May 6, 2026

VIA EMAIL and U.S. Mail

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

Re: **Draft Environmental Impact Statement (March, 2026)**
Ho'onani Village Mixed-Use Development Project, Kahului, Maui, Hawai'i

Dear Ms. Ballard:

Pacific Resource Partnership ("PRP") has reviewed the Draft Environmental Impact Statement ("DEIS") for the proposed Ho'onani Village Mixed-Use Development project that was published in the Environmental Notice on March 23, 2026, and offers the following comments on the DEIS.

1. **Prime Agricultural Lands and State Important Agricultural Lands**

The entire project area is located upon Prime Agricultural Lands of Importance to the State of Hawai'i ("ALISH"). Accordingly, the soils are physically and chemically suited for crop production under appropriate management and with adequate water. Furthermore, the project area is located upon Land Study Bureau (LSB) "A" Soil Classifications. "A" rated soils indicate soils that historically support intensive agriculture.

The water well system that is proposed to serve the project is located on State Important Agricultural Lands ("IAL"). IALs are lands that should be protected and preserved for long-term agricultural use based on criteria such as soil quality, agricultural infrastructure, and contribution to the State's agricultural economy.

Based upon the foregoing, the Final EIS ("FEIS") should provide a meaningful alternatives analysis evaluating feasible crop types and productivity potential, and the infrastructure that may be necessary to effectuate these various agricultural uses on the project site.

The additional analysis should include, for example: an analysis of potential crop varieties (including less water-intensive crops); disclosure of the cost assumptions supporting the estimated costs associated with the different types of crops, irrigation methods, and other infrastructure; the impact of the proposed water well system on the IAL land (including the estimated size and footprint of the proposed system); and an evaluation of the permanent loss of these ALISH and IAL lands in Maui County in light of the county's goals to expand local food production; promote responsible natural resource stewardship; and create a more equitable, sustainable, and resilient food system.

2. M-1 Light Industrial Zoning

While acknowledging the mixed-use nature of the proposed development, the DEIS primarily focuses upon residential use. The project proponent is currently seeking a change of zoning for the property from the Agricultural District to the M-1, Light Industrial District, and represents that it seeks "flexibility for future options".

M-1 Light Industrial zoning permits a wide variety of uses and development standards. Accordingly, the FEIS should necessarily include a more thorough analysis of the impact(s) of each of the contemplated "future options" of permitted uses within the M-1 zoning designation. Seeking broad M-1 zoning "flexibility for future options" without analyzing each of those options in the FEIS would effectively defer analysis of reasonably foreseeable development scenarios and the full scope of potential impacts.

3. Aircraft Noise

The project area lies one mile from the Kahului Airport ("OGG"), directly beneath the approach-and-departure flight path for Runway 2-20 – OGG's primary commercial runway. Therefore, the project area is within the 55-75 DNL contours of the Base Year 1993 Kahului Airport Noise Exposure Map. The State of Hawai‘i Department of Transportation recommends Noise Level Reduction measures for residential development within the 60-70 DNL range. Measured noise levels at the project area fall within the 60-65 DNL Range.

The project proposes to incorporate enhanced building envelope measures, including upgraded glazing assemblies, sealed exterior construction, and mechanical ventilation or air conditioning to achieve interior noise levels of 45 DNL or less with respect to the residential component of the development.

Based upon the foregoing, the FEIS should:

- Analyze in more detail the feasibility, cost-effectiveness, and energy consumption of utilizing air-conditioning to achieve interior noise levels of 45 DNL or less throughout all of the proposed residential units at the project, including but not

limited to, a discussion of whether and how such mitigation measures will impact affordable-housing, energy efficiency, and climate resiliency goals.

- In addition to focusing on interior noise mitigation, the FEIS should evaluate the compatibility of outdoor uses within the 55-75 DNL contour, including impacts to outdoor living environments, recreational areas, and long-term livability and noise impacts upon different segments of likely residents (including children) throughout the project area.

4. <u>Water Resources and Wastewater Infrastructure</u>

The Project has identified modification and reuse of the existing Pu‘unene Pump 6 Well (State Well No. 5226-002) as the preferred water supply source. The project would withdraw approximately 1.097 MGD (average) from the Kahului Aquifer system through the Pu‘unene Pump 6 Well - at full buildout. This proposed withdrawal exceeds the Kahului Aquifer’s designated sustainable yield of 1.0 MGD, while existing withdrawals already exceed that sustainable yield.

The Water Resource Assessment was completed based upon the approximate water demand for the project and has identified that water quality testing to date indicates that groundwater from the well is slightly brackish and that reverse osmosis treatment would be required prior to potable use. The DEIS indicates that the water system will be designed and constructed to meet the requirements of the County of Maui’s Department of Water Supply to the maximum extent possible so that the County will take over ownership and operation of the system after the system is in operation.

Furthermore, the project area does not currently have any existing wastewater lines or structures on-site. The Applicant has indicated that it plans to install a private wastewater system on-site to serve the development.

Based upon the foregoing, the FEIS should further:

- Analyze the effect of the 1.097 MGD (average) withdrawal in light of current withdrawals exceeding the Kahului Aquifer’s designated sustainable yield of 1.0 MGD. Any analysis should also evaluate the potential effects of any recent Well Construction permits issued by or currently being sought from CWRM with respect to the Kahului Aquifer, and the impacts of such use on cultural and/or traditional use, beliefs and practices, given the project’s Cultural Impact Assessment finding that the project’s water consumption should not exceed the sustainable yield for any of the aquifers from which it draws water.

- Evaluate whether the project remains feasible if sustainable yield limits are enforced and competing water demands are considered.

- Provide a detailed analysis of the reverse osmosis process, including brine disposal methods, discharge locations, environmental impacts, regulatory requirements, and associated costs.

- Provide a final calculation based upon the ESD methodology set forth in Maui County Council's adoption of Ordinance 5759. ESD calculations should be included for all uses being sought or considered, including but not limited to, residential, commercial, industrial, and hotel.

- Discuss any additional costs, including but not limited to annual maintenance and operational costs, in connection with the project's stated goal of transferring water system ownership to the County of Maui.

- Disclose and discuss in detail the cost assumptions relating to the construction and ongoing maintenance of the proposed onsite wastewater treatment plant.

5. Solid Waste

The DEIS has identified that the project is anticipated to generate an average of 2,701 tons of solid waste per year that will be taken to the Central Maui Landfill. This represents a substantial additional demand on the Central Maui Landfill. The FEIS should analyze how this waste stream will affect the remaining capacity and projected lifespan of the Central Maui Landfill, including cumulative impacts from other developments.

6. Cultural Resources

The State of Hawai‘i Historic Preservation Division ("SHPD") and the project Cultural Impact Assessment Report identified multiple historic sites in the vicinity of the project area, including SIHP # 50-50-05-07622 (secondary deposit of human remains along the western boundary of the northern parcel of the project), and SIHP #50-50-05-00056 (Papanene Heiau, approximately 0.5 miles to the West of the project area). Given the close proximity of the project to various historic sites, the FEIS should fully evaluate indirect and cumulative impacts to nearby cultural sites, including degradation of cultural setting, increased noise, and increased public access.

Given the presence of human remains on nearby parcels and known burial activity in the general Pu‘unēnē area, the Cultural Impact Assessment noted a modest potential for encountering previously undocumented burials or reinterred remains during ground disturbing activity at the project site. Accordingly, the project proponent should commit to

completing an archaeological inventory survey and implementing archaeological monitoring for the project site in consultation with SHPD.

Finally, PRP notes that the digital version of the FEIS would be further improved by pdf-bookmarking the document in its entirety. All chapters, subchapters, appendices, and comment letters should be bookmarked for easier access.

Thank you for the opportunity to comment on the DEIS for this project. Notwithstanding the scope of the foregoing comments, PRP reserves the right to address any aspect of the project, including, but not limited to, through its environmental review and entitlement process.

Sincerely,

Pacific Resource Partnership

cc: State of Hawai‘i Land Use Commission
[Via Email and U.S. Mail]
Jeffrey Ueoka, Esq.
[Via Email and U.S. Mail]