

RICHARD T. BISSEN, JR.
Mayor

KATE L. K. BLYSTONE
Director

ANA LILLIS
Deputy Director



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

November 3, 2025

Honorable Richard T. Bissen, Jr.
Mayor, County of Maui
200 South High Street
Wailuku, Hawaii 96793

APPROVED FOR TRANSMITTAL

Richard Bissen 11-5-25
Mayor Date

For Transmittal to:

Honorable Tamara Paltin, Chair
Disaster, Resilience, International Affairs and Planning Committee
200 South High Street
Wailuku, Hawaii 96793
via: drip.committee@mauicounty.us

Dear Chair Paltin:

SUBJECT: BILL 163 (2025), BILL 164 (2025), AND BILL 165 (2025), TO AMEND THE MAUI ISLAND PLAN'S DIRECTED GROWTH MAP C5 (PŪLEHU ROAD), AMEND THE WAILUKU-KAHULUI COMMUNITY PLAN DESIGNATION, AND CHANGE THE ZONING FOR 166.511 ACRES SITUATED AT KAHULUI, HAWAII (HO'ONANI VILLAGE) (DRIP-19)

Thank you for your October 23, 2025 letter requesting information pertaining to Bills 163, 164 and 165. The following identifies your request followed by the Planning Department's (Department) response:

- 1. To the extent feasible given the shortness of time, please review and provide your Department's comments on the project and attached proposed bills, including any anticipated impacts as a result of the proposal.*

Proposed Bills - Process Concerns:

Given the County's existing housing crisis and considering the many related General Plan goals and policies that encourage the County to address this crisis, the Department is very supportive of projects or initiatives that provide new housing opportunities for County residents. However, it is the Department's position that all

DATE FOR TRANSIT

Date

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development projects, whether they provide additional housing opportunities or not, should be evaluated thoroughly to ensure that a project's potential impacts affecting the community are properly analyzed and addressed through the entitlement application process established within the Maui County Code (MCC). While the Department recognizes that the Maui County Charter (Charter) and to some extent MCC Titles 2 and 19 reference that the County Council may initiate changes to community plans and zoning, the Department is not supportive of this abbreviated process for the proposed Ho'onani Village project as it bypasses the standard application and environmental procedures/analysis that would normally be expected of a large private development project.

More specifically, MCC section 2.80B.060(A) and 2.80B.100 provide a process for a non-decennial amendment to the Maui Island Plan and community plans proposed by the Planning Director or County Council in accordance with the provisions of Sections 8-8.4 and 8-8.6 of the Charter. Unfortunately, other than review by the appropriate Planning Commission, MCC Sections 2.80B.060(A), 2.80B.100 or the Charter do not provide any guidance as to how the potential impacts of such requests are to be analyzed. For example, there are no stated requirements for the submittal of a project application or environmental analysis for the Department or Planning Commission to consider in formulating their recommendations prior to the Council acting on the amendment.

On the other hand, MCC Sections 2.80B.060(B) and 2.80B.110 provide a process for a non-decennial amendment to the Maui Island Plan and community plans proposed by a private party such as the applicant for Ho'onani Village. Under these sections, it is clearly stated that the applicant, must submit an application in compliance with the requirements of MCC Sections 19.510.010 and 19.510.020. Additionally, MCC Sections 2.80B.060(B) and 2.80B.110 mandate the submittal of an Environmental Assessment (EA) or Environmental Impact Statement (EIS) in accordance with Hawai'i Revised Statutes (HRS) Chapter 343. Thus, within the MCC, there is an expressed difference between what is expected from Council-initiated versus developer-initiated Maui Island Plan and community plan amendments. The Department believes that this difference is crucial in ensuring that private development projects are thoroughly analyzed and considered by the community before any action is taken.

Importantly, as part of the application process for a developer-initiated community plan amendment and/or change in zoning, MCC Section 19.510.010 requires detailed information to be submitted by an applicant so that the project can be properly analyzed by the Department, and evaluated by the public, Planning Commission and Council before final action. This is evident through MCC Subsection 19.510.010(C)(2), which requires that for all community plan amendment and change in zoning applications deemed complete, the director shall prepare a report that includes an assessment and detailed explanation for each requirement set forth in MCC Subsection 19.510.010(D), and that

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report shall include all relevant data, studies, agency reports, and any other information relied upon by the Director in finding that an application is complete. Amongst a variety of application materials required of Subsection 19.510.010(D), the applicant of a developer-initiated project would be required to submit the following:

- *“19.510.010(D)(7): Policies and objectives of the general plan, the provisions of the community plan applicable to the application, the provisions of the applicable district and an analysis of the extent to which the application, if granted, conforms to these policies, objectives and provisions;*
- *19.510.010(D)(9): Preliminary archaeological and historical data and comments from the department of land and natural resources and office of Hawaiian affairs of the State, and if applicable, a preservation/mitigation plan which has been reviewed and approved by the department of land and natural resources and office of Hawaiian affairs of the State;*
- *19.510.010(D)(10): Analysis of the secondary impacts of the proposed use on surrounding uses which includes, but which is not limited to, increases in property value, populations, housing, community services and facility needs, secondary jobs and employment generated, and compatibility with surrounding uses, and if applicable, the affordable housing program and comments from the department of human concerns of the County, and other mitigation plans and comments from the respective governmental and community services agencies;*
- *19.510.010(D)(11): Traffic impact analysis and, if applicable, a traffic master plan, which includes, but which is not limited to, comments from the department of transportation of the State and department of public works and environmental management;*
- *19.510.010(D)(13): Water source, supply and distribution analysis which includes, but which is not limited to, methods of irrigation existing on the parcel and proposed for the application, location and use of groundwater and nonpotable water sources, and, if applicable, a water master plan, which includes, but which is not limited to, comments from the department of land and natural resources of the State and the departments of water supply and public works and environmental management;*
- *19.510.010(D)(14): Sewage disposal analysis, a description of a proposed method of sewage disposal, and comments, if applicable, from the departments of health and land and natural resources of the State and the departments of public works and environmental management and water supply;*

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- *19.510.010(D)(15): Solid waste disposal analysis, a description of a proposed method of solid waste disposal and comments, if applicable, from the departments of health and land and natural resources of the State and the departments of public works and environmental management and water supply;*
- *19.510.010(D)(16): Identification of environmentally sensitive areas, habitat and botanical features which include, but which are not limited to, wetlands, streams, rock outcroppings, endangered plants and animals, and exceptional trees, if applicable, a baseline study and preservation/mitigation plan, and comments, if applicable, from the department of land and natural resources of the State, the United States Fish and Wildlife Service, and the United States Corps of Engineers;*
- *19.510.010(D)(17): Identification of the topographical and drainage patterns existing on the subject parcel and any proposed alterations to these patterns;*
- *19.510.010(D)(18): Identification of all meetings held between the applicant and any community or residential group which may be impacted by the applicant's request, the issues raised by these meetings, and any measures proposed by the applicant to deal with or to mitigate these issues;*
- *19.510.010(D)(22): Operations and management of the proposed use which includes, but is not limited to, number of employees, proposed employee housing plan, hours of operation, fees charged to residents and visitors, provisions for off-site parking;*
- *19.510.010(D)(24): Identification and assessment of chemicals and fertilizers used, including, but not limited to, detailing effects upon surface, underground and marine water resources and neighboring properties and surrounding flora and fauna, and if applicable, a mitigation plan and maintenance program and schedule, and comments from the departments of health and of land and natural resources of the State, the United States Fish and Wildlife Service, and the United States Environmental Protection Agency;"*

Furthermore, MCC Section 19.510.040(A) requires that applications for a change in zoning be processed to provide for community, State and County agency input through public hearing(s) in accordance with the requirements of MCC Sections 19.510.010 and 19.510.020. MCC Section 19.510.040(A) also requires that:

- "1. The appropriate planning commission shall conduct a public hearing on all change of zoning applications;*
- 2. Upon closing the public hearing and upon reviewing the report and recommendation of the planning director and all other applicable information on the application, the commission shall prepare a report which includes, but which is not*

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limited to, the commission's findings of fact, conclusions of law, recommendations, and any recommended condition which the commission determines to be necessary pursuant to the conditional zoning provisions of this chapter;

3. *Upon appropriate action by the commission, the director of planning shall transmit the report of the commission to the county council;*

4. *The county council may grant a change of zoning if all of the following criteria are met:*

a. *The proposed request meets the intent of the general plan and the objectives and policies of the community plans of the county,*

b. *The proposed request is consistent with the applicable community plan land use map of the county,*

c. *The proposed request meets the intent and purpose of the district being requested,*

d. *The application, if granted, would not adversely affect or interfere with public or private schools, parks, playgrounds, water systems, sewage and solid waste disposal, drainage, roadway and transportation systems, or other public requirements, conveniences and improvements,*

e. *The application, if granted, would not adversely impact the social, cultural, economic, environmental, and ecological character and quality of the surrounding area, and*

f. *If the application change in zoning involves the establishment of an agricultural district with a minimum lot size of two acres, an agricultural feasibility study shall be required and reviewed by the department of agriculture and the United States Soil and Conservation Service."*

In summary, it is the Department's position that bypassing the normal application and environmental review procedures/analysis expected of a private development project of this magnitude will result in a significant reduction in the level of impact analysis normally performed by the Department, Planning Commission and Council, result in relatively little community input, and may result in potential impacts to the community. For these reasons, the Department recommends that the Bills not be passed, and the project developer be required to submit the necessary application materials as required per the MCC for a developer-initiated project.

Anticipated Impacts of the Proposal:

Absent a complete application that would include all information as required within the MCC (see partial list above), the Department is unable to identify anticipated impacts resulting from the proposal nor provide specific recommendations. Based upon the limited information submitted thus far, the Department's Long-Range Division prepared the attached General Plan Consistency analysis. The analysis provides a list of project-applicable General Plan policies, along with staff's comments regarding level of consistency. As noted in the analysis, while the project appears to be consistent with some

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policies, the Department has concerns with consistency of others. If additional project information is submitted as recommended by the Department, the Department would conduct a more thorough consistency review and analysis for future Planning Commission and Council review.

Further, an EIS provides the opportunity for a detailed environmental impact analysis, which is critical for analyzing projects of this magnitude. The Council may be aware of HRS Section 343-5(6), which indicates that an EA shall be required for actions that *"(6) Propose any amendments to existing county general plans where the amendment would result in designations other than agriculture, conservation, or preservation, except actions proposing any new county general plan or amendments to any existing county general plan initiated by a county"* (emphasis added). According to this Section, if this project were developer-initiated, an EA would be required to be processed prior to County action on the change in community plan designation. Since this project is Council initiated, an EA or EIS is not required prior to Council action, which bypasses this important analysis at the County level.

The Department acknowledges that the proposal requires approval of a State Land Use Boundary Amendment from the State Land Use Commission. According to the State Land Use Commission, the State Land Use Boundary Amendment application that the developer has filed with the State will not be deemed complete until an approved EIS for the project is accepted by the State Land Use Commission or another accepting authority.

Importantly, assuming Bills 163, 164 and 165 pass, along with the State Land Use Commission's approval of the State Land Use Boundary Amendment and any associated EIS, beyond any specific project conditions/mitigation measures mandated by the State, since there are no further entitlement actions required, the County would not be able to control the amount of development beyond the list of permitted uses and development standards identified within the proposed new zoning district of M-1 Light Manufacturing. With a variety of uses permitted in the M-1 District and limited permitted development standards that include an allowed 60' height limit and potential 0' setbacks along property lines, the proposed project will result in a significant change to the surrounding community without proper County impact analysis that would otherwise be required of a developer-initiated amendment.

Concern with Proposed Change in Community Plan and Zoning Designations:

Given the lack of information submitted, the Department is not clear as to the reason the applicant is choosing to change the zoning designation for the property to M-1 (Light Industrial District) as opposed to a designation of B-2 (Community Business District) or B-3 (Central Business District), which may be more appropriate for this site. Additionally, the proposed change in community plan designation from Agriculture to Business/Multi-Family does not appear to be consistent with the proposed change in zoning to M-1 (Light

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Industrial District) and perhaps may be a better fit for a community plan designation of Light Industrial. If it is the project proponent's intention to build a complete community, however, the appropriate community plan designation is as proposed and the zoning designation should be either B-2 or B-3. The department strongly opposes M-1 and believes B-2 is a more appropriate designation based on the limited understanding the Department has of the project.

Further, within the applicant's presentation for the November 5, 2025 DRIP Committee Meeting, it appears that the applicant is proposing a "Hospitality" phase to the project, which the Department assumes to mean a transient vacation rental use. This use is not permitted in the B-1, B-2, B-3 or M-1 zoning districts. If the applicant desires such a use, then a change in zoning should be requested for a site-specific Hotel zoning district.

2. Please be prepared to comment on the project at the November 5th Committee meeting.

The Department will have staff in attendance at the November 5th Committee meeting prepared to comment on the project and respond to questions.

3. Please provide the appropriate Community Plan Map and Land Zoning Map for Bills 164 and 165, respectively.

Please find attached a copy of the existing Community Plan Map and existing Zoning Map for the subject property.

4. On September 4, 2025, you notified the State Office of Planning and Sustainable Development's Environmental Review Program that the Department withdrew its submission of the Environmental Impact Statement Preparation Notice for the project.

a. Please explain the Department's rationale for withdrawal and why the Department believes the State Land Use Commission is the more appropriate agency to be the Accepting Authority.

The Department submitted the Environmental Impact Statement Preparation Notice for the project based upon a request from the Applicant. After further review of the project, the Department determined that it would be more appropriate for the State Land Use Commission (LUC) to be the accepting authority as the Ho'onani project requires a State District Boundary Amendment (DBA) from Agriculture to Urban. This designation must occur prior to a Change in Zoning by the County of Maui. Therefore, since LUC review and approval for the DBA must come first, the Department determined that it would be more appropriate for the LUC to be the accepting authority for the EIS.

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b. What is the status of the project's Environmental Impact Statement?

The Department received a copy of the attached letter from the LUC directing the applicant to submit material necessary for the processing of the request for a State Land Use Boundary Amendment and referencing the necessity for an EA/EIS. The Department assumes that Applicant is working with the State LUC and the EIS is being processed in accordance with the requirements of Chapter 343, HRS. The Council may wish to ask the project proponent to describe the scope of the EIS to ensure that it includes analysis of the entire project area.

Thank you for the opportunity to provide this information. If you have any further questions, please do not hesitate to contact me.

Sincerely,



KATE L. K. BLYSTONE
Director

Attachments:

- General Plan Consistency Analysis
- Existing Community Plan Map for the Subject Property
- Existing Zoning Map for the Subject Property
- August 26, 2025 Letter from the Land Use Commission

cc: Ana Lillis, Deputy Director
Danny Dias, PPA, Current Division
Jacky Takakura, PPA, Long Range Division
Carolyn Cortez, PPA, ZAED Division
Gregory Pfof, Administrative Planning Officer

KLKB:GP:jlj

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LAND USE COMMISSION

Komikina Ho'ohana 'Āina

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

Ka 'Oihana Ho'omohala Pā'oihana, 'Imi Wai wai a Ho'omāka'ika'i

235 S. Beretania Street, RM 406, Honolulu, Hawai'i 96813

Mailing Address: P.O. Box 2359, Honolulu, Hawai'i 96804

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August 26, 2025

Ho'onani Development LLC
Wells Street Law, LLLC
Jeffrey Ueoko
2145 Wells Street, Suite 406
Wailuku, Hawai'i 96793

SUBJECT: A25-811 Ho'onani Development LLC Petition for Land Use Boundary Amendment

Dear Mr. Ueoka:

This is to acknowledge receipt of the subject Petition For Land Use Boundary Amendment ("Petition") and Exhibits 1-4 seeking to reclassify approximately 166.512 acres of land from the State Land Use ("SLU") Agricultural District to the SLU Urban District for the development of a mixed use development consisting of approximately 1,600 multi-family residential units along with retail, office, dining, open spaces, hospitality, and light industrial (the "Project") situated at Pu'unēnē, Wailuku, Island and County of Maui, TMK No.: (2) 3-8-006:004 unit 0005 (the "Petition Area") filed in the subject docket on August 18, 2025, by Ho'onani Development LLC ("Petitioner").

We have reviewed the information contained in the Petition pursuant to §15-15-50, Hawai'i Administrative Rules ("HAR"). Based upon our review of the submitted information, we have the following comments:

1. Pursuant to §15-15-50(b), HAR: the Petition cannot be deemed complete until an approved environmental impact statement for the Project is accepted by the LUC or another accepting authority and is incorporated as part of the Petition.
2. Pursuant to §15-15-50(c)(3), HAR:
 - Please revise Petitioner's Exhibit 3 (Petition Area) so that the Petition Area is clearly identified on the tax map (ie. use of bold outline);
 - Please provide the LUC staff with one (1) copy of a full-size tax map with the Petition Area clearly identified; and,

- Petitioner's Exhibit 3 should contain the metes and bounds description for the Petition Area and be signed by the preparer (Austin Tsutsumi & Associates). Without the surveyor's signature, these documents do not satisfy the requirement for a map and description of the Petition Area.
3. Pursuant to §§15-15-50(c)(5) and (c)(6), HAR: Petitioner should clarify the property interests identified in Petitioner's Exhibit 1 (Limited Warranty Unit Deed) that have authorized the Petitioner to file the Petition and if those interests were served with a copy of the Petition – and if not, please explain why. As this Petition Area represents a portion of a condominium property regime ("CPR") please provide information on all reservations, covenants, and restrictions that effect adjacent unit owners.
 4. Pursuant to §15-15-50(c)(8), HAR: Petitioner should detail the proposed methods and the ability of the Petitioner to finance the development of the Project in terms of the Project's incremental and total estimated costs.
 5. Pursuant to §15-15-50(c)(19), HAR: Petitioner will need to provide further detail on the conformity of the boundary amendment to the County General Plan, Community Plan and zoning designations.
 6. Pursuant to §15-15-50(c)(20), HAR: Petitioner will need to provide a detailed schedule, in ten-year increments, of the proposed development schedule and a map showing the location of each increment.
 7. Pursuant to §15-15-50(c)(21), HAR: Petitioner will need to address Hawaiian customary and traditional rights. The EIS should prepare a Cultural Impact Assessment ("CIA") and the Petition needs to have a Ka Pa'akai analysis completed.
 8. Pursuant to §§15-15-50(c)(24) and (c)(25), HAR: Petitioner must address climate change related to the proposed development and proposed mitigation measures. In addition, Petitioner should conduct an analysis of the proposed development's adherence to sustainability principles and priority guidelines contained in §226-108, Hawai'i Revised Statutes ("HRS").

We recognize that until the EIS process is completed much of the required information for a petition is not yet fully available. Petitioner will be required to file a motion to designate the Land Use Commission as the approving agency under Chapter 343, HRS and for the authority to prepare an Environmental Impact Statement Preparation Notice ("EISPN").

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Pursuant to §15-15-50(f), HAR, the Petition is deemed incomplete at this time as information regarding the above-mentioned items have not been submitted or addressed adequately pursuant to §15-15-50(b) and (c), HAR. We reserve the right to provide additional comments and raise additional concerns not included in this review. Pursuant to §15-15-50(f), HAR, the Petition may be deemed as a proper filing upon review of the additional information submitted and upon determination by the Executive Officer.

Please be advised that in the event a notice of intent to intervene is filed with the LUC pursuant to §15-15-52(b), HAR, the Petitioner is required to serve a copy of the Petition upon the potential intervenor and file an affidavit of Petitioner or its agent attesting to its compliance with §15-15-48(b), HAR.

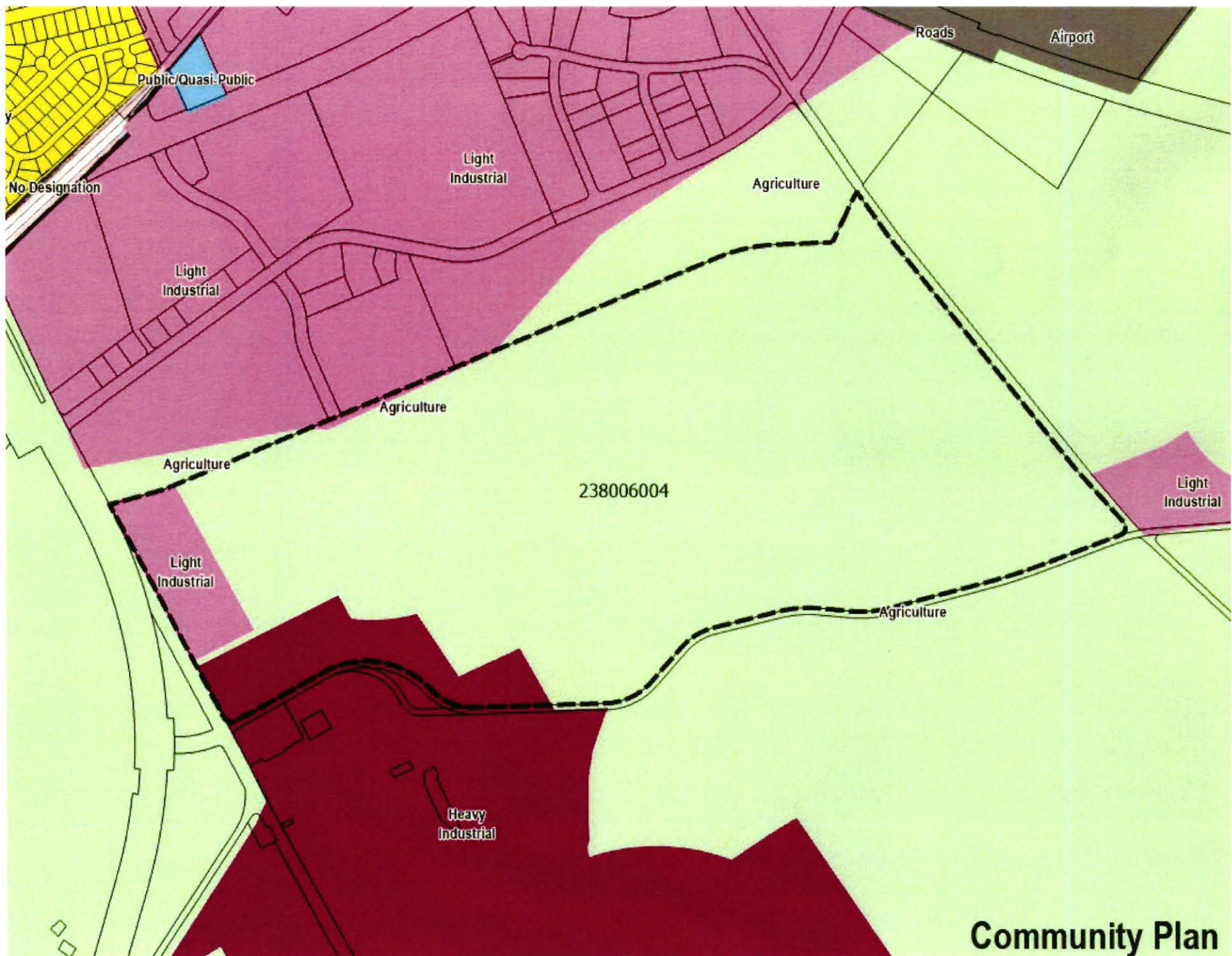
Please address the above identified matters as soon as possible. Should you require clarification or further assistance in this matter, please contact Scott Derrickson, AICP, of my staff at 587-3921.

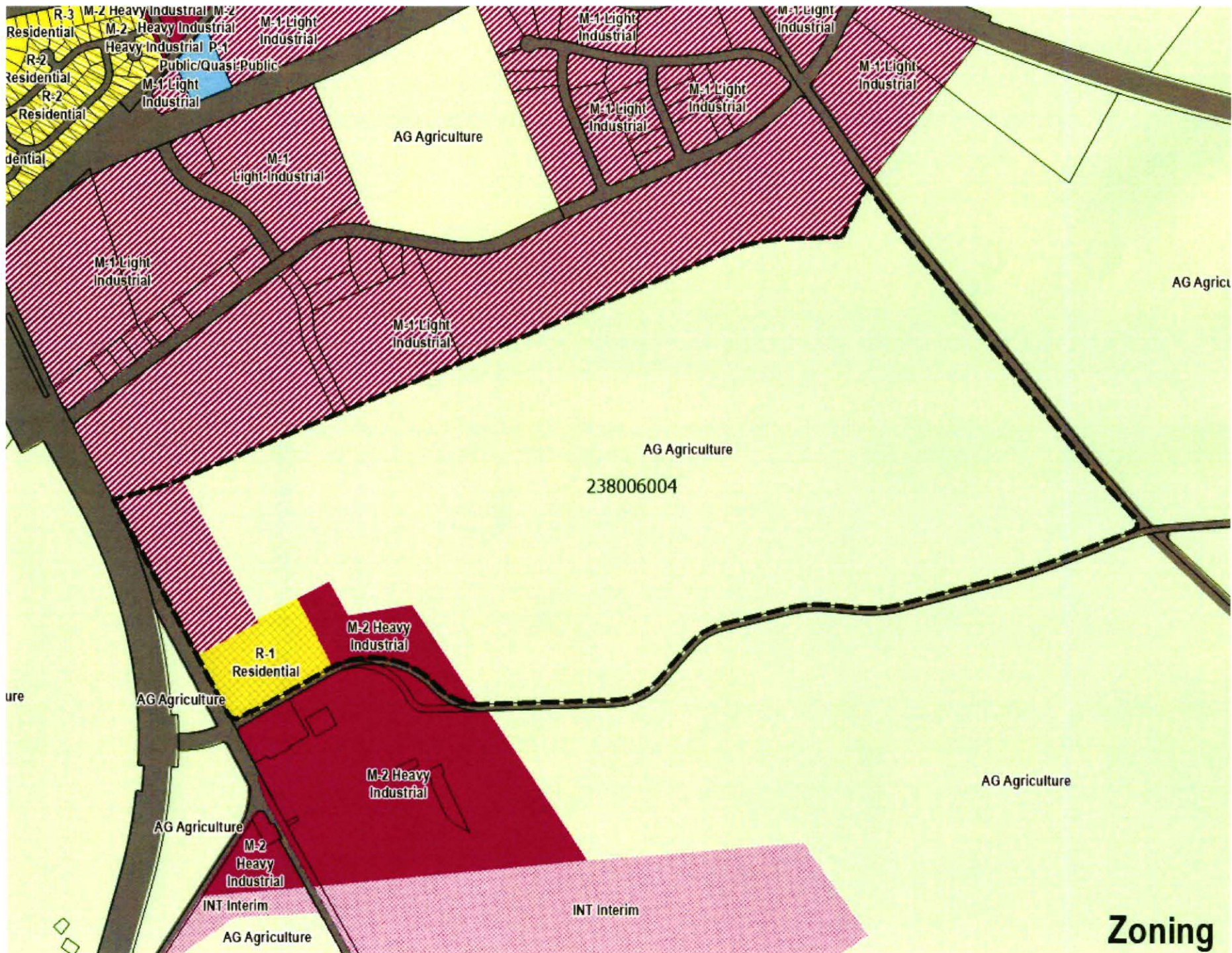
Sincerely,



Daniel Orodener
Executive Officer
Land Use Commission
State of Hawai'i

CC: Mary Alice Evans, Office of Planning and Sustainable Development
Kate Blystone, Maui County Planning Department





Zoning

General Plan Consistency Analysis - Ho‘onani Village, Kahului
Department of Planning – Long Range Division
Bills 163, 164, 165 - Resolution 25-132, FD1
November 3, 2025

PROJECT DESCRIPTION:

It is the Department’s understanding that Ho‘onani Village is a proposed mixed-use development project, to include an anticipated 1,600 multi-family residential units, commercial office space, retail, restaurant dining areas, light industrial uses, recreational and open space, an outdoor amphitheater, community gathering places, and/or sports fields.

The parcel contains the following land use designations:

- a) State Land Use - Agriculture
- b) Maui Island Plan – Outside Urban Growth Boundary
- c) Wailuku-Kahului Community Plan – Agriculture
- d) County Zoning – Agriculture
- e) Flood Zone – X (low-to-moderate risk of flooding and outside SFHA)
- f) SMA – no

TMK (2)3-8-006:004-0005 (portion) - 166.511 acres

PROPOSED ENTITLEMENT REQUESTS:

- Amend MIP Directed Growth Map C5 (Pūlehu Road) to expand Urban Growth Boundary
- Amend Wailuku-Kahului community plan designation from Agriculture to Business/multi-family
- Change zoning from Agriculture to M-1 Light Industrial
- State Land Use Boundary Amendment from Agriculture to Urban (request not included in proposed bills)

LONG RANGE DIVISION COMMENTS:

The Long-Range Division reviews discretionary applications against the policies of the Maui County General Plan, which includes the Countywide Policy Plan (CWPP) approved in 2010 and amended in 2021, the Maui Island Plan (MIP) adopted in 2012, and the Wailuku-Kahului Community Plan adopted in 2002 to determine if the application is consistent with the General Plan. Below is a preliminary consistency analysis based upon project information submitted to date.

CWPP:

E. Expand Housing Opportunities for Residents

- *Objective 2. Increase the mix of housing types in towns and neighborhoods to promote sustainable land use planning, expand consumer choice, and protect the County’s rural and small-town character.*
Policy d. Promote infill housing in urban areas at scales that capitalize on existing infrastructure, lower development costs, and are consistent with existing or desired patterns of development.

Staff Comment: The proposal appears consistent with the objective and policy because it promotes a greater diversity of housing options and mixed uses in a location likely planned for growth in the future, supporting sustainable land use and infill development. By increasing density through multi-family housing, the proposal likely capitalizes on existing infrastructure and may lower development costs. However, the proposed area is currently outside of existing urban areas, and it is important that the design and scale of the project respect the surrounding context to avoid undermining this goal.

- *Objective 3. Increase and maintain the affordable housing inventory.*
Policy g. Minimize the intrusion of housing on prime, productive, and potentially productive agricultural lands and regionally valuable agricultural lands.

Staff Comment: The proposal includes multi-family residential housing, which often provides opportunities for more affordable housing types compared to single-family homes. However, this is not consistent with the policy because the project site has a long history of productive and valuable agricultural land, and according to Hawai'i Land Study Bureau website the soil classification is rated "A" which represents highest productivity.

F. Strengthen the Local Economy

- *Objective 2. Diversify and expand sustainable forms of agriculture and aquaculture*
Policy b. Prioritize the use of agricultural land to feed the local population, and promote the use of agricultural lands for sustainable and diversified agricultural activities.
Policy e. Support ordinances, programs, and policies that keep agricultural land and water available and affordable to farmers.

Staff Comment: Converting high productivity ag land for non-ag uses is inconsistent with this policy.

I. Improve Physical Infrastructure

- *Objective 1. Improve water systems to assure access to sustainable, clean, reliable, and affordable sources of water.*
Policy a. Ensure that adequate supplies of water are available prior to approval of subdivision or construction documents.

Staff Comment: To align with objective and policy, the proposal should provide assurances or documentation that adequate, sustainable water supplies will be available before development proceeds.

- *Objective 3. Direct growth in a way that makes efficient use of existing infrastructure and to areas where there is available infrastructure capacity.*
Policy a. Capitalize on existing infrastructure capacity as a priority over infrastructure expansion.
Policy b. Planning for new towns should only be considered if a region's growth is too large to be directed into infill and adjacent growth areas.
Policy c. Utilize appropriate infrastructure technologies in the appropriate locations.

Policy d. Promote land use patterns that can be provided with infrastructure and public facilities in a cost-effective manner.

Policy e. Support catchment systems and on-site wastewater treatment in rural areas and aggregated water and wastewater systems in urban areas if they are appropriately located.

Staff Comment: The project should be considered only after an analysis of the existing Urban Growth area, to ensure that there are no infill opportunities, and that the existing infrastructure can be adequately expanded.

- *Objective 5. Improve the planning and management of infrastructure systems.*
Policy g. Ensure that infrastructure is built concurrent with or prior to development.

Staff Comment: Proposal reflects planning-level coordination but should clarify infrastructure planning and capacity. Identify which infrastructure systems are already available (roads, sewer, water, electricity, etc.). Provide a phasing plan or commitment that infrastructure will be delivered before or during development, not after.

J. Promote Sustainable Land Use and Growth Management

- *Objective 1. Improve land use management and implement a directed-growth strategy.*
Policy a. Establish, map, and enforce urban- and rural-growth limits.

Staff Comment: Although the project site is currently zoned agriculture, its location abutting Pūlehu Road within the Maui Island Plan's directed growth map suggests that the proposed amendment to change zoning from agriculture to M-1 light industrial and business/multi-family uses is an effort to align zoning with the designated urban growth boundary.

However, it is important to demonstrate that this change is part of a managed and justified growth strategy, not an ad hoc expansion into agricultural lands. The project may be more appropriate after ensuring that there are no further development opportunities within the currently mapped Urban Growth Boundary.

- *Policy b. Direct urban and rural growth to designated areas.*

Staff Comment: The project site's adjacency to the Directed Growth Map area and proposed amendments support directing growth into designated urban zones, is consistent with this policy; however, as stated above, infill development opportunities should be exhausted prior to pursuing this project.

- *Policy e. Encourage redevelopment and infill in existing communities on lands intended for urban use to protect productive farmland and open-space resources.*

Staff Comment: The project is partially consistent with the policy. While it is not infill or redevelopment, its proximity to existing designated urban growth areas, and its integrated, mixed-use character help it support the broader intent of promoting efficient land use.

- *Policy h. Support the dedication of land for public uses.*

Staff Comment: The inclusion of recreational spaces, community gathering places, and sports fields supports public use dedication, aligning well with this policy.

- *Objective 2. Improve planning for and management of agricultural lands and rural areas*
Policy a. Protect prime, productive, and potentially productive agricultural lands to maintain the islands' agricultural and rural identities and economies.
Policy c. Discourage developing or subdividing agriculturally designated lands when non-agricultural activities would be primary uses.
- *Objective 4. Improve and increase efficiency in land use planning and management.*
Policy b. Ensure that new development projects requiring discretionary permits demonstrate a community need, show consistency with the General Plan, and provide an analysis of impacts.

Staff Comment: The proposed amendments represent a significant land use change. This requires thorough justification showing alignment with the General Plan's vision, particularly regarding growth management and agricultural preservation. Although, the project's inclusion of multi-family housing and commercial space can address housing shortages and economic development needs, a comprehensive analysis for the following should be provided: demand for these uses, and environmental, traffic, infrastructure, and social impacts.

- *Policy c. Encourage public and private partnerships to preserve lands of importance, develop housing, and meet the needs of residents.*

Staff Comment: The project provides housing and community spaces, which helps meet resident needs and partially supports this policy. However, since it would convert agricultural land, the project should also include ways to preserve or offset the loss of farmland, such as setting aside other agricultural lands or partnering with organizations to protect important farmland.

- *Policy d. Promote creative subdivision designs that implement best practices in land development, sustainable management of natural and physical resources, increased pedestrian and bicycle functionality and safety, and the principles of livable communities.*

Staff Comment: The development should prioritize pedestrian and bicycle infrastructure by designing safe, accessible, and convenient pathways, crosswalks, and bike lanes. Veterans Highway currently has designated walkways and bicycle lanes. Similarly, Pūlehu and Hansen Roads should include designated walkways that connect to Veterans Highway. This emphasis not only encourages healthier transportation choices but also reduces reliance on vehicles, contributing to sustainability goals.

Policy e. Coordinate with Federal, State, and County officials in order to ensure that land use decisions are consistent with County plans and the vision local populations have for their communities.

Staff Comment: Effective collaboration between government and residents is essential for balanced and successful land use decisions. Extensive community engagement is highly recommended.

L. Mitigate Climate Change and Work Toward Resilience

- *Objective 3. Significantly increase the use of renewable and green technologies to promote energy efficiency and energy self-sufficiency.*

Policy a. Promote the use of locally renewable energy sources, and reward energy efficiency.

Staff Comment: While building plans have not yet been submitted, the proposal could align with this policy if it incorporates energy-efficient design, solar panels, or other renewable energy systems. At this stage, however, no such features have been indicated.

- *Policy b. Consider tax incentives and credits for the development of sustainable- and renewable-energy sources.*

Staff Comment: The following was not mentioned on the proposal, tax incentives, energy credits, or participation in green building programs. Including such elements would improve consistency with this policy.

- *Policy d. Encourage small-scale energy generation that utilizes wind, sun, water, biowaste, and other renewable sources of energy.*

Staff Comment: In the absence of site layout, the inclusion of ample open space and mixed uses could potentially support solar PV arrays, small-scale wind installations, or biowaste systems—particularly in industrial or community gathering areas.

- *Objective 4. Direct growth in a way that makes efficient use of existing infrastructure and to areas where there is available infrastructure capacity.*
Policy b. Planning for new towns should only be considered if a region's growth is too large to be directed into infill and adjacent growth areas.

Staff Comment: The site abuts the Urban Growth Boundary and likely benefits from proximity to existing or planned infrastructure networks. The project promotes compact, efficient growth. The project qualifies as adjacent growth, not a new town. An analysis of the region's growth should be considered to ensure the project does not conflict with the policy's intent to prevent sprawl or premature expansion into undeveloped regions.

Maui Island Plan

Housing

- *Objective 5.1.1 More livable communities that provide for a mix of housing types, land uses, income levels, and age.*

Policy 5.1.1.a Promote livable communities (compact/walkable/bikeable, access to transit) that provide for a mix of housing types and land uses, including parks, open space, and recreational areas.

Staff Comment: Resolution 25-132 FD1, describes the proposed project as “a high-density, master-planned, mixed-use community, featuring multi-family residential housing, commercial office space, retail, restaurant dining areas, light industrial uses, recreational and open space, an outdoor amphitheater, community gathering places, and sports fields...” The proposal is consistent with Objective 5.1.1 and Policy 5.1.1.a, provided walking/biking paths and access to transit are provided.

Land Use

- *Objective 7.1.1. Significantly reduce the loss of productive agricultural lands.*
Policy 7.1.1.c. Discourage developing or subdividing productive agricultural lands for residential uses in which the residence would be the primary use and any agricultural activities would be secondary uses.
Policy 7.1.1.e. Focus urban growth, to the extent practicable, away from productive and important agricultural lands.
Policy 7.1.1.f Strongly discourage the conversion of productive and important agricultural lands (such as sugar, pineapple, and other produce lands) to rural or urban use, unless justified during the General Plan update, or when other overriding factors are present.
Policy 7.1.1.j Require all major developments adjacent to agricultural lands to provide an appropriate and site-specific agricultural protection buffer as part of a required site plan.

Staff Comment: According to the Hawai'i Land Study Bureau GIS program, the project site is rated as Class “A,” indicating that the property is prime agricultural land. Therefore, amending the Wailuku-Kahului Community Plan to change the designation of this land is not consistent with the policy. If the project is approved, a protection buffer must be included adjacent to any remaining agricultural lands.

- *Objective 7.3.1 Facilitate and support a more compact, efficient, human-scale urban development pattern.*
Policy 7.3.1.c Strengthen evaluation requirements for new urban expansion, new towns, and major urban infill projects within urban growth areas. Tailor submittal requirements to reflect the impact or scale of different projects.

Staff Comment: Expanding urban boundaries or undertaking large infill projects within urban growth areas should go through a more rigorous and transparent evaluation process. These projects often have substantial and long-term effects on infrastructure, traffic, public services, the environment, and community character.

Directed Growth

- *Goal 8.1 Maui will have well-serviced, complete, and vibrant urban communities and traditional small towns through sound planning and clearly defined development expectations.*

Policy 8.1.a. The County, with public input, will be responsible for designating new growth areas where infrastructure and public facilities will be provided, consistent with the policies of the MIP and in accordance with State and County infrastructure plans.

Staff Comment: The proposed mix of housing, employment opportunities, recreational areas, and community spaces aligns with the intent to support well-served and complete communities. However, its location calls for support through infrastructure planning and public input.

- *Policy 8.1.b. Amendments to a UGB or STB shall be reviewed as a MIP amendment. A UGB or STB shall only be expanded if the island-wide inventory (maintained by the Department of Planning) of existing land uses (residential, commercial, industrial) indicates that additional urban density land is necessary to provide for the needs of the projected population growth within ten years of that inventory; or, during the decennial update of the MIP.*

Policy 8.1.e. New development shall be consistent with the UGBs, STBs, and all other applicable policies of the MIP. New urban-density development shall not be allowed outside of a UGB or STB.

Staff Comment: The total unmet housing demand in the current Maui Island Plan (2010–2030) is 10,845 units. The table below shows some of the existing approved and ongoing housing projects, totaling 4,069 units. A detailed analysis demonstrating the need for additional urban land should be provided. With these estimates, the proposal is not consistent with the policy. (these numbers represent a preliminary review and need to be further verified for accuracy)

Approved or anticipated housing projects:

Kahului Civic Center	300 units approximately
Maui Lani remaining entitlements	608 homes (need to verify)
DHHL Wailuku Single Family Residential	173 homes plus 31 lots
DHHL Pu'uhona (Wailuku)	171 homes
DHHL (Waiehu Mauka)	343 homes and 55 rural lots
Waikapu Country Town	1,433 residential units plus 146 ohanas
Waikapu Development Venture	80 homes
Wa'ihee Affordable Housing	752 units
Hale Pilina (Puunene Ave, Kahului)	<u>178 apartments</u>
	4,069 (Total)

Missing from this list are Queen Ka'ahumanu Center and Kahului Shopping Center which have significant potential for mixed use transit-oriented development but have not proposed plans yet. Also, any phase-out of Apartment district transient vacation rentals can create opportunities for some Central Maui residents to live closer to where they work in South and West Maui. Note: this is not an exhaustive list and the numbers may change.

According to the [Central Maui Community Plan Update Housing Resource Paper December 2024](#), roughly 695 new housing units are needed in Central Maui by 2043.

- *Regional Framework Theme Two: (p. 8-14) Protect Maui's agricultural resource lands, especially prime and productive agricultural lands. "Maui's agricultural lands are an important resource for both current and future generations of island residents. Agricultural lands provide the opportunity for greater economic diversification; food and energy security; and better stewardship of land, water, and open space resources. Maui residents have expressed a strong desire to support the agricultural economy and protect the island's agricultural lands for both present and future generations."*

Regional Framework Theme Three: (p. 8-14) Direct growth to areas proximate to existing employment centers, where infrastructure and public facility capacity can be cost-effectively provided, and where housing can be affordably constructed.

Regional Framework Theme Four: (p. 8-15) Within the Urban Growth Boundaries, promote livable, mixed-use communities, defined by a high quality of life. "...Beyond our urban boundaries, working agricultural landscapes, natural wildland areas, and undeveloped shorelines and beaches are vitally necessary to provide a sense of refuge and escape from the stresses of urban life."

Staff Comment: The Regional Framework Themes stress saving ag land for ag purposes, only expanding growth to areas where infrastructure and public facility capacity can be cost-effectively provided, and maintaining ag landscapes as a boundary around urban areas. The proposed project should be carefully reviewed if it can be developed within these Framework Themes.

WAILUKU-KAHULUI COMMUNITY PLAN

Proposed community plan designation

Business/Multi-Family. This includes a mixture of retail, office, and commercial services which are oriented to neighborhood service and single family and multi-family residential uses.

Staff comment: This community plan designation is more consistent with Business-type zoning districts, such as B-2 Community Business District. Community plan designations such as Business/Industrial or Light Industrial are more consistent with M-1 Light Industrial zoning.

Environment

1. Preserve agricultural lands as a major element of the open space setting that which borders the various communities within the planning region. The close relationship between open space and developed areas is an important characteristic of community form.

Staff Comment: The project is not consistent with this policy.

13. Support energy conservation measures, including the use of solar heating and photovoltaic systems, in conjunction with urban areas.

Staff Comment: The proposal could align with this policy if it includes energy-efficient building standards, use of solar panels, or other renewable systems. At this stage, no such features are described.

Housing

2. Provide sufficient land areas for new residential growth which relax constraints on the housing market and afford variety in type, price, and location of units. Opportunities for the provision of housing are presently constrained by a lack of expansion areas. This condition should be relieved by a choice of housing in a variety of locations, both rural and urban in character.

3. Seek alternative residential growth areas within the planning region, with high priority given to the Wailuku and Kahului areas. This action should recognize that crucial issues of maintaining important agricultural lands, achieving efficient patterns of growth, and providing adequate housing supply and choice of price and location must be addressed and resolved.

Staff Comment: The proposed project is partly consistent with Policies 2. and 3. in that it proposes land areas for new residential growth; however, it may need some modifications to maintain important agricultural lands and achieve efficient growth patterns such as infill. Note that these policies are over twenty years old and do not reflect housing developments built since that time.

8. Promote efficient housing designs in order to reduce residential home energy and water consumption.

Staff Comment: See above comment on environment on energy-efficient home designs. The use of water efficient appliances and fixtures are recommended that will contribute to water consumption.

Social Infrastructure

1. Provide park and recreation areas as an integral part of project district specifications which will accommodate the needs of population growth.

Staff Comment: The project proposal is consistent with the stated goal. The following elements are included in the project proposal: recreational and open space, an outdoor amphitheater, community gathering places, and sports fields.

Public Safety

2. Encourage communities to establish Neighborhood Crime Watch Programs

Staff Comment: This is a necessity for the future neighborhood at this site. Pūlehu Road is currently largely occupied by homeless encampments and has been the location of frequent brush fires.

Government

5. Ensure that adequate infrastructure is or will be available to accommodate planned development.

6. Support public and private partnerships to fund the planning and construction of infrastructure.

Staff Comment: The applicant should work with the county and/or state to ensure adequate infrastructure.

Land Use

1. Ensure that adequate lands are available to support the region's present and future agricultural activities.

2. Identify prime or productive agricultural lands, and develop appropriate regulations for their protection.

Staff Comment: The proposed project site is identified as a prime or productive agricultural land. The proposed project is inconsistent with this policy.

Infrastructure

- *Water and Utilities*

1. Coordinate water system improvement plans with growth areas to ensure adequate supply and a program to replace deteriorating portions of the distribution system. Future growth should be phased to be in concert with the service capacity of the water system.

3. Promote water conservation and education programs.

5. Coordinate the construction of all water and public roadway and utility improvements to minimize construction impacts and inconveniences to the public.

6. Coordinate expansion of and improvements to the water system to coincide with the development of residential expansion areas.

7. Promote conservation of potable water through the use of treated wastewater effluent for irrigation.

Staff Comment: Applicant should ensure water and utilities infrastructure meet all system standards. Information is inadequate at this time to determine consistency.

- *Liquid and Solid Waste*

1. Coordinate sewer system improvement plans with future growth requirements, as defined in the Community Plan.

- *Drainage*

1. *Establish a storm drain improvement program to alleviate existing problems; implement a continuing maintenance program, and ensure that improvements to the system will meet growth requirements. This addresses safety and property loss concerns as well as the need for comprehensive flood control planning.*

5. *Encourage the incorporation of drainageways, setbacks, and flood protection areas into greenways consisting of open space, pedestrian way and bikeway networks.*

- **Energy**

1. *Promote the use of alternative energy sources, such as biomass, wind and solar.*

2. *Develop efficient circulation systems, public transportation and promote bicycle and pedestrian travel to reduce energy expenditures for travel.*

6. *Encourage energy efficient building design and site development practices.*

7. *Support energy conservation measures, including the use of solar heating and photovoltaic systems, in conjunction with urban uses.*

8. *Promote recycling programs to reduce solid waste disposal in landfills.*

Staff Comment: For liquid and solid waste, drainage, and energy source, applicant should follow all system standards requirements. Information is inadequate at this time to determine consistency.

- **Transportation**

2. *Provide bikeway and walkway systems in the Wailuku-Kahului area which offer safe and pleasant means of access, particularly along routes accessing residential districts, major community facilities and activity centers, school sites, and the shoreline between Kahului Harbor and Pa'ia.*

4. *Support private efforts to expand public transit service, with an emphasis on service to the Kahului Airport and Wailuku Civic Center. Future growth in population will warrant an expanded public transportation system.*

5. *For future residential development, prohibit direct lot access from primary roads.*

6. *Accommodate bicycle and pedestrian ways within planned roadway improvements.*

- 6.b.2. *(Kahului) Improve major intersections to accommodate increased traffic volumes, including turning lanes, signals, and other improvements, including but not limited to the corridors of Kamehameha, Pu'unene and Wakea Avenues.*

Staff Comment: Applicant should ensure safe multi-modal options are included in design. Applicant should consult with DPW, MDOT and HIDOT to ensure all requirements are met due to inadequate information provided at this time.

- *Urban Design*

2. Maintain a design quality for commercial and public projects and large-scale master planned developments.

3. Improve pedestrian and bicycle access within the region.

6. Promote a unified street tree planting program along major highways and streets.

7. Buffer public and quasi-public facilities and light-heavy industrial/commercial type facilities from adjacent residential uses with appropriate landscape planting.

10. Incorporate drought tolerant plant species and xeriscaping in future landscape planting.

14. Require all future subdivisions, construction projects and developments to comply with the adopted Maui County Planting Plan.

Staff Comment: Applicant should ensure project design meets all Urban Design policies.

Objectives and Policies for Kahului

2. Circulation: provide and maintain sidewalks and bikeways for convenient and pleasant connections between activity centers, such as shopping centers, schools, Maui Community College and public parks. These pathways should have adequate separation from vehicular traffic for safety purposes.

Staff Comment: Applicant should ensure project design meets all objectives and policies for Kahului.

Planning Standards

- *Land Use*

a. All zoning applications and/or proposed land uses and developments shall conform with the planned use designations, as specified in the adopted Community Plan Map, and be consistent with the Community Plan policies.

Staff Comment: Proposed zoning and community plan designation are not consistent. As mentioned above the proposed community plan designation is more consistent with Business-type zoning districts, such as B-2 Community Business District. Community plan designations such as Business/Industrial or Light Industrial are more consistent with M-1 Light Industrial zoning.

*c. Development of the vacant properties in the Dairy Road Light Industrial Expansion (Matrix 33), identified as TMK: 3-8-1:portion of 2 and **3-8-6:portion of 4**; and the Airport Triangle (Matrix 34), identified as TMK: 3-8-79:13, shall provide a landscaped aesthetic visual corridor*

along all adjacent highways. Additionally, a landscaped berm utilizing trees and shrubbery shall be constructed along the entire proposed collector road (Hoʻokele Street Extension) to soften the visual impact of the buildings along the road. Ingress/egress or other improvements mandated by engineering safety standards shall be exempt. Additionally, alternative energy shall be utilized, including, but not limited to, the use of solar energy to heat water. Underground utilities and low impact lighting to preserve the visual appearance of the area shall also be utilized. Signalized intersections shall be minimized on the Hoʻokele Street Extension, and shall be installed only when warranted by standard traffic engineering requirements.

In addition, the said Dairy Road Light Industrial Expansion (Matrix 33), shall be constructed in increments of not greater than seventy (70) acres. Building permits shall not be authorized for each increment until completion of the infrastructure construction for the prior increment. The Hoʻokele Street Extension, or similar thoroughfare connecting Dairy Road to Hana Highway, shall be constructed concurrently with development of the first increment. The exact location of the Hoʻokele Street Extension shall be determined as a part of the property's zoning approval, with an emphasis on maintaining a "view corridor" toward Haleakala.

Staff Comment: Applicant should ensure all Planning Standards for Land Use are met, including landscaping and other requirements as described in Policy c. above.

- **Urban Design**

- a. **General**

- 1. Buffer public and quasi-public facilities and light-heavy industrial/commercial type facilities from adjacent residential uses with appropriate landscape planting and setbacks.*
- 2. Save and incorporate healthy mature trees in the landscape planting plans of subdivisions, roads and other developments.*
- 3. Incorporate drought tolerant plant species and xeriscaping in future landscape planting.*
- 4. Use native plants for landscape planting in public projects to the extent practicable.*
- 5. Emphasize contrasting earth-tone color schemes for buildings.*

Staff Comment: Applicant should ensure project design meets all Land Use Urban Design policies; information is inadequate at this time to determine consistency.

DRIP Committee

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Sent: Wednesday, November 5, 2025 8:54 AM
To: DRIP Committee
Cc: Cynthia E. Sasada; Didi A. Hamai; Erin A. Wade; Josiah K. Nishita; Kelii P. Nahooikaika; Ana L. Lillis; joy.paredes@co.maui.hi.us; Katie L. Blystone
Subject: MT#11287-Bill 163
Attachments: MT#11287-DRIP Committee.pdf