

Disaster Recovery, International Affairs, and Planning Committee (2025-2027) on 2026-05-20 1:30 PM

Meeting Time: 05-20-26 13:30

eComments Report

Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Disaster Recovery, International Affairs, and Planning Committee (2025-2027) on 2026-05-20 1:30 PM	05-20-26 13:30	2	4	0	2	1

Sentiments for All Meetings

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment

Support (0%) Oppose (50%) Neutral (25%)
No Response (25%)



Disaster Recovery, International Affairs, and Planning Committee (2025-2027) on 2026-05-20 1:30 PM

05-20-26 13:30

Agenda Name	Comments	Support	Oppose	Neutral
DRIP-19 Bill 163 (2025) BILL 163 (2025), BILL 164 (2025), AND BILL 165 (2025), TO AMEND THE MAUI ISLAND PLAN'S DIRECTED GROWTH MAP C5 (PULEHU ROAD), AMEND THE WAILUKU-KAHULUI COMMUNITY PLAN DESIGNATION, AND CHANGE THE ZONING FOR 166.511 ACRES SITUATED AT KAHULUI, HAWAI'I (HO'ONANI VILLAGE) (DRIP-19)	4	0	2	1

Sentiments for All Agenda Items

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

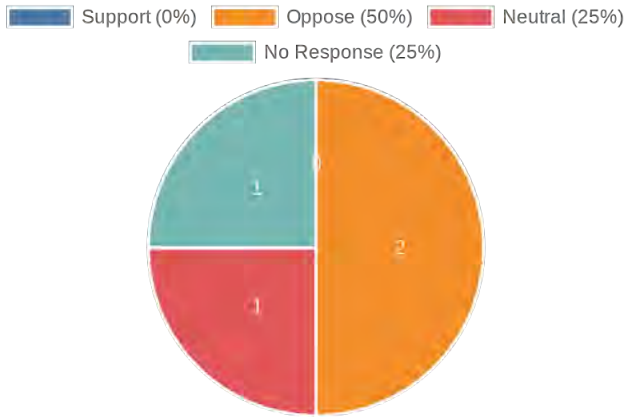
Overall Sentiment

Support (0%) Oppose (50%) Neutral (25%)
No Response (25%)



Agenda Item: eComments for DRIP-19 Bill 163 (2025) BILL 163 (2025), BILL 164 (2025), AND BILL 165 (2025), TO AMEND THE MAUI ISLAND PLAN'S DIRECTED GROWTH MAP C5 (PULEHU ROAD), AMEND THE WAILUKU-KAHULUI COMMUNITY PLAN DESIGNATION, AND CHANGE THE ZONING FOR 166.511 ACRES SITUATED AT KAHULUI, HAWAI'I (HO'ONANI VILLAGE) (DRIP-19)

Overall Sentiment



DRIP Committee

Location:
Submitted At: 12:15pm 05-20-26

Testimonies received by DRIP Committee

Lore Menin

Location:
Submitted At: 8:22pm 05-19-26

I oppose this project, these bills, these proposals, these exhibits, and the developer submissions because the County is being asked to approve the legal framework for large-scale urban expansion before the underlying infrastructure, environmental review, water availability, wastewater capacity, cultural review, and public planning process are complete.

I oppose this project because the Planning Department itself warned that this abbreviated Council-initiated process bypasses the normal developer application process, reduces impact analysis, reduces community input, and may create impacts to the community.

I oppose this project because the Council is being asked to approve entitlements first and deal with the consequences later.

I oppose this project because the Department of Water Supply acknowledged the proposal relies on private wells within the Pa_ia Aquifer System while also acknowledging reported pumpage already exceeds sustainable yield figures discussed in the record.

I oppose this project because the County is effectively being asked to urbanize agricultural land before long-term water sustainability is secured.

I oppose this project because the Department of Environmental Management acknowledged the project lies outside the County sewer service area, lacks current treatment capacity, and may not even be capable of future County sewer connection until approximately 2029 or 2030 depending on future infrastructure expansion.

I oppose this project because the legislation itself guarantees very little.

I oppose this project because Bill 163 does not secure:

- * permanent affordability protections,
- * binding infrastructure timelines,
- * guaranteed water allocations,
- * completed wastewater capacity,
- * transportation mitigation,
- * or enforceable long-term public safeguards.

I oppose this project because the affordability conditions contain loopholes allowing units to be rented to non-income-qualified residents after vacancy periods and because portions of the County workforce housing requirements are effectively bypassed through HHFDC structures and exemptions.

I oppose this project because non-residential development may move forward after permits are merely issued for a limited number of housing units, not after homes are actually built, occupied, or serving local residents.

I oppose this project because the proposal is repeatedly presented primarily as workforce housing while simultaneously seeking broad M-1 Light Industrial zoning and mixed-use urban expansion rights involving commercial, office, industrial, hospitality, recreation, and other future development flexibility.

I oppose this project because the public hears one version of the project while the entitlement structure allows something much broader over time.

I oppose this project because once the Urban Growth Boundary is expanded and the zoning changes are approved, the leverage permanently shifts away from the public and toward future project momentum.

I oppose this project because the Environmental Impact Statement process remains incomplete while the Council is still being asked to advance major entitlements.

I oppose this project because the Planning Department itself questioned why the EIS Preparation Notice was withdrawn from County review and shifted toward the State Land Use Commission process.

I oppose this project because the Department of __iwi Resources acknowledged the cultural significance of the area and referenced archaeological concerns and prior iwi k_puna discoveries associated with nearby development activity.

I oppose this project because Maui already contains:

- * vacant industrial lands,
- * underutilized commercial centers,
- * partially occupied business parks,
- * aging retail corridors,
- * stalled redevelopment areas,
- * and previously entitled urban inventory with existing infrastructure access.

I oppose this project because instead of prioritizing redevelopment, infill housing, adaptive reuse, and activation of already urbanized land, the County is being asked to expand outward into agricultural land and create entirely new long-term infrastructure obligations.

I oppose this project because this is not smart growth.

This is leapfrog expansion.

I oppose this project because residents are tired of watching the same development pattern repeat itself:

- * approve first,
- * amend later,
- * expand later,
- * and leave future residents and taxpayers responsible for the infrastructure consequences afterward.

I oppose this project because residents no longer simply evaluate the initial project presentation. Residents evaluate the approval structure itself, and this structure gives away enormous leverage upfront while deferring critical realities into:

- * future studies,
- * future amendments,
- * future negotiations,
- * future administrations,
- * and future taxpayers.

I oppose this project because responsible planning requires:

- * completed environmental review,
- * secured infrastructure,
- * demonstrated water sustainability,
- * wastewater capacity,
- * transportation analysis,
- * enforceable affordability protections,
- * cultural review,
- * transparency,
- * sequencing,
- * and public trust.

Those standards have not been met here.

Lore Menin, Kihei Resident

Edward Codelia

Location:

Submitted At: 8:07pm 05-19-26

Chair and Committee Members,

I am in strong opposition to Bills 163, 164, and 165 relating to Ho'onani Village.

This project is being presented primarily as workforce housing, but the actual entitlement package goes far beyond housing and would permanently expand the Urban Growth Boundary, convert agricultural land to Business/Multi-Family use, and rezone 166 acres to M-1 Light Industrial before critical infrastructure and environmental questions are resolved.

The County is being asked to approve the legal framework for urban expansion first and deal with the consequences later.

The Planning Department itself warned this abbreviated process reduces impact analysis and public review. Water availability remains uncertain, wastewater capacity does not currently exist, the Environmental Impact Statement process is incomplete, and significant cultural resource concerns remain unresolved.

Meanwhile Maui already has vacant and underutilized commercial and industrial areas with existing infrastructure that should be prioritized before expanding outward into agricultural lands.

Residents are tired of the same pattern:
approve first, amend later, expand later, and leave future residents and taxpayers responsible for the infrastructure consequences afterward.

Please refer to my written testimony for a more detailed discussion regarding:

- * infrastructure deficiencies,
- * water and sewer concerns,
- * Environmental Impact Statement issues,
- * Opportunity Zone-style speculative growth concerns,
- * leapfrog urban expansion,
- * and the long-term risks of granting broad entitlements before the public has a complete and transparent record.

I respectfully urge the Committee to deny or defer Bills 163, 164, and 165.

Thank you.

Guest User

Location:

Submitted At: 12:02pm 05-18-26

I would like to provide an update on SBA's Office of Disaster Recovery & Resilience efforts throughout Maui.

DRIP Committee

From: Albert Perez <director@mauitomorrow.org>
Sent: Tuesday, May 19, 2026 1:21 PM
To: DRIP Committee
Subject: Testimony re. Bill 163
Attachments: MTF_Testimony_Bill_163_2025.pdf; MTF_HoonaniEISPN_Comments.pdf

You don't often get email from director@mauitomorrow.org. [Learn why this is important](#)

Aloha Chair Paltin and members of the Committee,

Please enter the attached two documents as written testimony from Maui Tomorrow Foundation.

Mahalo,

Albert Perez, Executive Director

Maui Tomorrow Foundation urges the Maui County Council to reject the Ho'onani Village proposal as currently presented. We strongly support truly affordable housing on Maui, but housing is not affordable if it is not safe and healthy. This project does not meet that standard.

The basic question for decisionmakers is this: Is this the kind of place we would want our own families to live? Ho'onani Village would place families, children, kūpuna, and workers in an industrial corridor directly beneath Kahului Airport's main commercial flight path. Future residents would face chronic aircraft noise day and night; industrial impacts, traffic hazards, a water supply with questionable quantity and quality, unresolved wastewater questions, and long-term infrastructure burdens. To review our full analysis of these issues, please see Maui Tomorrow's Comment Letter on the Draft Environmental Impact Statement (DEIS), attached.

These impacts would shape people's daily lives: whether children can sleep and learn, whether residents suffer from preventable cardiovascular or other chronic health impacts, whether families can safely use outdoor spaces, whether kūpuna can rest comfortably, whether residents can afford the utility costs of constant air conditioning, and whether the project's private infrastructure will remain reliable over time.

In addition to being affordable, housing needs to be healthy and safe. This project should give Council members serious pause. Major changes should be required before any approvals move forward. At a minimum, residential uses should be moved as far as possible away from the airport runway and the proposed, upwind waste-to-energy facility.

This is not just an affordable-housing project. This is a major new urban development in an airport/industrial corridor. The Council should evaluate it that way.

One of MTF's biggest concerns is that the project puts family housing directly under high levels of aircraft noise, which is a serious public-health issue. The project's own noise monitoring study shows future residents would be subject to average sound levels of 60 to 65 decibels (Ldn), directly beneath Kahului Airport's main commercial flight path. Those averaged numbers understate the real exposure that future residents would experience, because the study failed to account for upper-floor living, nighttime and early-morning disturbance, and the repeated, very loud, single-event noise of aircraft passing overhead, day and night.

One-third of all global deaths are due to cardiovascular disease (CVD). Nearly half of all adults—48.9% live with some form of CVD¹. Long-term aircraft-noise exposure is associated with 10% higher incidence of cardiovascular disease, 14% higher with nighttime exposure), 7% higher odds of cardiovascular mortality, and 7% higher odds of

¹ <https://www.jacc.org/doi/full/10.1016/j.jacc.2022.11.001>

death from heart attacks. In 2021 alone, CVDs accounted for 20.5 million deaths, comprising approximately one-third of all global deaths.² Applied to a proposed community of more than 5,000 residents across 1,600 units, these are not abstract statistics. **At Ho‘onani, more people will experience cardiovascular diseases, and there will be a higher incidence of heart attack and stroke (with associated increased health care costs) - as a result of long term, day and night aircraft noise exposure.**¹

The applicant’s proposed “solution” is to seal residents inside: have them keep windows closed and rely on air conditioning and mechanical ventilation. However, the project’s Draft Environmental Impact Statement (DEIS) indicates that such measures will only provide about 9 dB of outdoor-to-indoor noise reduction. Even that is not a true solution, because it **shifts the burden onto residents** through loss of fresh air and reduced outdoor livability (which has its own public health and quality-of-life implications), higher electric bills for air conditioning, and continued exposure to loud airport noise in the project’s parks, walkways, and gathering areas. These impacts would be even worse during power outages when the air conditioning isn’t working.

Councilmembers should ask themselves: Are we willing to approve housing for thousands of people in a location where the health risks are already documented and foreseeable? **Affordable housing should not mean asking low-income families, kūpuna, children, and workers to “tough it out” and absorb the long-term health consequences of a poorly sited project.** Indeed, in the case of Hale Kaiola in Kihei, a poor siting decision meant that 38 families who were finally able to purchase an affordable home were flooded out by the recent Kona storms. Now they are financially worse off than before. At Ho‘onani, health issues will translate into higher medical bills and make this housing less affordable than promised. The people of Maui deserve better.

The bottom line is that this developer is asking the Council to approve a major new mixed-use development in a location with serious unresolved problems.

- chronic airport noise over future homes, with documented health risks from noise, including cardiovascular illness, high blood pressure, sleep disruption, stress, and reduced childhood learning;
- housing placed in an airport/industrial corridor and related concerns for airport safety and emergency-response, as well as air pollution, odor, dust, diesel, and industrial impacts, and cumulative impacts from nearby industrial uses, including the proposed Aloha ‘Āina waste-to-energy project, adjacent to Ho‘onani;
- uncertain private water supply from a brackish former agricultural well in the Kahului Aquifer, where current pumpage is already described as 6 to 7 times the aquifer’s sustainable yield, with pending requests from CWRM for further USGS aquifer studies, unresolved wastewater contingencies, the need for costly water treatment to remove contaminants, and possible resident rate impacts;

² <https://pmc.ncbi.nlm.nih.gov/articles/PMC10809869/#B1>

- traffic and hazardous-condition concerns and impacts on school, medical, fire, and police service;
- inconsistency with adopted planning policies that were meant to guide residential growth away from the project site, including the area's purposeful exclusion from the Urban Growth Boundary in the Maui Island Plan, and the Planning Department's staff report that concludes this area is unsuitable for family housing.

All people on Maui deserve a good quality of life. Affordable housing should not mean placing residents in a noisy, polluted location with infrastructure uncertainty, and asking them to absorb the long-term costs and health impacts.

We respectfully urge the Council to oppose the project as currently proposed. At minimum, the Council should not grant permissions until the applicant provides clear, project-specific answers on airport noise and safety, water and wastewater reliability, traffic safety, public-service capacity, industrial and air-pollution impacts, environmental justice, and consistency with adopted planning policies.

Mahalo,

Albert Perez, Executive Director
Maui Tomorrow Foundation



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.

DRIP Committee

From: Peaches Lorraine Cernal <peachescernal@gmail.com>
Sent: Tuesday, May 19, 2026 2:28 PM
To: DRIP Committee
Cc: Peaches Cernal
Subject: Written Testimony Bills 163, 164 and 165
Attachments: Peaches Written Testimony.pdf

You don't often get email from peachescernal@gmail.com. [Learn why this is important](#)

Aloha Councilmembers,

Please see my attached testimony,

Mahalo,

Peaches Cernal
(P) 808-856-6039
peachescernal@gmail.com

Aloha Chair Paltin, Vice Chair U‘u-Hodgins, and Councilmembers,

My name is Peaches Cernal and I am a Maui resident, mother of seven and a local realtor. I am writing in support of Ho‘onani Village and Bills 163, 164, and 165.

Maui families need housing options now. Too many local residents, workers, and longtime community members are being pushed off island because they cannot find a place to live that is within reach. This affects our families, our businesses, and the future of Maui.

These bills help move Ho‘onani Village forward by allowing the needed land use and zoning changes for a planned mixed-use workforce community in Central Maui.

Ho‘onani Village would bring much-needed rental housing for Maui residents, including teachers, healthcare workers, first responders, and other essential workers who serve our island every day. The project also includes parks, walkable areas, business space, local-serving retail, community gathering areas, and infrastructure improvements to support responsible growth.

This is an opportunity to turn unused plantation land into a thoughtfully planned community that supports local people, local jobs, and Maui’s long-term needs.

We all know there is no simple answer to Maui’s housing crisis, but projects like this are an important step toward keeping Maui people on Maui.

I respectfully ask for your support of Bills 163, 164, and 165.

Mahalo,

Peaches Cernal

21 Aheahe Pl

Makawao, HI 96768

Phone: 808-856-6039

Email: peachescernal@gmail.com

DRIP Committee

From: Rowena Kauhane <rowenak@alphahawaii.com>
Sent: Wednesday, May 20, 2026 10:03 AM
To: DRIP Committee
Subject: Strong Support for Ho'onani Village and Bills 163, 164, and 165

You don't often get email from rowenak@alphahawaii.com. [Learn why this is important](#)

Aloha Chair Paltin, Vice Chair U'u-Hodgins, and Councilmembers,

My name is **Rowena Kauhane**, and I am a **Maui resident of 46 years a mom and someone who does not own a home**, writing in strong support of **Ho'onani Village and Bills 163, 164, and 165**.

Maui is my home. It is where I live, work, and raise my family. Like many local families, it is my dream to one day own a home here. But the reality is, I cannot afford it. Even with hard work and a deep commitment to this community, homeownership feels out of reach.

Maui urgently needs more homes for local families and our working community. Every day, we see friends, coworkers, and even long-time residents forced to leave Maui because they cannot find housing they can afford. This is not sustainable for our community, our economy, or our future.

These bills will update the Maui Island Plan, amend the Wailuku-Kahului Community Plan from Agriculture to Business/Multi-Family, and change zoning to M-1 Light Industrial to support a master-planned mixed-use workforce village. These actions are necessary to allow Ho'onani Village to move forward and create much-needed housing and jobs for our community.

Ho'onani Village will create workforce homes designed for Maui residents and local workers, allowing them the opportunity to continue to live and work here. The project includes approximately 1,600 rental homes primarily for households up to 140% AMI, with flexibility to support local "gap group" families. It also creates housing opportunities for teachers, healthcare workers, first responders, essential workers, and families like mine.

This project is more than housing. It is a complete community with parks, walkability, business space for local jobs and small businesses, local-serving retail, meeting space, and community recreation areas that enhance Central Maui for residents. It also includes infrastructure investments and a plan for recycled-water treatment to support responsible and sustainable growth.

Ho'onani Village transforms inactive plantation land into a thoughtfully planned, resident-focused community that reflects local values. It honors Maui's culture, supports our local workforce, and helps ensure that the people who serve this island can continue to live here and thrive.

We cannot solve our housing crisis without bold, locally minded solutions. We need to bring back true affordable housing, housing that is actually attainable for Maui residents, local workers, parents, and families. Ho'onani Village represents a meaningful step toward keeping Maui residents on Maui and building a more resilient and equitable island community.

I respectfully ask for your support of **Bills 163, 164, and 165.**

Thank you,

Rowena Kauhane
Senior Recruiter, Maui

Alpha Inc.

O: 808.873.3883 | C: 808.318.3092

427 Ala Makani St. Suite 100

Kahului, HI 96732