

HLU Committee

From: Tom Schnell <tschnell@pbrhawaii.com>
Sent: Friday, August 1, 2025 4:50 PM
To: HLU Committee
Cc: Tasha A. Kama; Carla M. Nakata; Bradley Furuya; Laurel Pikcunas
Subject: RE: HLU-1(1), Relating to Kaiahale 'o Kahiluhilu Affordable Housing Rental Project
Attachments: 2025-08-01 Distribution List - Maui_print.pdf

Chair Kama and HLU Committee Staff,

We are working on our response to Chair Kama's letter received Thursday, July 31, 2025, and expect to send it to you before August 5, 2025, at 9:00 a.m.

I understand that the information HHFDC transmitted to the Council on July 28, 2025, did not include complete comment letters on the 201H application and responses to comments.

Attached is a list noting the agencies departments, groups we requested comments from. The list also notes if comments were received and responses sent. Please note that we received comments from the Department of Public Works on July 25, 2025. We are working on a response to the Department of Public Works's comments and expect to send that letter on or before the August 5, 2025.

You can download the complete letters of comments received and responses from this link:

<https://www.dropbox.com/t/tc7wlkvINyPyAu9c>

(This link will expire in 7 days)

Tom Schnell, AICP
Vice President



PBR HAWAII

Phone: 808-521-5631

Mobile: 808 561-7978

Email:

tschnell@pbrhawaii.com

From: HLU Committee <HLU.Committee@mauicounty.us>
Sent: Thursday, July 31, 2025 12:28 PM
To: Tom Schnell <tschnell@pbrhawaii.com>
Cc: HLU Committee <HLU.Committee@mauicounty.us>; Tasha A. Kama <Tasha.Kama@mauicounty.us>; Carla M. Nakata <Carla.Nakata2@mauicounty.us>
Subject: HLU-1(1), Relating to Kaiahale 'o Kahiluhilu Affordable Housing Rental Project

Aloha, Mr. Schnell, please refer to the attached letter from the Housing and Land Use Committee Chair, dated July 31, 2025.

Mahalo,
HLU Committee Staff

Kaiahale 'o Kahiluhilu Affordable Housing
201H Application Distribution List

AGENCIES CONTACTED	REQUEST SENT	FOLLOW-UP SENT	COMMENTS RECEIVED	RESPONSE SENT
STATE OF HAWAII				
Department of Transportation, Statewide Transportation Planning Office	3/31/2025		4/30/2025	5/16/2025
Department of Education	3/31/2025	5/1/2025		
Department of Health, District Environmental Health Program	3/31/2025	5/1/2025	5/2/2025	5/16/2025
Department of Health, Solid and Hazardous Waste Branch	3/31/2025	5/1/2025	5/2/2025	5/16/2025
Department of Land and Natural Resources	3/31/2025		4/30/2025	5/16/2025
Department of Land and Natural Resources, Land Division	3/31/2025		4/30/2025	5/16/2025
Department of Land and Natural Resources, Engineering Division	3/31/2025		4/30/2025	5/16/2025
Department of Land and Natural Resources, Commission on Water Resource Management	3/31/2025		4/17/2025	5/16/2025
Office of Planning and Sustainable Development	3/31/2025	5/1/2025	5/8/2025	5/16/2025
COUNTY OF MAUI				
Department of Fire and Public Safety	3/31/2025	5/1/2025		
Department of Emergency Management	3/31/2025	5/1/2025		
Department of Environmental Management	3/31/2025		4/14/2025	5/16/2025
Department of Housing	3/31/2025	5/1/2025	6/9/2025	
Department of Human Concerns	3/31/2025		4/8/2025	5/16/2025
Department of Oiw Resources	3/31/2025	5/1/2025		
Department of Parks and Recreation	3/31/2025		4/17/2025	5/16/2025
Department of Planning	3/31/2025	5/1/2025		
Department of Public Works			7/25/2025	Pending as of 8/01/25
Department of Transportation	3/31/2025	5/1/2025	5/7/2025	5/22/2025
Department of Water Supply	3/31/2025	5/1/2025	5/5/2025	5/16/2025
Police Department	3/31/2025		4/11/2025	5/16/2025
ELECTED OFFICIALS				
The Honorable Troy Hashimoto, Senator District 5, Hawaii State Legislature	3/31/2025	5/1/2025		
The Honorable Justin Woodson, Representative District 9, Hawaii State Legislature	3/31/2025	5/1/2025		
Councilmember, Tasha Kama, Council Member Kahului, Maui County Council	3/31/2025	5/1/2025		
CITIZEN GROUPS, INDIVIDUALS, CONSULTED PARTIES				
Maui Historical Society	3/31/2025	5/1/2025		



May 16, 2025

Shayne Agawa, Director
Department of Environmental Management
County of Maui
200 S High Street
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. Agawa:

Thank you for the Department of Environmental Management's (DEM) return of the response form regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application). We received the returned response form via an email from Elaine L. Baker sent Monday, April 14, 2025, 3:23 PM.

HKI Kahului Kaiahale LLC is the Applicant for the 201H/EP Application. As the Applicant's planning consultant, PBR HAWAII is responding to DEM's comments.

We note that the Department of Environmental Management does not have comments except for noting that DEM is not authorized to exempt landfill fees, which we acknowledge.

The Applicant is seeking certain exemptions from the Maui County Code (MCC) pursuant to §201H-38, HRS, which the Maui County Council has the authority to approve pursuant to §201H-38(a)(1)(c), HRS.


Regarding disposal fee exemptions the Applicant is seeking:

1. An exemption from Chapter 8.04.040, MCC, Disposal permits to exempt the Project from disposal permit fees, special handling fees, and the requirement of acquiring a disposal permit.
2. An exemption from Section 8.04.050, MCC, Disposal Charges to exempt the Project from disposal permit fees, special handling fees, and disposal charges during construction.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII


Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
Executive Vice-President / Principal

CATIE CULLISON, AICP
Senior Vice-President / Principal

TOM SCHNELL, AICP
Vice-President / Principal

MARC SHIMATSU, PLA, ASLA
Principal

RAYMOND T. HIGA, PLA, ASLA
Associate Principal

DACHENG DONG, LEED® AP
Associate Principal

NATHALIE RAZO
Associate Principal

ANN MIKIKO BOUSLOG, PhD
Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
Chairman Emeritus

RUSSELL Y. J. CHUNG, PLA, FASLA
Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

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E-mail: sysadmin@pbrhawaii.com

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O:\Job373753.10 Kahului Civic Center 201H\201H Application Transmittal, Comments, & Responses\Agency Responses\Word Doc Letters\TS Reviewed\COUNTY DEM Response Letter.docx

RESPONSE FORM

Kaiahale 'o Kahiluhilu

Application for Approval for Chapter 201H, HRS Exemptions Pursuant To § 201H-38, HRS and Approval Pursuant to The Office Of The Governor, State Of Hawaii, Eleventh Proclamation Relating To Affordable Housing (Dated February 4, 2025, Or As Amended Under Future Proclamations) (201H/EP Application) (201H/EP Application)

If you, your agency, or department have no comments, please check the box below, sign, date and mail or email, this response form to PBR HAWAII.

TO: PBR HAWAII & Associates, Inc.
ATTN: Tom Schnell, Vice President
1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813
Email: tschnell@pbrhawaii.com

Hawai'i Housing Finance & Development Corporation
Dean Minakami, Executive Director
ATTN: Stan Fujimoto, Project Manager
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813
Phone: (808) 587-0548
Email: stanley.s.fujimoto@hawaii.gov

SUBJECT: Response to review of 201H/EP Application

PROJECT: Kaiahale 'o Kahiluhilu Affordable Housing 201H/EP Application

TMK: (2) 3-7-004: 003 (portion)

☐ Our Agency has reviewed this application and has no comments.

Agency/Department:

ENVIRONMENTAL MANAGEMENT

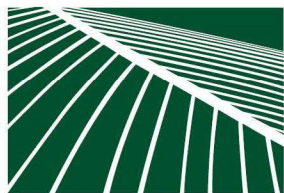
Signed:

Elaine Baker

Printed name:

ELAINE BAKER

DEPT. OF ENVIRONMENTAL MANAGEMENT IS NOT
AUTHORIZED TO EXEMPT LANDFILL FEES.



PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
Executive Vice-President / Principal

CATIE CULLISON, AICP
Senior Vice-President / Principal

TOM SCHNELL, AICP
Vice-President / Principal

MARC SHIMATSU, PLA, ASLA
Principal

RAYMOND T. HIGA, PLA, ASLA
Associate Principal

DACHENG DONG, LEED® AP
Associate Principal

NATHALIE RAZO
Associate Principal

ANN MIKIKO BOUSLOG, PhD
Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
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RUSSELL Y. J. CHUNG, PLA, FASLA
Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
Founding Partner

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Fax: (808) 523-1402
E-mail: sysadmin@pbrhawaii.com

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May 16, 2025

Lori Tsuhako, Director
County of Maui
Department of Human Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Ms. Tsuhako:

Thank you for returning the response form indicating no comments for the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application). We received the returned response form via an email from Kimberly Ferguson sent Tuesday, April 8, 2025, 3:15 PM.

HKI Kahului Kaiahale LLC is the Applicant for the 201H/EP Application. As the Applicant's planning consultant, PBR HAWAII acknowledges that the Department of Human Concerns has no comments.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation

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RESPONSE FORM

Kaiahale 'o Kahiluhilu

**Application for Approval for Chapter 201H, HRS Exemptions Pursuant To § 201H-38, HRS and
Approval Pursuant to The Office Of The Governor, State Of Hawaii, Eleventh Proclamation
Relating To Affordable Housing (Dated February 4, 2025, Or As Amended Under Future
Proclamations) (201H/EP Application) (201H/EP Application)**

If you, your agency, or department have no comments, please check the box below, sign, date and mail or email, this response form to PBR HAWAII.

TO: PBR HAWAII & Associates, Inc.
ATTN: Tom Schnell, Vice President
1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813
Email: tschnell@pbrhawaii.com

Hawai'i Housing Finance & Development Corporation
Dean Minakami, Executive Director
ATTN: Stan Fujimoto, Project Manager
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813
Phone: (808) 587-0548
Email: stanley.s.fujimoto@hawaii.gov

SUBJECT: Response to review of 201H/EP Application


PROJECT: Kaiahale 'o Kahiluhilu Affordable Housing 201H/EP Application

TMK: (2) 3-7-004: 003 (portion)

☒ Our Agency has reviewed this application and has no comments.

Agency/Department: Department of Human Concerns

Signed:

 4/8/2025

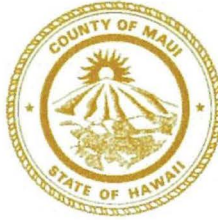
Printed name:

Lori Tsuhako, Director

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, HAWAII 96793
PHONE: (808) 270-7351
FAX: (808) 270-6284

June 9, 2025

Tom Schnell, Vice President
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dean Minakami, Executive Director
Hawaii Housing Finance & Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

**SUBJECT: KAIAHALE ‘O KAHILUHILU AFFORDABLE HOUSING
PROJECT CHAPTER 201H, HAWAII REVISED STATUTES,
COMMENTS**

Dear Director Minakami and Mr. Schnell,

The Department of Housing (Department) is in receipt of your letter dated March 31, 2025, requesting review and comment for the proposed Kaiahale ‘o Kahiluhilu Affordable Housing Project’s (Project) Chapter 201H, Hawaii Revised Statutes, application.

At this time, the Department has no comments to offer on the Project. We appreciate the opportunity to participate in the consultation process and remain available should additional coordination or information be needed.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Mitchell", written over a circular stamp or seal.

RICHARD E. MITCHELL, ESQ.
Director of Housing



**PBR HAWAII
& ASSOCIATES, INC.**

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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CATIE CULLISON, AICP
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TOM SCHNELL, AICP
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May 22, 2025

Marc I. Takamori, Director
County of Maui
Department of Transportation
200 South High Street
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION)– 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. Takamori:

Thank you for the County of Maui Department of Transportation's (DOT) letter dated May 7, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized to follow the comments provided in your letter:

1. ***Transit-Oriented Development:*** *The project's location near the Kahului Transit Center supports regional transit goals by providing affordable housing and civic services within walking distance of high-frequency bus routes. This supports increased transit ridership and reduced vehicle dependence.*

Response: Thank you for highlighting the Project's close proximity to Kahului Transit Center supports regional transit goals for increased ridership and reduced vehicle dependency.

2. ***Multimodal Access:*** *MDOT recommends integration of Complete Streets elements, including wide sidewalks, safe crossings, protected bike lanes, and green infrastructure. This enhances walkability and safety for all users.*

Mr. Marc I. Takamori, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION)– 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

Page 2 of 4

Response: Regarding integration of Complete Streets elements, according to the Applicant's traffic engineer, WSP, the County of Maui Department of Public Works (DPW) is currently evaluating conceptual plans for improvements on Kāne Street from West Ka'ahumanu Avenue to West Kamehameha Avenue in accordance with its Complete Streets program. Between West Ka'ahumanu Avenue and Vevau Street, there are three alternative concepts. All concepts are proposed to occur within the existing 80-foot right-of-way (ROW) for Kāne Street. The Project site respects this existing 80-foot ROW boundary and, therefore, does not preclude any of these concepts.

We note that Kane Street/Vevau Street intersection crosswalk has been outfitted with Rectangular Rapid Flashing Beacons (RRFBs) to increase safety for pedestrians crossing Kāne Street and appears to be achieving the goal of enhancing pedestrian safety at the intersection.

Regarding walkability and safety, the project includes features that contribute to a comfortable and interesting streetscape. Elements include:

- Preservation of the low historic stone and mortar boundary wall with a "WPA 1939" plaque along Ka'ahumanu Avenue and a portion of Kāne Street
- Along Kāne Street, ground floor windows to active areas within the building, such as the multi-purpose room, management offices, and resident common areas
- At the corner of Ka'ahumanu Avenue and Kāne Street, large ground floor windows to provide visual interest from the exterior and the interior.
- Along Ka'ahumanu Avenue:
 - Street trees to shade pedestrians and screen parking areas
 - A second-floor landscaped recreation deck to provide visual interest
 - L-shape and U-shape buildings to break up massing

3. ***Parking and Demand Management:*** *The parking supply may exceed optimal levels for a transit-rich location. MDOT recommends Transportation Demand Management (TDM) strategies such as unbundled parking, transit subsidies, and secure bicycle storage to discourage overreliance on personal vehicles.*

Response: The project will include several features to discourage overreliance on personal vehicles, including

- Proximity to the Kahului Transit Center
- About 22 short-term and 196 long-term bicycle parking spaces
- Rideshare stalls for resident use.

Mr. Marc I. Takamori, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION)– 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

Page 3 of 4

Regarding parking, the Applicant is seeking an exemption from §19.36B.020, Maui County Code (MCC) to reduce required parking spaces by approximately 50 percent. Per §19.36B.020, MCC, 612 off-street parking spaces would be required for the Project. The Project includes approximately 298 off-street parking spaces, 314 less than required.

4. ***Pedestrian Safety:*** *Surrounding arterials (Ka'ahumanu Ave and Pu'unene Ave) present pedestrian safety challenges. A Traffic Impact Analysis should assess pedestrian risks and identify potential crossing upgrades, such as HAWK beacons and raised crosswalks.*

Response: Fehr-Peers & Associates prepared a “Mobility Analysis Report (MAR) as part of the *Final Environmental Assessment/ Finding of No Significant Impact for the Kahului Civic Center Mixed-Use Complex (FEA/FONSI)*. The MAR concludes that the Project would not result in any significant impacts at the intersections studied. In a letter dated May 12, 2025, the Applicant's traffic engineer, WSP, confirmed that the findings of the MAR are still valid and can be used for the Project's current 201H/EP and SMA application.

WSP also noted that the rectangular rapid-flashing beacons (RRFB) at the Kane Street/Vevau Street intersection recommended in the MAR have since been installed and appear to be successfully improving pedestrian safety.

5. ***Consistency with LRTP and TIP:*** *The project supports the LRTP vision of Kahului-Wailuku as a multimodal hub. Coordination with Maui MPO is encouraged to secure funding for adjacent infrastructure improvements.*

Response: Thank you for highlighting how the Project aligns with the Long-Range Transportation Plan (LRTP) vision of Kahului-Wailuku as a multimodal hub. The Applicant will coordinate with the Maui MPO as necessary.

6. ***Climate and Resilience:*** *Incorporation of green mobility elements (e.g., EV charging, bikeshare proximity, permeable pavement) is encouraged to support Greenhouse Gases (GHG) reduction and long-term resilience.*

Response: The Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing and will include a range of sustainability features, including rideshare and Electric Vehicle (EV)-ready stalls, ample bicycle parking, photovoltaic systems, and other elements that promote greenhouse gas (GHG) reduction and long-term resilience.

Mr. Marc I. Takamori, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION)– 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

Page 4 of 4

7. *The Department supports the project's transportation goals and recommends continued coordination with the Maui MPO, Maui Bus, and Planning Department to optimize multimodal access, safety, and climate resilience.*

Response: Thank you for your support of the project's transportation goals. The Applicant will coordinate with the Maui MPO, Maui Bus, and Maui Planning Department as necessary.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation

O:\Job37\3753.10 Kahului Civic Center 201H\201H Application Transmittal, Comments,
& Responses\Agency Responses\Word Doc Letters\TS Reviewed\Final\COUNTY DOT Response
Letter.docx

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

May 7, 2025

PBR HAWAII & Associates, Inc.
ATTN: Tom Schnell, Vice President
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813
Email: tschnell@pbrhawaii.com

SUBJECT: Comments Regarding the Proposed Kahului Civic Center Mixed-Use Complex at 153 West Ka'ahumanu Avenue; Kahului, Maui, Hawai'i (TMK: (2) 3-7-004:003 (Portion)

Dear Mr. Schnell:

Thank you for the opportunity to provide comment. The Maui Department of Transportation (MDOT) has reviewed the proposed Kahului Civic Center Mixed-Use Complex with a focus on its alignment with multimodal transportation goals outlined in the Maui Metropolitan Planning Organization's (Maui MPO) Hele Mai Maui Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP). Key findings and recommendations are as follows:

1. **Transit-Oriented Development:** The project's location near the Kahului Transit Center supports regional transit goals by providing affordable housing and civic services within walking distance of high-frequency bus routes. This supports increased transit ridership and reduced vehicle dependence.
2. **Multimodal Access:** MDOT recommends integration of Complete Streets elements, including wide sidewalks, safe crossings, protected bike lanes, and green infrastructure. This enhances walkability and safety for all users.
3. **Parking and Demand Management:** The parking supply may exceed optimal levels for a transit-rich location. MDOT recommends Transportation Demand Management (TDM) strategies such as unbundled parking, transit subsidies, and secure bicycle storage to discourage overreliance on personal vehicles.
4. **Pedestrian Safety:** Surrounding arterials (Ka'ahumanu Ave and Pu'unene Ave) present pedestrian safety challenges. A Traffic Impact Analysis should assess pedestrian risks and identify potential crossing upgrades, such as HAWK beacons and raised crosswalks.

5. **Consistency with LRTP and TIP:** The project supports the LRTP vision of Kahului-Wailuku as a multimodal hub. Coordination with Maui MPO is encouraged to secure funding for adjacent infrastructure improvements.
6. **Climate and Resilience:** Incorporation of green mobility elements (e.g., EV charging, bikeshare proximity, permeable pavement) is encouraged to support Greenhouse Gases (GHG) reduction and long-term resilience.

The Department supports the project's transportation goals and recommends continued coordination with the Maui MPO, Maui Bus, and Planning Department to optimize multimodal access, safety, and climate resilience.

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

Sincerely,

MARC I. TAKAMORI
Director of Transportation

Cc: Marc I. Takamori, MDOT, Director, via email
Ignacio Filippini, MDOT, Transportation Planner, via email
Tom Schnell, PBR HAWAII Inc., Vice President, via email
Stan Fujimoto, HHFDC, Project Manager, via email



May 16, 2025

Patrick McCall, Director
Department of Parks & Recreation
700 Halia Nako Street, Unit 2
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. McCall:

Thank you for the Department of Parks & Recreation's (DPR) letter dated April 17, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H/EP Application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

We appreciate and acknowledge DPR's comment that should the Project "...satisfy requirements as set by Maui County Code (MCC) 2.96 Residential Workforce Housing Policy, and remain 100% workforce housing, the project would be exempted from MCC 18.16.320 Parks and Playground Requirements."

The Applicant is seeking certain exemptions from the MCC pursuant to §201H-38, HRS, which the Maui County Council has the authority to approve pursuant to §201H-38(a)(1)(c), HRS.

Regarding parks and playgrounds, the Applicant is seeking:

- An exemption from Section 18.16.320, MCC, Parks and Playgrounds, to exempt the Project from park dedication requirements and assessment fees.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII

Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
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GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
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C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
Chairman Emeritus

RUSSELL Y. J. CHUNG, PLA, FASLA
Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

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O:\Job37\3753.10 Kahului Civic Center 201H\201H Application Transmittal, Comments, & Responses\Agency Responses\Word Doc Letters\TS Reviewed\COUNTY DPR Response Letter.docx

RICHARD T. BISSEN, JR.
Mayor

JOSIAH K. NISHITA
Managing Director

PATRICK S. MCCALL
Director

SHANE T. DUDOIT
Deputy Director



DEPARTMENT OF PARKS AND RECREATION

COUNTY OF MAUI
700 HALI'A NAKOA STREET, UNIT 2
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov

April 17, 2025

Tom Schnell, Vice President
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, HI 96813

Dear Mr. Schnell:

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO §201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION); 153 WEST KA'AHUMANU AVENUE, KAHULUI, MAUI, TMK: (2) 3-7-004:003 (POR.)

Thank you for providing the Department an opportunity to respond to the 201H Application for the Kaiahale 'O Kahiluhilu Affordable Housing project, dated March 2025.

In review of the project, we note that the applicant is currently proposing to develop 301 affordable rental housing units, two (2) non-revenue staff units, as well as recreational facilities that include a dog park, children's play area, recreation deck, activity room, and a fitness room. As a result, should this project satisfy requirements as set by Maui County Code (MCC) 2.96 Residential Workforce Housing Policy, and remain 100% workforce housing, the project would be exempted from MCC 18.16.320 Parks and Playground Requirements. We have no further comments at this time and look forward to review of your final application.

Should you have any questions or concerns, please feel free to call me, or Samuel A. Marvel, Chief of Parks Planning and Development, at (808) 270-6173.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick S. McCall".

PATRICK S. MCCALL
Director of Parks & Recreation

c: Dean Minakami, Hawai'i Housing Finance & Development Corporation
Samuel A. Marvel, Chief of Planning and Development

PSM:SAM:csa

RICHARD T. BISSEN, JR.
Mayor

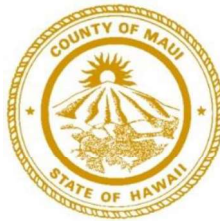
JOSIAH K. NISHITA
Managing Director

JORDAN MOLINA
Director

PAUL M. BARANY, P.E.
Deputy Director

WADE SHIMABUKURO, P.E.
Development Services Administrator

Telephone: (808) 270-7379



COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
DEVELOPMENT SERVICES ADMINISTRATION
110 ALAIHI STREET, SUITE 214
KAHULUI, MAUI, HAWAII 96732

July 25, 2025

Tom Schnell, Vice President
PRB Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

SUBJECT: **KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION**
153 WEST KA'AHUMANU AVENUE, MAUI, HAWAII
TMK: (2) 3-7-004:003 (PORTION)

Dear Mr. Schnell,

In response to your letter dated March 31, 2025, in which you request comments on proposed exemptions, we offer the following:

B. Exemptions from Title 12, MCC, Streets, Sidewalks, and Public Places

*1. Exemption from Driveway Permits fees. **No objection.***

Please be advised that the project team should research county laws and have awareness of fee waivers already provided for by law. Ordinance 5816, which established the Fiscal Year 2026 Budget for the County of Maui already provides a waiver from driveway permit fees for any agency of the state government (see Exemption 2 on page 46 of Appendix B Rates and Fees).

*2. Exemption from driveway spacing for fire access driveway on Vevau Street. **The Department opposes this exemption pending further clarification.***

The Department requests clarification of whether the fire access driveway will always be available for access or used only during emergencies. If the driveway will be used for regular access, the Department opposes the exemption due to safety concerns of project traffic conflicting with the bus traffic from the adjacent driveway access the County's Kahului Transit Center.

Tom Schnell, Vice President

**SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION
153 WEST KA'AHUMANU AVENUE, MAUI, HAWAII
TMK: (2) 3-7-004:003 (PORTION)**

July 25, 2025

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3. *Exemption from Street Trees. **The department opposes this exemption.***

Please clarify the extent to which street trees will be provided. Please note that a stated benefit of the project is that it is "within walking distance of jobs, schools, recreation, and shopping". Street trees are central to making sidewalks safe, healthy, comfortable and sustainable. The proposal to eliminate street trees undermines the project's purported value of being in a walkable location.

D. *Exemption from Title 16, MCC, Buildings and Construction*

3. *Exemption from Electrical Permit fees. **No objection.***

Please be advised that the project team should research county laws and have awareness of fee waivers already provided for by law. Ordinance 5816, which established the Fiscal Year 2026 Budget for the County of Maui already provides a waiver from electrical permit fees for any project that is funded in whole or in part by the County. (see Exemption 1 on page 43 of Appendix B Rates and Fees).

4. *Exemption from Plumbing Permit fees. **No objection.***

Please be advised that the project team should research county laws and have awareness of fee waivers already provided for by law. Ordinance 5816, which established the Fiscal Year 2026 Budget for the County of Maui already provides a waiver from plumbing permit fees for any project that is funded in whole or in part by the County. (see Exemption 1 on page 45 of Appendix B Rates and Fees).

5. *Exemption from Building Permit and Plan Review fees. **No objection.***

Please be advised that the project team should research county laws and have awareness of fee waivers already provided for by law. Ordinance 5816, which established the Fiscal Year 2026 Budget for the County of Maui already provides a waiver from building permit fees for any project that is funded in whole or in part by the County. (see Exemption 4 on page 35 of Appendix B Rates and Fees). The plan review fee is also waived because of the building permit fee being waived.

6. *Exemption from improvements to public streets for (1) construction of curb, gutter, sidewalk, and (2) placement of underground utilities. **The Department opposes this exemption.***

Tom Schnell, Vice President

**SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION
153 WEST KA'AHUMANU AVENUE, MAUI, HAWAII
TMK: (2) 3-7-004:003 (PORTION)**

July 25, 2025

Page 3 of 5

The project must construct these improvements and apply the County funding it already received towards these costs or request additional funding from the County. Please note that a stated benefit of the project is that it is "within walking distance of jobs, schools, recreation, and shopping". Eliminating the improvements to the pedestrian ways and removal of the obstructions caused by overhead utility poles undermines the project's purported value of being in a walkable location.

The Department requests an off-site improvement plan be submitted for review and comment. The improvements to Kane St should be consistent with the improvement made by the neighboring Kahului Lani Apartments and include road widening to achieve an ultimate right-of-way width of 80 feet, 6-foot wide sidewalks, realignment of curb and gutters as necessary to accommodate road widening, and relocation of overhead utilities underground. At the project's Kane St. driveway, the Department will also need to evaluate the need for a left-turn lane into the project, crosswalks, streetlighting, and other traffic safety improvements that are necessary to meet the minimum requirements for public health and safety as required by HRS 201H-38.

E. Exemption from Title 18, MCC, Subdivision

1. Exemption from providing complete streets improvements. **The Department opposes this exemption.**

The project site plan fails to describe the bicycle and pedestrian improvements proposed by the project. The project must construct complete street improvements and apply the County funding it already received towards these costs or request additional funding from the County. Please note that stated benefit of the project is that it is "within walking distance of jobs, schools, recreation, and shopping". Eliminating complete street improvements undermines the project's purported value of being in a walkable location.

3. Exemption from constructing curbs, gutters, and sidewalks along the project frontages (MCC 18.20.040). **The Department opposes this exemption.**

The project must construct these improvements and apply the County funding it already received towards these costs or request additional funding from the County. Please note that stated benefit of the project is that it is "within walking distance of jobs, schools, recreation, and shopping". Eliminating the improvements to the pedestrian ways undermines the project's purported value of being in a walkable location.

Tom Schnell, Vice President

**SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION
153 WEST KA'AHUMANU AVENUE, MAUI, HAWAII
TMK: (2) 3-7-004:003 (PORTION)**

July 25, 2025

Page 4 of 5

4. *Exemption from constructing sidewalks along the project frontages (MCC 18.20.070).*
The Department opposes this exemption.

The project must construct these improvements and apply the County funding it already received towards these costs or request additional funding from the County. Please note that stated benefit of the project is that it is "within walking distance of jobs, schools, recreation, and shopping". Eliminating the improvements to the pedestrian ways undermines the project's purported value of being in a walkable location.

5. *Exemption from constructing curbs and gutters along the project frontages (MCC 18.20.080).* **The Department opposes this exemption.**

The project must construct these improvements and apply the County funding it already received towards these costs or request additional funding from the County. Please note that stated benefit of the project is that it is "within walking distance jobs, schools, recreation, and shopping". Curbs and gutters are necessary and integral components of constructing sidewalk improvements and road widening.

G. *Exemption from Title 20, MCC, Environmental Protection*

1. *Exemption from Grading Permit fees.* **No objection.**

H. *Permitting*

1. *Exemption from Section 16.25.105, MCC, Permits from standard permitting process of all County permits.* **The Department opposes this exemption.**

The Department is unable to comprehend the exemption as written and will be unable to implement the exemption.

The exemption further states that the project intends to utilize the fast track permitting procedures under Section 2.96.160, MCC. Section 2.96.160, MCC, provides that a project qualifies for fast track permitting upon recordation of a fully executed residential workforce housing agreement between the developer and the County. If the project desires to modify the eligibility requirements for fast track permitting, then it should consult with the County Department of Housing and propose an exemption to Chapter 2.96, MCC accordingly.

Tom Schnell, Vice President

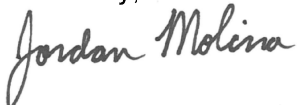
**SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATIO
153 WEST KA'AHUMANU AVENUE, MAUI, HAWAII
TMK: (2) 3-7-004:003 (PORTION)**

July 25, 2025

Page 5 of 5

Please feel free to contact me at (808) 270-7845 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jordan Molina".

JORDAN MOLINA
Director of Public Works



PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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CATIE CULLISON, AICP
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TOM SCHNELL, AICP
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THERESA DEAN
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R. STAN DUNCAN, PLA, ASLA
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RUSSELL Y. J. CHUNG, PLA, FASLA
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May 16, 2025

John Stufflebean, Director
County of Maui
Department of Water Supply
200 South High Street
Wailuku, Hawai'i 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. Stufflebean:

Thank you for the Department of Water Supply's (DWS) letter dated April 30, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized to follow the comments provided in your letter:

Source and Infrastructure

1. *The project is served by our Central Maui water system. Based on the Water Systems Standards (2002, State of Hawai'i), the projected water demand for the 303 multi-family units would be 169,680 gallons per day (gpd).*

The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. Given this condition, requests for water service that exceed 1,200 gpd are considered a "large quantity of water" and are subject to the limitations described in §16-201-04 of the County of Maui Administrative Rules. However, §16-201-03(g)(1) exempts projects comprised of 100 percent residential workforce housing units, as defined in section 2.96.020, Maui County Code, evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

Mr. John Stufflebean, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 2 of 5

At this point, there is not sufficient remaining capacity on the Central Maui water system to serve this project.

Response: We understand that:

- The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity.
- The projected water demand for Project would be considered a "large quantity of water" and may be subject to limitations described in §16-201-04 of the County of Maui Administrative Rules (MAR)
- However, §16-201-03(g)(1), MAR exempts water limitations for projects comprised of 100 percent residential workforce housing units, as evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.
- *At this point* [emphasis added], there is not sufficient remaining capacity on the Central Maui water system to serve this project.

The Project is comprised of 100 percent residential workforce housing units. The Applicant is actively working on a residential workforce housing agreement that will be executed with the County and recorded.

In addition, in a letter to DWS dated May 12, 2025, the Hawai'i Housing Finance Development Corporation (HHFDC) requested a reservation for water availability for the Project and the related adjacent State civic center (which is not part of the 201H Application). While the State of Hawai'i is the fee simple owner of the property, Executive Order No. 4590 sets aside the property to HHFDC for the development of a mixed-use project consisting of multi-family affordable housing, a State civic center, and the Kahului Transit Center. The letter from HHFDC to DWS is attached.

2. *There are several Department of Water Supply (DWS) waterlines in proximity to the proposed project:*

- *A 12-inch cover level (CL) water line runs east to west along Ka'ahumanu Avenue, approximately 50 feet from the property line, which could serve as a primary source for water connections.*
- *An 8-inch CL water line runs north to south along Kane Street, located about 85 feet from the property line, which may also provide a viable connection point.*
- *At the intersection of Vevau Street and School Street, approximately 70 feet from the property, there are two additional water lines: a 6-inch ductile iron (DI) line along School Street and an 8-inch (DI) line along Vevau Street.*

Mr. John Stufflebean, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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- *Additionally, a 12-inch CL line runs along Lono Avenue.*

Should the project be served by DWS in the future, approved backflow prevention devices will be required if not already installed on-site. At such time, the applicant should contact the DWS Engineering division for information regarding infrastructure and system improvements.

Response: The Applicant understands that approved backflow prevention devices will be required. The Applicant will coordinate with the DWS Engineering Division to confirm infrastructure requirements and any necessary system improvements.

Requested Exemptions

The applicant has requested the following exemptions related to water supply and infrastructure:

3. *Exemptions from Title 14, MCC, Public Services*

An exemption from Chapter 14.07, MCC, Water System Development Fees is requested to exempt the Project from water availability and service restrictions.

While DWS supports affordable housing, we already exempt 100% affordable housing from source requirements, which leaves DWS to expedite development and often use progressively more expensive sources of water to accommodate these projects in timely fashion. Exempting projects from all fees would place the full burden of source, storage, and transmission on the Department, which is contrary to the principles of fiscal soundness and independence, as well as developer-funded infrastructure concurrency.

Response: We appreciate DWS's ongoing support of 100% affordable housing projects and recognize the challenges associated with balancing expedited development timelines and long-term infrastructure planning.

4. *An exemption from Chapter 14.12, MCC, Water Availability, is requested to exempt the Project from the water availability policy.*

DWS already exempts 100% affordable projects from Water Availability requirements.

Response: We appreciate that 100% affordable housing projects can be exempt from the Water Availability requirements under Chapter 14.12, MCC. The Applicant seeks an exemption from Water Availability requirements under Chapter 14.12, MCC from DWS and/or pursuant to §201H-38, HRS, whichever option may be approved t.

Mr. John Stufflebean, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 4 of 5

5. Exemptions from Title 16, MCC, Buildings and Construction

An exemption from Chapter 16.04D, MCC, Fire Code, is requested to exempt the Project from plan review, permit, and inspection fees required by the Fire Code.

DWS cannot support any deviation from code that would render a housing project less safe than it would be with adherence to code. We defer to the fire department on this matter, but we will not accept liability for system inadequacies that are approved over and above our recommendation.

Response: Regarding exemption from Chapter 16.04D, MCC, Fire Code, the Applicant is seeking exemptions from plan review fees, permit fees, and inspection fees. The Applicant is not seeking exemptions from the Fire Code. The exemption from plan review fees, permit fees, and inspection fees will not impact health and safety.

Conservation

6. *The Department recommends the following Best Management Practices (BMPs) to conserve water for the future development of the project:*

Indoor

- *Utilize EPA WaterSense-labeled plumbing fixtures.*
- *Install dual flush toilets with high-efficiency models that use 1.28 gallons per flush or less.*
- *Install bathroom sink faucets with fixtures that do not exceed 1 gallon per minute at 60 psi.*

Outdoor

- *Dust Control: Consider using non-potable water for dust control as an alternative source during construction.*
- *Use Smart Approved WaterMark irrigation products, such as evapotranspiration irrigation controllers, drip irrigation, and water-saving spray heads.*
- *After plants are established, avoid excessive growth by refraining from fertilizing and pruning. Schedule watering in the early morning or evening to minimize evaporation and limit the use of turf.*
- *Incorporate native Hawaiian climate-adapted plants for landscaping, as they conserve water and protect the watershed from degradation due to invasive species.*
- *We recommend adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawaii.*

Mr. John Stufflebean, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 5 of 5

Response: The Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing and water conservation measures may include:

- Separate water meters for buildings and landscaped areas
- High-efficiency plumbing fixtures to reduce water use, such as Water Sense labeled ultra-low flow water fixtures and toilets
- Drought tolerant plants and xeriscape landscaping
- Efficient irrigation systems (such as a drip system and moisture sensors)

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

Attachment: Letter from HHFDC to DWS dated May 12, 2025

cc: Questor Lau, EAH Housing, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation

O:\Job37\3753.10 Kahului Civic Center 201H\201H Application Transmittal, Comments,
& Responses\Agency Responses\Word Doc Letters\TS Reviewed\COUNTY DWS Response
Letter.docx

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR



DEAN MINAKAMI
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300

Honolulu, Hawaii 96813

FAX: (808) 587-0600

IN REPLY REFER TO:
25:DEV/0050

May 12, 2025

Mr. John Stufflebean, P.E., Director
Department of Water Supply
County of Maui
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Stufflebean:

Subject: Request For Reservation of Water Availability for the Kahului Civic Center Mixed-Use Complex – 153 West Kaahumanu Avenue, Kahului, Maui, TMK No. (2) 3-7-004:003 (Por.)

The Hawaii Housing Finance and Development Corporation (HHFDC) requests a reservation of water for the Kahului Civic Center Mixed-Use Complex at 153 West Kaahumanu Avenue, Kahului, Maui, TMK No. (2) 3-7-004: 003 (Por.) in the approximate amount of 172,400 gallons per day (gpd), average daily demand, as follows:

Residential Component	170,000 gpd
Civic Center Component	<u>2,400 gpd</u>
Total	172,400 gpd

The State of Hawaii is the fee simple owner of the 5.572-acre property at 153 West Kaahumanu Avenue, Kahului, TMK No. (2) 3-7-004: 003 (Property). The Property was set aside to HHFDC by Executive Order No. 4590 for development of a mixed-use project consisting of multi-family affordable rental housing (Residential Component), office space/civic center (Civic Center Component), parking, new Maui bus hub (Transit Center), and other incidental uses purposes.

On December 24, 2018, HHFDC, the State Department of Accounting and General Services (DAGS), and the County of Maui (County) executed a Memorandum of Understanding (MOU) providing for the accommodation of the Transit Center at the Property under a 65-year ground lease from HHFDC, HHFDC administration of \$2.5 million in Capital Improvement Program funds for design and construction of the Transit Center, the issuance of a 65-year ground lease to DAGS for

Mr. John Stufflebean, P.E., Director

Re: Request For Reservation of Water Availability for the Kahului Civic Center Mixed-Use Complex – 153 West Kaahumanu Avenue, Kahului, Maui, TMK No. (2) 3-7-004:003 (Por.)

May 12, 2025

Page 2

the development and operation of the Civic Center Component, the County providing a 65-year ground lease of its Wailuku property at 70 South High Street to DAGS for use with the adjacent State Office Building, and HHFDC procuring a developer through a request for proposals (RFP) process for the leasehold development and operation of the Residential Component. At the time of the MOU, the Transit Center was required to vacate its previous location at the adjacent Queen Kaahumanu Center. A copy of the MOU is enclosed.

Construction for the Transit Center at the Property was completed in 2024, and on February 28, 2024, HHFDC executed a 65-year Ground Lease to the County for the Transit Center.

The Civic Center Component consists of a four-story building with a mezzanine, 79' in height, and approximately 156' x 174' in size. In total, the building is 72,600 square feet (sf), which includes 50,497 sf of office space for State agencies, 9,213 sf for the McKinley Community School for Adults classrooms, and 12,890 sf for Hawaii State Public Library System innovation center. There is also a separate 190-stall parking structure 5-stories, 69' tall, and approximately 84' x 280' in size. A copy of the latest plans for the Civic Center Component (4/15/25) is enclosed.

After an RFP process, on January 10, 2025, HHFDC executed a Development Agreement with HKI Kahului Kaiahale LLC (Developer), an affiliate of EAH, Inc., dba EAH Housing, for the master plan of the Residential and Civic Center Components and the leasehold development and operation of the Residential Component.

The Residential Component includes 301 affordable rental and two managers' units (a mixture of 1-, 2-, and 3-bedroom units), 298 parking spaces, and 374,018 sf over two phases in two buildings. Phase 1 will contain 197 rental units in a U-shaped building, approximately 219' x 258' in size, and 239,994 sf. Phase 2 will contain 106 rental units in an L-shaped building, approximately 147' x 258' in size, and 134,024 sf. The buildings will be six stories (five levels over one level of surface parking), and about 74' in height. All of the units, except the managers' units will be affordable at 30 – 60% or below the U.S. Department of Housing and Urban Development area median income. The Developer is calling the Residential Component, Kaiahale 'o Kahiluhilu. Because of its file size, a copy of the permit set of the construction drawings (2/28/25) for both phases of the Residential Component will be shared via MS OneDrive.

In December 2024, the Developer submitted an application for a Special Management Area Use Permit with the County Planning Department for the Residential and Civic Center Components.

In February 2025, HHFDC received an application for certain exemptions from statutes, ordinances, and rules for the Residential Component pursuant to Section 201H-38, Hawaii Revised Statutes. On March 31, 2025, the Developer forwarded application and project materials to review agencies, including the Department of Water Supply (DWS). HHFDC received a copy of DWS review

Mr. John Stufflebean, P.E., Director

Re: Request For Reservation of Water Availability for the Kahului Civic Center Mixed-Use
Complex – 153 West Kaahumanu Avenue, Kahului, Maui, TMK No. (2) 3-7-004:003 (Por.)

May 12, 2025

Page 3

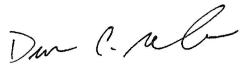
comments dated April 30, 2025, which included the comment that, “At this point, there is not sufficient remaining capacity on the Central Maui water system to serve this project” (DWS Letter). A copy of the DWS letter is enclosed.

HHFDC respectfully requests a reservation of water for the Kahului Civic Center Mixed-Use Complex as described herein.

Thank you for your favorable consideration of this request.

Should there be any questions or comments regarding this matter, please contact Randy Chu, Development Branch Chief, at (808) 587-0527, or randy.n.t.chu@hawaii.gov.

Sincerely,



Dean C. Minakami
Executive Director

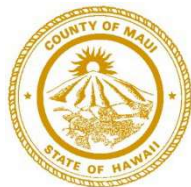
Enclosures: 1. HHFDC-DAGS-County MOU (12/24/18)
 2. Plans for the Civic Center Component (4/15/25)
 3. DWS Letter (4/30/25)
 4. Permit Set of Plans for Phases 1 and 2 of the Residential Component (2/28/25)
 will be shared via MS OneDrive

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>

April 30, 2025

PBR Hawaii & Associates, Inc.
Attn: Tom Schnell, VP
1001 Bishop Street
Suite 650
Honolulu, HI 96813

Re: Kaiahale 'O Kahiluhilu Affordable Housing Application for Chapter 201H, HRS Exemptions Pursuant to §201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawaii, Eleventh Proclamation Relating to Affordable Housing (Dated February 4, 2025, or as Amended Under Future Proclamations) (201H/EP Application) – 153 West Ka'ahumanu Avenue, Maui. TMK: (2)3-7-004:003 (Por)

Dear Mr. Schnell,

Thank you for the opportunity to comment on the proposed Kaiahale 'O Kahiluhilu Affordable Housing and Civic Center project application.

Source and Infrastructure

The project is served by our Central Maui water system. Based on the Water Systems Standards (2002, State of Hawai'i), the projected water demand for the 303 multi-family units would be 169,680 gallons per day (gpd).

The three-year demand projection for the Central Maui system is currently between 98% and 100% of the system's maximum reliable capacity. Given this condition, requests for water service that exceed 1,200 gpd are considered a "large quantity of water" and are subject to the limitations described in §16-201-04 of the County of Maui Administrative Rules. However, §16-201-03(g)(1) exempts projects comprised of 100 percent residential workforce housing units, as defined in section 2.96.020, Maui County Code, evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County. At this point, there is not sufficient remaining capacity on the Central Maui water system to serve this project.

"By Water All Things Find Life"

There are several Department of Water Supply (DWS) waterlines in proximity to the proposed project:

- A 12-inch cover level (CL) water line runs east to west along Ka'ahumanu Avenue, approximately 50 feet from the property line, which could serve as a primary source for water connections.
- An 8-inch CL water line runs north to south along Kane Street, located about 85 feet from the property line, which may also provide a viable connection point.
- At the intersection of Vevau Street and School Street, approximately 70 feet from the property, there are two additional water lines: a 6-inch ductile iron (DI) line along School Street and an 8-inch (DI) line along Vevau Street.
- Additionally, a 12-inch CL line runs along Lono Avenue.

Should the project be served by DWS in the future, approved backflow prevention devices will be required if not already installed on-site. At such time, the applicant should contact the DWS Engineering division for information regarding infrastructure and system improvements.

Requested Exemptions

The applicant has requested the following exemptions related to water supply and infrastructure:

B. Exemptions from Title 14, MCC, Public Services

1. An exemption from Chapter 14.07, MCC, Water System Development Fees is requested to exempt the Project from water availability and service restrictions.

While DWS supports affordable housing, we already exempt 100% affordable housing from source requirements, which leaves DWS to expedite development and often use progressively more expensive sources of water to accommodate these projects in timely fashion. Exempting projects from all fees would place the full burden of source, storage, and transmission on the Department, which is contrary to the principles of fiscal soundness and independence, as well as developer-funded infrastructure concurrency.

2. An exemption from Chapter 14.12, MCC, Water Availability, is requested to exempt the Project from the water availability policy.

DWS already exempts 100% affordable projects from Water Availability requirements.

C. Exemptions from Title 16, MCC, Buildings and Construction

1. An exemption from Chapter 16.04D, MCC, Fire Code, is requested to exempt the Project from plan review, permit, and inspection fees required by the Fire Code.

DWS cannot support any deviation from code that would render a housing project less safe than it would be with adherence to code. We defer to the fire department on this matter, but we will not accept liability for system inadequacies that are approved over and above our recommendation.

Conservation

The Department recommends the following Best Management Practices (BMPs) to conserve water for the future development of the project:

Indoor

- Utilize EPA WaterSense-labeled plumbing fixtures.
- Install dual flush toilets with high-efficiency models that use 1.28 gallons per flush or less.
- Install bathroom sink faucets with fixtures that do not exceed 1 gallon per minute at 60 psi.

Outdoor

- Dust Control: Consider using non-potable water for dust control as an alternative source during construction.
- Use Smart Approved WaterMark irrigation products, such as evapotranspiration irrigation controllers, drip irrigation, and water-saving spray heads.
- After plants are established, avoid excessive growth by refraining from fertilizing and pruning. Schedule watering in the early morning or evening to minimize evaporation and limit the use of turf.
- Incorporate native Hawaiian climate-adapted plants for landscaping, as they conserve water and protect the watershed from degradation due to invasive species.
- We recommend adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawai'i.

Should you have any questions regarding the source capacity and infrastructure requirements, please contact the DWS Engineering Division at (808) 270-7835. For other inquiries related to this letter, please reach out to staff planner Geovanna Torres, Ed.D. at (808) 463-3104 or via email at Geovanna.Torres@co.maui.hi.us.

Sincerely,

John Stufflebean, P.E.
DWS Director
GT

S:\PLANNING\PERMIT_Review\Planning\Affordable-Workforce Hsng\2_3_7_004_003 Kaiahale O Kahiluhilu



KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
Executive Vice-President / Principal

CATIE CULLISON, AICP
Senior Vice-President / Principal

TOM SCHNELL, AICP
Vice-President / Principal

MARC SHIMATSU, PLA, ASLA
Principal

RAYMOND T. HIGA, PLA, ASLA
Associate Principal

DACHENG DONG, LEED® AP
Associate Principal

NATHALIE RAZO
Associate Principal

ANN MIKIKO BOUSLOG, PhD
Director of Land Economics & Real Estate

RAMSAY R. M. TAUM
Cultural Sustainability Planner

ETSUYO KILA
Senior Associate

GREG NAKAI
Senior Associate

BRADLEY FURUYA, AICP
Associate

C.R. 'IMIPONO WICHMAN
Associate

THERESA DEAN
Associate

R. STAN DUNCAN, PLA, ASLA
Chairman Emeritus

RUSSELL Y. J. CHUNG, PLA, FASLA
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THOMAS S. WITTEN, FASLA
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Fax: (808) 523-1402
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May 16, 2025

Chief Keola Tom
Chief of Police
Police Department
County of Maui
55 Mahalani Street
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHLU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Chief Tom:

Thank you for the County of Maui Police Department's (MPD) letter dated April 11, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized to follow the comments provided in your letter:

1. Crime Prevention Through Environmental Design (CPTED):

I recommend utilizing CPTED principles, which focus on designing spaces that reduce crime and improve community safety. This includes placing seating areas with good visibility of parking lots or main structures, using appropriate lighting (preferably LED), and keeping landscaping low to ensure clear sightlines. Such designs help deter crime and create a safer environment for all.

Response: Thank you for your recommendation to incorporate CPTED principles. Project will include:

- Appropriate exterior and parking area LED lighting where feasible.
- Ground floor management offices and resident common areas along Kāne Street and at the corner of Kāne Street West Ka'ahumanu Avenue to activate streetways and provide "eyes on the street" monitoring.
- A ground level play area near the Project center and parking areas.
- Clear pathways to discourage unauthorized access.
- Low-growing plants and well-spaced trees to preserve open sightlines.

Chief. Keola Tom, Chief of Police

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 2 of 2

2. Construction Impact:

During the construction phase, efforts should be made to minimize noise, dust, and debris, especially due to nearby residences. The project manager should also consider where heavy equipment will be stored during non-working hours to reduce disruption. Additionally, managing vehicular movement carefully is crucial to minimize traffic impacts on pedestrians and vehicles.

Response: Thank you for highlighting the importance of minimizing construction-related impacts. Noise, dust, and debris control strategies are in place, including the use of dust suppression methods and adherence to noise regulations. Equipment and materials will be stored in designated areas away from the neighboring residential areas to reduce visual and physical disruption during non-working hours. In addition a construction traffic management plan will be implemented to coordinate vehicle movement and staging to minimize conflicts with pedestrians regional traffic patterns.

We value your participation and thank you for your review of the 201H/EP Application.
Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation



JOHN PELLETIER
CHIEF OF POLICE

POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE: (808) 244-6400
FAX: (808) 244-6411



WADE M. MAEDA
DEPUTY CHIEF OF POLICE

April 11, 2025

Attention: Tom Schnell, Vice President
1001 Bishop Street, Suite 650
Honolulu, HI 96813
tschnell@pbrhawaii.com

**Re: KAIAHALE O KAHILUHILU AFFORDABLE HOUSING
APPLICATION FOR 201H, HRS EXEMPTIONS PURSUANT TO
201H-38, HRS/APPROVAL PURSUANT TO THE OFFICE OF THE
GOVERNOR. STATE OF HAWAII, ELEVENTH PROCLAMATION
RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4,
2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS)
(201H/EP APPLICATION)-153 WEST KAAHUMANU AVENUE,
MAUI TMK (2)3-7-004:003 (PORTION)**

Dear Mr. Schnell,

We are writing in response to the submitted documents for the Early Notice and Public Review of your proposed project. After review, I would like to address some concerns and recommendations from a police perspective, particularly regarding pedestrian and vehicular safety.

Crime Prevention Through Environmental Design (CPTED):

I recommend utilizing CPTED principles, which focus on designing spaces that reduce crime and improve community safety. This includes placing seating areas with good visibility of parking lots or main structures, using appropriate lighting (preferably LED), and keeping landscaping low to ensure clear sightlines. Such designs help deter crime and create a safer environment for all.

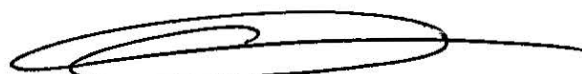
Construction Impact:

During the construction phase, efforts should be made to minimize noise, dust, and debris, especially due to nearby residences. The project manager should also consider where heavy equipment will be stored during non-working hours to reduce disruption. Additionally, managing vehicular movement carefully is crucial to minimize traffic impacts on pedestrians and vehicles.

Conclusion:

I do not have significant concerns with the proposed project as long as these considerations are addressed. Please feel free to contact me for any further discussion.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'K' followed by a horizontal line extending to the right.

Assistant Chief Keola Tom
for: JOHN PELLETIER
Chief of Police



PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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Principal Emeritus

THOMAS S. WITTEN, FASLA
Principal Emeritus

W. FRANK BRANDT, FASLA
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printed on recycled paper

May 16, 2025

Russell Tsuji, Land Administrator
State of Hawai'i
Department of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. Tsuji:

Thank you for the Department of Land and Natural Resources (DLNR) letter dated April 30, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized by DLNR Division:

Engineering Division

We acknowledge that the Engineering Division has no comments.

Commission on Water Resource Management

1. *We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.*

Response: The Applicant or the Applicant's civil engineer will coordinate with the Department of Water Supply to incorporate the Project into the Maui Island Water Use and Development Plan.

Russell Tsuji, Land Administrator

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 2 of 4

2. *We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development 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>.*

Response: The Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing and water conservation measures may include:

- Separate water meters for buildings and landscaped areas
- High-efficiency plumbing fixtures to reduce water use, such as Water Sense labeled ultra-low flow water fixtures and toilets
- Drought tolerant plants and xeriscape landscaping
- Efficient irrigation systems (such as a drip system and moisture sensors)

3. *We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to 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: The Applicant and the Applicant's contractors will use best management practices (BMPs) for stormwater management to minimize the impact of the Project to the area hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. The Applicant and the Applicant's contractors will comply with the prevailing State of Hawai'i "Rules Relating to Water Quality" and "Storm Drainage Standards."

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

Response: Alternative water sources, such as non-potable water, are not available to the Project site.

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 to participate in the Hawai'i Green Business Program. The Applicant will consider participating in this program.

Russell Tsuji, Land Administrator

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 3 of 4

6. *We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.*

Response: Project landscaping will include water conservation measures such as drought tolerant plants, xeriscape landscaping, and efficient irrigation systems (such as a drip system and moisture sensors), where feasible.

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 and the developer's acceptance of any resulting requirements related to water quality.*

Response: Applicant will comply with all State Department of Health Hawai'i Administrative Rules (HAR) regarding: 1) Public Water Systems; 2) Underground Injection Control; and 3) Groundwater and Source Water Protection in accordance with HAR Chapters 11-19, 11-20, 11-21, 11-23, 11-23A, and 11-25.

8. *Planning - The proposed water source(s) and projected water demands for the project, both potable and nonpotable, 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.*

Proposed water sources did not include confirmation with Maui DWS that existing system capacity was adequate. It is recommended that the applicant work closely with the appropriate CWRM branches and Maui DWS to address system capacity and sustainable yield availability.

Response: The water source for the project is the Central Maui water system, which is managed by Maui DWS. Based on the Water Systems Standards (2002, State of Hawai'i) the Maui DWS projects the potable water demand for the 303 multi-family units is approximately 169,680 gallons per day (gpd).

In their comments on the 201H/EP application the Maui DWS stated that §16-201-03(g)(1), County of Maui Administrative Rules exempts water limitations for projects comprised of 100 percent residential workforce housing units, as evidenced by an executed, recorded, and valid residential workforce housing agreement between the developer and the County.

Russell Tsuji, Land Administrator

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 4 of 4

The Project is comprised of 100 percent residential workforce housing units. The Applicant is actively working on a residential workforce housing agreement that will be executed with the County and recorded.

In addition, in a letter to DWS dated May 12, 2025, the Hawai'i Housing Finance & Development Corporation (HHFDC) requested a reservation for water availability for the Project and the related adjacent State civic center (which is not part of the 201H Application). While the State of Hawai'i is the fee simple owner of the property, Executive Order No. 4590 sets aside the property to HHFDC for the development of a mixed-use project consisting of multi-family affordable housing, a State civic center, and the Kahului Transit Center.

The Applicant understands the importance of addressing potential impacts on water resources and public trust uses. To that end, the Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing and water conservation measures may include:

- Separate water meters for buildings and landscaped areas
- High-efficiency plumbing fixtures to reduce water use, such as Water Sense labeled ultra-low flow water fixtures and toilets
- Drought tolerant plants and xeriscape landscaping
- Efficient irrigation systems (such as a drip system and moisture sensors)

The Applicant will work with the Maui DWS to address water demand for the Project.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation




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

Apr 17, 2025

REF: RFD.6412.6

TO: Tom Schnell, Vice President
PBR Hawaii & Associates, Inc

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

SUBJECT: Kaiahale 'O Kahiluhilu Affordable Housing

FILE NO.: RFD.6412.6
TMK NO.: (2) 3-7-004:003

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/cwrw>.

Our comments related to water resources are checked off below.

- ☒ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. 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 Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development 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>.
- ☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to 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 http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.

- ☒ 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 and the developer's 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 Hawaii 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.
- ☐ 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 from our office, or whether there are potential impacts to water resources.

☒ 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.

Proposed water sources did not include confirmation with Maui DWS that existing system capacity was adequate. It is recommended that the applicant work closely with the appropriate CWRM branches and Maui DWS to address system capacity and sustainable yield availability.

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.

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

April 4, 2025

MEMORANDUM


FROM: ~~TO:~~

DLNR Agencies:

- ☐ Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- ☐ Div. of Boating & Ocean Recreation (richard.t.howard@hawaii.gov)
- ☒ **Engineering Division** (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☐ Div. of State Parks (curt.a.cottrell@hawaii.gov)
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☐ Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- ☒ Land Division – Maui District (dlnr.land.maui@hawaii.gov)
- ☐ Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

TO: ~~FROM:~~

SUBJECT:

For Russell Y. Tsuji, Land Administrator 
Kaiahale 'O Kahiluhilu Affordable Housing Application for Chapter 201H, HRS
Exemptions Pursuant to Section 201H-38, HRS and Approval Pursuant to the
Office of the Governor, State of Hawaii Eleventh Proclamation relating to
Affordable Housing, Island of Maui, Hawaii
LOCATION: 153 West Ka'ahumanu Ave, Maui; TMK: (2)3-7-004:003 portion
APPLICANT: HKI Kahului Kaiahale LLC with representation by PBR HAWAII & Associates,
Inc.

Transmitted for your review and comment is information on the above-referenced subject matter.
Please submit comments by **April 29, 2025**.

If no response is received by the above date, we will assume your agency has no comments.
Should you have any questions about this request, please contact Raymond Severn at
raymond.severn@hawaii.gov. Thank you.

BRIEF COMMENTS:

- ☐ We have no objections.
- ☒ We have no comments.
- ☐ We have no additional comments.
- ☐ Comments are included/attached.

Signed:

Print Name: Dina U. Lau, Acting Chief Engineer

Division: Engineering Division

Date: Apr 24, 2025

Attachments

cc: Central Files

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 HAWAI'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

April 30, 2025

Tom Schnell, Vice President
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96732

via email: tschnell@pbrhawaii.com

SUBJECT: Kaiahale 'O Kahiluhilu Affordable Housing Application for Chapter 201H, HRS
Exemptions for proposal in Kahului, Island of Maui; TMK (2) 3-7-004:003 (por.)

Dear Mr. Schnell:

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.

Currently, we have received two responses. One from the Commission on Water Resource Management dated April 17, 2025 (which we understand has already been sent directly to you) and one from our Engineering Division noting that they have no comments dated April 24, 2025.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

FOR Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'ŌKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
Maui District Health Office
54 South High St. Rm. #300
Wailuku, HI 96793

Lorin W. Pang, M.D., M.P.H.
District Health Officer

May 2, 2025

Tom Schnell, Vice President
1001 Bishop Street, Suite 650
Honolulu, Hawaii'i 96813
email: tschnell@pbrhawaii.com

Dear Mr. Schnell:

Subject: KAIAHALE 'O KAHILUHLU AFFORDABLE HOUSING APPLICATION
FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS
AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR,
STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO
AFFORDABLE HOUSING – 153 WEST KA'AHUMANU AVENUE, MAUI
(TMK (2) 3-7-004: 003 (PORTION))

Thank you for the opportunity to comment on this project. The Food Safety Branch has no comments to offer.

It is strongly recommended that you review the department's website at <https://health.hawaii.gov/epo/landuse/> and contact the appropriate program that concerns your project.

Should you have any questions, please contact me at 808 984-8230 or email me at patricia.kitkowski@doh.hawaii.gov

Sincerely,

Patti Kitkowski
Program Chief Environmental Health
Food Safety Branch

c: EMD; HHFDC email: stanley.s.fujimoto@hawaii.gov



PBR HAWAII
& ASSOCIATES, INC.

KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

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printed on recycled paper

May 16, 2025

Patti Kitkowski
Program Chief Environmental Health
Department of Health, Food Safety Branch
54 South High Street, Room #300
Wailuku, HI 96793

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Ms. Kitkowski:

Thank you for the Department of Health's (DOH) letters, both dated May 2, 2025, regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H/EP Application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

We acknowledge that the District Health Office will no longer provide individual comments to agencies or project owners to expedite the land use review and process. We understand that the project should apply DOH's "Standard Comments" regarding land use in their submittal—which can be found on the Land Use Planning Review section of the DOH website: <https://health.hawaii.gov/epo/landuse/>.

We understand that agencies and project owners are responsible for adhering to all applicable standard comments and obtaining proper and necessary permits before the commencement of any work.

Thank you for providing a general summary of these comments, and we understand that these comments are not all-inclusive and do not substitute for review of and compliance with all applicable standard comments for the various DOH individual programs.

Our responses to DOH's standard comments are organized by DOH Branch.

Ms. Patti Kitkowski, Program Chief

SUBJECT: KAIAHALE 'O KAHILUHILO AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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Food Safety Branch

We acknowledge that the Food Safety Branch has no comments except for recommending that the project review the department's website and contact the appropriate program that concerns this project (<https://health.hawaii.gov/epo/landuse>).

Clean Air Branch

1. *All project activities shall comply with the Hawaii Administrative Rules (HAR), Chapters 11-59 and 11-60.1.*

Response: The Applicant and its contractors will comply with Hawai'i Administrative Rules (HAR), Chapters 11-59 and 11-60.1.

2. *Control of Fugitive Dust: You must reasonably control the generation of all airborne, visible fugitive dust and comply with the fugitive dust provisions of HAR §11-60.1-33. Note that 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 and visible fugitive dust and that buffer zones be established wherever possible.*

Response: The Applicant and its contractors will comply with the fugitive dust provisions of HAR §11-60.1-33. A dust control management plan will be developed which identifies and mitigates all activities that may generate airborne and visible fugitive dust.

3. *Standard comments for the Clean Air Branch are at:
<https://health.hawaii.gov/epo/landuse/2>*

Response: Thank you for providing the URL for the standard comments for the Clean Air Branch.

Clean Water Branch

1. *All project activities shall comply with the HAR, Chapters 11-53, 11-54, and 11-55. The following Clean Water Branch website contains information for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with HAR, Chapters 11-53, 11-54, and 11-55:
<https://health.hawaii.gov/cwb/clean-water-branchhome-page/cwb-standard-comments/>.*

Response: The Applicant and its contractors will comply with HAR, Chapters 11-53, 11-54, and 11-55.

Ms. Patti Kitkowski, Program Chief

SUBJECT: KAIAHALE ‘O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA‘AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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Hazard Evaluation & Emergency Response Office

1. *A Phase I Environmental Site Assessment (ESA) and Phase II Site Investigation should be conducted for projects wherever current or former activities on site may have resulted in releases of hazardous substances, including oil or chemicals. Areas of concern include current and former industrial areas, harbors, airports, and formerly and currently zoned agricultural lands used for growing sugar, pineapple or other agricultural products.*

Response: A Phase 1 Environmental Site Assessment (Phase 1 ESA) was conducted for the Project site. The purpose of the Phase 1 ESA was to evaluate the presence of recognized environmental conditions (RECs) at the Site. The Phase 1 ESA did not discover evidence of RECs at the Site. The 201H/EP Application (Exhibit 18) contains the Phase 1 ESA report.

2. *Standard comments for the Hazard Evaluation & Emergency Response Office are at: <https://health.hawaii.gov/epo/landuse/>.*

Response: Thank you for providing the URL for the standard comments for the Hazard Evaluation & Emergency Response Office.

Indoor and Radiological Health Branch

1. *Project activities shall comply with HAR Chapters 11-39, 11-45, 11-46, 11-501, 11-502, 11-503, 11-504.*

Response: Applicant and its contractors will comply with HAR Chapters 11-39, 11-45, 11-46, 11-501, 11-502, 11-503, 11-504.

2. *Construction/Demolition Involving Asbestos: If the proposed project includes renovation/demolition activities that may involve asbestos, the applicant should contact the Asbestos and Lead Section of the Branch at <https://health.hawaii.gov/irhb/asbestos/>.*

Response: A Limited Asbestos, Toxicity Characteristic Leaching Procedure, and Lead-Based Paint Sampling and Analysis Report was prepared for the existing buildings at the site. (see 201H/EP Application Exhibit 26). The report found:

- Asbestos in the roof material of a collapsed building on site; the leachable lead in demolition waste is expected to be below the Environmental Protection Agency’s 5 milligrams per liter limit)
- Lead-based paint in the collapsed building

Ms. Patti Kitkowski, Program Chief

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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Before moving forward with demolition of existing buildings on site the Applicant or its contractors will contact the Asbestos and Lead Section Branch. In addition, the Applicant and its contractors will follow all laws, rules, and regulations regarding demolition involving asbestos and lead based paint.

Safe Drinking Water Branch

1. *Agencies and/or project owners are responsible for ensuring environmental compliance for their projects in the areas of: 1) Public Water Systems; 2) Underground Injection Control; and 3) Groundwater and Source Water Protection in accordance with HAR Chapters 11-19, 11-20, 11-21, 11-23, 11-23A, and 11-25. They may be responsible for fulfilling additional requirements related the Safe Drinking Water program: <https://health.hawaii.gov/sdwb/>.*

Response: We acknowledge the Applicant is responsible for:

- Ensuring environmental compliance for the Project in the areas of: 1) Public Water Systems; 2) Underground Injection Control; and 3) Groundwater and Source Water Protection in accordance with HAR Chapters 11-19, 11-20, 11-21, 11-23, 11-23A, and 11-25.
- Fulfilling any additional requirements related the Safe Drinking Water program: <https://health.hawaii.gov/sdwb/>.

2. *Standard comments for the Safe Drinking Water Branch can be found at: <https://health.hawaii.gov/epo/landuse/>.*

Response: Thank you for providing the URL for the standard comments for the Safe Drinking Water Branch.

Solid & Hazardous Waste Branch

1. *Hazardous Waste Program - The state regulations for hazardous waste and used oil are in HAR Chapters 11-260.1 to 11-279.1. These rules apply to the identification, handling, transportation, storage, and disposal of regulated hazardous waste and used oil.*

Response: The Applicant and its contractors will comply with HAR Chapters 11-260.1 to 11-279.1.

2. *Solid Waste Programs - The laws and regulations are contained in HRS Chapters 339D, 342G, 342H and 342I, and HAR Chapters 11-58.1 , and 11-282. Generators and handlers of solid waste shall ensure proper recycling or disposal at DOH-permitted solid waste management facilities. If possible, waste prevention, reuse and recycling are preferred*

Ms. Patti Kitkowski, Program Chief

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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options over disposal. The Office of Solid Waste Management also oversees the electronic device recycling and recovery law, the glass advanced disposal fee program, and the deposit beverage container program.

Response: The Applicant and its contractors will comply with HRS Chapters 339D, 342G, 342H and 342I and HAR Chapters 11-58.1 and 11-282.

3. *Underground Storage Tank Program - The state regulations for underground storage tanks are in HAR Chapter 11-280.1. These rules apply to the design, operation, closure, and release response requirements for underground storage tank systems, including unknown underground tanks identified during construction.*

Response: The Phase I ESA does not show evidence of underground storage tanks on the project site. However, if underground storage tank(s) are discovered on the project site, Applicant and its contractors will comply with HAR Chapter 11-280.1

4. *Standard comments for the Solid & Hazardous Waste Branch can be found at: <https://health.hawaii.gov/epo/landuse/>. Wastewater Branch For comments, please email the Wastewater Branch at doh.wwb@doh.hawaii.gov.*

Response: Thank you for providing the URL for the standard comments for the Solid & Hazardous Waste Branch.

Sanitation / Local DOH Comments

1. *Noise may be generated during demolition and/or construction. The applicable maximum permissible sound levels, as stated in Title 11, HAR, Chapter 11-46, "Community Noise Control," shall not be exceeded unless a noise permit is obtained from the Department of Health.*

Response: Applicant and its contractors will comply with Title 11, HAR, Chapter 11-46.

2. *According to HAR § 11-26-35, Vector Control, No person, firm, or corporation shall demolish or clear any structure, place, or vacant lot without first ascertaining the presence or absence of rodents that may endanger public health by dispersal from such premises. Should any such inspection reveal the presence of rodents, the rodents shall be eradicated before demolishing or clearing the structure, site, or vacant lot. A demolition or land clearing permit is required prior to demolition or clearing.*

Response: Applicant and its contractors will comply with HAR § 11-26-35.

Ms. Patti Kitkowski, Program Chief

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 6 of 6

Other

1. *CDC - Healthy Places - Healthy Community Design Checklist Toolkit recommends that state and county planning departments, developers, planners, engineers, and other interested parties apply these principles when planning or reviewing new developments or redevelopment projects.*

Response: The Applicant will consider applying the Healthy Places - Healthy Community Design principles where practical and feasible.

2. *If new information is found or changes are made to your submittal, DOH reserves the right to implement appropriate environmental health restrictions as required. Should there be any questions on this matter, please contact the Department of Health Maui District Health Office at 808 984-8230.*

Response: We acknowledge that if new information is found or changes are made, DOH reserves the right to implement appropriate environmental health restrictions as required.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation



STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

Lorin W. Pang, M.D., M.P.H.
District Health Officer

DATE: May 2, 2025

TO: Mr. Tom Schnell, Vice President
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813
email: tschnell@pbrhawaii.com

FROM: Patti Kitkowski 
Maui District Environmental Health Program Chief
54 S. High St., Rm 300
Wailuku, HI 96793

SUBJECT: **Kaiahale 'O Kahiluhilu Affordable Housing Application for Chapter 201H HRS Exemptions Pursuant to §201H-38, HRS and Approval Pursuant to the office of the Governor, State of Hawaii, Eleventh Proclamation Relating to Affordable Housing-153 West Kaahumanu Ave, Maui (TMK 2-3-7004:003 por.)**

In most cases, the District Health Office will no longer provide individual comments to agencies or project owners to expedite the land use review and process. Agencies, project owners, and their agents should apply Department of Health "Standard Comments" regarding land use to their standard project comments in their submittal. Standard comments can be found on the Land Use Planning Review section of the Department of Health website: <https://health.hawaii.gov/epo/landuse/>. Contact information for each Branch/Office is available on that website.

Note: Agencies and project owners are responsible for adhering to all applicable standard comments and obtaining proper and necessary permits before the commencement of any work.

General summary comments have been included for your convenience. However, these comments are not all-inclusive and do not substitute for review of and compliance with all applicable standard comments for the various DOH individual programs.

Clean Air Branch

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

2. Control of Fugitive Dust: You must reasonably control the generation of all airborne, visible fugitive dust and comply with the fugitive dust provisions of HAR §11-60.1-33. Note that 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 and visible fugitive dust and that buffer zones be established wherever possible.
3. Standard comments for the Clean Air Branch are at: <https://health.hawaii.gov/epo/landuse/2>

Clean Water Branch

1. All project activities shall comply with the HAR, Chapters 11-53, 11-54, and 11-55. The following Clean Water Branch website contains information for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with HAR, Chapters 11-53, 11-54, and 11-55: <https://health.hawaii.gov/cwb/clean-water-branch-home-page/cwb-standard-comments/>.

Hazard Evaluation & Emergency Response Office

1. A Phase I Environmental Site Assessment (ESA) and Phase II Site Investigation should be conducted for projects wherever current or former activities on site may have resulted in releases of hazardous substances, including oil or chemicals. Areas of concern include current and former industrial areas, harbors, airports, and formerly and currently zoned agricultural lands used for growing sugar, pineapple or other agricultural products.
2. Standard comments for the Hazard Evaluation & Emergency Response Office are at: <https://health.hawaii.gov/epo/landuse/>.

Indoor and Radiological Health Branch

1. Project activities shall comply with HAR Chapters 11-39, 11-45, 11-46, 11-501, 11-502, 11-503, 11-504.
2. Construction/Demolition Involving Asbestos: If the proposed project includes renovation/demolition activities that may involve asbestos, the applicant should contact the Asbestos and Lead Section of the Branch at <https://health.hawaii.gov/irhb/asbestos/>.

Safe Drinking Water Branch

1. Agencies and/or project owners are responsible for ensuring environmental compliance for their projects in the areas of: 1) Public Water Systems; 2) Underground Injection Control; and 3) Groundwater and Source Water Protection in accordance with HAR Chapters 11-19, 11-20, 11-21, 11-23, 11-23A, and 11-25. They may be responsible for fulfilling additional requirements related the Safe Drinking Water program: <https://health.hawaii.gov/sdwb/>.
2. Standard comments for the Safe Drinking Water Branch can be found at: <https://health.hawaii.gov/epo/landuse/>.

Solid & Hazardous Waste Branch

1. Hazardous Waste Program - The state regulations for hazardous waste and used oil are in HAR Chapters 11-260.1 to 11-279.1. These rules apply to the identification, handling, transportation, storage, and disposal of regulated hazardous waste and used oil.
2. Solid Waste Programs - The laws and regulations are contained in HRS Chapters 339D, 342G, 342H and 342I, and HAR Chapters 11-58.1, and 11-282. Generators and handlers of solid waste shall ensure proper recycling or disposal at DOH-permitted solid waste management facilities. If possible, waste prevention, reuse and recycling are preferred options over disposal. The Office of Solid Waste Management also oversees the electronic device recycling and recovery law, the glass advanced disposal fee program, and the deposit beverage container program.
3. Underground Storage Tank Program – The state regulations for underground storage tanks are in HAR Chapter 11-280.1. These rules apply to the design, operation, closure, and release response requirements for underground storage tank systems, including unknown underground tanks identified during construction.
4. Standard comments for the Solid & Hazardous Waste Branch can be found at: <https://health.hawaii.gov/epo/landuse/>. Wastewater Branch For comments, please email the Wastewater Branch at doh.wwb@doh.hawaii.gov.

Sanitation / Local DOH Comments:

1. Noise may be generated during demolition and/or construction. The applicable maximum permissible sound levels, as stated in Title 11, HAR, Chapter 11-46, "Community Noise Control," shall not be exceeded unless a noise permit is obtained from the Department of Health.
2. According to HAR §11-26-35, Vector Control, No person, firm, or corporation shall demolish or clear any structure, place, or vacant lot without first ascertaining the presence or absence of rodents that may endanger public health by dispersal from such premises. Should any such inspection reveal the presence of rodents, the rodents shall be eradicated before demolishing or clearing the structure, site, or vacant lot. A demolition or land clearing permit is required prior to demolition or clearing.

Other

1. CDC - Healthy Places - Healthy Community Design Checklist Toolkit recommends that state and county planning departments, developers, planners, engineers, and other interested parties apply these principles when planning or reviewing new developments or redevelopment projects.
2. If new information is found or changes are made to your submittal, DOH reserves the right to implement appropriate environmental health restrictions as required. Should there be any questions on this matter, please contact the Department of Health Maui District Health Office at 808 984-8230.



PBR HAWAII
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May 16, 2025

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

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Mr. Sniffen:

Thank you for the Hawai'i Department of Transportation's (HDOT) letter dated April 30, 2025 (Reference #STP 00749.25, STP 8.3922), regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized to follow the comments provided in your letter:

1. *The Kaiahale O Kahiluhilu project is approximately 0.79 miles from Kahului Airport (OGG). All projects within 5 miles from 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: https://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.*

Response: The Applicant has reviewed the TAM for development activities within 5 miles of state airports and will follow its guidance. Development activities will be undertaken in a manner to avoid impacts on OGG operations.

Edwin H. Sniffen, Director

SUBJECT: KAIAHALE ‘O KAHILUHLU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA‘AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 2 of 5

2. *The project site is approximately 11,847 feet from the end of Runway 2 at OGG. Federal Aviation Administration (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 criteria for submittal can be found at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.*

Response: The Applicant or a consultant to the Applicant will submit FAA Form 7460-1 to the FAA. When received, the Applicant will provide a copy of the FAA determination to the DOT-Airports Planning Section.

3. *Due to the proximity to OGG, the applicant and future residents should be aware of potential 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 acknowledges potential noise from aircraft operations due to the proximity to OGG. The Applicant also acknowledges the potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. The Applicant understand that these impacts may increase or decrease over time and are dependent on airport operations.

4. *The HDOT requires that the proposed development not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. 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 FAA.*

Response: The Applicant has reviewed the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or near Airports. The Circular will be shared with the Project’s landscape architects, who will follow its guidance so that no landscape features will become a wildlife attractant.

5. *If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the aircraft's approach path can create a hazardous condition for pilots*

Edwin H. Sniffen, Director

SUBJECT: KAIAHALE 'O KAHILUHLU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 3 of 5

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 FAA.

The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The www.sandia.gov/glare website has information and guidance on the preparation of a glint and glare analysis. 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 FAA.

Response: In designing any future PV system, the Applicant's design team will specify non-glint and non-glare solar panels, follow FAA guidance, prepare a glint and glare analysis, and file FAA Form 7460-1 for proposed PV systems. When received, the Applicant will provide a copy of the FAA determination to the HDOT-Airports Planning Section. The Applicant acknowledges that if it is determined that its PV array creates a hazardous condition for pilots, it will take immediate action to mitigate the situation.

6. *HDOT-Highways has determined that based on the Mobility Analysis Report dated December 2021, it appears that the project will not have any significant impact on State Highway facilities.*

Response: We acknowledge and appreciate that HDOT-Highways has determined that based on the Mobility Analysis Report dated December 2021, it appears that the project will not have any significant impact on State Highway facilities.

7. *All drainage, discharge, and connection permit applications must be submitted for review and approval by the HDOT-Highways, Maui District Engineer.*

Response: The Applicant acknowledges that all drainage, discharge, and connection permit applications must be submitted for review and approval by the HDOT-Highways, Maui District Engineer.

Edwin H. Sniffen, Director

SUBJECT: KAIAHALE ‘O KAHILUHLU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA‘AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

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8. *Construction plans for work done within the HDOT-Highway Right-of-Way must be submitted for review and permit approval by the HDOT-Highway, Maui District Engineer.*

Response: The Applicant or the Applicant’s civil engineer will submit construction plans for work done within the HDOT-Highway Right-of-Way for review and permit approval by the HDOT-Highway, Maui District Engineer.

9. *The HDOT recommends 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: The Applicant will make efforts to reduce carbon emissions by providing LED lighting and short-term and long-term bicycle parking.

In addition, the Project will be designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing and, as feasible, may include:

- Site & Landscaping
 - Erosion and dust control during construction.
 - Non-invasive plants in landscaping.
 - Heat island reduction with shaded parking.
 - On site permanent stormwater infiltration system.
 - Non-toxic pest control measures for termite protection.
- Water Efficiency
 - Separate water meters for landscape and buildings.
 - High-efficiency plumbing fixtures to reduce water use.
- Energy Efficiency
 - Energy-efficient appliances and LED (light-emitting diode) lighting.
 - Well-insulated walls and roofs for reduced energy use.
 - Whole-building energy metering with possible unit submeters.
 - PV (photovoltaic) panels to offset common area electricity usage.

Edwin H. Sniffen, Director

SUBJECT: KAIAHALE 'O KAHILUHLU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 16, 2025

Page 5 of 5

- Materials & Resources
 - Sustainable, non-tropical wood materials.
 - Water-resistant flooring and mold-resistant drywall in wet areas.
 - Optimized framing to reduce material waste.
 - Waste management plan to divert materials from landfills.
- Indoor Air Quality
 - Proper ventilation systems for fresh air circulation.
 - Energy Star exhaust fans in kitchens and bathrooms.
 - Carbon monoxide (CO) monitors in all units.
 - Low-VOC paints, adhesives, flooring, and insulation.
- Innovation & Regional Priorities
 - EV (electric vehicle)-ready stalls for future EV charging stations.

We value your participation and thank you for your review of the 201H/EP Application.

Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF TRANSPORTATION | KA 'ŌIHANA ALAKAU
869 PUNCHBOWL STREET
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EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'ŌKELE

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

IN REPLY REFER TO:

STP 00749.25
STP 8.3922

April 30, 2025

VIA EMAIL: tschnell@pbrhawaii.com
stanley.s.fujimoto@hawaii.gov

Mr. Tom Schnell, Vice President
PBR Hawaii & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Schnell:

Subject: Kaiahale O Kahiluhilu Affordable Housing Application for Chapter 201H,
Hawaii Revised Statutes Exemptions and Approval Pursuant to the Office of the
Governor, State of Hawaii, Eleventh Proclamation Relating to Affordable
Housing
Kahului, Maui, Hawaii
Tax Map Key: (2) 3-7-004: 003 (portion)

Thank you for your letter, dated March 31, 2025, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. HDOT understands that HKI Kahului Kaiahale LLC is proposing to construct an affordable rental apartment development at the Kahului Civic Center Mixed-Use Complex. The project will be constructed in two phases and include 301 affordable rental apartment units and two non-revenue staff units.

HDOT has reviewed the subject application and has the following comments:

1. The Kaiahale O Kahiluhilu project is approximately 0.79 miles from Kahului Airport (OGG). All projects within 5 miles from 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: https://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
2. The project site is approximately 11,847 feet from the end of Runway 2 at OGG. Federal Aviation Administration (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 criteria for submittal can be found at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

3. Due to the proximity to OGG, the applicant and future residents should be aware of potential 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.
4. The HDOT requires that the proposed development not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. 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 FAA.
5. If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the aircraft's approach path 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 FAA.

The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The www.sandia.gov/glare website has information and guidance on the preparation of a glint and glare analysis. 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 FAA.

6. HDOT-Highways has determined that based on the Mobility Analysis Report dated December 2021, it appears that the project will not have any significant impact on State Highway facilities.
7. All drainage, discharge, and connection permit applications must be submitted for review and approval by the HDOT-Highways, Maui District Engineer.
8. Construction plans for work done within the HDOT-Highway Right-of-Way must be submitted for review and permit approval by the HDOT-Highway, Maui District Engineer.
9. The HDOT recommends 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.

Please submit any 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



KIMI MIKAMI YUEN, LEED® AP BD+C
President / Chairperson

VINCENT SHIGEKUNI
Executive Vice-President / Principal

GRANT T. MURAKAMI, AICP, LEED® AP BD+C
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printed on recycled paper

May 22, 2025

Mary Alice Evans, Director
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, HI 96804-2359

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

Dear Ms. Evans:

Thank you for the Office of Planning and Sustainable Development's (OPSD) letter dated May 8, 2025 (Reference # DTS 202502040759NA), regarding the Kaiahale 'o Kahiluhilu Affordable Housing Application for: Chapter 201H, HRS Exemptions Pursuant to § 201H-38, HRS and Approval Pursuant to the Office of the Governor, State of Hawai'i, Eleventh Proclamation Relating to Affordable Housing (dated February 4, 2025, or as amended under future proclamations) (201H/EP Application).

HKI Kahului Kaiahale LLC is the Applicant for the 201H application. As the Applicant's planning consultant, PBR HAWAII is responding to your comments.

Our responses are organized to follow the comments provided in your letter:

1. *Exemption from Title 19, Maui County Code (MCC), Chapter 19.18, B-2 Community Business District maximum Floor Area Ratio (FAR).* OPSD strongly supports an exemption from the maximum FAR to allow a project density of 2.2 FAR. This enables the production of more affordable housing units in the same project footprint and is more consistent with TOD-supportive densities. OPSD also supports a housing unit mix that targets families as well as the production of larger units with more bedrooms to provide families with more rental options in TOD and infill areas.

Response: We thank OPSD for strongly supporting an exemption from the maximum FAR to allow a project density of 2.2 FAR.

2. *Exemption from MCC Chapter 19.36B, related to off-street parking and loading and reduced parking stall size.* The Project is within walking distance of various services, schools, shopping, and recreational facilities, is located adjacent to a public transit hub, and is served by a network of bicycle and pedestrian infrastructure, OPSD supports the request for fewer off-street parking stalls and the use of smaller compact stalls. This will also help reduce monthly housing costs for residents. Consideration should be given to offering transportation choices for residents to reduce the need for surface parking, such as car-sharing services.

Ms. Mary Alice Evans, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

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Response: We thank OPSD for supporting the requested exemption for fewer off-street parking stalls and the use of smaller compact stalls. The Project will include rideshare stalls and about 22 short-term and 196 long-term bicycle parking spaces. In addition, the proximity to the Kahului Transit Center will provide residents with transportation choices other than relying on personal cars.

3. *Exemptions from various MCC sections related to sidewalk improvements, sidewalk improvements along frontages, and bicycles and pedestrian improvements in support of the County's Complete Streets policy. OPSD is concerned with the blanket requests to exempt the project from sidewalk improvements that may be essential to providing a safe and comfortable pedestrian environment critical for walkable TOD communities. The County transit hub will generate more pedestrian traffic onsite and to and from the adjoining neighborhoods—and supporting an improved pedestrian environment within and bounding the Mixed-Use Complex site should be a priority for the entire site. The Applicant should work with the County to determine how the project could contribute to improvements to sidewalks and pedestrian facilities along the project frontage that would advance the County's "Complete Streets" policy and result in a better-connected pedestrian environment within the Ka'ahumanu Ave (TOD) Community Corridor*

Consideration should be given to how ground level facades and project landscaping contribute to creating a comfortable and interesting streetscape for pedestrian and other non-vehicular travel along the project's Ka'ahumanu Avenue and Kane Street frontages. OPSD suggests including street trees that could shade sidewalks and ped/bikepaths and screen the residential surface parking from view Ka'ahumanu Avenue.

Response: Regarding sidewalks and pedestrian facilities that advance the County's "Complete Streets" policy, according to the Applicant's traffic engineer, WSP, the County of Maui Department of Public Works (DPW) is currently evaluating conceptual plans for improvements on Kāne Street from West Ka'ahumanu Avenue to West Kamehameha Avenue in accordance with its Complete Streets program. Between West Ka'ahumanu Avenue and Vevau Street, there are three alternative concepts. All concepts are proposed to occur within the existing 80-foot right-of-way (ROW) for Kāne Street. The Project site respects this existing 80-foot ROW boundary and, therefore, does not preclude any of these concepts.

Regarding ground level features and landscaping along Ka'ahumanu Avenue and Kāne Street that contribute to a comfortable and interesting streetscape, the Project includes:

- Preservation of the low historic stone and mortar boundary wall with a "WPA 1939" plaque along Ka'ahumanu Avenue and a portion of Kāne Street
- Along Kāne Street, ground floor windows to active areas within the building, such as the multi-purpose room, management offices, and resident common areas

Ms. Mary Alice Evans, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAII, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

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- At the corner of Ka'ahumanu Avenue and Kāne Street, large ground floor windows to provide visual interest from the exterior and the interior
 - Along Ka'ahumanu Avenue,
 - Street trees to shade pedestrians and screen parking areas
 - A second-floor landscaped recreation deck to provide visual interest
 - L-shape and U-shape buildings to break up massing
4. *Exemption from Chapter 12.08.100, MCC requirement that driveways be separated by a minimum distance of 45 feet. OPSD is concerned about unsafe vehicular and pedestrian conflicts that will arise from the proposed permanent fire access driveway that accesses Vevau Street through the Civic Center component of the site. Two-way traffic on this fire access roadway may impair County bus ingress and egress at the transit hub facility and it also creates a traffic barrier for pedestrians traveling to and from the transit hub. It also may result in a reduction in the usable ground level floor area and opportunities for public place-making in the DAGS civic center component. OPSD recommends the Applicant work with DAGS and the County to determine how to minimize and discourage use of this roadway to access the rental housing component.*

Response: We understand your concern about possible unsafe vehicle and pedestrian conflicts that could arise from the permanent fire-access driveway from Vevau Street. The Applicant consulted with the County of Maui Department of Fire and Public Safety, Fire Prevention Bureau, who determined that this fire-access driveway is required. The Applicant understands that the Department of Accounting and General Services (DAGS), will include pedestrian access when they construct the permanent fire-access driveway.

The driveway along Vevau Street was part of the conceptual plan included in the *Kahului Civic Center Mixed-Use Complex Final Environmental Assessment Finding of No Significant Impact* (FEA/FONSI) prepared by G70 and analyzed as part of the Mobility Analysis Report included as an appendix to the FEA/FONSI. The MAR concluded that “No significant impacts to pedestrians are forecasted to occur with buildout of the project.”

As part of the EA consultation process HFFDC, DAGS, and G70 coordinated with the Maui County Department of Transportation (MDOT) to discuss the design of a shared driveway with the transit hub facility. The MDOT decided it was necessary to provide a perimeter fence surrounding the transit hub and thus a shared driveway was not feasible.

The fire access driveway from Vevau Street cannot be moved further from the transit hub driveway as that would put severe limitations on the design of the civic center and significantly reduce the area available for the civic center building.

Ms. Mary Alice Evans, Director

SUBJECT: KAIAHALE 'O KAHILUHILU AFFORDABLE HOUSING APPLICATION FOR CHAPTER 201H, HRS EXEMPTIONS PURSUANT TO § 201H-38, HRS AND APPROVAL PURSUANT TO THE OFFICE OF THE GOVERNOR, STATE OF HAWAI'I, ELEVENTH PROCLAMATION RELATING TO AFFORDABLE HOUSING (DATED FEBRUARY 4, 2025, OR AS AMENDED UNDER FUTURE PROCLAMATIONS) (201H/EP APPLICATION) – 153 WEST KA'AHUMANU AVENUE, MAUI (TMK (2) 3-7-004: 003 (PORTION))

May 22, 2025

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5. *Proposed stormwater retention system and other utility systems for Kahului Civic Center Mixed-Use Complex (Project).* OPSD notes that the FEA and HHFDC-HKI Kahului Kaiahale LLC Development Agreement cite the preparation and completion of a master plan for approval by HHFDC and DAGS for the entire Project site, in which plans and agreements for on- and offsite infrastructure improvements would have been specified. In the absence of such a plan setting forth these shared site improvements, OPSD recommends that the application clarify whether the onsite stormwater retention system and other utility improvements described in the application are shared system improvements or whether separate improvements would be required for the DAGS civic center component of the Project.

Response: The Applicant's intent is that on-site infrastructure systems for the affordable housing component and the civic center component be separate and independent systems. This includes separate onsite stormwater retention systems, water connections and meters, and electrical and communication systems. Separate infrastructure systems are preferred as the housing component and the civic center component will be financed separately, and construction, competition, and operational timing of each component is expected to be different, with the housing component likely to be built and operating before the civic center is built and operating. On a long-term basis, separate on-site infrastructure systems will allow for separate operating, billing, and maintenance costs. The Applicant's proposed separation of the utilities between the affordable housing and civic center components is still under review by HHFDC and DAGS and is subject to HHFDC and DAGS' approval.

We value your participation and thank you for your review of the 201H/EP Application.

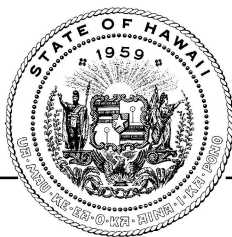
Sincerely,

PBR HAWAII



Tom Schnell, AICP
Vice President

cc: Questor Lau, EAH Housing
Stan S. Fujimoto, Hawai'i Housing Finance & Development Corporation



**STATE OF HAWAII
OFFICE OF PLANNING
& SUSTAINABLE DEVELOPMENT**

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DTS 202504071337NA

Coastal Zone
Management
Program

May 8, 2025

Environmental Review
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Statewide Geographic
Information System

Statewide
Sustainability Branch

Mr. Tom Schnell, Vice President
PBR Hawai'i & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawai'i 96813

Dear Mr. Schnell:

Subject: HRS Chapter 201H Application and Request for Exemptions
Pursuant to HRS § 2021H-38,
Kaiahale 'O Kahiluhilu Affordable Housing Application
153 West Ka'ahumanu Avenue, Kahului, Maui
Tax Map Key No. (2) 3-7-004: 003 (por)

The Office of Planning and Sustainable Development (OPSD) received your March 31, 2025 letter requesting comments on a Hawai'i Revised Statutes (HRS) 201H application and requested exemptions for the subject project.

The Applicant, HKI Kahului Kaiahale LLC (an affiliate of EAH Housing), plans to develop a 303-unit affordable rental housing project on approximately 3.4 acres of a State-owned parcel on Ka'ahumanu Avenue. The affordable units will all be reserved for residents earning up to 60% of the Area Median Income (AMI). The Project will have a mix of 1-bedroom, 2-bedroom, and 3-bedroom units. A total of 298 parking stalls and short- and long-term bicycle parking for 218 bikes will be provided.

The subject project is the residential component of the larger Kahului Civic Center Mixed-Use Complex being developed on the parcel. The Mixed-Use Complex includes a State civic center component with structured parking being developed by the State Department of Accounting and General Services (DAGS) and a County of Maui (County) regional transit hub, now operational on a .85-acre site at the southeast corner of the parcel. The Kahului Civic Center Mixed-Use Complex is a State priority transit-oriented development (TOD) project in the *State Strategic Plan for Transit-Oriented Development* issued by the Hawai'i Interagency Council for Transit-Oriented Development in 2017. It is a key project supporting the County-led effort to transform the Kaahumanu Avenue corridor from Wailuku to Kahului into mixed-use, transit-oriented communities along the corridor. The DAGS civic center project is being designed to provide approximately 66,000 gross

square feet of space for State offices, adult school programs, and proposed Hawai'i State Public Library System (HSPLS) programs.

The Applicant seeks numerous exemptions pursuant to HRS § 201H-38 and suspension of laws pursuant to the Governor's Eleventh Proclamation Related to Affordable Housing dated February 4, 2025 (EP Suspensions). Based on its review of the 201H Application materials, the Development Agreement executed between the Applicant and the Hawai'i Housing Finance and Development Corporation (HHFDC), and the Final Environmental Assessment/Finding of No Significant Impact (FEA) issued for the Kahului Civic Center Mixed Use Complex in May 2022, OPSD supports the subject project's 201H application, which will provide long-term affordable rental housing for households earning from 30-60% of AMI. OPSD offers the following comments on specific elements in the Application and exemption requests.

1. Exemption from Title 19, Maui County Code (MCC), Chapter 19.18, B-2 Community Business District maximum Floor Area Ratio (FAR). OPSD strongly supports an exemption from the maximum FAR to allow a project density of 2.2 FAR. This enables the production of more affordable housing units in the same project footprint and is more consistent with TOD-supportive densities. OPSD also supports a housing unit mix that targets families as well as the production of larger units with more bedrooms to provide families with more rental options in TOD and infill areas.
2. Exemption from MCC Chapter 19.36B, related to off-street parking and loading and reduced parking stall size. The Project is within walking distance of various services, schools, shopping, and recreational facilities, is located adjacent to a public transit hub, and is served by a network of bicycle and pedestrian infrastructure. OPSD supports the request for fewer off-street parking stalls and the use of smaller compact stalls. This will also help reduce monthly housing costs for residents. Consideration should be given to offering transportation choices for residents to reduce the need for surface parking, such as car-sharing services.
3. Exemptions from various MCC sections related to sidewalk improvements, sidewalk improvements along frontages, and bicycle and pedestrian improvements in support of the County's Complete Streets policy. OPSD is concerned with the blanket requests to exempt the project from sidewalk improvements that may be essential to providing a safe and comfortable pedestrian environment critical for walkable TOD communities. The County transit hub will generate more pedestrian traffic onsite and to and from the adjoining neighborhoods—and supporting an improved pedestrian environment within and bounding the Mixed-Use Complex site should be a priority for the

entire site. The Applicant should work with the County to determine how the project could contribute to improvements to sidewalks and pedestrian facilities along the project frontage that would advance the County's "Complete Streets" policy and result in a better-connected pedestrian environment within the Ka'ahumanu Ave (TOD) Community Corridor.

Consideration should be given to how ground-level facades and project landscaping contribute to creating a comfortable and interesting streetscape for pedestrian and other non-vehicular travel along the project's Ka'ahumanu Avenue and Kane Street frontages. OPSD suggests including street trees that could shade sidewalks and ped/bike paths and screen the residential surface parking from the view of Ka'ahumanu Avenue.

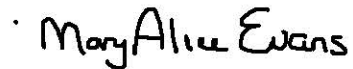
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5. Proposed stormwater retention system and other utility systems for Kahului Civic Center Mixed-Use Complex (Project). OPSD notes that the FEA and HHFDC-HKI Kahului Kaiahale LLC Development Agreement cite the preparation and completion of a master plan for approval by HHFDC and DAGS for the entire Project site, in which plans and agreements for on- and offsite infrastructure improvements would have been specified. In the absence of such a plan setting forth these shared site improvements, OPSD recommends that the application clarify whether the onsite stormwater retention system and other utility improvements described in the application are shared system improvements or whether separate improvements would be required for the DAGS civic center component of the Project.

Thank you for the opportunity to comment on the subject application and request for exemptions. If you have any questions, please contact Seiji Ogawa, (808) 587-2898,

Mr. Tom Schnell
May 8, 2025
Page 4

seiji.ogawa@hawaii.gov, or Ruby Edwards, (808) 587-2817, ruby.m.edwards@hawaii.gov. If you respond to this comment letter, please include DTS 202504071337NA in the subject line.

Mahalo,

A handwritten signature in black ink that reads "Mary Alice Evans". The signature is written in a cursive, slightly slanted style.

Mary Alice Evans
Director

cc: Dean Minakami, Hawai'i Housing Finance and Development Corporation