. 8: Infrastructure

Please include details about all infrastructure requirements, including, but not limited to the provision of water, sewage disposal, solid waste disposal, backup plans for redundancy, and meeting system standards requirements. Please describe development costs and who will pay for maintenance and operation if water and wastewater will be private systems. If only one well is planned, describe how water will be provided when the well is down for maintenance or system failure.

Response:

The Draft EIS will include details on infrastructure requirements. A Preliminary Engineering Report (PER) and Water Resource Assessment will be included and discussed in the Draft EIS, as well. The water system will be designed to County standards. The Applicant would handle maintenance and operation of the private system, unless it is dedicated to the County in the future. While the project anticipates use of a primary well, redundancy is typically incorporated into the water source and delivery system, rather than relying on a single point of failure. As will be discussed in the Draft EIS, redundancy is generally provided at three levels:

- (1) the well and source infrastructure,
- (2) the pumping system, such that the project's maximum day demand can still be met if one pump is offline, and
- (3) the treatment system, where individual components can be taken out of service without interrupting the project's ability to meet maximum day demand.

Water transmission lines themselves do not typically have parallel redundancy; instead, they are conservatively designed and sized to exceed anticipated demands. In the event of an extended outage due to maintenance or unforeseen system failure, temporary water hauling by truck is a standard contingency measure and would be implemented as necessary to maintain service.

The Draft EIS will also address redundancy for other utility systems for context. For wastewater, redundancy is typically achieved through R-1 recycled water management, with the Department of Health requiring two independent disposal or reuse options (such as R-1 storage ponds, leachfields, basins, on-site irrigation, or off-site reuse by a third party). Storm drainage systems do not include operational backups but are designed to accommodate large storm events. Electrical reliability is typically addressed through backup generators and, if incorporated, battery storage associated with on-site renewable energy systems.

These system reliability and contingency measures will be described in the Draft EIS to demonstrate that utility service can be maintained during routine maintenance and emergency conditions.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and

comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai‘i LLC.

A handwritten signature in black ink that reads "Emily Ballard". The signature is written in a cursive, flowing style.

Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission
Fehr & Peers

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, HAWAII 96793
<http://www.mauicounty.gov/water>



December 23, 2025

Emily Murai
Pioneer Design Group – Hawai'i, LLC
711 Kapiolani Blvd, Suite 1450
Honolulu, HI 96813

RE: Environmental Impact Statement Preparation Notice (EISPN) for the Proposed Ho'onani Village Mixed-Use Development Project at Kahului, Maui, Hawai'i; TMK: (2) 3-8-006:004

Dear Ms. Murai:

The Department of Water Supply (DWS) appreciates the opportunity to comment on the Environmental Impact Statement Preparation Notice (EISPN) for proposed Ho'onani Village Mixed-Use Development.

Source of Water

The project proposes to utilize a private water source (Pu'unene Pump 5). The Department supports the development of private sources that align with the Water Use and Development Plan [Ordinance 5335 Maui Island WUDP 202304281454302026.pdf](#). The project is subject to Maui County Code (MCC) Title 14.12 water availability policy. The applicant must secure a long-term reliable source of water for the project's total demand.

Consumption Guidelines

Based on the Water Systems Standards (2002, State of Hawai'i), the calculated average daily demand for the proposed 1,600 multi-family residential units is 560 gallons per day (gpd) per unit, totaling 896,000 gpd.

Existing Infrastructure

The subject parcel contains a 6-inch waterline running along Hansen Road and an 8-inch waterline traversing the lot. Should the development connect to DWS infrastructure, the water system must be developed to DWS system standards.

"By Water All Things Find Life"

Water Conservation Best Management Practices (BMPs)

Indoor

DWS recommends the following indoor conservation measures be implemented:

- Install EPA WaterSense-labeled plumbing fixtures, as well as appliances that are EPA Energy Star or ASHRAE certified.
- Install high-efficiency (HE) faucet aerators in all plumbing fixtures wherever possible.
- Install dual-flush toilets using HE models that consume 1.28 gallons per flush (gpf) or less.
- Install HE showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 psi.
- Install HE bathroom sink faucets with a flow rate not exceeding 1 gpm at 60 psi.
- Ensure laundry facilities and individual unit machines use Energy Star-labeled washers.
- Install recirculating indoor water features powered by solar photovoltaics when practical.

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 or micro-sprinklers that direct water only to intended areas without causing runoff.
- Apply graywater to tolerant native and non-native landscaping using subsurface drip irrigation. This includes courtyards and other vegetated areas, provided it is permitted and applied according to Hawaii State Department of Health guidelines.
- Install recirculating outdoor water features with solar photovoltaics when practical.
- Use drip irrigation or combine drought-tolerant landscaping with gravel and rocks in narrow medians to reduce runoff.
- Use mulching in landscaped areas to help retain soil moisture. Set irrigation timers for early morning or evening to limit evaporation.
- Reduce and replace underutilized lawn areas with native plants to conserve water and mitigate the heat island effect.
- Prioritize native and climate-adapted plants for landscaping whenever possible.
- Limit watering or irrigation of lawns, landscapes, and other vegetated areas to the hours before 9:00 a.m. and after 5:00 p.m.

“By Water All Things Find Life”

Page 3
Ho'onani Village Master Plan
December 23, 2025

- Limit landscape irrigation to no more than three days per week, except where stricter requirements apply during a water shortage declaration.
- Avoid spray irrigation during excessively windy days.
- Avoid irrigation during rain events.

Should you have any questions, please contact either Geovanna Torres at (808) 463-3104 or via email at Geovanna.Torres@co.maui.hi.us.

Sincerely,

John
Stufflebean

Digitally signed by John
Stufflebean
Date: 2025.12.26
10:53:55 -10'00'

John Stufflebean, P.E.
DWS Director
GT

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"By Water All Things Find Life"



March 13, 2026

Director John Stufflebean, P.E.
County of Maui
Department of Water Supply
2065 Main Street, Suite 108
Wailuku, HI 96793

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i

Aloha Director Stufflebean:

Thank you for providing us with your comments, dated December 23, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development LLC, we offer the following information in response to the comments received.

Comment No. 1: Source of Water

The project proposes to utilize a private water source (Pu'unene Pump 5). The Department supports the development of private sources that align with the Water Use and Development Plan Ordinance 5335 Maui Island WUDP 202304281454302026.pdf. The project is subject to Maui County Code (MCC) Title 14.12 water availability policy. The applicant must secure a long-term reliable source of water for the project's total demand.

Response:

For clarification, the project proposes to modify and utilize the Pu‘unēnē Pump 6. As discussed in the Maui Island Water Use and Development Plan (WUDP) the Kahului Aquifer in which Pu‘unēnē Pump 6 is located is known to contain semi-brackish to brackish water. As such, based on test results, desalination in the form of reverse osmosis will be pursued. We acknowledge that a long-term water source will be need to be secured for the project.

Comment No 2: Consumption Guidelines

Based on the Water Systems Standards (2002, State of Hawai‘i), the calculated average daily demand for the proposed 1,600 multi-family residential units is 560 gallons per day (gpd) per unit, totaling 896,000 gpd.

Response:

We acknowledge the average daily demand from the water system standards for multi-family units on Maui is 560 gpd. However, given the unit mix of studios, 1-bedroom, 2-bedroom and 3-bedroom units, it is anticipated that actual water demand and use will be much lower. As demonstrated in the Maui County Equivalent Single Dwelling (ESD) water demand calculations, a 4-bedroom, 2-bathroom single-family dwelling has an ESD 1.0, equivalent to an estimated demand of 300 gpd. As such for the current water demand sizing calculation the Applicant utilized an estimated 400 gpd, which is used to estimate the average daily demand for multi-family low rise units for Hawai'i island and O'ahu. The applicant's goal is to analyze the realistic impact of the project on the Kahului Aquifer. Utilizing the ESD methodology, the estimated unit mix would have an average daily demand of 182 GPD per unit. The Applicant is currently working with the DWS staff on the final methodology that will be utilized to size the system. Utilizing the 560 gallons per day will not provide a true understanding of the project's impact. The preliminary water system sizing calculations also included the demand from the various commercial uses, the industrial areas and for irrigation. The projected average daily demand for the project at full build out utilizing 400 GPD per residential unit will be about 1,097,170 gallons per day when we consider the additional unmetered losses.

In addition, it is anticipated that recycled water generated from the proposed onsite Wastewater Treatment Plan will be used for project irrigation needs and will reduce this overall project demand. The estimated water demands for the entire project are included below and also discussed further in the Preliminary Engineering Report (PER), which will be appended to the Draft EIS.

Preliminary Water System Sizing Calculations				
Phase	Type of Use	Quantity of unit	Average Daily Demand (gpd)	Max Daily Demand (gpd) (1.5 x ADD)
1	Residential Irrigation	268 units 3.77 acres	113,609	170,414
2	Residential Commercial Irrigation	268 units 0.230 acres 4.77 acres	116,686	175,030
3	Residential Commercial Irrigation	268 units 1.722 acres 4.96 acres	125,963	188,944
4	Residential Commercial Irrigation	268 units 1.033 acres 4.60 acres	121,218	181,828
5	Residential Commercial Irrigation	268 units 0.803 acres 6.63 acres	123,292	184,938
6	Residential Irrigation	268 units 3.56 acres	113,252	169,878

Preliminary Water System Sizing Calculations				
Phase	Type of Use	Quantity of unit	Average Daily Demand (gpd)	Max Daily Demand (gpd) (1.5 x ADD)
7	Commercial Irrigation	240 units 2.05 acres	87,485	131,228
8	Commercial Irrigation	235,000 sq. ft. 1.41 acres	35,297	52,946
9	Commercial Irrigation	25 acres 6.25 acres	160,625	240,938
Project Total	-	-	997,427	1,496,141
Project Total	-	-	1,097,170 (Increased by 10% for unmetered losses)	1,645,755

The applicant will continue to coordinate with the DWS staff as the project progresses.

Comment No 3: Existing Infrastructure

The subject parcel contains a 6-inch waterline running along Hansen Road and an 8-inch waterline traversing the lot. Should the development connect to DWS infrastructure, the water system must be developed to DWS system standards.

Response:

We acknowledge the existing waterlines are within and in proximity to the project site. We confirm that the project’s water system including any potential connection to DWS infrastructure will be designed to DWS system standards.

Comment No 4: Water Conservation Best Management Practices (BMPs)

Indoor

DWS recommends the following indoor conservation measures be implemented:

- *Install EPA WaterSense-labeled plumbing fixtures, as well as appliances that are EPA Energy Star or ASHRAE certified.*
- *Install high-efficiency (HE) faucet aerators in all plumbing fixtures wherever possible.*
- *Install dual-flush toilets using HE models that consume 1.28 gallons per flush (gpf) or less.*
- *Install HE showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 psi.*
- *Install HE bathroom sink faucets with a flow rate not exceeding 1 gpm at 60 psi.*

- *Ensure laundry facilities and individual unit machines use Energy Star-labeled washers.*
- *Install recirculating indoor water features powered by solar photovoltaics when practical.*

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 or micro-sprinklers that direct water only to intended areas without causing runoff.*
- *Apply graywater to tolerant native and non-native landscaping using subsurface drip irrigation. This includes courtyards and other vegetated areas, provided it is permitted and applied according to Hawaii State Department of Health guidelines.*
- *Install recirculating outdoor water features with solar photovoltaics when practical.*
- *Use drip irrigation or combine drought-tolerant landscaping with gravel and rocks in narrow medians to reduce runoff.*
- *Use mulching in landscaped areas to help retain soil moisture. Set irrigation timers for early morning or evening to limit evaporation.*
- *Reduce and replace underutilized lawn areas with native plants to conserve water and mitigate the heat island effect.*
- *Prioritize native and climate-adapted plants for landscaping whenever possible.*
- *Limit watering or irrigation of lawns, landscapes, and other vegetated areas to the hours before 9:00 a.m. and after 5:00 p.m.*
- *Limit landscape irrigation to no more than three days per week, except where stricter requirements apply during a water shortage declaration.*
- *Avoid spray irrigation during excessively windy days.*
- *Avoid irrigation during rain events.*

Response:

Thank you for providing recommendations for water conservation BMPs. The project will incorporate high-efficiency water fixtures and irrigation systems as much as practicable. Recycled water will also be used whenever feasible.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Geovanna.Torres, Maui County DWS
Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

RICHARD T. BISSEN, JR.
Mayor

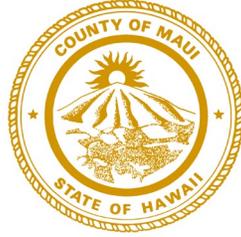
SHAYNE R. AGAWA, P.E.
Director

MICHAEL D. PETERSEN
Deputy Director

MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

CECILE POWELL
Environmental Protection &
Sustainability Division



COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAII 96793



December 12, 2025

Emily Murai
Pioneer Design Group- Hawai'i
711 Kapiolani Blvd, Suite 1450
Honolulu, Hawai'i 96813

emurai@pdg-hawaii.com

and

Martina Segura
State of Hawai'i, Land Use Commission3
P.O. Box 2359
Honolulu, Hawai'i 96813

dbedt.luc.web@hawaii.gov

**SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN)
HO'ONANI VILLAGE MIXED-USE DEVELOPMENT PROJECT
KAHULUI, MAUI, HAWAII
TMK (2) 3-8-006:004
MAPPS CASE: DEMD2025-00004**

This letter is in response to your December 5, 2025 request for comments on the project document published in the December 8, 2025 edition of *The Environmental Notice*. A review by our Wastewater Reclamation Division (WWRD) has compiled the following:

1. We understand that the subject project is being developed is approximately 166.5 acres of the former Puunene Sugar Mill property located west of Pulehu Rd. and north of Hansen Rd. in Kahului. The project includes a mix of multifamily residential units, industrial and commercial development. Per the information available, the project will develop approximately 1,608 residential units, approximately 464,000 sf of industrial/commercial property with additional space for a possible 700± housing units. It is expected that the project will produce approximately one million gallons per (1 MGD) day of wastewater (average daily flow) at final buildout.
2. The proposed project is outside of the current sewer service area.
3. If the development intends to connect to the County wastewater system, we note that there is currently not enough capacity within the existing sewer collection system.
 - a. Assuming the sewer tie-in would be at Pakaula Street (SMH KA02XB3950) the project's wastewater will ultimately affect approximately 7,900 feet of existing gravity sewer lines from the tie-in point to the Alamaha Wastewater Pump Station (WWPS). These lines would need to be increased in size.

- b. The Alamaha WWPS (aka A&B WWPS), force main and 200 feet of gravity line after discharge would also need to be upgraded to accept the additional flow. Further analysis of the Kahului WWPS and its force main would need to be conducted to determine if it would have adequate capacity.
4. Similarly, there is not enough capacity at the Wailuku/Kahului Wastewater Reclamation Facility (WWRF) to accept flow at this time.
 - a. The facility currently processes approximately 5.6 million gallons per day (mgd) of wastewater. To date the County has allocated about 7.5 mgd of the plants 7.9 mgd capacity.
 - b. In addition, the strength of wastewater has exceeded its original design value further decreasing actual available plant capacity.
 - c. Efforts to increase treatment capacity are underway. To accept any flow, the Ho'onani Village project would need to wait until late 2029 or 2030 for the Central Maui WWRF near Waikapu to be constructed and become operational and existing flow diverted, and/or until WWRD is successful in increasing treatment capacity at the Wailuku/Kahului WWRF.
5. Based on the required upgrades to the existing wastewater infrastructure and treatment capacity status WWRD suggests that the developer perform a detailed cost analysis to determine if an onsite WWRF would be more feasible.
6. Note that capacity cannot be guaranteed until building permits are issued. There is always a possibility that adequate capacity may not be available if construction is delayed, other projects are developed, or regulatory conditions change.

Should you have any questions or require any additional information regarding our ability to serve this project, do not hesitate to contact me at (808) 270-8230 or our Wastewater Division at (808) 270-7417.

Sincerely,

SHAYNE R. AGAWA, P.E.
Director of Environmental Management

xc: Wastewater Reclamation Division



March 13, 2026

Director Shayne R. Agawa, P.E.
County of Maui
Department of Environmental Management
2145 Kaohu Street, Suite 102
Wailuku, HI 96793

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i,

Aloha Director Agawa:

Thank you for providing us with your comments, dated December 12, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

We understand that the subject project is being developed is approximately 166.5 acres of the former Puunene Sugar Mill property located west of Pulehu Rd. and north of Hansen Rd. in Kahului. The project includes a mix of multifamily residential units, industrial and commercial development. Per the information available, the project will develop approximately 1,608 residential units, approximately 464,000 sf of industrial/commercial property with additional space for a possible 700± housing units. It is expected that the project will produce approximately one million gallons per (1 MGD) day of wastewater (average daily flow) at final buildout.

Response:

We confirm that the project proposes to develop approximately 1,608 residential units. To clarify, currently the project does not propose additional residential units. The estimated total square footage for the various project components is provided below. These square footages represent the area within the project and not the actual building square footages. A Preliminary Engineering Report will be included in the Draft EIS, which will be provided to the Department for review.

Use	S.F.
Residential	2,656,099
Commercial	226,334
Office	427,465
Town Center (Retail & Restaurant)	503,515
Hospitality	356,800
Light Industrial	1,002,757
Recreation / Entertainment	621,666
Future Civic Uses	431,377
Street R.O.W.	420,096
Sewer System Improvements	76,899
Detention Basin Area	530,214

Based upon the calculations provided in the project’s Preliminary Engineering and Drainage Report, at final buildout the project is expected to produce approximately 803,995 gallons per day of wastewater (average daily flow volume). The preliminary wastewater system calculations are attached as well to this response letter for your use.

Comment No 2:

The proposed project is outside of the current sewer service area.

Response:

Thank you for confirming that the project is outside of the current County sewer service area.

Comment No 3:

If the development intends to connect to the County wastewater system, we note that there is currently not enough capacity within the existing sewer collection system.

- a. Assuming the sewer tie-in would be at Pakaula Street (SMH KA02XB3950) the project’s wastewater will ultimately affect approximately 7,900 feet of existing gravity sewer lines from the tie-in point to the Alamaha Wastewater Pump Station (WWPS). These lines would need to be increased in size.*
- b. The Alamaha WWPS (aka A&B WWPS), force main and 200 feet of gravity line after discharge would also need to be upgraded to accept the additional flow. Further analysis of the Kahului WWPS and its force main would need to be conducted to determine if it would have adequate capacity.*

Response:

We acknowledge that at this time there is not enough capacity to serve the project at full build out and acknowledge the upgrades needed to potentially connect. From our discussions with the D.E.M. staff, it is our understanding that the project will be allowed to connect to the County sewer system for one or more of the initial phases of the development without any upgrades to the existing system. Phase 1 of the development is projected to produce approximately 85,187 gallons per day of wastewater. The applicant will continue to coordinate with the D.E.M. staff for the potential service of one or more of the initial phases of development.

Comment No 4:

Similarly, there is not enough capacity at the Wailuku/Kahului Wastewater Reclamation Facility (WWRF) to accept flow at this time.

- a. The facility currently processes approximately 5.6 million gallons per day (mgd) of wastewater. To date the County has allocated about 7.5 mgd of the plants 7.9 mgd capacity*
- b. In addition, the strength of wastewater has exceeded its original design value further decreasing actual available plant capacity.*
- c. Efforts to increase treatment capacity are underway. To accept any flow, the Ho‘onani Village project would need to wait until late 2029 or 2030 for the Maui WWRF near Waikapu to be constructed and become operational and existing flow diverted, and/or until WWRD is successful in increasing treatment capacity at the Wailuku/Kahului WWRF.*

Response:

Thank you for this information. We acknowledge that sewer service capacity for the entire project would not be available until the new WWRF is constructed and/or until the Department is successful in increasing treatment capacity at the Wailuku/Kahului Wastewater Reclamation Facility. As mentioned above, it is our understanding that one or more phases of the project will be allowed to connect to the County system to be managed at the Wailuku/Kahului WWRF. Future phases will either be managed by an on-site WWTP, or at the Wailuku/Kahului WWRF should additional capacity become available.

Comment No 5:

Based on the required upgrades to the existing wastewater infrastructure and treatment capacity status WWRD suggests that the developer perform a detailed cost analysis to determine if an onsite WWRF would be more feasible.

Response:

The approximate cost for the onsite WWTP is approximately \$18,000,000, with a yearly operational cost of \$500,000 a year. With the improvements needed to connect to the County system, the cost for upsizing the lines would be approximately \$25,000,000. However, as timing of availability is uncertain at this time, an onsite WWTP is still proposed to be constructed during the development to ensure service for the entire project, and potentially also producing recycled water that could be used for irrigation purposes.

Comment No 6:

Note that capacity cannot be guaranteed until building permits are issued. There is always a possibility that adequate capacity may not be available if construction is delayed, other projects are developed, or regulatory conditions change.

Response:

We acknowledge that capacity cannot be guaranteed until building permits are issued and that project delays or changes in regulatory conditions can impact available capacity.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission



MAUI TOMORROW

Protecting Maui's Future

TO: Mr. Greg Sado
Ho'onani Development LLC
greg@alphahawaii.com

Ms. Martina Segura
State of Hawai'i Land Use Commission
dbedt.luc.web@hawaii.gov

Ms. Emily Murai and TC Campbell
Pioneer Design Group, Hawai'i, LLC
emurai@pdg-hawaii.com

FROM: Albert Perez, Executive Director
Maui Tomorrow Foundation
director.mauitomorrow@gmail.com

DATE: January 7, 2026

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, LAm_{ax} 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.



March 13, 2026

Via email: director.mauitomorrow@gmail.com

Albert Perez, Executive Director
Maui Tomorrow Foundation

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i,

Aloha Executive Director Perez:

Thank you for providing us with your comments, dated January 7, 2026, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comments on EIS Contents

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 §11200.1-14(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, socioeconomic 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*

Response:

The Applicant concurs that a full EIS is warranted. We confirm that the EIS will that the Draft EIS will fully address all reasonably foreseeable environmental impacts, infrastructure commitments, alternatives, and cumulative effects consistent with HRS Chapter 343 and HAR Chapter 11-200.1.

Comment No. 2: 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 §11-200.124(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.*

Response:

These comments are acknowledged. The Draft EIS evaluates the proposed project as a phased, master-planned development under a full build-out scenario.

Consultation with agencies having jurisdiction and relevant expertise has occurred during preparation of the EIS regarding aviation safety, airspace compatibility, and aircraft noise considerations associated with the proximity of the project to Kahului Airport. Through this consultation, HDOT Airports Division has advised that the environmental review should rely on the FAA-approved 1993 Kahului Airport Noise Exposure Map (NEM) contours, which remain the official accepted noise contours recognized by the FAA for land use compatibility evaluations associated with Kahului Airport. Consistent with this guidance, the Draft EIS utilizes the 1993 noise contours in its analysis of airport-related noise exposure and compatibility. In addition, the Department of Health also provides guidance on acceptable noise levels based on zoning, which is discussed in the Draft EIS.

The Draft EIS also incorporates the findings of the project-specific Environmental Noise Assessment and identifies design measures intended to achieve interior noise levels consistent with applicable standards. Comments received from HDOT, FAA, and other agencies during the EIS review process will be included in the Final EIS, and any applicable recommendations or requirements related to aviation safety, airspace compatibility, or aircraft noise will be addressed through project design measures or mitigation, as appropriate.

Comment No. 3: 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.

Response:

The comments regarding aircraft noise exposure and potential public health effects are acknowledged. The project site is located within the vicinity of Kahului Airport flight paths, and aircraft noise has been identified as a key environmental consideration for the proposed development.

An Environmental Noise Assessment was prepared for the project and will be included and discussed in the Draft EIS. The noise study evaluated existing ambient noise conditions at the project site using long-term sound monitoring conducted over multiple days and nights. Aircraft noise was identified as the dominant noise source affecting the site, and noise exposure was evaluated using accepted metrics, including day–night average sound level (Ldn) and maximum noise levels (Lmax), consistent with guidance from the Federal Aviation Administration (FAA), Hawai‘i Department of Transportation (HDOT) Airports Division, and the Hawai‘i Department of Health.

The analysis accounts for aircraft operations occurring during all hours of airport activity, including nighttime periods, through the use of Ldn, which incorporates a penalty for nighttime noise events. While the study does not model separate runway-use or wind-condition scenarios, it recognizes that aircraft noise levels may vary based on operational and weather conditions.

The Draft EIS will disclose both exterior and interior noise considerations. The noise study evaluated building design and construction measures capable of reducing interior noise levels to 45 dBA or less, consistent with HDOT Airports Division use compatibility criteria. Recommended measures include enhanced exterior wall assemblies, upgraded glazing, and mechanical ventilation or air-conditioning systems that allow windows to remain closed. These measures will be identified in the Draft EIS as mitigation to improve compatibility between the proposed land uses and airport operations. Outdoor noise exposure is evaluated in the context of land use compatibility and relative noise sensitivity, recognizing that proposed outdoor uses, such as pedestrian circulation, recreation areas, and open space amenities, are less noise-sensitive than interior residential living spaces. As discussed in the Environmental Noise Assessment, noise mitigation measures are therefore appropriately focused on reducing interior noise levels within dwelling units, while outdoor areas are evaluated for overall compatibility rather than compliance with interior residential noise thresholds.

Comment No. 4: Aircraft Safety and Crash Risk

The site is located in an area long recognized as inappropriate for residential use due to flightpath 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 (§11200.1-13(b)(5)) and substantial risks associated with hazardous conditions (§11-200.113(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.*

Response:

The Applicant will continue to coordinate with the Hawai‘i Department of Transportation Airports Division and the Federal Aviation Administration, and any safety-related guidance or recommendations provided by these agencies will be incorporated into the Draft EIS and subsequent project design, as applicable.

In evaluating aviation safety, publicly available records maintained by the HDOT indicate that there have been no commercial aircraft crash events involving residential areas on Maui over the operational history of Kahului Airport. While aviation incidents are inherently low-probability events, this long-term safety record provides important context for understanding baseline conditions and risk when evaluating potential safety considerations associated with airport-adjacent development. Emergency response considerations will also be evaluated in coordination with County emergency service providers to ensure that access, response times, and operational requirements are adequately addressed.

The Draft EIS will also provide contextual discussion of existing healthcare capacity on Maui, informed by publicly available healthcare utilization data. Emergency medical response to rare, mass-casualty aviation incidents is addressed through established countywide and statewide emergency preparedness and disaster response protocols rather than through project-specific facilities. The Draft EIS will, therefore focus on site access, emergency vehicle circulation, and coordination with emergency services, and will clarify that the proposed project does not materially alter islandwide hospital capacity or emergency response planning. Coordination with applicable County emergency service

providers will be documented, and access requirements, response routes, and operational constraints will be evaluated to confirm that emergency response capability can be maintained during construction and at full build-out.

Comment No. 5: 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.

Response:

The Draft EIS will evaluate potential effects on economic and social welfare, public health, and ambient noise, and whether such effects would disproportionately affect specific populations.

An Air Quality and Climate Change Study has been prepared for the project and will be incorporated into and discussed in Draft EIS. This study evaluates existing and future air quality conditions, greenhouse gas emissions, and potential project-related contributions in the context of regional emission sources. The Draft EIS will integrate the findings of this study with analyses of aircraft noise, transportation, adjacent land uses, and other environmental stressors to evaluate potential cumulative effects on future residents.

Consistent with HAR §11-200.1-24(1), the Draft EIS will include a cumulative impacts analysis that considers past, present, and reasonably foreseeable actions in the surrounding area, including airport operations, existing industrial uses, and proposed future facilities identified during scoping. This analysis will evaluate whether the combined effects of noise, air emissions, and land use patterns could result in disproportionate environmental or health burdens, and will disclose assumptions, uncertainties, and applicable regulatory thresholds.

The Draft EIS will discuss the historical land use, existing conditions, surrounding airport- and industrial-related activities, site photographs, and the project's relationship to the Maui Island Plan Directed Growth framework. Housing need and market demand will be discussed in conjunction with site characteristics, constraints, and compatibility considerations.

In addition, the Draft EIS will evaluate impacts to both the natural and human environment, including air quality, climate change, noise, public health, cultural and archaeological resources, visual resources, agricultural resources, population and housing, public services (including fire, police, schools, and medical services), solid waste, drainage and flooding, infrastructure systems, and airport-related considerations.

Comment No. 6: 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.

Response:

To provide clarification, drilling a new well is not the preferred alternative. The project's preferred water supply approach is to repurpose an existing well with an existing water allocation, subject to regulatory approvals. Alternative water supply scenarios, including development of a new well, will be identified and evaluated in the Draft EIS. This analysis will address cumulative impacts on existing groundwater users, and consistency with public water planning. The Draft EIS will also evaluate energy requirements, operational vulnerability, and long-term resilience associated with water conveyance and treatment.

Unresolved issues, required approvals, and infrastructure commitments will be disclosed, and feasibility of proposed water supply and conveyance components will be evaluated rather than assumed.

Comment No. 7: 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 §11200.1-10.

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.

Response:

The Draft EIS will evaluate the proposed project as a single action at full build-out, including all reasonably foreseeable wastewater servicing scenarios. The analysis will

address potential wastewater configurations, including on-site treatment, phased infrastructure, and possible future connection to the County system, as applicable.

The Draft EIS will disclose projected wastewater flows, treatment capacity requirements, infrastructure commitments, and cumulative environmental impacts associated with full build-out conditions. The analysis will not segment review or assume future infrastructure feasibility without evaluation, and will identify uncertainties, approvals, and constraints relevant to wastewater treatment, reuse, and disposal to support informed decision-making.

Comment No. 8: 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.

Response:

The comment regarding transportation demand, roadway conditions, and project description is acknowledged. The Draft EIS will include a comprehensive analysis of transportation and traffic impacts at full build-out, including foreseeable travel demand generated by the proposed residential population and associated uses. The analysis will address roadway operations, safety conditions, and cumulative impacts on Hansen Road, Pūlehu Road, and the surrounding transportation network, taking into account existing conditions, planned improvements, and other past, present, and reasonably foreseeable projects identified during scoping.

The Draft EIS will incorporate a Traffic Impact Analysis which will analyze the full build out of the project. In addition, the Draft EIS will include a full project description, including the master plan concept, land use framework, circulation systems (vehicular, pedestrian, bicycle, and transit), potential sustainability strategies, phasing, and information on infrastructure and public spaces for facilities, to support informed decision-making under Chapter 343.

Comment No. 9: 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.

Response:

Comment No. 10: 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.*

Response:

The Draft EIS will include a detailed land use and plan consistency analysis addressing the Maui Island Plan, applicable community plans, and relevant State and County policies. The Draft EIS will discuss and identify the land use amendments and discretionary approvals being pursued to implement the proposed project.

The Draft EIS will also evaluate the proposed land use changes in the context of adopted planning frameworks and will not assume plan consistency. The Draft EIS will discuss

how airport hazards, land use compatibility, and alternative land use patterns were considered in developing the proposed action, providing decision-makers with sufficient information to assess whether the proposed land use changes are appropriate.

Comment No. 10: 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*

Response:

The Draft EIS will present a comprehensive, project-wide evaluation of the proposed action, rather than isolated topic-specific analyses. The Draft EIS will include a complete project description addressing the master plan concept, land use program, development phasing, and full build-out scenario, and will evaluate environmental, public health, infrastructure, and socioeconomic impacts on both a project-wide and cumulative basis.

The Draft EIS will include an alternatives analysis that evaluates feasible alternatives capable of meeting the project objectives. This analysis will consider a range of alternatives, including the No-Action Alternative, variations in density and site planning, non-residential or industrial-use alternatives, and other reasonable alternatives identified during scoping. Each alternative will be described and evaluated in a manner that allows meaningful comparison of potential impacts and trade-offs.

Comment No. 11 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.

Response:

The Draft EIS will include analyses necessary to disclose the project’s direct, indirect, and cumulative environmental effects and will be prepared to serve as a clear and comprehensive public record of the environmental, public health, and equity considerations associated with the proposed action.

While the Applicant is not the decision-making agency and does not control whether site visits are conducted, the Draft EIS will document existing conditions using technical studies, field data, and accepted analytical methodologies, including evaluation of aircraft noise, surrounding industrial activity, and land use context under representative operating conditions. Through this approach, the Draft EIS will ensure that relevant environmental information is disclosed and available for consideration by decision-makers and the public prior to any irreversible commitments of land or public resources.

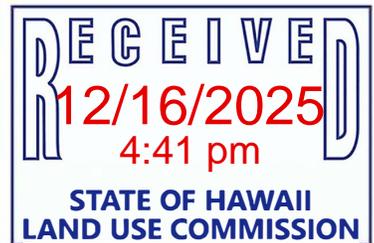
Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission



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





March 13, 2026

Via Email: micahk@prp-hawaii.com
and nkinney@prp-hawaii.com

Pacific Resource Partnership
1100 Alakea Street/4th Floor
Honolulu, HI 96813

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i

Aloha,

Thank you for Pacific Resource Partnership’s December 16, 2025 scoping comments on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 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.*

Response:

An Agricultural Impact Assessment Report was prepared to assess the impacts of the project and the proposed land use conversion. This report will be included in the Draft EIS along with discussion of potential impacts from converting agricultural lands identified as Prime ALISH lands and lands with Land Study Bureau (LSB) “A” soil classifications.

Comment No. 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.*

Response:

The Draft EIS will discuss anticipated effects of expanding the UGB and related secondary and cumulative impacts. The Draft EIS will also address the relationship of the project and applicable adopted long-range State and County growth management planning objectives.

Comment No. 3: Population, Housing, and Socioeconomic Effects

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

The Draft EIS should analyze:

- *Projected population generation associated with full build-out of the proposed residential uses.*
- *Distribution of 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.*

Response:

The Draft EIS will analyze projected population generation from the development of the residential uses, housing distribution by affordability and tenure, and indirect socioeconomic effects associated with population growth.

Comment No. 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.*

Response:

A Preliminary Engineering Report (PER) discussing water demand and wastewater treatment demands will be included and discussed in the Draft EIS; that report will also address drainage infrastructure. The Draft EIS will also include a Water Supply Report that addresses groundwater conditions and potential effects to water resources.

Comment No. 5: Transportation and Mobility

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.*

Response:

A Traffic Impact Analysis Report (TIAR) assessing transportation conditions and mitigation recommendations has been prepared for the project and will be appended to and discussed in the Draft EIS. The Draft EIS will discuss transportation impacts at full project build-out, cumulative effects, and multimodal transportation conditions.

Comment No. 6: Hazard Exposure and Emergency Response

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 buildout.

Response:

The comment regarding hazard exposure, evacuation, and emergency service capacity is acknowledged. The Draft EIS will include an evaluation of potential hazards affecting the project site and surrounding area, as well as emergency access and response considerations associated with the proposed development.

Comment No. 7: Cultural and Archaeological Resources

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.

Response:

A Cultural Impact Assessment (CIA) and an Archaeological Literature Review Assessment (ALRA) were prepared for the project to identify cultural resources, traditional cultural practices, and previously recorded archaeological sites within and adjacent to the project area. The findings of these studies, along with documentation of consultation efforts and assessment of potential project-related impacts, will be included and discussed in the Draft EIS.

Comment No. 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.

Response:

The Draft EIS will include a section that evaluates the reasonable alternatives to the proposed project, including the no-action alternative and delayed action alternatives. The assessment will provide an appropriate analysis of impacts to allow for meaningful comparisons between the alternatives.

Comment No. 9: Cumulative Impacts

The Draft EIS should include a cumulative impacts analysis consistent with HAR §11-200.1-20 that: Identifies relevant past, present, and reasonably foreseeable actions in Central Maui; and Evaluates the incremental contribution of the proposed project across resource areas when considered with those actions.

Response:

The Draft EIS will include a cumulative impacts analysis consistent with HAR §11-200.1-20.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS. Pacific Resource Partnership will receive a copy of the Draft EIS for review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,
Pioneer Design Group – Hawai‘i LLC.

A handwritten signature in black ink that reads "Emily Ballard". The signature is written in a cursive, flowing style.

Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission

TO: Applicant: Ho'onani Development LLC
Mr. Greg Sado greg@alphahawaii.com

January 5, 2026

TO: Accepting Authority: State of Hawai'i Land Use Commission
Ms. Martina Segura, Staff Planner dbedt.luc.web@hawaii.gov

TO: Consultant: Pioneer Design Group, Hawai'i, LLC
Ms. Emily Murai and TC Campbell, P.E. emurai@pdg-hawaii.com

TO: Maui Planning Director
Ms. Kate Blystone kate.blystone@mauicounty.gov



FROM: Prof. Richard "Dick" Mayer 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.

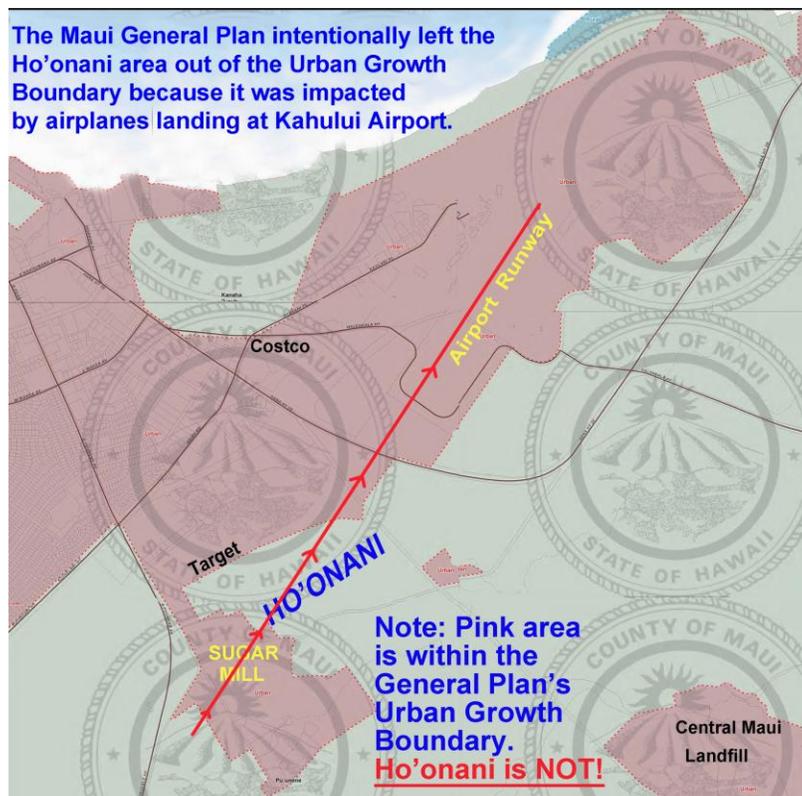


Figure 1. Showing the Maui Island Plan's Urban Growth Boundary's effort to exclude the Ho'onani site from urban development because of potential noise disturbances.

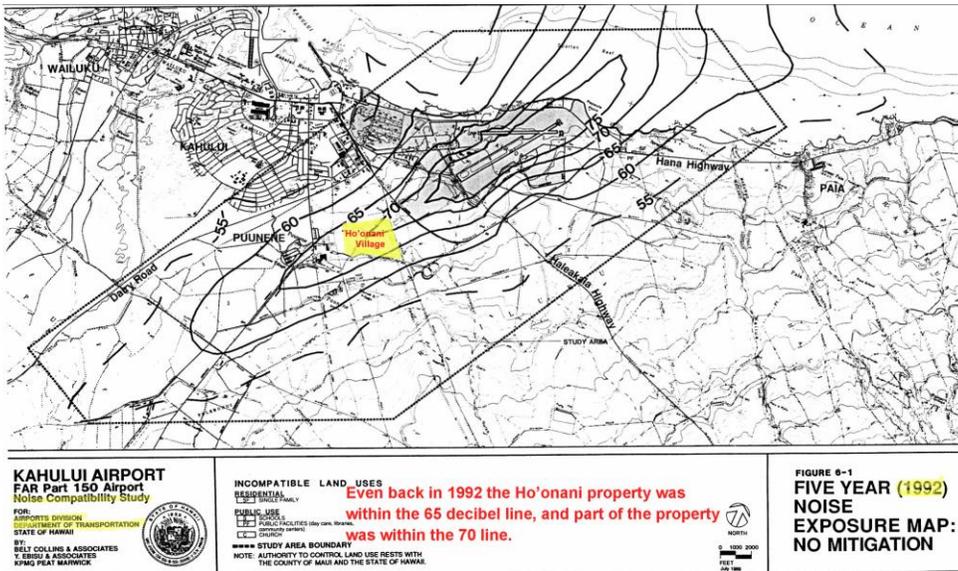


Figure 2 *The most recent 1992 Noise Level study (compiled for the Dept of Transportation-Airports) concerning noise levels around Kahului Airport. The noise levels today would be much higher, especially at night when residents would want to be sleeping.*

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.

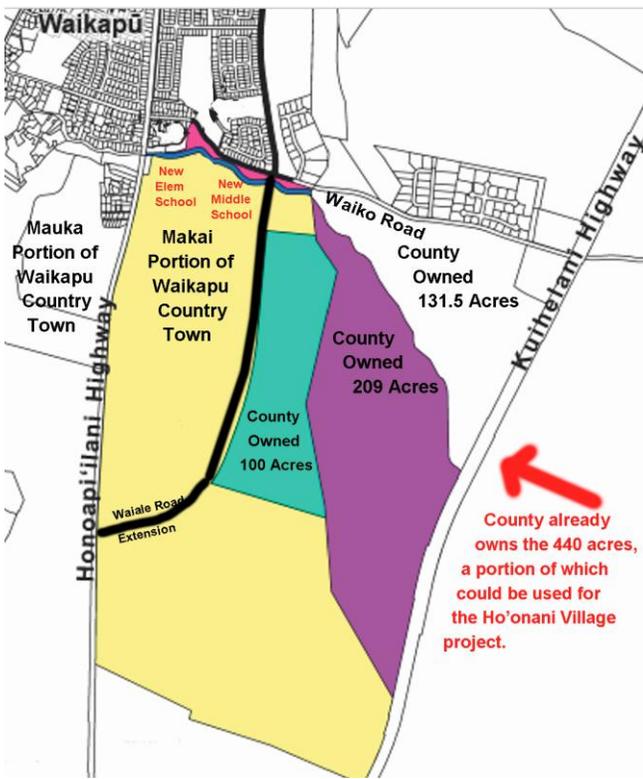


Figure 4 The Maui County owned lands in Waikapu that could provide the needed housing.

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.

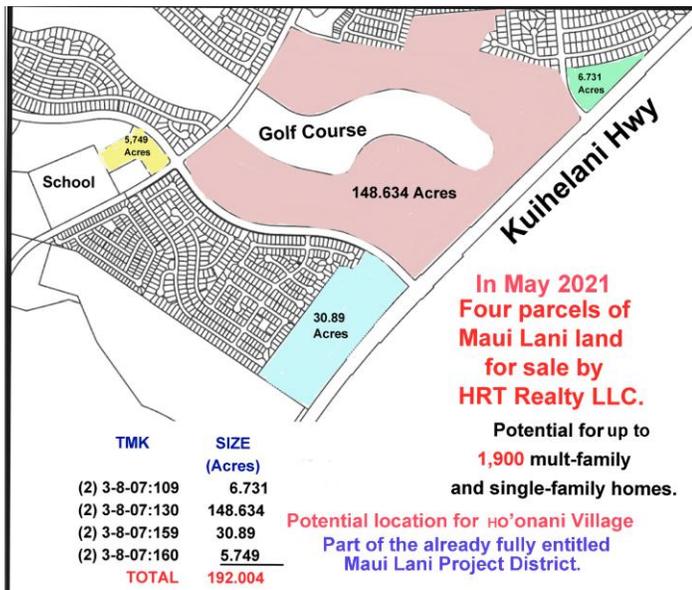


Figure 5 Possible alternative land site for much-needed Central Maui housing. Fully entitled for a large residential development with proximity to infrastructure (roads, schools, transportation, etc.)



March 13, 2026

Via email: dickmayer@earthlink.net

Professor Richard “Dick” Mayer

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i, STP 00965.25; STP 8.4016

Aloha Richard Mayer:

Thank you for providing us with your comments, dated January 5, 2026, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

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?

Response:

The Draft EIS will evaluate both exterior and interior noise conditions and will identify building design and construction measures capable of reducing interior noise levels within dwelling units to levels consistent with applicable land use compatibility guidance. The purpose of this evaluation is not to minimize the concern raised, but to disclose potential impacts and mitigation measures so that decision-makers and the public can fully understand the trade-offs associated with the proposed location.

The Draft EIS will also include an alternatives analysis that evaluates other reasonable development scenarios, including alternatives that vary in location, density, land use configuration, or design, to the extent feasible. This analysis will allow consideration of whether alternative sites or project configurations could reduce aircraft-related impacts while meeting the project's objectives, including the provision of affordable and workforce housing in proximity to employment, services, and infrastructure.

Ultimately, determinations regarding land use appropriateness and public policy considerations are the responsibility of the decision-making agencies. The role of the Draft EIS is to ensure that the potential environmental, public health, and quality-of-life implications of locating housing within an airport-influenced area are fully disclosed and considered prior to any final decisions.

Comment No 2:

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.

Response:

The comment regarding project scale and potential impacts is acknowledged. The estimate of approximately 5,000 residents assumes an average household size that is higher than what is typically supported by available demographic data and the proposed unit mix. According to the 2017–2021 American Community Survey, the average household size in Maui County is approximately 3.0 persons per household, and statewide averages are slightly lower. In addition, the proposed residential program includes a substantial number of studio and one-bedroom units, which are generally occupied by smaller households than the countywide average. As a result, actual population associated with the proposed 1,608 units is expected to be lower than the estimate cited in the comment.

The Draft EIS will nonetheless treat the project as a large, mixed-use development and will evaluate potential impacts and mitigation measures accordingly. The analysis will address environmental, infrastructure, public service, transportation, and quality-of-life considerations associated with residential, commercial, and employment-generating uses to ensure that conditions for residents, businesses, and visitors are adequately disclosed and inform decision-making.

Comment No 3:

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.

Response:

Currently contemplated residential components call for matching multifamily apartment structures, thoughtfully placed throughout the site to reflect the environment. Each building is expected to be three stories. We may include both solar photovoltaic panels or solar hot water, but final determination by the Owner has not yet been made. In any case, any requests for solar panels would be evaluated for FAA compliance and glare analysis for subsequent permitting. Any final residential designs will fully comply with all applicable building codes (including the Hawaii State Building Code and IBC requirements for multi-family residential buildings). Elevators will be provided where required for accessibility. The project will fully comply with any Americans with Disabilities Act (ADA), Fair Housing Act, and State of Hawai'i accessibility requirements. Currently, every workforce unit includes a dedicated in-unit washer/dryer space. There will be adequate on-grade parking provided for renters, visitors, and businesses throughout Ho'onani Village.

Comment No 4: 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.

Response:

It is noted that all units are proposed to be made available to households earning 140% AMI or below with 1/3rd of the units proposed to be made available to households earning 60% or below AMI. Specific details regarding resident selection, eligibility, priority criteria, and the allocation of rental versus ownership opportunities will be determined through coordination with HHFDC and the County of Maui.

Comment No 5: 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.

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.

Response:

The comment regarding the historical rationale for excluding the project site from the Maui Island Plan Urban Growth Boundary (UGB), airport operations, and aircraft noise is acknowledged. The Draft EIS will include a detailed discussion of the project's proximity to Kahului Airport, applicable airport influence areas, and land use compatibility considerations, including aircraft noise exposure associated with landing and takeoff operations under varying conditions, such as Kona weather.

The Draft EIS will provide disclosure of existing aircraft noise conditions using accepted noise metrics and long-term monitoring data, including evaluation of nighttime operations and their contribution to day-night average sound levels. The analysis will address how aircraft operations during evening and nighttime hours influence noise exposure at the

project site and will discuss potential effects on interior and exterior residential environments, as well as mitigation measures intended to reduce interior noise levels consistent with applicable land use compatibility guidance.

With respect to aircraft operations data, the Draft EIS will rely on available airport operational information, noise contour mapping, and technical noise analysis rather than attempting to independently regulate or certify airport operations. The Applicant does not have the authority to require the Hawai‘i Department of Transportation Airports Division or airport management to prepare a separate noise study or certification. However, the Applicant has coordinated and will continue to coordinate with the Hawai‘i Department of Transportation Airports Division and the Federal Aviation Administration, and relevant agency guidance and comments will be incorporated into the Draft EIS, as applicable.

The Draft EIS will also include a land use and planning context discussion that addresses the Maui Island Plan, including the existing UGB designation, the planning rationale underlying adopted land use boundaries, and the land use amendments being pursued as part of the proposed project. The EIS process is intended to disclose potential impacts, compatibility considerations, and trade-offs associated with proposed land use changes so that decision-makers may evaluate whether such changes are warranted in light of current conditions and community needs.

While determinations regarding plan amendments, airport operations, and long-term land use policy rest with the appropriate decision-making agencies, the Draft EIS will serve as a comprehensive public record documenting aircraft noise exposure, operational context, mitigation measures, and land use compatibility considerations prior to any irreversible commitments of land or public resources.

Comment No 6: Education Infrastructure

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.

Response:

The Draft EIS will address school-related impacts at a programmatic level, including estimated student generation associated with the proposed housing and potential implications for existing public school facilities. The Applicant has consulted with the Hawai‘i Department of Education (DOE) and the School Facilities Authority (SFA)

regarding school capacity and planning considerations, and information provided through this coordination will be incorporated into the Draft EIS, as appropriate.

While the Applicant cannot require the DOE to prepare a separate report, the Draft EIS will disclose assumptions, available enrollment data, and planning considerations relevant to school facilities and transportation to inform decision-makers and the public.

Comment No 7: 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.

Response:

While the project is not primarily a healthcare facility, the proposed mixed-use program may include medical offices or urgent-care uses, subject to market demand and subsequent permitting. A significant constraint on healthcare availability on Maui is the limited availability of housing for healthcare workers, which affects providers’ ability to staff and expand services. By providing affordable workforce housing near employment centers and infrastructure, the project could indirectly support healthcare system capacity. Decisions regarding the specific type, size, and timing of any on-site medical facilities will be addressed through later design, market feasibility, and regulatory review processes rather than at the EIS stage.

Comment No 8: 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.

Response:

The proposed project includes parks, open space, recreational amenities, and areas intended for civic and community uses as integral components of the overall master plan. These facilities are intended to serve residents of all ages, including children, adults, and seniors, and to reduce reliance on off-site recreational facilities.

Comment No 9: 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.

Response:

The proposed project anticipates an on-site wastewater treatment plant (WWTP) to serve the residential, commercial, and industrial components of the development, rather than reliance on the existing Kahului wastewater system. The Draft EIS will describe the general location, scale, and operational characteristics of the on-site WWTP and will evaluate potential environmental impacts associated with its construction and operation.

The on-site WWTP is anticipated to produce R-1 recycled water that would be reused for landscape irrigation within the project site, reducing demand on potable water supplies. The Draft EIS will also evaluate the potential for R-1 water to be made available to adjoining properties for irrigation, subject to regulatory approvals and agreements. Residual waste streams will be managed in accordance with applicable Department of Health requirements, and the Draft EIS will describe disposal methods, redundancy measures, and safeguards to protect groundwater and surface water resources.

Comment No 10: Water and Water Quality

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.

Response:

The Draft EIS will include a detailed discussion of the proposed water supply source, including expected water quantities, well capacity, and water quality characteristics, based on available data and engineering studies. As previously noted, the preferred water supply approach is to repurpose an existing well, rather than relying on County of Maui Department of Water Supply infrastructure, subject to confirmation of capacity and regulatory approvals.

The Draft EIS will address historical agricultural land use in the vicinity of the well source, including the potential for legacy fertilizer, pesticide, and herbicide residues associated

with former plantation operations. Available groundwater quality data, including any existing sampling or testing results, will be disclosed in the Draft EIS. If additional testing or treatment is required, the Draft EIS will describe applicable treatment technologies, monitoring requirements, and regulatory standards to ensure compliance with Department of Health drinking water and water quality requirements.

Comment No 11: 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.

Response:

We confirm that water source testing will be conducted to ensure the water source is compatible with potable water quality standards. Findings will be discussed, and any required mitigation or treatment measures will be identified to ensure compliance with drinking water requirements. The Draft EIS will also describe water demands for both potable and non-potable uses

Comment No 12: 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.

Response:

The TIAR evaluates existing and future traffic conditions on both Hansen Road and Pūlehu Road, which serve as the primary access routes to the project site. The TIAR analyzes traffic operations along Hansen Road and Pūlehu Road at multiple intersections, including the Hansen Road / Pūlehu Road intersection and the proposed project driveway intersections along both roadways. Traffic conditions were evaluated under Existing (2024), Year 2042 No Project, and Year 2042 Plus Project conditions. The analysis includes review of intersection operations, turning movements, and queue lengths to ensure that the roadway network can safely accommodate passenger vehicles, service vehicles, and heavy vehicles using these corridors. The TIAR concludes that, with the assumed

implementation of the planned County roundabout at Hansen Road and Pūlehu Road and identified roadway improvements, the surrounding roadway network will continue to operate at acceptable levels of service.

In addition to the regional roadway analysis, the project includes an internal circulation network designed to support safe and efficient movement within the development. Internal streets will be designed in accordance with the County of Maui Street Design Manual and applicable engineering standards. The project will include sidewalks, pedestrian pathways, street lighting, traffic signage, and designated parking areas throughout the development. The internal roadway network is designed to accommodate emergency vehicles, service vehicles, and solid-waste collection vehicles, while also providing safe pedestrian connections between residential areas, commercial uses, and community amenities.

Comment No 13: Post-Construction Management

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.

Response:

To clarify, the property owner is currently based on Maui. The entire project is currently contemplated as multifamily apartment rentals. No Homeowner Association or Association of Apartment Owners will be formed. The project will not be managed by the construction company: instead, long-term property management (including things like maintenance, security, rent collection, and resident services) will be handled by a professional third-party property management company that has experience in Hawaii multifamily rental communities. That company will be selected by the developer prior to occupancy under a long-term management agreement and staffed locally in Hawai'i. Rental charges, security deposits, and all fees will be set by this management company based on market conditions and in full compliance with State and County fair-housing laws, while renters will have opportunities to provide input through resident surveys, portals, community meetings, and direct communication with on-site staff.

Comment No 14: 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.

Response:

At this time, no commitments have been made by Maui County or the State of Hawai'i to fund or construct project-related infrastructure improvements, and that no such commitments should be assumed.

The Draft EIS will describe infrastructure needs associated with the proposed project and will identify where improvements may be required to support full build-out. The Applicant anticipates working collaboratively with County and State agencies to evaluate infrastructure improvements and, where appropriate, cost-sharing or partnership arrangements that could be mutually beneficial and consistent with adopted plans and capital improvement programs. Any such arrangements would be subject to future negotiations, approvals, and funding availability.

The Draft EIS will also discuss potential impacts on County and State operations at a programmatic level, including transportation, public services, and facilities, and will disclose that final determinations regarding funding responsibility, project timing, and implementation would be made through subsequent discretionary approvals and budgeting processes rather than through the EIS.

Comment No 15: Alternative Locations

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.

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#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.

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.

Response:

The comment regarding potential alternative locations for meeting Central Maui housing needs is acknowledged. The Draft EIS will include an alternatives analysis that evaluates

reasonable alternatives to the proposed action, consistent with the purpose and need of the project and within the Applicant's control.

The Applicant notes that it does not own or control the alternative parcels identified in the comment, and therefore cannot assume their availability, feasibility, or development timeline. Several of the parcels referenced are subject to separate ownership, existing entitlements, or regulatory constraints, including areas located within the Special Management Area (SMA) and lands owned by the County that are designated for park or public use, which limits their suitability or availability for residential development. Decisions regarding the use, disposition, or incentivization of such lands rest with their respective owners and public agencies, not the Applicant.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared and the Department will receive a copy for further review and comment. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

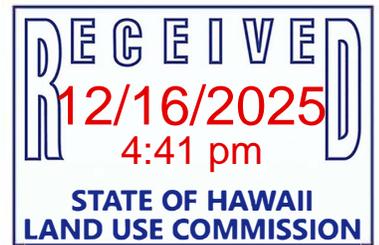
Sincerely,
Pioneer Design Group – Hawai'i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho'onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai'i Land Use Commission

From: [Jerry Isdale](#)
To: [Emily Murai](#)
Subject: EIS for Ho'onani Village
Date: Sunday, December 14, 2025 4:14:50 PM



I am in process of reading the EIS, but am reminded of the original pr release of the project. It came out about a week before the Hawaii Dept of Health released a study that found concerning levels of PFAS chemicals in the ground water of the adjacent Maui Business Park area. <https://health.hawaii.gov/news/submenu/pfas-detected-in-maui-business-park-system/>

Such contamination may not be in scope of an EIS but it should be a concern for an area that is touted to have residential and family activity (sports) areas. It is relevant to the project and remediation of the hazard, if found in Ho'onani, should be part of the EIS.

Has the water and soil been adequately tested?

- Jerry Isdale
Maui Institute of Art and Technology

sent from my phone, sorry for any voice2text goofs



March 13, 2026

Via email: isdale@gmail.com

Jerry Isdale

SUBJECT: Response to Environmental Impact Statement Preparation Notice
Comments for the Ho‘onani Village Mixed-Use Development Project,
Kahului, Maui, Hawai‘i

Aloha Jerry,

Thank you for your comments dated December 14, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment:

I am in process of reading the EIS, but am reminded of the original pr release of the project. It came out about a week before the Hawaii Dept of Health released a study that found concerning levels of PFAS chemicals in the ground water of the adjacent Maui Business Park area. <https://health.hawaii.gov/news/submenu/pfas-detected-in-maui-business-park-system/>

Such contamination may not be in scope of an EIS but it should be a concern for an area that is touted to have residential and family activity (sports) areas. It is relevant to the project and remediation of the hazard, if found in Ho'onani, should be part of the EIS.

Has the water and soil been adequately tested?

Response:

As a point of clarification, the EIS for the proposed project has not been prepared. The document that was published and for which you provided these comments in the EIS Preparation Notice (EISPN). Following the publication and comment period for the EISPN, a Draft EIS will be prepared, and following the publication and comment period on the Draft EIS, a proposed Final EIS will be prepared and presented to the EIS accepting authority (the State Land Use Commission) for review and action.

Your comment regarding per- and polyfluoroalkyl substances (PFAS) identified in groundwater within the adjacent Maui Business Park area is acknowledged. We confirm that multiple environmental investigations have been conducted for the project site, including a Phase I Environmental Site Assessment (ESA), and a Limited Soil Investigation. These studies were undertaken to evaluate existing site conditions, identify

potential recognized environmental conditions, and assess soil and groundwater characteristics relevant to human health and environmental protection.

The Phase I ESA reviewed historical land uses, regulatory databases, and surrounding properties to identify potential sources of contamination that could affect the project site, including nearby industrial and commercial uses. The soil sampling program included laboratory analysis of soils collected at representative locations across the site.

The findings of these investigations will be included and discussed in the Draft EIS and will be evaluated against applicable State of Hawai'i Department of Health (DOH) Environmental Action Levels (EALs) and other relevant regulatory standards. If contaminants of concern are identified at concentrations exceeding DOH EALs or other applicable thresholds, the Draft EIS will identify appropriate mitigation measures and remediation strategies consistent with DOH guidance and regulatory requirements.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared for this project. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

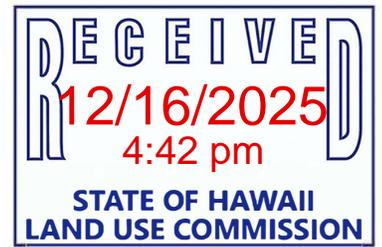
Sincerely,
Pioneer Design Group – Hawai'i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho'onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai'i Land Use Commission

From: [Leo C](#)
To: [Emily Murai](#)
Subject: Housing project
Date: Monday, December 8, 2025 4:15:20 PM



How come the project is taking land out of ag
Why can't homes be built with ag as the priority to provide help to the sg economy .

Will this project add burden to importing food?

Isn't at zones lands better for ag ?

Thanks
Leo

Sent from my remote email



March 13, 2026

Via email: leogizmo50@gmail.com

SUBJECT: Response to Environmental Impact Statement Notice Comments for the Ho‘onani Village Mixed-Use Development Project, Kahului, Maui, Hawai‘i

Aloha Leo,

Thank you for your comments dated December 8, 2025, regarding the proposed Ho‘onani Village Mixed-Use Development Project. On behalf of the Applicant, Ho‘onani Development, LLC, we offer the following information in response to the comments received.

Comment No. 1:

How come the project is taking land out of ag

Response:

We acknowledge your concern regarding removal of agricultural lands. While the project site is currently designated for agricultural use, there is no agricultural activity on site and its agricultural designation does not require that land be actively farmed, nor does it guarantee long-term agricultural viability. The purpose of the project is to create a complete community with housing, employment opportunities, and supporting infrastructure in a location adjacent to existing urban development. In addition, the Hawai‘i State Land Use Commission data indicates that State Urban designated lands are constrained on Maui, representing approximately 5 percent of total lands while Agricultural lands represent over 50% of land on Maui while the site’s conversion of agricultural land represents approximately 0.23% of the island’s high-quality farmland. A further analysis of agricultural impacts can be reviewed in the Agricultural Impact Report prepared for the project, which will be included in the Draft Environmental Impact Statement (EIS).

Comment No. 2:

Why can’t homes be built with ag as the priority to provide help to the sg [ag] economy

Response:

Under current regulations, housing is generally not permitted on agricultural lands unless it qualifies as a farm dwelling that is directly tied to bona fide agricultural operations. Such dwellings are subject to strict limitations on size, density, and use, and are intended to

support farming activity, not to function as general residential housing. As a result, agricultural zoning is not a viable mechanism for addressing broader housing needs or affordability challenge.

Comment No. 3:

Will this project add burden to importing food?

Response:

The project is not expected to increase Hawai‘i’s reliance on imported food. The site is not currently contributing meaningfully to local food production, and its conversion would not displace active or productive agricultural operations.

Comment No. 3:

Isn’t at [ag] zones lands better for ag?

Response:

Agricultural zoning is intended to protect lands that are suitable for agricultural use, but not all lands within the agricultural district are equally viable for farming. The project site is adjacent to existing urban development and infrastructure, making it more appropriate for urban uses than for long-term agricultural preservation. Concentrating development in such areas allows higher-quality agricultural lands to remain in agricultural use and reduces fragmentation.

Thank you again for your comments. Your comments and this response will be included in the Draft EIS being prepared for this project. Should you have any questions or require additional information, please feel free to contact me at 808-400-5959.

Sincerely,

Pioneer Design Group – Hawai‘i LLC.



Emily Ballard
Project Planner

cc: Greg Sado, Ho‘onani Development, LLC
Matthew Pennaz, Aspire Development and Consulting, LLC
Jeffrey Ueoka, Wells Street Law, LLLC
State of Hawai‘i Land Use Commission