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DTS DTS202603241042NA

Coastal Zone  
Management  
Program

Environmental Review  
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented  
Development

Statewide Geographic  
Information System

Statewide  
Sustainability Branch

April 23, 2026

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

Martina Segura  
State of Hawai'i, Land Use Commission  
P.O. Box 2359  
Honolulu, Hawai'i 96804

Dear Ms. Ballard & Ms. Segura:

**Subject:** Draft Environmental Impact Statement  
Ho'onani Village Mixed-Use Development  
Kahului, Maui, Hawai'i  
Tax Map Key: (2) 3-8-006:004: 0005; (2) 3-8-006:001; Pūlehu  
Road; Hansen Road



The Office of Planning and Sustainable Development (OPSD) is in receipt of your review request, received March 23, 2026, on the Draft Environmental Impact Statement (DEIS) for the proposed Ho'onani Village Mixed-Use Development in Kahului, Maui, Hawai'i.

According to the Draft EIS, the applicant, Ho'onani Development LLC, proposes to construct a 166.512-acre master-planned community that includes low-rise multi-family residential uses; neighborhood-serving retail and food-and-beverage establishments; office and entertainment uses; light industrial and employment-oriented uses; and a system of parks, open spaces, and pedestrian corridors

The development would include construction of internal roadways and further roadway improvements, utility infrastructure, stormwater management facilities, an on-site wastewater treatment plant and the modification of an existing off-site water system, parking areas, and pedestrian and bicycle circulation networks designed to integrate the project with surrounding transportation infrastructure. The proposed development seeks to provide workforce housing, economic opportunities and an integrated, authentic community. Construction is anticipated to start in 2028 and will occur in nine phases over 17 years.

The project would provide 100 percent of the approximately 1,608 housing units as affordable, offered to households earning 140 percent of the Area Median Income (AMI) or below, for a minimum of 10 years. The applicant is further proposing to have one third of the units reserved for renters at 60 percent AMI or below. The applicant intends to work with Hawai'i Housing and Finance Development Corporation (HHFDC) to pursue a Hawai'i Revised Statutes (HRS) § 201H-38 Affordable Housing Approval and Low-Income Housing Tax Credit (LIHTC) funds for project cost savings.

The project site is located within the State Land Use Agricultural District. Almost all of the project site is outside the Urban Growth Boundary (UGB) of the Maui Island Plan and nearly all of it is designated Agriculture in the Wailuku-Kahului Community Plan. The entire project site is zoned Agriculture by the County of Maui. The applicant proposes to expand the UGB to encompass the project site, amend the Community Plan and County zoning to Light Industrial and has initiated a petition with the State Land Use Commission for a District Boundary Amendment to change State Land Use Zoning from Agriculture to Urban. All of the project site is located in Flood Zone X.

OPSD has reviewed the subject request and has the following comments to offer:

1. **Airport Proximity/Noise**: OPSD notes that the project area is in the vicinity of Kahului Airport. The DEIS states that the project is located within the 55-75 Day-Night Average Sound Level (DNL) noise contours of the Base Year 1993 OGG Noise Exposure Map. In its comment letter, the Hawai'i Department of Transportation recommends that noise-sensitive land uses—specifically housing—be located outside of 65 DNL or greater noise contours.

OPSD acknowledges the DEIS discussion of proposed noise mitigation measures for the residential development, including dual-pane windows and concrete masonry unit (CMU) walls. The DEIS also describes the incorporation of outdoor gathering and community spaces intended to accommodate markets, performances, cultural activities, and recreational uses.

Given the project's proximity to the airport and the outdoor nature of these proposed uses, OPSD recommends that the DEIS include a discussion of how anticipated aircraft noise levels may impact the functionality, usability, and community experience of these outdoor spaces. Such a discussion should address potential noise exposure, compatibility with intended activities, and any additional mitigation measures that may be warranted for outdoor environments.

2. **Transportation, Multimodal, and Walkability**: The DEIS states that the project proposes an interconnected network of sidewalks, multiuse paths, and bicycle facilities intended to link residents to surrounding commercial areas, employment centers, and regional transit corridors. Additionally, the applicant is requesting that the project site be designated as a Transit Oriented Corridor (TOC) to

maintain consistency with the proposed amendments to the Maui Island Plan Urban Growth Boundary.

OPSD recommends that the DEIS further examine how this multimodal network will connect beyond the project boundary. Specifically, additional analysis should be provided describing how the proposed sidewalks, multiuse paths, and bicycle facilities will integrate with existing or planned facilities in adjacent neighborhoods and commercial areas, and whether any off-site improvements may be necessary to ensure safe, continuous, and functional connectivity for pedestrians and cyclists.

OPSD appreciates the applicant's commitment to coordinate with the County "on potential bus stop locations to improve access to public transit and further reduce reliance on single occupancy vehicles, advancing the intent of the Countywide Policy Plan to support a balanced, multimodal transportation system." To support this goal, OPSD recommends that the project's master planning process identify potential on-site and adjacent area bus stop locations early in design. Ensuring that bus stops are located within one-half mile of project residences will enhance transit accessibility and strengthen the project's consistency with TOC principles and County multimodal transportation policies.

3. **Water:** The project proposes the development of a private water system utilizing the existing Pu'unēnē–Pump 6 Well, a former Hawaiian Commercial & Sugar Company (HC&S) well located off-site on TMK (2) 3-8-006:001 within the Kahului Aquifer. Groundwater from this source is described as slightly brackish, and the applicant proposes the use of a reverse osmosis (RO) treatment system to meet drinking water standards. According to the DEIS, RO treatment will generate a brine byproduct amounting to approximately 15–30 percent of the total pumped and treated groundwater, which is proposed to be discharged into the nearby Ha'ikū Ditch.

OPSD recommends that the DEIS discuss the overall feasibility of relying on the RO treatment system, including considerations related to long-term affordability, energy consumption, operational sustainability, and maintenance requirements. The DEIS should also provide examples of comparable long-term RO use elsewhere in Hawai'i or brackish groundwater contexts to support the practicality of the proposed system.

OPSD further recommends that the DEIS clearly identify ownership and control of the Pu'unēnē–Pump 6 Well, including any existing agreements, permits, or access requirements that may affect long-term water system viability.

Regarding the proposed discharge of RO brine into the Ha'ikū Ditch, OPSD requests clarification on what entity has jurisdiction or control over the ditch and

what permissions, agreements, or discharge authorizations are required. The DEIS should also address contingency scenarios, including what occurs if ditch water levels are low or flow is intermittent, and whether brine discharge could exacerbate water quality concerns during such conditions.

4. **Housing:** The project states that the proposed affordable housing units will remain affordable for a minimum of 10 years. The DEIS also notes that “housing cost burdens, limited rental availability, and post-disaster displacement have intensified existing social and health vulnerabilities.” Given these conditions, OPSD recommends that the applicant explore options for lengthening the period of affordability, rather than limiting it to 10 years.

Additionally, OPSD requests that the DEIS clearly specify whether all proposed rental housing units will be 100 percent affordable or whether the project will consist of a mix of affordable and market-rate units. The DEIS currently contains statements that suggest both possibilities, and clarification is needed for accurate evaluation.

If you respond to this comment letter, please include DTS202603241042NA in the subject line. For any questions regarding this letter, please contact Rachel Beasley of our office at (808) 587-2888 or by email at [rachel.e.beasley@hawaii.gov](mailto:rachel.e.beasley@hawaii.gov).

Sincerely,



Mary Alice Evans  
Director