VOLUME 1 OF 2

Application for Chapter 2.97, MCC Fast-Tracked Residential Workforce Housing Project Approval

HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY

TMK: (2)3-3-001:106

Prepared for: Waiehu Housing, LP

February 2023

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3. Final Environmental Assessment

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Ch 2.97\0 2.97 Application Dec 2022\2.97 Application.rpt.docx

CHAPTER 2.97
APPLICATION
CHECKLIST

Proposed Hale Mahaolu Ke Kahua Affordable Housing Community Project

Chapter 2.97 Application Checklist

Application requirements per MCC 2.97.060		
1.	Name of Project	Exhibit A
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EXHIBITS 2

EXHIBIT A. Applicant Information

APPLICANT INFORMATION

NAME OF PROJECT

Hale Mahaolu Ke Kahua Affordable Housing Community

PROPERTY OWNER

Maui Economic Opportunity, Inc. 99 Mahalani Street Wailuku, Hawai'i 96793

PROPERTY LOCATION

Maui Island Waiehu

TMK: (2)3-3-001:106

APPLICANT AND DEVELOPER

Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248 Contact: Monte Heaton

Phone No.: (424) 258-2910

EXHIBIT B. Project Description

PROJECT DESCRIPTION

In response to the current and projected shortage of affordable housing in Maui County, Waiehu Housing, LP (Applicant) proposes to develop a 120-unit affordable rental housing community in Waiehu, Maui, Hawaiʻi. The subject property is identified by TMK (2)3-3-001:106 (Parcel 106) and covers an area of approximately 11.476 acres. The project site is bounded by the intersection of Kahekili Highway and Waiehu Beach Road to the north, Waiehu Heights is located immediately to the east, while lands designated as the Piʻihana Project District lie to the south and west. Parcel 106 is largely vacant, but historically, the subject property was farmed by Wailuku Agribusiness Co., Inc. and its forbearers for the cultivation of pineapple and sugar cane.

More recently, the property was used for the cultivation of macadamia nuts. Agricultural production ceased on December 31, 1999. Although agricultural operations ceased some time ago, many macadamia nut trees are still on the property. The subject property was acquired by Hawai'i Land & Farming (HL&F) in 2004. HL&F formally conveyed the 11.476-acre parcel to Maui Economic Opportunity, Inc. (MEO) in June of 2008.

MEO formerly operated the Ke Kahua Farm project on the property, where volunteers planted taro and other plants when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves. The Applicant and MEO plan to enter into a long-term lease to develop the affordable housing community.

The proposed project will be 100 percent affordable, providing rental housing for residents earning 60 percent or less of the Area Median Income (AMI) and will be developed in cooperation with Hale Mahaolu. The project will consist of 120 multi-family residential units, housed in 13 2-story buildings, including 28 1-bedroom units, 60 2-bedroom units, and 32 3-bedroom units, as well as a 3,477 square foot (sq. ft.) non-profit building, a 3,231 sq. ft. clubhouse, landscaping, and related improvements. One-bedroom units will be approximately 652 square feet (s.f.), 2-bedroom units will be approximately 852 s.f. and 3-bedroom units will be approximately 1,208 s.f. Additional amenities will include two (2) play areas, two (2) onsite laundry facilities and a maintenance room. A total of

approximately 274 parking stalls and two (2) loading stalls will also be provided. Hale Mahaolu, a private nonprofit corporation, will serve as property manager and handle the operations of the project. Access to the project site will be provided by three (3) driveway entrances off of Kahekili Highway.

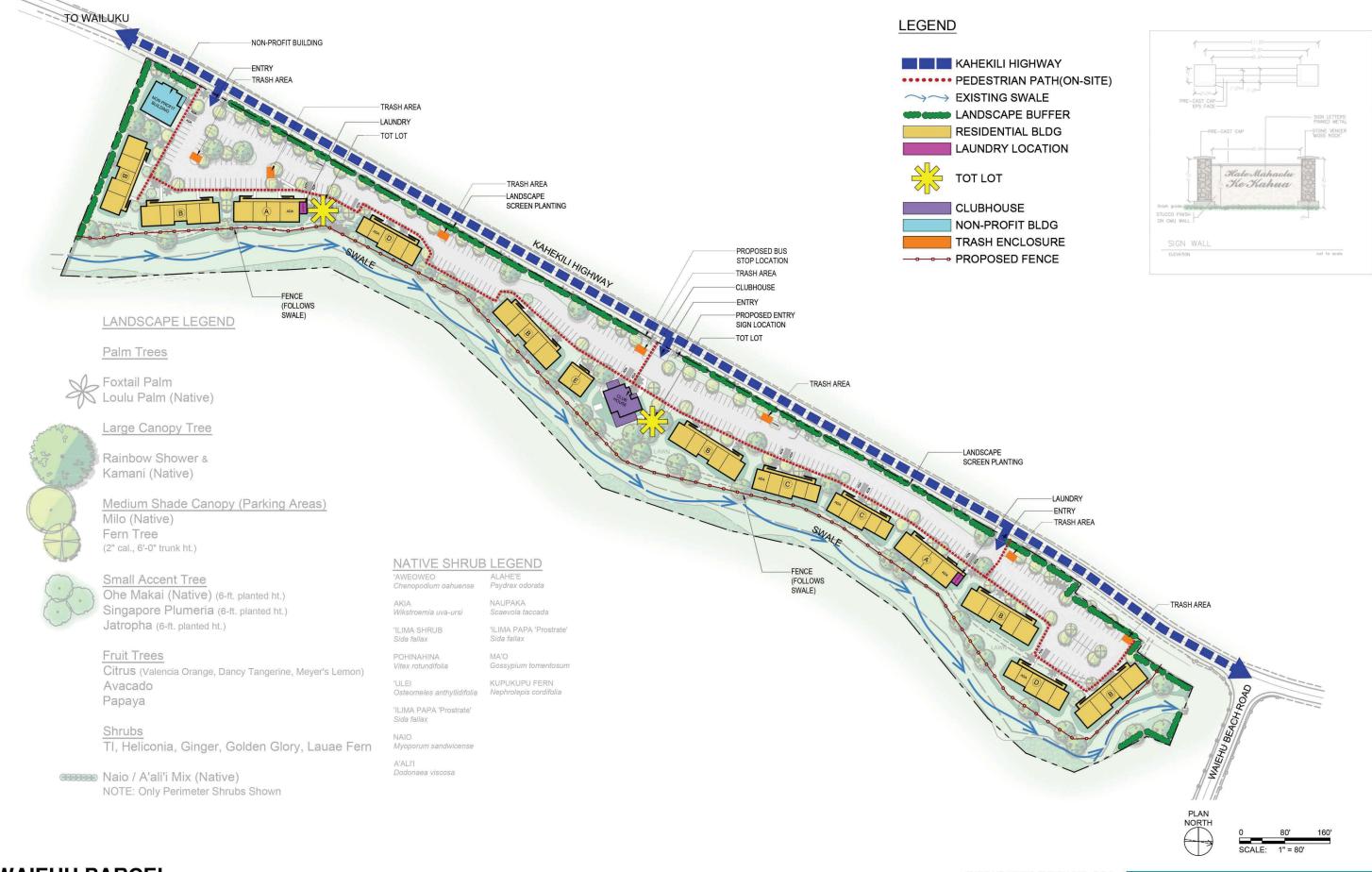
Of the total 120 affordable multi-family units, twelve (12) units will be rented at 30 percent or less of the Housing and Urban Development (HUD) Area Median Income (AMI) and 107 units will be rented at 60 percent or less of the HUD AMI. The proposed project also includes one (1) exempt manager unit.

For reference, rent prices at 30 percent of the HUD AMI are approximately \$569.00, \$683.00 and \$789.00 for 1-bedroom, 2-bedroom and 3-bedroom units, respectively. Rent prices at 60 percent of the HUD AMI are approximately \$1,137.00, \$1,365.00 and \$1,577.00 for 1-bedroom, 2-bedroom and 3-bedroom units, respectively (Income Limits and Affordable Rent Guidelines by the Department of Housing and Human Concerns, Housing Division, effective as of May 1, 2022).

Construction of the proposed project will commence upon the MCC Chapter 2.97 approval by the Maui Council and upon receipt of building permit approval. The Applicant is targeting to start construction in the first or second quarter of 2023, once entitlement and construction permit approvals have been obtained for the project. The project will be built in a single phase over an estimated 16 months, with completion targeted around the third quarter of 2024. The total cost of the proposed project is estimated to be \$33.5 million.

EXHIBIT C.

Site Plans



WAIEHU PARCEL WAIEHU HOUSING, LP

CONCEPT SITE PLAN
FEBRUARY 8, 2022





WAIEHU PARCEL WAIEHU HOUSING, LP

Landscape Plan
FEBRUARY 8, 2022





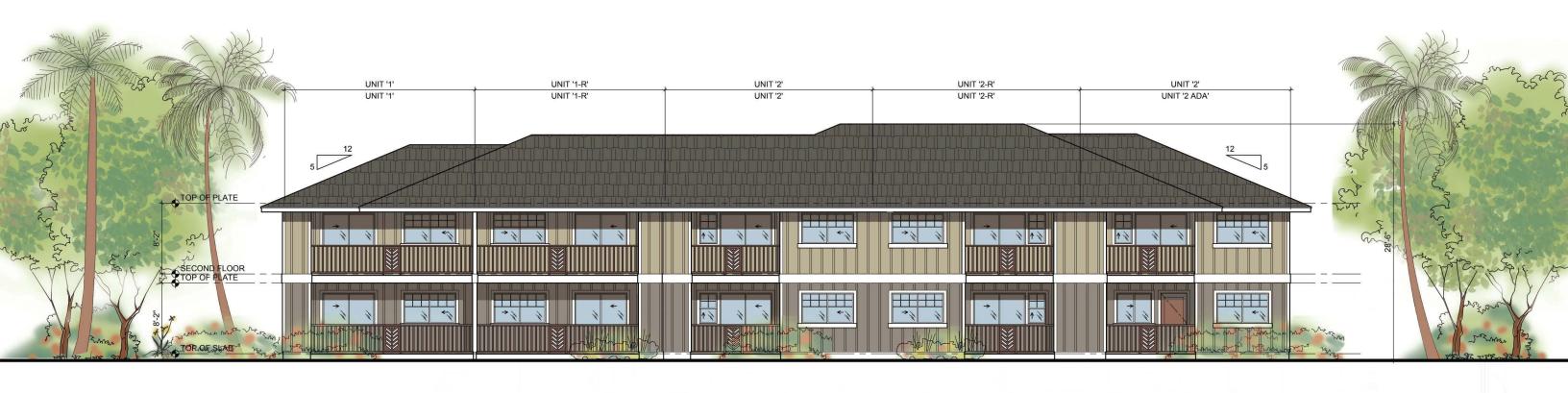




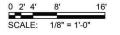










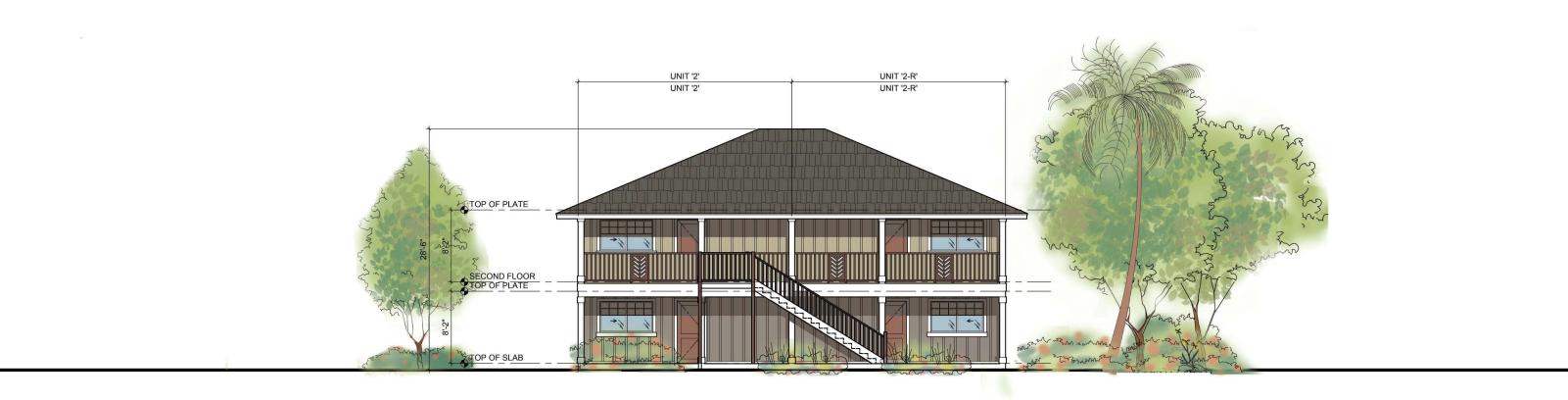


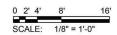














FRONT ELEVATION

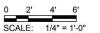


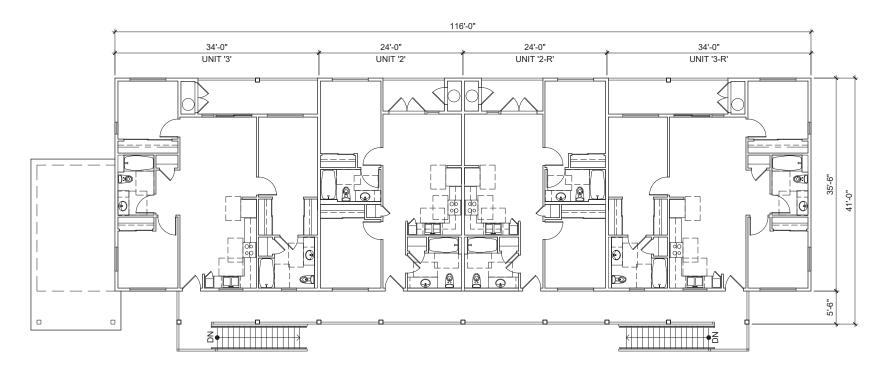
REAR ELEVATION

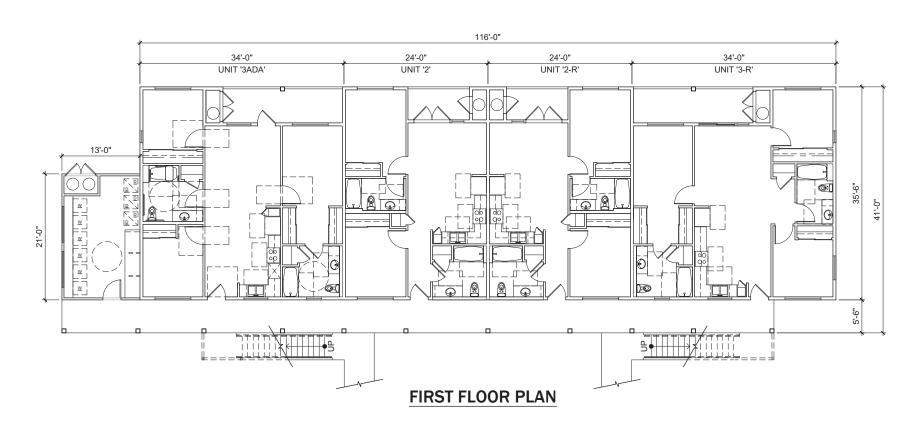




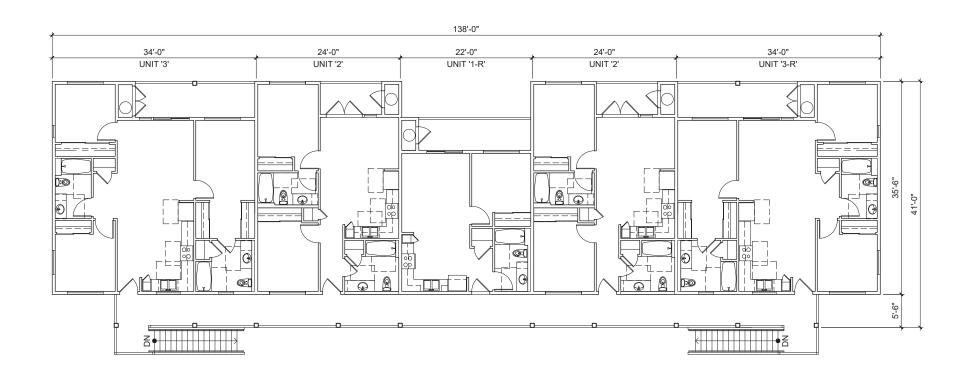


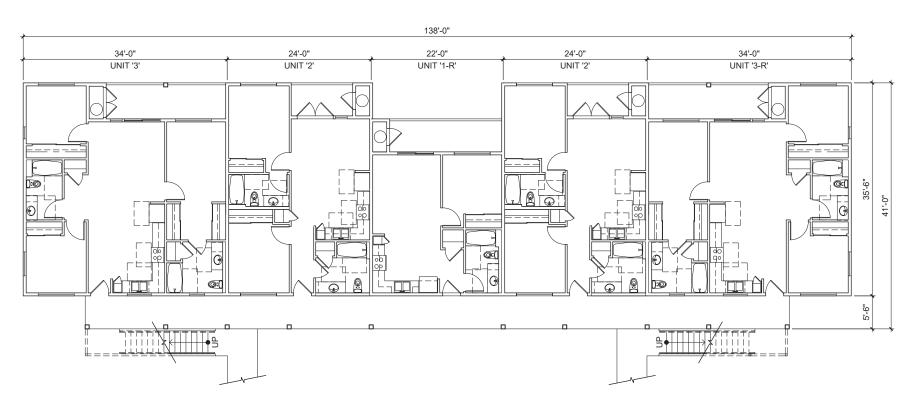






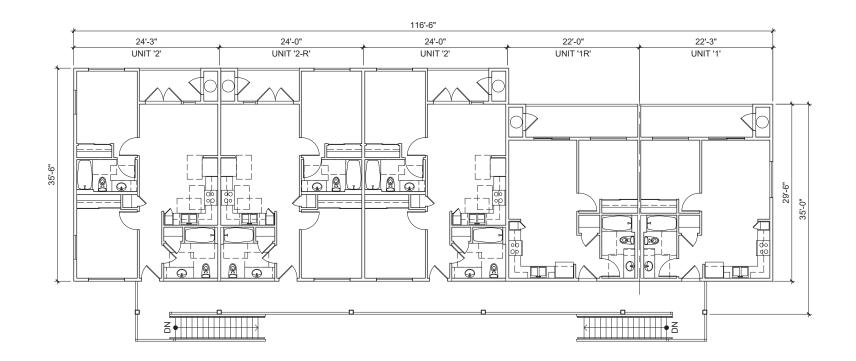


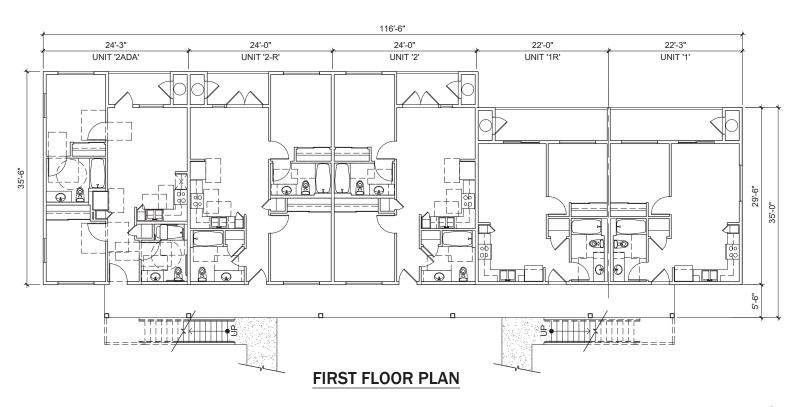




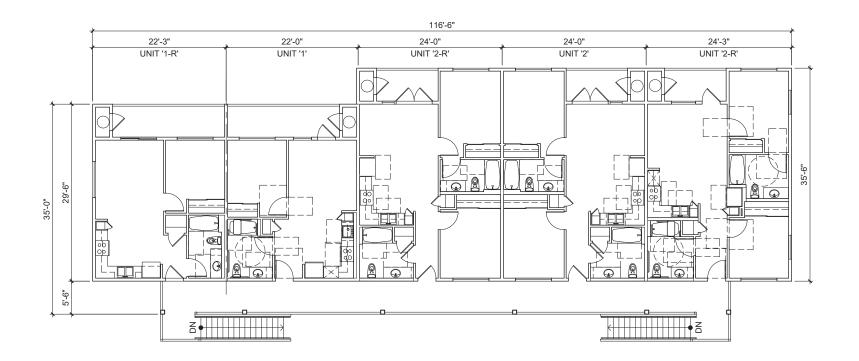


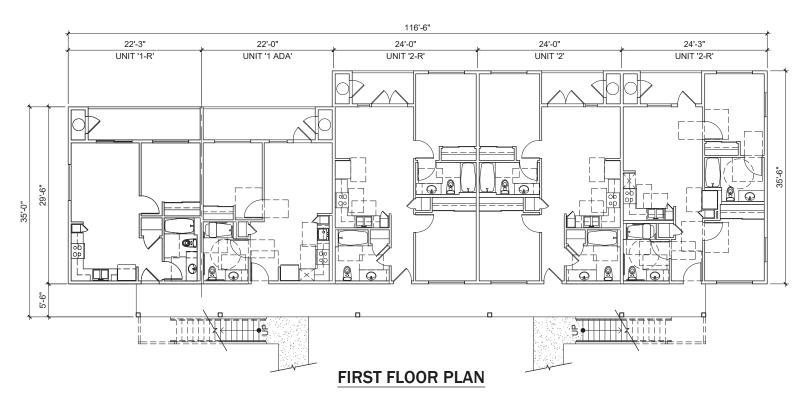




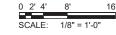


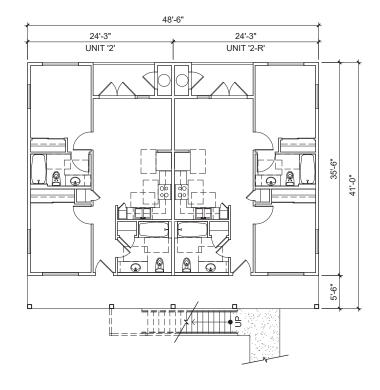




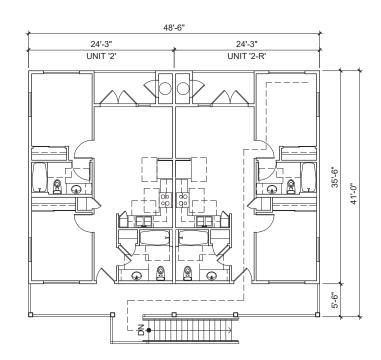






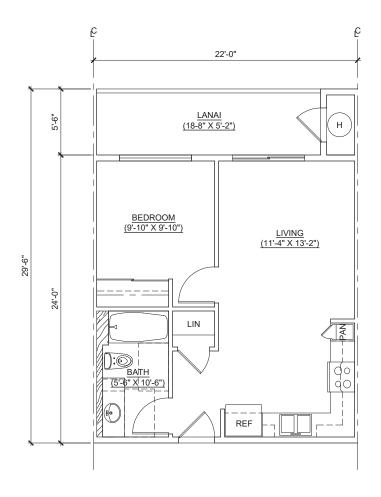


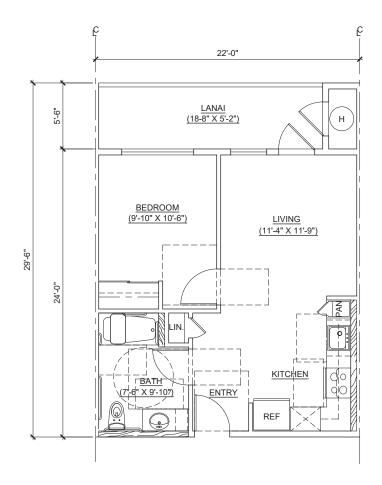
FISRT FLOOR PLAN



SECOND FLOOR PLAN



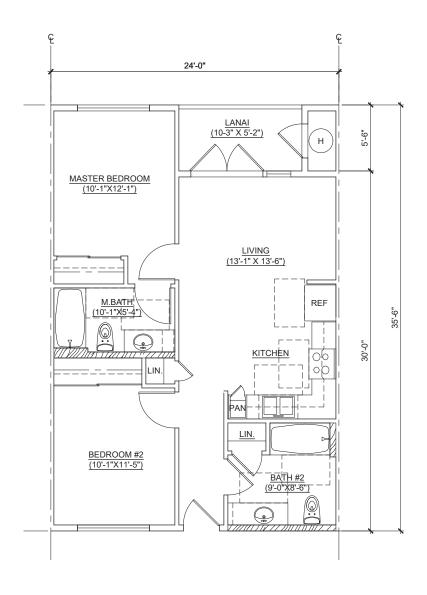


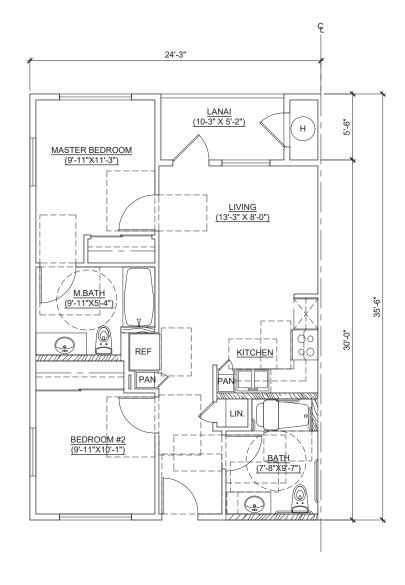


1-BEDROOM UNIT 652 SF

1-BEDROOM ADA UNIT 652 SF





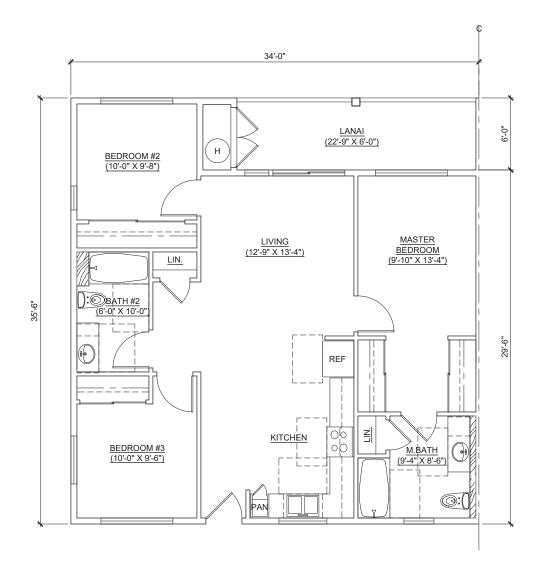


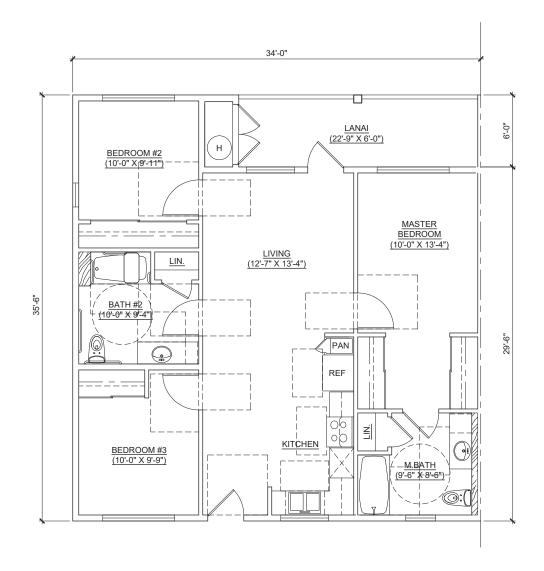
2-BEDROOM UNIT 852 SF

2-BEDROOM ADA UNIT 852 SF



DESIGN PARTNERS
INCORPORATED





3-BEDROOM UNIT 1,208 SF

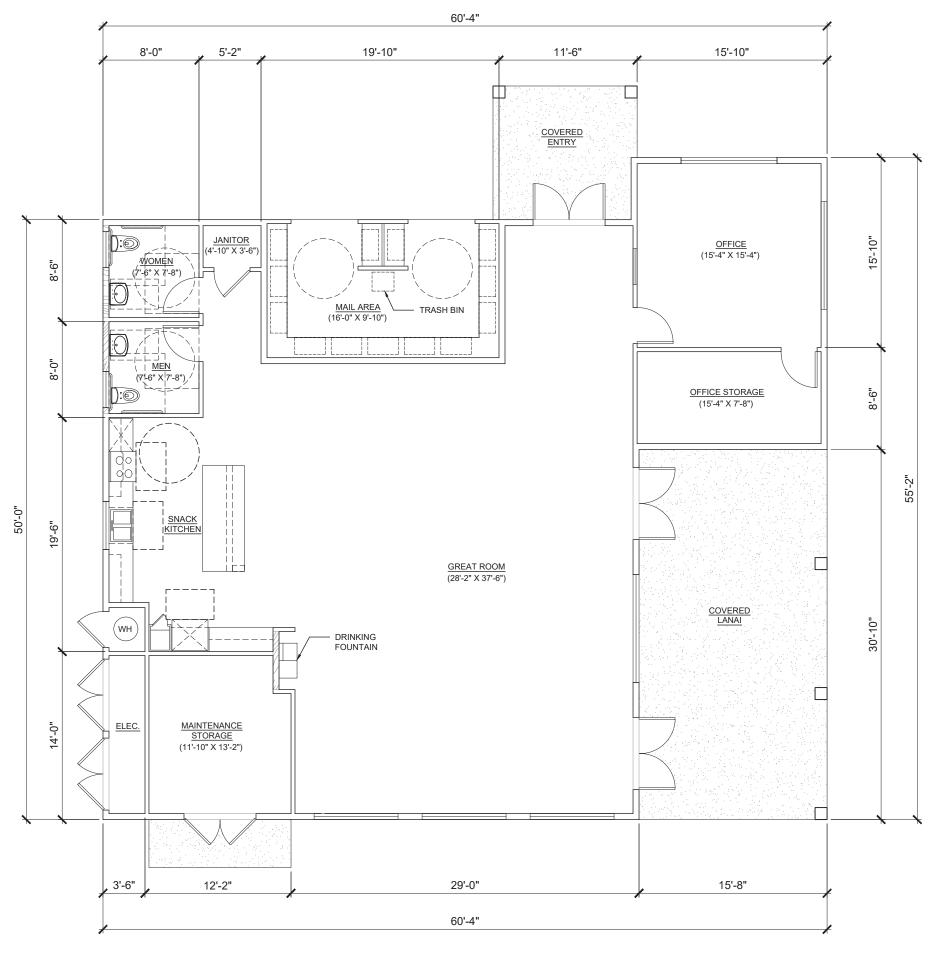
3-BEDROOM ADA UNIT 1,208 SF

DESIGN PARTNERS

INCORPORATED

CLUBHOUSE

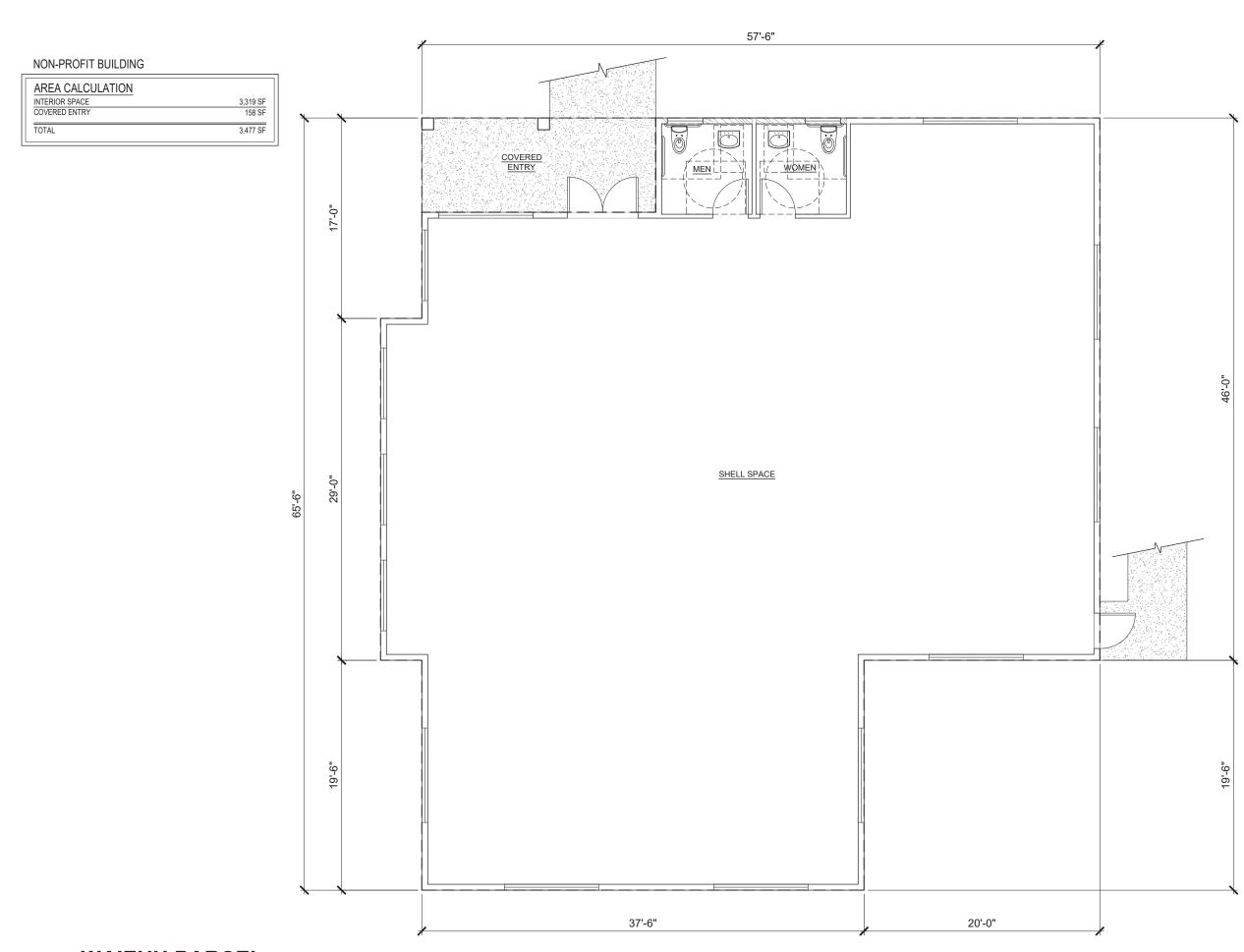
AREA CALCULATION	
INTERIOR SPACE	2,395 SF
COVERED ENTRY	131 SF
COVERED LANAI	483 SF
MAIL AREA	222 SF
TOTAL	3,231 SF













WAIEHU PARCELWAIEHU HOUSING, LP

NON-PROFIT BUILDING PLAN

JUNE 24, 2021



EXHIBIT D. Infrastructure Description

INFRASTRUCTURE DESCRIPTION

Roadways

Access to the project site will be provided by three (3) driveway entrances off Kahekili Highway. The Maui Public Bus system's Waihe'e Villager Route 8 passes along the north end of the project area on Waiehu Beach Road, and serves a number of locations throughout Waiehu, Waihee and Kahului. The Applicant has engaged with the County Department of Public Works and County Department of Transportation, and is reviewing the feasibility of incorporating a bus stop and lighted crosswalk in the project plans.

Based on the Traffic Impact Analysis Report (TIAR), the project is anticipated to generate 64 (79) trips during the AM (PM) peak hours. Regionally, the majority of project trips will route to/from the greater Kahului-Wailuku areas and will add about 10 to 35 vehicles along Waiehu Beach Road and 5 to 10 vehicles along Kahekili Highway. This corresponds to a 3.46 percent increase in traffic from base conditions (without the project) along both Kahekili Highway and Waiehu Beach Road. With the added project trips, operations at the study intersections are generally anticipated to be similar to 2024 conditions (without the project).

The project's Driveways 1 and 3 are proposed to operate as right-in, right-out intersections, while Driveway 2 is proposed as a full access intersection. Due to relatively low turning movements generated by the project, signals are not warranted and all intersections are recommended to be unsignalized with stop control along the westbound project exit approaches.

At all three (3) project driveways, a northbound entering right-turn deceleration lane is recommended. For the full-access Driveway 2, it is anticipated that only one (1) of the two (2) auxiliary lanes (southbound left-turn lane or northbound right-turn lane) can be accommodated due to right-of-way constraints. If this is the case, the provision of the southbound left-turn lane should be prioritized over the northbound right-turn lane. All movements at all three (3) of the project driveways are anticipated to operate at LOS B or better across both peak hours.

As vacant lands along Kahekili Highway get developed, speeds should be enforced to ensure vehicles adhere to posted 30 mph speed limits. Northbound traffic along Kahekili Highway will continue to be relatively low with only 200 to 280 northbound vehicles per peak hour, or on average 4 to 5 vehicles per minute. This should provide numerous gaps

for entering left-turn and exiting right-turn project vehicles to complete turns with less conflicts and delays. With low northbound traffic, no northbound queues were observed at the Kahekili Highway/Waiehu Beach Road intersection. Therefore, queue spillback into the nearest project's Driveway 1 should not occur.

The Maui Metropolitan Planning Organization prepared The Hele Mai Maui Long Range Transportation Plan (LRTP) 2040 dated December 2019. The Hele Mai Maui LRTP 2040 Plan identifies various long-range transportation improvements for the island of Maui, many of which are improvements previously identified as future planned, programmed or funded improvements by Maui County or the State of Hawai'i. Two (2) major long-range regional roadway extension improvements are identified in the plan for Imi Kala Street, however, neither are anticipated to be constructed by Year 2024:

Imi Kala Street Extension (Phase I) and Imi Kala Bridge Improvements

 This regional improvement would provide a new paved roadway stemming from Kahekili Highway to the north and traversing south, intersecting with Piihana Road and terminating at the south end at the existing Imi Kala Street/Wili Pa Loop/Eha Street intersection.

Imi Kala Street Extension (Phase II)

 This improvement is planned by Maui County and would provide a new paved roadway stemming from the existing Imi Kala Street/Mill Street intersection and traverse south, adjacent to St. Anthony School, terminating at the south end at Lower Main Street.

Both of these above-noted improvements are major capacity improvement projects that will alleviate some of the existing AM traffic congestion along both Kahekili Highway and Waiehu Beach Road.

It is noted that the Applicant has been coordinating with the State Department of Transportation regarding review of the project's TIAR. HDOT issued a letter accepting the TIAR and confirming a fair share determination for the project on February 7, 2022.

Considering the proposed project's minimal (3.46 percent) increase to existing traffic conditions for the region, no significant impacts are anticipated. Coordination with the County and State will continue during the development of the proposed project, and appropriate BMPs will be implemented before, during, and after construction.

Water

The average daily demand for the project is approximately 70,800 gallons per day. Water flow demand for a multi-family development is 2,000 gallons per minute for a 2-hour duration. There are no existing fire hydrants in the vicinity of the project site. The subject parcel was part of a large-lot subdivision, and some improvements, such as water service and fire protection, were not required until the development of the individual large lots. The project shall install approximately 2,000 feet of 8-inch waterline along Kahekili Highway and fire hydrants will be installed with a maximum spacing of 250 feet. The use of non-potable water features, such as rainwater harvesting systems for irrigation, will be evaluated and incorporated as practicable and feasible. The Applicant will be using reclaimed water for its non-potable water needs, such as irrigation of the project's landscaping, which will include drought-tolerant native plants. It is anticipated that the proposed project will be served by County water services. Domestic water and fire flow calculations will be prepared and submitted during the building permit process. Water meter and fire protection improvements will be made, as necessary, to meet the requirements of the Department of Water Supply and Department of Fire Prevention and Public Safety.

Wastewater

The proposed project will generate approximately 30,600 gallons of wastewater daily. The onsite sewerage collection system will be designed to accommodate this flow. The nearest gravity sewer connection is located approximately 1,500 feet from the proposed site, along Waiehu Beach Road. Connection to this system will require a lift station for the project. The wastewater generated from the project will be transported to the Wailuku-Kahului Wastewater Reclamation Facility. At the present time, the treatment plant has sufficient capacity to accommodate the additional wastewater generated from the proposed project.

Drainage

After the development of the proposed project, it is estimated that the 50-year, 1-hour storm runoff will be 22.205 cfs, corresponding to a runoff volume of 49,961 cf. The increase in runoff will be 14.337 cfs, with an increase in runoff volume of 26,356 cf (23,605 cf to 49,961 cf). Onsite runoff will be intercepted by catch basins located within the paved parking area and conveyed to a subsurface drainage system. The subsurface drainage system will consist of a perforated drainline embedded in crushed rock, which will be

wrapped with a layer of filter fabric. Surface runoff entering the perforated pipe will be allowed to infiltrate into the ground.

The drainage system will be designed to accommodate the increase in surface runoff volume from a 50-year, 1-hour storm for the proposed project. The proposed project will not alter the grades or capacity of the existing swale. The design intent of the development plan will be to utilize the existing topography to the greatest extent practicable and to limit the need for extensive grading. Development of the project will include the implementation of site-specific best management practices (BMPs) during the construction to provide erosion control and minimize impacts to downstream properties. In addition, an application for a National Pollutant Discharge Elimination System (NPDES) permit for construction will be submitted to the State Department of Health (DOH) for review and approval prior to the start of construction. The project will also include post-construction BMPs, which will improve the quality of stormwater runoff from the proposed development.

The Applicant is aware of previous localized flooding events within the vicinity of the project site. MEO has reported to the Applicant that debris blocking a culvert to the north of the Kahekili Highway and Waiehu Beach Road intersection has caused drainage issues and flooding. The HDOT is responsible for maintaining the culvert and clears trash and debris from the culvert, which has mitigated the issue. Hale Mahaolu will coordinate with HDOT on ensuring the culvert is clear and operating properly during heavy rain events.

EXHIBIT E. Project Financing

PROJECT FINANCING

The proposed Hale Mahaolu Ke Kahua Affordable Housing Community is a 100 percent affordable housing project by Waiehu Housing, LP (Applicant), aimed at providing housing opportunities for families earning 60 percent of the HUD Area Median Income (AMI) or less. The Applicant will be utilizing various funding streams to bring this project to fruition, including, but not limited to equity; the State Rental Housing Revolving Fund (RHRF) loan; the Maui County Affordable Housing Fund Grant; Federal and State Low-Income Housing Tax Credit (LIHTC), Hula Mae Multi Family (HMMF) Bonds and a permanent loan.

The Maui Affordable Housing Fund application was submitted in September of 2022, and is pending evaluation. The Tax Exempt Bond, RHRF and LIHTC are projected to be submitted to the Hawai'i Housing Finance and Development Corporation (HHFDC) on or about February 17, 2023, with notification of award anticipated in September of 2023. If Chapter 2.97 approval cannot be achieved before the February HHFDC application deadline, the project will substantially be delayed as it will be forced to apply for financing to HHFDC in February of 2024.

EXHIBIT F. Community Meetings

COMMUNITY MEETINGS

The Applicant and its consultants have participated in a number of community/public meetings with residents and community groups for the proposed project. Meeting invitations and consultation with surrounding communities has also occurred throughout the Environmental Assessment (EA) process. An overview of meetings and consultation for the proposed project is provided below.

One (1) community meeting was held on February 2, 2021, with board members of Waihe'e Community Association (WCA). The meeting was held via telephone conference at the request of WCA in the afternoon with the Applicant and supporting project consultants. WCA requested the meeting following receipt of an Early Consultation Letter (ECL) for the proposed project, which was sent by the Applicant to nearby community/neighborhood associations. See **Attachment "1A"**. The Applicant provided a brief overview of the project and answered questions from the four (4) board members who attended the meeting. A memo summarizing the comments/questions and Applicant responses from the meeting was prepared and sent to WCA on March 3, 2021. See **Attachment "1B"**.

One (1) community meeting was held on October 21, 2021, with nearby residents to provide an overview of the proposed housing community and answer questions about the project. A meeting notification flier was mailed out to property owners within 500 ft. of the project boundary (92 addresses), primarily within the Waiehu Heights subdivision. Participants had the option of registering for the online meeting, to join via video or by phone. While the meeting included ten (10) registered participants, a number of family members and others participated on a single device. A memo summarizing the comments/questions and Applicant responses from the meeting was prepared and included in the Final EA. See **Attachment "1C"**.

A second community meeting was held with WCA board members via telephone conference on October 25, 2021. The Applicant provided a brief update/presentation on the project and answered questions from the four (4) board members who attended the meeting. A memo summarizing the comments/questions and Applicant responses from the meeting was prepared and formally sent to WCA on April 11, 2022. See **Attachment** "1D".

The Applicant and its consultants provided a presentation to, and received comments from, the Urban Design Review Board (UDRB) on October 5, 2021. The UDRB agreed

that it is a good project and were unanimous in its support, and commended the Applicant for offering it at the rates proposed. The UDRB noted that the project is not only aesthetically pleasing, but has a sensitivity to both affordability and consideration of quality of life. A letter summarizing the comments/questions and Applicant responses from the meeting was prepared and included in the Final EA. See **Attachment "1E"**.

The Applicant and its consultants also provided a presentation to, and received comments from, the Maui Planning Commission (MPC) on October 26, 2021. The MPC voted unanimously in favor of the project. A letter summarizing the comments/questions and Applicant responses from the meeting was prepared and included in the Final EA. See **Attachment "1F**".

Additionally, the Applicant and MEO provided a joint presentation to the County of Maui Commission on Healing Solutions for Homelessness on November 18, 2021. The commission is established to protect and promote public health, safety, and welfare of residents and maintain the commitment of aloha'aina. As an advisory group, the commission provides recommendations to the council and the administration on funding and policies to help combat and eliminate homelessness and poverty in Maui County. The commission voted and approved drafting a letter of support for the proposed project. See **Attachment "1G"**.

A matrix summarizing community outreach and meetings is provided as **Attachment** "1H".

LIST OF ATTACHMENTS

- **1A.** Early Consultation Letter
- 1B. Memo for Meeting with Waihe'e Community Association on February 2, 2021
- 1C. Memo for Meeting with Waiehu Residents (Waiehu Heights) on October 21, 2021
- **1D.** Memo for 2nd Meeting with Waihe'e Community Association on October 25, 2021
- **1E.** Memo for Meeting with Urban Design Review Board on October 5, 2021
- **1F.** Meeting with Maui Planning Commission on October 26, 2021
- **1G.** Meeting with Commission on Healing Solutions for Homelessness on November 18, 2021
- **1H.** Community Outreach Summary

ATTACHMENT 1A. Early Consultation Letter



Michael T. Munekiyo
CHAIRMAN
Karlynn K. Fukuda
PRESIDENT
Mark Alexander Roy
VICE PRESIDENT
Tessa Munekiyo Ng
VICE PRESIDENT

December 1, 2020

via email: bryan@mauigateway.com

Mr. Bryan Sarasin, Sr., Vice-Chairman Waihe'e Community Association

SUBJECT: Chapter 343, Hawai'i Revised Statutes, Early Consultation Request

for Proposed Waiehu Affordable Housing Community at TMK (2)3-

3-001:106, Waiehu, Maui, Hawai'i

Dear Mr. Sarasin:

In response to the current and projected shortage of affordable housing in Maui County, Highridge Costa Development Company (Applicant) along with development partner, Hale Mahaolu, proposes to develop a new 120-unit affordable rental housing community in Waiehu, Maui, Hawai'i. See Figure 1. The subject property is identified as TMK (2)3-3-001:106 (Parcel 106) and covers an area of approximately 11.476 acres. See Figure 2. The project site is bounded by the intersection of Kahekili Highway and Waiehu Beach Road to the north, Kahekili Highway to the west, the Waiehu Heights singlefamily residential community to the east, and Piihana Project District lands to the south. Other uses in the vicinity of the proposed project include agricultural subdivisions to the northwest and southwest inland (mauka) of Kahekili Highway, as well as the Waiehu Kou Department of Hawaiian Home Lands residential subdivisions and Waiehu Municipal Golf Course further to the north. Parcel 106 is largely vacant and undeveloped, but historically, the property was utilized for the cultivation of pineapple, sugar cane and macadamia nuts. The current owner of Parcel 106 is Maui Economic Opportunity, Inc., (MEO). The Applicant and MEO plan to enter into a long-term lease to develop the project.

The proposed project will be 100 percent affordable, providing all 120 rental units housing for residents earning 60 percent or less of the Area Median Income (AMI). The new community will be managed and operated by Hale Mahaolu. The project will provide 120 multi-family residential rental units, housed in 13 2-story buildings. See **Figure 3**. The new community will consist of 30 1-bedroom units, 58 2-bedroom units, and 32 3-bedroom units. In addition to the residential units, a 3,500 square foot (sq. ft.) non-profit building, a 3,000 sq. ft. community center, landscaping, and related

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 321 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

Mr. Bryan Sarasin, Sr., Vice-Chairman December 1, 2020 Page 2

improvements are proposed as part of the project. A total of 285 off-street parking stalls and two (2) loading stalls will also be provided. Access to the project site will be via three (3) new driveway entrances off of Kahekili Highway.

The subject property is designated "Urban" and "Agricultural" by the State Land Use Commission, "Project District" and "Agriculture" district by the Wailuku-Kahului Community Plan, and "Interim" and "Agricultural" by Maui County Zoning. The project site is situated within the County of Maui's Urban Growth Boundary as set forth by the Maui Island Plan. The subject property is not located in the Special Management Area (SMA) of the island of Maui.

The Applicant proposes to seek a fast tracked affordable housing project approval from the Maui County Council pursuant to Chapter 2.97 of the Maui County Code (MCC). The Chapter 2.97 fast tracked housing application review process was approved by the Maui County Council in December of 2018 via Ordinance 4941. The Chapter 2.97 approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon provided that the project still meets the minimum requirements for health and safety. Among other exemptions, the Applicant will be seeking exemptions from State Land Use District Boundary Amendment, Change in Zoning, Community Plan Amendment, as well as Project District processing requirements. It is noted that pursuant to Section 2.97.120, MCC, an exemption from State Land Use District Boundary Amendment requirements can be requested for projects less than 15 acres. The subject project area is just under 12 acres.

The proposed project will seek both State and County funding and will also involve installation of infrastructure improvements along Kahekili Highway, a County right-of-way. Use of State/County funds and County lands are triggers for preparation of an Environmental Assessment (EA) pursuant to Chapter 343, Hawai'i Revised Statutes (HRS). As the proposed project is not able to meet the criteria for a Chapter 343, HRS exemption for affordable housing projects, an EA will be prepared in support of the Chapter 2.97 application. As the Chapter 2.97 application will be the first discretionary approval sought for the project, the County of Maui, Department of Housing and Human Concerns (DHHC) will be the Approving Agency for the Chapter 343, HRS EA.

On behalf of the Applicant, we are writing to you today to kindly request your early review and comment on the proposed project in accordance with the requirements of Chapter 11-200.1, Hawai'i Administrative Rules (HRS).

Mr. Bryan Sarasin, Sr., Vice-Chairman December 1, 2020 Page 3

We would appreciate receiving any comments you may have at the address listed below by December 22, 2020.

> Munekiyo Hiraga Attention: Chris Sugidono, Senior Associate 305 High Street, Suite 104 Wailuku, Hawai'i 96793

Should you have any questions regarding this Chapter 343, HRS early consultation request, please do not hesitate to contact me at (808) 244-2015. Thank you.

Very truly yours,

Chris Sugidono Senior Associate

CS:yp **Enclosures**

Mohannad H. Mohanna, Highridge Costa Development Company (w/enclosures) CC:

Grant Chun, Hale Mahaolu (w/enclosures)

Debbie Cabebe, Maui Economic Opportunity, Inc. (w/enclosures)) K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\EC\WCA.EC.ltr.doc



Figure 1

Proposed Waiehu Affordable Housing Community Regional Location Map





MUNEKIYO HIRAGA

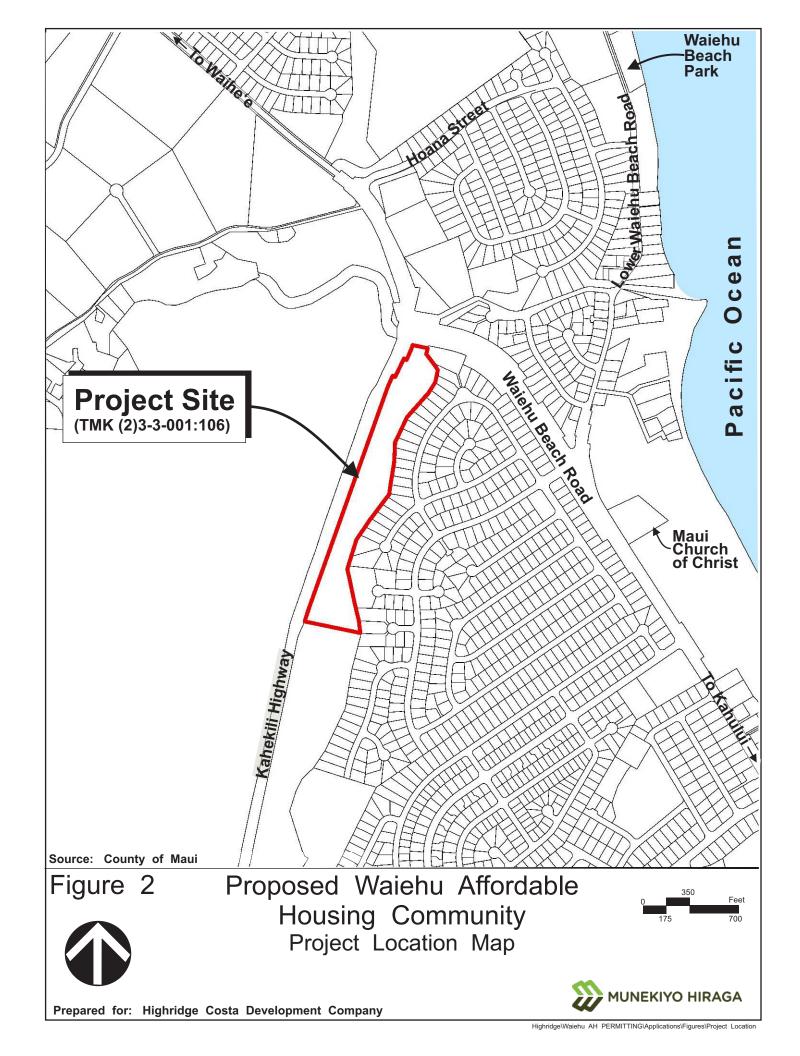




Figure 3 Proposed Waiehu Affordable Housing Community
Conceptual Site Plan

NOT TO SCALE



ATTACHMENT 1B.

Memo for Meeting with Waihe'e Community Association on February 2, 2021



Michael T. Munekiyo
CHAIRMAN
Karlynn K. Fukuda
PRESIDENT
Mark Alexander Roy
VICE PRESIDENT
Tessa Munekiyo Na

VICE PRESIDENT

March 3, 2021

MEMORANDUM

To: George Paresa, Jr.

Waihe'e Community Association

From: Chris Sugidono, Senior Associate

Munekiyo Hiraga

Subject: Waihe'e Community Association Meeting on February 2, 2021 Regarding

the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Participants: George Paresa, Jr., Waihe'e Community Association

Brian Sarasin, Sr., *Waihe'e Community Association*James Crowe, *Waihe'e Community Association*Melvin Fukunaga, *Waihe'e Community Association*

Grant Chun, *Hale Mahaolu*Moe Mohanna, *Highridge Costa*Monte Heaton, *Highridge Costa*Harrison Herzberg, *Highridge Costa*Lena Tamashiro, *Design Partners*Johnny Wu, *Design Partners*Ashley Otomo, *Otomo Engineering*

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, *ATA*Mark Roy, *Munekiyo Hiraga*Chris Sugidono, *Munekiyo Hiraga*

Thank you for your Early Consultation letter dated December 14, 2020, and subsequent conference call meeting with the Applicant and consultant team on February 2, 2021, regarding the subject project. We very much appreciate you taking the time to provide us with the following comments and questions during the early stages of planning for this 100 percent affordable housing community.

Please see below a brief overview of the main comments that were discussed at our meeting as well as the Applicant team's responses:

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 321 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

1. Comment:

Question regarding vehicle access points and the possibility of installing a center turn lane.

Response: The current proposed site plan includes three access points at project site, however, the Applicant is in the process of consulting with the County Department of Public Works. Any left-turn entry into the project site would be provided with a left-turn storage lane.

2. Comment:

Question regarding the title of the property if a restriction for agricultural classes and/or agricultural uses was placed on the property when it was donated to Maui Economic Opportunity, Inc. (landowner).

Response: The property has been used for agricultural endeavors in the past.

We appreciate the comment and we will review this specific

question with the landowner.

3. Comment:

Question regarding if a retaining wall (along the dune) is planned to minimize potential for erosion from the sand dune due to flooding. Flooding across the highway has been a concern in this area.

Response: The Applicant is still fairly early on in its preliminary design process.

We will be studying the grading requirements for this project and we will make a decision regarding retaining wall requirements

based on this evaluation.

4. Comment:

Question regarding if the Applicant intends to utilize the irrigation well to irrigate landscaping within the project.

Response: We will need to meet the requirements of the County in terms of

water service, but we will look into this as a potential option if it

feasible.

5. Comment:

Question regarding what kind of sewer system improvements will be required.

Based on preliminary feedback from the County, the Applicant will Response:

need to install a sewer line extension and a lift station as part of the project. This improvement is currently being assumed as part of the

project plans.

6. Comment:

Question regarding the length of affordability for the units.

Response: The Hale Mahaolu Ke Kahua Affordable Housing Community will

remain affordable for at least 60 years.

7. Comment:

Question regarding engagement of kupuna and cultural practitioners in the surrounding area of the project site.

Response: As part of the ongoing process to prepare a Draft Environmental Assessment (EA) for the project, a Cultural Impact Assessment (CIA) report was prepared to gain an understanding of traditional cultural practices within and in the vicinity of the project area and identify any potential effects on these practices that may occur during, or as a result of, the implementation of the proposed project.

> Community outreach letters were sent to a range of individuals, organizations and agencies - including traditional cultural practitioners and kupuna with generational ties to the proposed project area. No on-going cultural practices were identified within the project area during community consultation for the CIA. However. the applicant will be implementing various recommendations from the CIA to mitigate any potential impacts.

8. Comment:

Question regarding potential presence of burials and iwi kupuna along the sand dunes in the Waiehu area.

Response: An Archaeological Assessment (AA) of the proposed site was submitted to the State Historic Preservation Division (SHPD) for review. No historic properties have been identified within the project area, though the project area is located adjacent to an inland sand dune complex where a number of human burials have been documented in the past. The Applicant has prepared an Archaeological Monitoring Plan as a precautionary measure for the project and has submitted it to SHPD for review and acceptance.

9. Comment:

Question regarding whether any other community groups have been contacted by the Applicant.

Response:

Community outreach by the Applicant and consultant team is ongoing and will continue through the EA process. Among the other community groups who have been contacted and received a copy of the Early Consultation Letter, include the Waiehu Terrace Community Association, Waiehu Kou Phase 3 Association and Aha Moku o Maui representatives. A copy of the Draft EA will be provided to these groups, when available, for review and comment.

10. Comment:

General concern regarding increased traffic concerns in the surrounding area of the proposed project site.

Response: The Applicant has prepared a Traffic Impact Analysis Report (TIAR) to study traffic impacts and develop recommended mitigation measures for the project area. As mentioned earlier, the project is still fairly early on in its preliminary design process, however, the Applicant continues to work with the County Department of Public Works and State Department of Transportation to address potential traffic issues in the area.

Mahalo again for your input and we welcome your further review and comments on the Draft EA when it is published and sent to Waihe'e Community Association. We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015

> Chris Sugidono Senior Associate

OL XL

CEJS:yp

CC: Grant Chun, Hale Mahaolu

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, MEO

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ATTACHMENT 1C.

Memo for Meeting with Waiehu Residents (Waiehu Heights) on October 21, 2021



December 1, 2021

MEETING MEMORANDUM

Subject: Draft Environmental Assessment Prepared for the Proposed Hale Mahaolu

Ke Kahua Affordable Housing Community

Registered

Participants: Miyo Miyasaki-Kim

Duane Kim

Colin Rodrigues
Damir Kouliev
Maureen Long
Cindy Natividad
Teri Liebmann
Darlene Endrina
Jeanie Dillon
Kehau Deutsch

Project Team: Grant Chun, Hale Mahaolu

Moe Mohanna, *Highridge Costa*Monte Heaton, *Highridge Costa*Harrison Herzberg, *Highridge Costa*

Debbie Cabebe, Maui Economic Opportunity Inc. (MEO)

Peter Horovitz, MEO

Lena Tamashiro, *Design Partners*Johnny Wu, *Design Partners*

David Sereda, *Chris Hart & Partners*Ashley Otomo, *Otomo Engineering*

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, ATA

Trevor Yucha, *Cultural Surveys Hawai'i*

Mark Roy, *Munekiyo Hiraga*Chris Sugidono, *Munekiyo Hiraga*



On October 21, 2021, the Applicant and its consultants participated in a virtual community meeting with nearby residents to provide an overview of the proposed affordable housing community and to answer questions about the project. A meeting notification flier was mailed out to 92 addresses, primarily within the Waiehu Heights subdivision. Participants had the option of registering for the meeting to join via video or by phone.

Below is a summary of the main comments that were discussed at the meeting, as well as the Applicant team's responses:

1. Comment:

Are there plans for fencing between the site and the stream behind the property?

Response: The Applicant will be installing a fence along the eastern side of the property between the adjacent homes within the Waiehu Heights subdivision. The fence provides a safety measure for children in the housing community and will include a locked entrance for staff to conduct any necessary maintenance.

2. <u>Comment:</u>

I'm concerned that your studies have underestimated the impact on local traffic and police/fire services due to the distance.

Response:

The Traffic Impact Assessment Report (TIAR) prepared by Austin, Tsutsumi & Associates, Inc. (ATA) determined that the proposed project is anticipated to generate a minimal increase in traffic over existing conditions for the region. This does not mean that there is minimal traffic on surrounding roads and intersections. Traffic in the area will continue to be heavy during peak morning and afternoon hours, with or without the proposed project.

The Applicant and its consultants have been coordinating and communicating with the Maui Police Department as well as the Department of Fire and Public Safety's Fire Prevention Bureau on the proposed affordable housing community. The agencies did not have any comments on the Draft EA, but will be consulted during the building permit review process when detailed plans are further developed. Coordination with the County Department of Public Works (DPW) and Hawai'i Department of Transportation (HDOT) on traffic mitigation measures is



also ongoing and will continue as the planning process proceeds for this project.

3. <u>Comment:</u>

The study also fails to assess noise impacts post construction.

Response:

As a 100-percent affordable housing community, noise generation would reasonably be restricted to vehicular traffic, children playing within the project's playground areas and other typical residential occurrences. The housing community will also be managed by Hale Mahaolu and an onsite manager will implement standard housing rules, such as quiet hours.

4. Comment:

What is the height of the 2-story buildings from the ground level?

Response:

The height of the 2-story housing unit buildings from the ground level to the top of the roof will be around 27 to 28.5 feet tall.

5. Comment:

Was the traffic report made during the Covid-19 pandemic? Because traffic was a lot crazier before the pandemic.

Response:

The TIAR prepared by ATA evaluated turning movement counts collected in 2016 to 2019, which was prior to the pandemic. Based on early consultation with HDOT and DPW, the use of historic counts were acceptable.

6. <u>Comment:</u>

Why was the gulch not mentioned in any reports?

Response:

The property does not appear to contain any recognized gulches, though, a swale generally occurs along the eastern edge of the property between the Waiehu Heights subdivision. The Applicant will minimize any grading of the existing swale and plans to enhance the landscape with native plants and irrigation.



Mohannad H. Mohanna, President Highridge Costa Development Company

ATTACHMENT 1D.

Memo for 2nd Meeting with Waihe'e Community Association on October 25, 2021



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

April 11, 2022

MEETING MEMORANDUM

To: George Paresa, Jr.

Waihe'e Community Association

From: Chris Sugidono, Senior Associate

Munekiyo Hiraga

Subject: Draft Environmental Assessment Prepared for the Proposed Hale

Mahaolu Ke Kahua Affordable Housing Community

Participants: George Paresa, Jr., Waihe'e Community Association

Brian Sarasin, Sr., *Waihe'e Community Association* Melvin Fukunaga, *Waihe'e Community Association*

Kiai Collier, *Hawai'i Land Trust*Grant Chun, *Hale Mahaolu*Moe Mohanna, *Highridge Costa*Monte Heaton, *Highridge Costa*Harrison Herzberg, *Highridge Costa*

Debbie Cabebe, Maui Economic Opportunity Inc. (MEO)

Peter Horovitz, MEO

Lena Tamashiro, *Design Partners*Johnny Wu, *Design Partners*

David Sereda, *Chris Hart & Partners* Ashley Otomo, *Otomo Engineering*

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, ATA

Trevor Yucha, Cultural Surveys Hawai'i

Mark Roy, Munekiyo Hiraga

Chris Sugidono, Munekiyo Hiraga

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Thank you very much for your time and participation in the conference call meeting that was held with the Applicant and its consultant team on October 25, 2021. We very much appreciate you taking the time to provide us with your comments and questions on the Draft Environmental Assessment (EA) for the Hale Mahaolu Ke Kahua Affordable Housing Community.

Please see below a summary of the main comments that were discussed at our meeting, as well as the Applicant team's responses:

1. Comment:

Why did the applicant not consult with Waihe'e Elementary School?

Response: The Applicant has consulted with the Hawai'i Department of Education (HIDOE) and its Planning Section on the proposed affordable housing community as part of the EA preparation process. The HIDOE and its Planning Section reviews new project proposals in relation to the State school system, including Maui County. The Applicant received comments from the HIDOE, noting that the proposed project is located within the Central Maui School Impact Fee District. The fee amount per unit for the district is \$2,371. As such, the Applicant will be providing a total school impact fee for this project of \$284,520.00.

> The Applicant looks forward to complying with the school impact fee requirement which is intended to mitigate any potential impacts from the project on HIDOE's school facilities including Waihe'e Elementary School.

2. Comment:

How many students are you expecting from the project to attend Waihe'e Elementary School?

Response: Once the project is mature and turnover stabilized, the HIDOE expects roughly 26 students would reside in the proposed housing community. This would include potential students for Waihe'e Elementary School, Iao Middle School and Baldwin High School.

3. Comment:

Sometimes during the wet season in the vicinity of this project there is an overflow of rocks and debris that goes onto the highway from the culvert at the highway intersection. Is this project doing anything to address the flooding concerns at the culvert? The culvert issue really needs to be addressed as I don't think we can rely on the State to keep it clear and maintained.

Response: The Applicant has spoken with MEO (landowner) about the offsite culvert and general flooding concerns near the project area. MEO noted that the culvert is maintained by the Hawai'i Department of Transportation (HDOT), which is responsible for cleaning and maintaining the culvert. MEO identified at least one previous flooding event caused by a lack of maintenance of the culvert, which had been clogged with debris.

> Development of the MEO property is expected to generally reduce the amount of debris in the surrounding area, which contains large trees and other vegetation. Regular landscaping and maintenance will occur once the project is completed, and include drainage system improvements to ensure that run-off from the property is not increased from existing conditions. Hale Mahaolu, which will serve as the property manager during the operational phase of the project, will additionally coordinate with HDOT to request that the culvert is regularly maintained to avoid potential future flooding events.

4. Comment:

Does the development have full clear title to this property?

Response: According to MEO, the nonprofit has clear title to the land and the deeds, which is confirmed by the County of Maui's previous subdivision of the property. The persons identifying themselves as the Heirs of Pehuino have made clear that they claim interests in only Land Commission Award (LCA) No. 3386. LCA No. 3386, Apanas 1, 2, and 3 are located nearly a mile away and were never part of the MEO property. This too is confirmed by historic deeds, LCA awards, and County records.

5. Comment:

Is there a stipulation on the title for this property to be used only for agriculture?

Response:

There is no stipulation on the title for the property that restricts the land to agriculture use only. This was confirmed by the Applicant and MEO.

6. Comment:

I don't agree with the findings of the traffic study and don't believe it is accurate. Are you working with the state and county agencies regarding the impacts to the highway and roadway infrastructure?

Response:

The Traffic Impact Assessment Report (TIAR) prepared by Austin, Tsutsumi & Associates, Inc. (ATA) determined that the proposed project is anticipated to generate a minimal increase in traffic over existing conditions for the region. This does not mean that there is minimal traffic on surrounding roads and intersections. Traffic in the area will continue to be heavy during peak morning and afternoon hours, with or without the proposed project. However, coordination with the County Department of Public Works and Hawai'i Department of Transportation on traffic mitigation measures is ongoing and will continue as the planning process proceeds for this project.

7. Comment:

Are native Hawaiian plants being used for this project? I really don't want to see county water being used for irrigation as it is too precious. Is this project planning on using the irrigation well that is on the site? I don't see any mention of this in the Draft EA.

Response: Since the publishing of the Draft EA, the Applicant has developed a Conceptual Landscaping Plan for the proposed housing community, which will be included in the Final EA. The plan includes a number of native plants appropriate for the area, including fruit trees. The Applicant will be working with its engineer and landscape architect to evaluate possible non-potable water sources (such as rainwater harvesting for the project's landscaped areas.

8. Comment:

What is the estimated water usage for irrigation?

Response: According to the Applicant's landscape architect, projects typically use drip irrigation and high-efficiency nozzles as water conservation measures. The project site will also include rain sensors, which limits water usage when it rains on the property. The estimated calculations for water irrigation will be developed as the project progresses, but these water conservation measures will help to reduce the project's overall water usage.

9. Comment:

Are there any upgrades that need to be done to the sewer pump station by Waiehu to accommodate the flow from this project?

Response:

The proposed project will generate approximately 30,600 gallons of wastewater daily. The onsite sewerage collection system will be designed to accommodate this flow. The nearest gravity sewer connection is located approximately 1,500 feet from the proposed site, along Waiehu Beach Road. Connection to this system will require a lift station for the project.

The wastewater generated from the project will be transported to the Wailuku-Kahului Wastewater Reclamation Facility. present time and as confirmed by the Department of Environmental Management, the reclamation facility has sufficient capacity to accommodate the additional wastewater generated from the proposed project.

10. Comment:

What are the terms of affordability for this project?

Response: An Affordable Housing Agreement will be entered into by the Applicant and the County of Maui, Department of Housing and Human Concerns for a period of 60 years for the proposed housing community.

11. Comment:

Are you working with the state and county agencies regarding the impacts to the highway and roadway infrastructure?

Response: According to the Applicant's traffic engineer, commute times in the surrounding area will generally remain the same with or without the proposed project. However, the Applicant does understand the community's concerns over any increases to the existing traffic in the area. The Applicant and ATA have engaged DPW and HDOT in discussions on fair-share mitigations that would be intended to alleviate any additional impacts from the proposed project.

12. Comment:

I drive my grandson to school each morning and observe traffic backing up past the Wailuku Country Estates driveway on our way into Happy Valley. We are at a crawl until we get to the intersection in Wailuku. This area of the highway is a bottleneck and traffic is coming from Waihe'e, Kahakuloa and Wailuku Country Estates.

Response: We note this comment. The TIAR did observe traffic in the Happy Valley area to gueue during the peak morning period before 8:00 a.m. This may partly be due to Main Street experiencing relatively slow-moving, stop-and-go traffic conditions due to on-street parking stalls, pedestrian crossing and numerous businesses and driveways in the area. The Applicant understands these concerns and will continue to work with its traffic engineer as well as DPW and HDOT to address any fair-share traffic mitigation requirements for the project.

13. Comment:

When are you proposing to break ground if this project is approved and moves forward to construction?

Response: Construction of the proposed project will commence upon the Maui County Code Chapter 2.97 approval by the Maui County Council and upon receipt of building permit approvals. This process is anticipated to take a couple of years to complete. Construction of the new affordable housing community is anticipated to be completed in 16 months.

14. Comment:

Will the developer be providing any updates to the community as it moves forward with this project?

Response: The Applicant and Hale Mahaolu will continue to provide updates to the community as project planning progresses. We recognize this meeting as the second conference call held with the association and project team (the first being held on February 2, 2021), and appreciate all of the input we have received to date. The Hale Mahaolu Ke Kahua Affordable Housing Community is envisioned to be a key part of the Waiehu-Waihe'e community and we look forward to ongoing dialogue with the surrounding community.

Thank you again for your input and review of the Draft EA for this affordable housing community. As mentioned during the meeting, this meeting memorandum will be included into the Final EA and a copy will also be sent to the Waihe'e Community Association. Should you have any questions or require further information, please feel free to contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CL- X7

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, MEO

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ATTACHMENT 1E.

Memo for Meeting with Urban Design Review Board on October 5, 2021 MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

> JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

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

October 13, 2021

Mr. Monte Heaton Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248

Dear Mr. Heaton:

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL

ASSESSMENT FOR THE PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY.

WAIEHU, MAUI, HAWAII; TMK: (2) 3-3-001:106

(EAC 2021/0006)

At its regular meeting held on **October 5, 2021**, the Urban Design Review Board (UDRB) reviewed the plans for the document referenced above. Based upon those discussions and questions to the Applicant and its consultants, the UDRB voted to recommend approval of the project, as presented.

Overall, the UDRB agrees that this is a good project and they were unanimous in their support of the project, the scope and amenities that it will offer to the community. It supports the need of the Maui community for affordable housing, and the applicant is commended for offering it at the rates proposed, which are impressive. The project is not only aesthetically pleasing; but, there is a sensitivity to both affordability and consideration of quality of life, and they appreciated the opportunity to review the project.

The UDRB also issued design-related comments and recommendations, as stated below:

- 1) Enlarge the lanai on the two bedroom units so that it has just as large a space as the one and three-bedroom units.
- 2) Consider the use of cool roof technology, specifically the Solaris product, so that it is cooler for the residents and there is a reduction in electric costs.
- 3) Ensure that there is bicycle storage within the complex.

- 4) Landscape buffer along the highway frontage to soften the edge of the project because people are accustomed to seeing that area as farm. Also, it will help visually screen the area from residents so that they are not seeing vehicles passing by, and to help attenuate noise to the ground floor units.
- 5) Factor in offsite runoff into drainage improvements. Currently, there is a lot of storm water runoff from the south, on the other side of the highway that flows across the highway through the project site.
- 7) Consider the proximity of the driveway nearest the intersection of Kahekili Highway and Waiehu Beach Road and whether there is an adequate distance from that egress point to Waiehu Beach Road for project design. Add in the left turn storage lane into the middle driveway, where left and right turns are allowed.
- 8) Add windows to front elevations, particularly above sinks, for increased ventilation, where possible.
- 9) Work to install a bus stop for connectivity because the site is remote.
- 10) Vehicles travel along Kahekili Highway at high speeds, so increase safety along the highway by adding speed tables.
- Erosion control in the back is of concern because there is sand, and we recommend that you work with your geotechnical engineers to ensure that it is addressed to prevent the undercutting of the buildings and stabilize the project site.
- We like the color palette, as it blends into the natural beauty of the surrounding environs.

Thank you for your cooperation. Should you require further clarification, please contact Staff Planner Tara Furukawa by email at tara.furukawa@mauicounty.gov or by phone at (808) 270-7520.

Sincerely,

Maui Urban Design Review Board

Mr. Monte Heaton October 13, 2021 Page 3

Copy to: Clayton I. Yoshida, Planning Program Administrator (PDF)

Tara K. Furukawa, Staff Planner (PDF)

Lori Tsuhako, Department of Housing and Human Concerns (PDF)

Monte Heaton, Waiehu Housing, LP (PDF Moe Mohanna, Highridge Costa (PDF) Harrison Herzberg, Highridge Costa (PDF)

Mark Roy, Munekiyo Hiraga (PDF) Chris Sugidono, Munekiyo Hiraga (PDF)

Leilani Ramoran-Quemado, Secretary to Boards and Commissions (PDF)

Maui Planning Commission (PDF)

Carolyn Takayama-Corden, Secretary to Boards and Commissions (PDF)

Project File

CHS:TKF:rma

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Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Caryl Hitchcock-Sprinzel, Chair County of Maui Department of Planning Maui Urban Design Review Board 2200 Main Street, Suite 315 Wailuku, Maui, HI 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Hitchcock-Sprinzel:

Thank you for your comment letter dated October 13, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

Overall, the UDRB agrees that this is a good project and they were unanimous in their support of the project, the scope and amenities that it will offer to the community. It supports the need of the Maui community for affordable housing, and the applicant is commended for offering it at the rates proposed, which are impressive. The project is not only aesthetically pleasing; but, there is a sensitivity to both affordability and consideration of quality of life, and they appreciated the opportunity to review the project.

Response: The Applicant appreciates the UDRB's comment and unanimous support for the project.

Comment No. 2:

1) Enlarge the lanai on the two bedroom units so that it has just as large a space as the one and three-bedroom units.

Response: The Applicant acknowledges the comment and will do its best to provide equally sized lanais for each unit, as feasible.

Comment No. 3:

2) Consider the use of cool roof technology, specifically the Solaris product, so that it is cooler for the residents and there is a reduction in electric costs.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Response:

The Applicant acknowledges the comment and will work with the development team to determine what energy efficient and sustainable features will be included in the project.

Comment No. 4:

3) Ensure that there is bicycle storage within the complex.

Response:

The Applicant acknowledges the comment and will work with the development team to provide bicycle storage within the project.

Comment No. 5:

4) Landscape buffer along the highway frontage to soften the edge of the project because people are accustomed to seeing that area as farm. Also, it will help visually screen the area from residents so that they are not seeing vehicles passing by, and to help attenuate noise to the ground floor units.

Response:

The Applicant will provide a greenway buffer along Kahekili Highway to help visually screen the property and to help with noise attenuation.

Comment No. 6:

5) Factor in offsite runoff into drainage improvements. Currently, there is a lot of storm water runoff from the south, on the other side of the highway that flows across the highway through the project site.

Response:

The Applicant acknowledges the comment and will comply with the County's drainage rules. Offsite flows to the property will be further analyzed as construction-level plans are developed.

Comment No. 7:

7) Consider the proximity of the driveway nearest the intersection of Kahekili Highway and Waiehu Beach Road and whether there is an adequate distance from that egress point to Waiehu Beach Road for project design. Add in the left turn storage lane into the middle driveway, where left and right turns are allowed.

Response:

The Applicant proposes to restrict the northernmost and southernmost accesses to right-in, right-out (RIRO) only, and maintain full access at the middle intersection to allow both left and right turns entering and exiting the project. All intersections will be designed to County standards. The County Department of Public Works (DPW) was acceptable to this access plan based on previous meetings.

Comment No. 8:

8) Add windows to front elevations, particularly above sinks, for increased ventilation, where possible.

Response: The Applicant will add windows as appropriate to maximize ventilation within the

units.

Comment No. 9:

9) Work to install a bus stop for connectivity because the site is remote.

Response: The Applicant and development team is coordinating with County Department of Transportation to determine the feasibility of providing a bus stop within or near

the project vicinity.

Comment No. 10:

10) Vehicles travel along Kahekili Highway at high speeds, so increase safety along the highway by adding speed tables.

Response:

The Applicant and development team has been in coordination with the State of Hawai'i Department of Transportation (HDOT) and DPW to determine if traffic calming measures are appropriate in this area. In lieu of any traffic calming measures, enforcement of speeds along Kahekili Highway will encourage

adherence to posted speed limit signs.

Comment No. 11:

11) Erosion control in the back is of concern because there is sand, and we recommend that you work with your geotechnical engineers to ensure that it is addressed to prevent the undercutting of the buildings and stabilize the project site.

Response: The Applicant has prepared a geotechnical report for the project site, which will be included in the Final EA. The Applicant also intends to utilize slope stabilization

materials to the greatest extent practicable.

Comment No. 12:

12) We like the color palette, as it blends into the natural beauty of the surrounding environs

Response: The Applicant acknowledges and appreciates the comment.

Caryl Hitchcock-Sprinzel, Chair June 1, 2022 Page 4

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC. 352

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc. Lena Tamashiro, Design Partners, Inc.

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ATTACHMENT 1F.

Meeting with Maui Planning Commission on October 26, 2021

MICHAEL P. VICTORINO Mayor MICHELE CHOUTEAU MCLEAN, AICP Director

JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

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

November 9, 2021

Mr. Monte Heaton Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248

Dear Mr. Heaton:

SUBJECT: MAUI PLANNING COMMISSION (MPC) COMMENTS ON DRAFT

ENVIRONMENTAL ASSESSMENT (EA) PREPARED FOR THE PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY, LOCATED IN WAILUKU, ISLAND OF

MAUI, HAWAII; TMK: (2) 3-3-001:106 (EAC 2021/0006)

At the October 26, 2021 meeting of the Maui Planning Commission (Commission), the Commission reviewed the above-referenced project. They voted unanimously in favor of the project. After due consideration and discussion, the Commission had the following recommendations for the Final EA:

- The project looked great and we are supportive, assuming the title issues are resolved.
- 2) Find a way to call out information on maps so that it is easier to understand without having to look them up in other places.
- 3) Discuss drainage mitigation in more detail. There is flooding in the northernmost part of the parcel, so better evaluate it because we would not want to see homes flooded.
- 4) Disclose perimeter fence locations, particularly around the swale.
- 5) We appreciated the lists of people consulted with for cultural impacts.
- 6) There is a bus route nearby and please address how people will travel to the bus stop.
- 7) Incorporate more native species into your landscape plan. Look at native plants documented as having grown in that area and incorporate that into your plants and replace the non-natives. There is good dirt back there and Hawaiian plants will have the water and the nutrients they are meant to have.
- 8) Research the history of the Piihana Project District and explain it in more detail.

- 9) Coordinate better with the project on the other side of the highway on ingress/egress.
- 10) For the clubhouse, keep in mind that more parking is needed for events for Hawaiian style celebrations.
- 11) We like the community-driven activities for residents, such as the community gardening concept.
- 12) We are concerned with the speed of traffic along Kahekili Highway and think you should consider adding a landscape buffer along the property frontage.
- We are also concerned about how busy traffic is during the work/school drop off/pick 13) up times, so that needs to be evaluated. Even if there will be traffic impacts, we are supportive of working class people obtaining houses.
- 14) It rains in the afternoons, so extend the awnings or eaves so that the rain does not affect homes/residents.
- 15) Research and address ongoing cultural practices occurring onsite.

If you have any questions, please contact Staff Planner Tara Furukawa by email at tara.furukawa@mauicounty.gov or by phone at (808) 270-8205.

Sincerely,

Mullulu

MICHELE MCLEAN, AICP Planning Director

xc: Clayton I. Yoshida, Planning Program Administrator (PDF)

Jacky Takakura, Acting Planning Program Administrator (PDF)

Tara K. Furukawa, Staff Planner (PDF)

Lori Tsuhako, Director, Department of Housing and Human Concerns (PDF)

Chris Sugidono, Senior Associate, Munekiyo Hiraga (PDF)

Mark Roy, Vice President, Munekiyo Hiraga (PDF)

Members of the Maui Planning Commission (PDF)

Carolyn Takayama-Corden, Secretary, Maui Planning Commission (PDF)

Project File

MCM:TKF:lp

K:\WP_DOCS\Planning\EAC\2021\0006 HaleMahaoluKeKahuaAffordableHsg\MPCDEAComments.doc



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Michele Chouteau McLean, Director County of Maui Department of Planning Maui Planning Commission 2200 Main Street, Suite 315 Wailuku, HI 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Ms. McLean:

Thank you for your comment letter dated November 9, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

In At the October 26, 2021 meeting of the Maui Planning Commission (Commission), the Commission reviewed the above-referenced project. They voted unanimously in favor of the project. After due consideration and discussion, the Commission had the following recommendations for the Final EA:

Response:

The Applicant acknowledges the comment and appreciates the Maui Planning Commission's unanimous vote in favor of this project.

Comment No. 2:

The project looked great and we are supportive, assuming the title issues are resolved.

Response:

According to Maui Economic Opportunity, Inc. (MEO), the nonprofit has clear title to the land and the deeds, which is confirmed by the County of Maui's previous subdivision of the property. The persons identifying themselves as the Heirs of Pehuino have made clear that they claim interests in only Land Commission Award (LCA) No. 3386. LCA No. 3386, Apanas 1, 2, and 3 are located nearly a mile away and were never part of the MEO property. This too is confirmed by historic deeds, LCA awards, and County records.

Comment No. 3:

Find a way to call out information on maps so that it is easier to understand without having to look them up in other places.

Response: The Applicant acknowledges the comment and will update specific maps, as appropriate.

Comment No. 4:

Discuss drainage mitigation in more detail. There is flooding in the northernmost part of the parcel, so better evaluate it because we would not want to see homes flooded.

Response:

The Applicant acknowledges the comment. It is our understanding that trash and debris blocking the culvert has previously caused drainage issues at Kahekili Highway and Waiehu Beach Road. The Hawai'i Department of Transportation (HDOT) subsequently cleared the trash and debris from the culvert, which mitigated the issue. This project will be designed to meet the County's drainage rules and storm water quality rules. An updated Preliminary Engineering Report is being prepared and will be included in the Final EA for the project.

Comment No. 5:

Disclose perimeter fence locations, particularly around the swale.

Response: The Applicant acknowledges the comment and will label the fence locations on the

conceptual site plan.

Comment No. 6:

We appreciated the lists of people consulted with for cultural impacts.

Response: The Applicant acknowledges and appreciates the comment.

Comment No. 7:

There is a bus route nearby and please address how people will travel to the bus stop.

Response:

The Applicant and development team is coordinating with the County Department of Transportation to determine the feasibility of providing a bus stop within or near the project vicinity. The Applicant will also maintain shoulder space along the project's frontage on Kahekili Highway.

Comment No. 8:

Incorporate more native species into your landscape plan. Look at native plants documented as having grown in that area and incorporate that into your plants and replace the non-natives. There is good dirt back there and Hawaiian plants will have the water and the nutrients they are meant to have.

Michele Chouteau McLean, Director June 1, 2022 Page 3

Response: A Conceptual Landscape Plan will be included in the Final EA. The plant palette

will include drought-tolerant native plants. Native Hawaiian plant species will

include those indigenous to the habitat within the vicinity of the project.

Comment No. 9:

Research the history of the Piihana Project District and explain it in more detail.

Response: The Applicant acknowledges the comment and will provide more information on

the history of the Pi'ihana Project District in the Final EA.

Comment No. 10:

Coordinate better with the project on the other side of the highway on ingress/egress.

Response: Thank you for this comment. The development mauka of Kahekili Highway is

aware that their accesses will need to be coordinated with the accesses for the

Hale Mahaolu Ke Kahua Affordable Housing Community.

Comment No. 11:

For the clubhouse, keep in mind that more parking is needed for events for Hawaiian style celebrations.

Response:

The Applicant will work with the development team and make every effort to provide as much parking as possible and as appropriate for the project. As the property managers for the eventual housing community, Hale Mahaolu will also manage onsite parking needs between residents, the nonprofit building and clubhouse.

Comment No. 12:

We like the community-driven activities for residents, such as the community gardening concept.

Response: The Applicant acknowledges the comment and will consider implementing community-driven activities for residents, as feasible.

Comment No. 13:

We are concerned with the speed of traffic along Kahekili Highway and think you should consider adding a landscape buffer along the property frontage.

Response:

A landscape buffer planting will be installed along the frontage of the property with Kahekili Highway to help visually screen the property and to help with noise attenuation.

Comment No. 14:

We are also concerned about how busy traffic is during the work/school drop off/pick up times, so that needs to be evaluated. Even if there will be traffic impacts, we are supportive of working class people obtaining houses.

Michele Chouteau McLean, Director June 1, 2022 Page 4

Response:

The Applicant proposes to provide 120 units of multi-family affordable housing units and a small nonprofit building, which is anticipated to generate 64(79) trips during the AM(PM) peak hour, and will account for only approximately 3-5 percent of traffic on Kahekili Highway and Waiehu Beach Road.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and the Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area based on the potential impacts that are expected to be generated by the project.

Comment No. 15:

It rains in the afternoons, so extend the awnings or eaves so that the rain does not affect homes/residents.

Response:

Roof eaves and awnings will be provided as appropriate and determined by the development team.

Comment No. 16:

Research and address ongoing cultural practices occurring onsite.

Response:

The EA process included the preparation of a Cultural Impact Assessment (CIA) that was prepared to assess the proposed project's potential effect on cultural beliefs, practices, and resources. The CIA included outreach to 73 Hawaiian organizations, agencies, and community members as well as cultural and lineal descendants in order to identify individuals with cultural expertise and/or knowledge of the project area and vicinity. Respondents included: Kumu Hōkūlani Holt-Padilla, kamaʻāina of Waiehu, Kumu Hula of Pāʻū o Hiʻiaka, and Director of Ka Hikina O Ka Lā; Kaniloa Kamaunu, kamaʻāina of Waiehu; Daniel Ornellas, kamaʻāina of Waiehu, representing Kwong Fook Tong Chinese Cemetery; and a confidential informant. No impacts to on-going cultural practices were identified within the project area during community consultation for this CIA. The project site, which is owned by Maui Economic Opportunity, Inc. (MEO), is unoccupied and there are no documented on-going cultural activities occurring on the project site.

Michele Chouteau McLean, Director June 1, 2022 Page 5

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC - 252

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Substantive Comments\MPC.res.docx

ATTACHMENT 1G.

Meeting with Commission on Healing Solutions for Homelessness on November 18, 2021

MINUTES

COMMISSION ON HEALING SOLUTIONS FOR HOMELESSNESS DEPARTMENT OF HOUSING AND HUMAN CONCERNS COUNTY OF MAUI

ON-LINE VIA BLUEJEANS THURSDAY, NOVEMBER 18, 2021

REGULAR MEETING

I. CALL TO ORDER

The meeting was called to order by Chair Hudson at 1:32 p.m.

II. ROLL CALL

Present:

George Kaimiola, Vice-Chair

Faith Chase

Joyce Kawakami

Mary Trotto

Scott Hansen

John Decker

John Tomoso

Lisa Darcy

Excused:

Wendy Hudson, Chair

Zhantell Lindo

Present Staff:

Lori Tsuhako, Director

Mimi Desjardins, Deputy Corporation Counsel

Daniel Kunkel, Deputy Corporation Counsel

Pili Nahooikaika, Secretary

III. PUBLIC TESTIMONY

No public testimony was presented.

IV. OLD BUSINESS

 Resource Mapping TIG – Vice-Chair Kaimiola and Members Chase, Kawakami and Trotto

Commissioner Kawakami suggested that the Commission recommend to the Maui County Council the use of UNITE Hawaii to assist homeless services agencies on Maui.

- Street Medical/Mental Team TIG Vice-Chair Kaimiola and Members Kawakami, Chase, Hansen, and Trotto Commissioner Kawakami reported that the TIG is researching what is needed on Maui and what resources and support have been successful on Oahu. The TIG is looking to propose funding through the Department of Housing and Human Concerns budget.
- Monthly Reporting TIG Nothing to report.
- Diversified Housing Solutions TIG Members Darcy, Decker, Lindo, Tomoso, and Chase
 - The TIG discussed prioritizing entry points to create an array of welcoming a diversified, safe, different avenues for people who have different types of needs. Acknowledging that people that are struggling with sobriety, trauma, domestic abuse, or individuals released from prison will have the support needed.
- Social and Community Impacts TIG Members Darcy, Decker, Kawakami, Tomoso, and Chase Nothing to report.
- Sustainable Housing TIG Vice-Chair Kaimiola and Members Chase, Decker, and Darcy
 Commissioner Chase reported that the TIG is looking at malama cycles with core elements for the urgency of recommendations, regional considerations, green initiatives by means of a portal to collect ideas, and identify challenges.

V. NEW BUSINESS

- Stan Franco, Senior Deacon, Catholic Diocese of Honolulu letter of support for housing and the homeless – Member Tomoso
 - Deacon Franco expressed that religious leaders are concerned about the right of human beings to have appropriate, safe and decent housing and to live with dignity and morale. He expressed that the Maui County Council will vote on a resolution that comes from the Comprehensive Affordable Housing Plan to provide affordable, decent and suitable homes for purchase or rent, as a right to all residents countywide, including Hana, Molokai and Lanai. He expressed that the hope is to open church doors in evenings so that have a safe place to sleep. Commissioner Trotto disagreed stating that while it will be generous to open doors, churches wouldn't have the ability to provide the necessary means of kitchens and hygiene facilities.
- The New York Times "A Quietly Big Idea on How We Think About Homeless People" – Member Decker
 Member Decker brought this to the attention of the commission as a resource to see if using it would be legally feasible.
- The Maui News "Long-term solutions for homeless encampments hard to come by" – Member Tomoso

No discussion taken.

- Presentation by Maui Economic Opportunity Project Team regarding Hale Mahaolu Ke Kahua Affordable Housing Community Commissioner Trotto moved and Commissioner Tomoso seconded the motion to draft a letter of support for Ke Kahua Affordable Housing project. The motion carried.
- Presentation by Pastor Dan Kaneshiro regarding "The Shelter" project Agenda item deferred to the next meeting.
- Presentation by Carol Hayashida of Unite Hawaii Ms. Hayashida reported that Unite Hawaii is a software piece bringing people together with a goal in making community based organizations available to everyone in need of health care at no cost. Ms. Hayashida explained that funding for Unite Hawaii is funded by health care organizations such as Aloha Care, Kaiser Permanente, Blue Health Care, etc. Ms. Hayashida explained that Unite Hawaii will only onboard an organization that is willing to assist resources within the community.
- Sunshine Law Amendments Allowing Remote Meetings
 Vice-Chair Kaimiola and Commissioner Trotto seconded the motion to
 establish a hybrid remote location based on Governor Ige's emergency
 proclamation. The motion carried.
 Director Tsuhako confirmed that the Department of Housing and Human
 Concerns is currently working on securing a location for the remote meetings.
 Agenda item deferred to the next meeting.

VI. ANNOUNCEMENTS

HHAW 2021 Calendar of Events – Commissioner Tomoso

VII. ADJOURNMENT

Vice-Chair Kaimiola adjourned the meeting at 4:00 p.m. No motions made or votes taken.

MICHAEL P. VICTORINO Mayor

LORI TSUHAKO Director

LINDA R. MUNSELL Deputy Director



DEPARTMENT OF HOUSING & HUMAN CONCERNS COUNTY OF MAUI

2200 MAIN STREET, SUITE 546 WAILUKU, MAUI, HAWAI'I 96793 PHONE: (808) 270-7805

June 6, 2022



Ms. Debbie Cabebe

Maui Economic Opportunity, Inc.

99 Mahalani St, Wailuku HI 96793

RE: Hale Mahaolu Ke Kahua project

Aloha Debbie:

the Commission on Healing Solutions for This is to confirm that Homelessness supports the Hale Mahaolu Ke Kahua Affordable Housing project as presented to our Commission on November 18, 2021.

Sincerely,

WENDY HUDSON

Chair

Commission on Healing Solutions for Homelessness

ATTACHMENT 1H. Community Outreach Summary

HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY COMMUNITY OUTREACH SUMMARY

DATE	GROUP	SUMMARY	
1/26/21	Attainable Housing for Maui Nui (AHMN) Meeting	Project Team met with all the County of Maui Departments to discuss the project plans and Ch. 2.97 Exemptions List	
2/2/21	Waihe'e Community Association (WCA) – First Meeting	Project Team met with WCA board members and provided an overview of the project and answered questions. A memo summarizing the comments/questions was sent to WCA and included in the Final Environmental Assessment (EA).	
3/1/21	Maui County Council Affordable Housing Committee (AHC)	Project Team met with AHC and provided overview of the project and answered questions.	
10/5/21	Urban Design Review Board (UDRB)	Project Team provided a presentation to, and received comments from, the UDRB. UDRB were unanimous in its support and commended the project for its affordability rates. UDRB added that project is aesthetically pleasing and sensitive to both affordability and consideration of quality of life.	
10/21/21	Community meeting with residents living within 500 feet of project	Project Team met with residents primarily within the Waiehu Heights subdivision and provided an overview of the project and answered questions. A memo summarizing the comments/responses was included in the Final EA.	
10/25/21	Waihe'e Community Association (WCA) – Second Meeting	Project Team met with WCA board members a second time and provided an update on the project and answered questions. A memo summarizing the comments/responses was sent to WCA and included in the Final EA.	
10/26/21	Maui Planning Commission (MPC)	Project Team provided a presentation to, and received comments from, the MPC. MPC voted unanimously in favor of the project.	
11/18/21	County of Maui Commission on Healing Solutions for Homelessness	Project Team met with the Commission on Healing	
2/24/21	Maui County Council Affordable Housing Committee (AHC)	Project Team met with AHC and provided an update on the project and answered questions.	
9/12/22	Waiehu Kou Phase 3 Community Association	Project Team attended community meeting hosted by the association and participated in Q&A session. A memo summarizing the comments/responses specific to the project was sent to the association.	
12/7/22	Waihe'e Community Association (WCA) – Third Meeting	Project Team met with WCA board members a third time to help answer any remaining questions.	

EXHIBIT G. Land Use Designations

LAND USE DESIGNATIONS

State Land Use District	Urban/Agricultural
Maui Island Plan	Urban Growth Boundary
Wailuku-Kahului Community Plan	Agriculture/Project District 2 (Pi'ihana)
Zoning	Interim/Agricultural District
Special Management Area	No
Flood Hazard Area Zone	Flood Zone X

COUNTY OF MAUI DEPARTMENT OF PLANNING One Main Plaza Building 2200 Main Street, Suite 315



Zoning Administration and Enforcement Division (EAFD) Telephone: (808) 270-7259-/ [Facsimile: (808) 270-7634

E-mail: planning@mauicould God 0 2020

Wailuku, Hawaii 96793 ZONING AND FLOOD CONFIRMATION FORM (This section to be completed by the Applicant) APPLICANT NAME Munekiyo Hiraga TELEPHONE (808)244-2015 PROJECT NAME General Information Request **E-MAIL** planning@munekiyohiraga.com PROPERTY ADDRESS Along Kahekili Highway TAX MAP KEY (2)3-3-001:106 No Will this Zoning & Flood Confirmation Form be used with a Subdivision Application? IF YES, answer questions A and B below and comply with instructions 2 & 3 below: A) Yes No Will it be processed under a consistency exemption from Section 18.04.030(B), MCC? IF YES, which exemption? (No. 1, 2, 3, 4 or 5) B) State the purpose of subdivision and the proposed land uses (ie 1-lot into 2-lots for all land uses allowed by law): 1) Please use a separate Zoning & Flood Confirmation Form for each Tax Map Key (TMK) number. 2) If this will be used with a subdivision application AND the subject property contains multiple districts/designations of (1) State Land Use Districts, (2) Maui Island Plan Growth Boundaries. (3) Community Plan Designations, or (4) County Zoning Districts; submit a signed and dated Land Use Designations Map, prepared by a licensed surveyor, showing the metes & bounds of the subject parcel and of each district/designation including any subdistricts. 3) If this will be used with a subdivision application AND the subject property contains multiple State Land Use Districts; submit an approved District Boundary Interpretation from the State Land Use Commission. (This section to be completed by ZAED) (SMA) LAND USE DISTRICTS/DESIGNATIONS (LUD) AND OTHER INFORMATION: 1 Special X Agriculture ☑ Urban ☐ Rural ☐ Conservation STATE DISTRICT: Management Area MAUI Growth Boundary: 2 X Urban Small Town Rural Planned Growth Area Outside Growth Boundaries **ISLAND** Protected Area:2 ☐ Preservation ☐ Park ☐ Greenbelt ☐ Greenway ☐ Sensitive Land ☑ Outside Protected Areas PLAN. COMMUNITY PLAN: 2 MM WITUR □ (PD) Planned COUNTY ZONING: INTONY Development **(PH)** OTHER/COMMENTS: **Project District** FEMA FLOOD INFORMATION: A Flood Development Permit is required if any portion of a parcel is ☐ See designated V, VE, A, AO, AE, AH, D, or Floodway, and the project is on that portion. Additional FLOOD HAZARD AREA ZONES 3 Comments (Pg.2) & BASE FLOOD ELEVATIONS: ☐ See For Flood Zone AO, FLOOD DEPTH: FEMA DESIGNATED FLOODWAY Attached LUD Map SUBDIVISION LAND USE CONSISTENCY: Not Consistent, (LUDs appear to have NO permitted uses in common). Not Applicable, (Due to processing under consistency exemption No. □1, □2, □3, □4, □5). Interim Zoning, (The parcel or portion of the parcel that is zoned interim shall not be subdivided). Consistent, (LUDs appear to have ALL permitted uses in common). Consistent, upon obtaining an SMA, PD, or PH subdivision approval from Planning. Consistent, upon recording a permissible uses unilateral agreement processed by Public Works (See Pg.2). NOTES: The conditions and/or representations made in the approval of a State District Boundary Amendment, Community Plan Amendment, County Change In Zoning, SMA Permit, Planned Development, Project District and/or a previous subdivision, may affect building permits, subdivisions, and uses on the land. 2 Please review the Maul Island Plan and the Community Plan document for any goals, objectives, policies or actions that may affect this parcel Flood development permits might be required in zones X and XS for any work done in streams, gulches, low-lying areas, or any type of drainageway; Flood development permits are required for work in all other zones. Subdivisions that include/adjoin streams, guiches, low-lying areas, or any type of drainageway might require the following designations to be shown on the subdivision map: 100-year flood inundation limits; base flood elevations; drainage reserves, Subdivisions will be further reviewed during the subdivision application process to verify consistency, unilateral agreement requirements, and the conditions associated with a unilateral agreement [Section 18.04.030 D, Maui County Code]. REVIEWED & CONFIRMED BY:

John S Rapacz, Planning Program Administrator, Zoning Administration and Enforcement Division

EXHIBIT H.

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
1.	Requirements for acquiring disposal permit and payment of disposal charges	Title 8, Health and Safety, Maui County Code (MCC): Chapter 8.04, Refuse Collection and Landfills	MCC 8.04.040 Disposal Permits – Application and Suspension; MCC 8.04.050, Disposal Charges Exemption for project to dispose of construction waste during the construction of the project without the need to apply for a disposal permit and pay for disposal charges.	An exemption from the requirements to apply for a disposal permit and pay associated charges will provide cost savings and ensure that the project is financially feasible.
2.	Requirement for payment of wastewater assessment fees	Title 14, Public Services, MCC: Section 14.35, Wastewater Assessment Fees for Facility Expansion for the Wailuku/Kahului Wastewater Treatment System	MCC 14.35 Wastewater Assessment Fees for Facility Expansion for the Wailuku/Kahului Wastewater Treatment System Exemption to allow the project to receive its building permits without the need to pay wastewater assessment fees. Section 14.35.080, Exemptions, exempts developments comprised of 100% residential workforce housing units from the provisions of this chapter.	An exemption from the requirements to pay the wastewater assessment fee for the Wailuku/Kahului Wastewater Treatment System will advance the affordability objectives of the project.
3.	Requirement for payment of water system development fees	Title 14 – Public Services, MCC: Chapter 14.07 – Water System Development Fees	MCC 14.07 Water System Development Fees Exemption requested from Section 14.07 water system development fees to allow the project to receive its building permits without the need to pay water system development fees.	An exemption from the requirements to pay the water system development fees will advance the affordability objectives of the project.

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
4.	Requirement to demonstrate water availability	Title 14 – Public Services, MCC: Chapter 14.12 – Water Availability	MCC 14.12 Water Availability Exemption requested from Section 14.12 Water Availability. Section 14.12.030, Exemptions, exempts developments comprised of 100% residential workforce housing units from the provisions of this chapter.	
5.	Requirements for payment of permit and inspection fees	Title 16, Buildings and Construction, MCC: Sections 16.04C, Fire Code 16.18B, Electrical Code 16.20B, Plumbing Code 16.26B, Building Code	MCC Title 16 Building and Construction Exemptions from MCC Chapters: • 16.04C, Fire Code, • 16.18B, Electrical Code, • 16.20B, Plumbing Code, and • 16.26B, Building Code, To exempt the project from payment of the fire, electrical, plumbing, and building permit, plan review, and inspection fees.	These exemptions provide savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.
6.	Requirements for payment of permit and inspection fees	Title 20, Environmental Protection, MCC: Chapter 20.08, Soil Erosion and Sedimentation Control Section 20.08.090, Grubbing and Grading Permit Fees	MCC 20.08.090, Grubbing and Grading Permit Fees An exemption is sought to payment of grubbing and grading permit and inspection fees. Section 20.08.090(D) exempts developments comprised of 100% residential workforce housing units from grubbing and grading permit fees.	This exemption provides savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.

Chapter 2.97 Exemption List

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
7.	Requirement for payment of park assessment fee	Title 18, Subdivisions, MCC: Chapter 18.16, Design Standards Section 18.16.320, Parks and Playgrounds	MCC, 18.16.320 Parks and Playgrounds An exemption is sought from the provision to pay park assessment fees. Pursuant to Section 18.16.320(I)(5) Park Assessment Fees are exempt for workforce housing projects.	This exemption provides savings to ensure the project is financially feasible. The project will provide two (2) play areas designed to serve the recreational needs of the residents living within the housing community. One play area will be centrally located near the clubhouse and the second located near a common laundry room.
8.	Requirements for number of parking stalls and number and sizes of loading areas	Title 19, Zoning, MCC: Chapter 19.36B, Off-Street Parking and Loading Sections 19.36B.020 Designated Number of Off-Street Parking Spaces 19.36B.030 Designated Number of Loading Spaces	An exemption from Section 19.36B.020 (Designated Number of Off-Street Parking Spaces) for off-street parking requirements for the proposed clubhouse, which will only be used by onsite residents and is not open to the public. An exemption from Section 19.36B.020 (Designated number of off-street parking spaces) for off-street parking for the proposed residential units to require only one stall per unit for the proposed 28 one bedroom units planned for the project. An exemption from Section 19.36B.030 to allow for reduced dimensions (8.5 ft. x 19 ft.) of the two (2) required loading spaces.	The proposed project will provide adequate parking for residents and the exemptions will enable flexibility in the number of parking stalls and dimensions of loading spaces. The requested exemptions would also minimize potential queuing issues by reducing the number of stalls near driveway entrances. This will further the affordability of the project. Smaller loading stalls, which can be used for moving vans and furniture delivery, would also improve the flexibility as to where they are located and make them more useful to the housing community. Larger stalls would require them to be located in areas that may not be as useful due to them requiring turning areas and back up space.

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
9.	Urban standards relating to curb, gutters and sidewalks	Title 16.26B, Building and Construction MCC: Chapter 16.20B Building Code Title 18, Subdivision, MCC: Chapter 18.20 – Improvements	MCC 16.26B.3600, Improvements to Public Streets MCC 18.20.040, 18.20.070. and 18.20.080, Existing Streets, Sidewalks, Curbs, and Gutters. Exemption from constructing curbs, gutters, and sidewalks for the frontage of the project adjacent to Kahekili Highway.	This exemption will allow the Applicant to implement the project without providing improvements to public streets and ensuring the project is financially feasible. The exemption would also allow the provision of a northbound right-turn lane into the project at the central access, which would provide a safeguard from traffic spilling out onto Kahekili Highway.
10	Requirement for State Land Use District Boundary Amendment for Agricultural portion of Subject Property	Title 19, Zoning, MCC: Chapter 19.68 – State Land Use District Boundaries Chapter 19.510 - Application and Procedures Article 8, Chapter 8, Revised Charter of the County of Maui (1983), as amended	MCC 19.68 State Land Use District Boundaries MCC 19.510 Application and Procedures Article 8, Chapter 8, Revised Charter of the County of Maui (1983), as amended Exemptions from these provisions are sought to enable the District Boundary Amendment (DBA) request to proceed directly to the Maui County Council, without requiring the preparation of a DBA application and subsequent processing through the Maui Planning Commission. An ordinance for a DBA will be reviewed by the County Council concurrently with the MCC 2.97 application.	The project site is 11.476 acres and located within the State "Urban" and "Agricultural" Districts. This exemption would expedite the delivery of affordable workforce housing.

Chapter 2.97 Exemption List

Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
11. Requirements of Change of Zoning and all provisions relating to "Agricultural" and "Interim" development standards to allow the use of the "A-1" district zoning standards.	Title 19, Zoning, MCC: Chapter 19.02A, Interim Zoning Provisions and 19.30A, Agricultural District Chapter 19.12, Apartment District	MCC 19.510.040 Change of Zoning MCC 19.02A Interim Zoning Provisions MCC 19.30A Agricultural District Exemptions from these provisions to allow the project to proceed without obtaining a Change of Zoning approval and to permit the development and use of the property for multi-family residential use according to the permitted uses, accessory uses and buildings, and development standards of the "A-1" District pursuant to the provisions set forth in Chapter 19.12, Apartment District.	The project site is zoned "Agricultural" and "Interim". These exemptions would expedite the delivery of affordable workforce housing by allowing the project to be developed in accordance with the "A-1" District zoning provisions, which are more applicable to the proposed development, without the need to obtain a Change of Zoning.
12. Requirement for General Plan, Community Plan Consistency	Title 2, Administration and personnel, MCC: Chapter 2.80B, General Plan and Community Plans	MCC 2.80B, General Plan and Community Plans An exemption from MCC 2.80B to allow the project to be implemented (1) without a Community Plan Amendment; and (2) without the need for consistency to be demonstrated between the community plan and zoning designations.	These exemptions would expedite the delivery of affordable workforce housing. The project site is located within the Urban Growth Boundary of the Maui Island Plan.

EXHIBIT I.

Option to Lease Agreement

OPTION TO LEASE AGREEMENT

(Waiehu Affordable Housing Project)

This **OPTION TO LEASE AGREEMENT** (this "<u>Agreement</u>") is made as of February 7, 2020 ("<u>Effective Date</u>") by and between **MAUI ECONOMIC OPPORTUNITY, INC.**, a Hawaii nonprofit corporation ("<u>Optionor</u>"), and **HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC**, a Delaware limited liability company ("<u>Optionee</u>").

RECITALS

- A. Optionor is the owner of that certain approximate 11.476 acres of real property, located in Wailuku, Island of Maui, County of Maui, State of Hawaii, designated as Tax Map Key No. (2) 3-3-001-106-0000, and more particularly described in **Exhibit A** attached hereto and incorporated herein by this reference (the "Premises").
- B. Optionee desires to obtain an option to lease the Premises for the development, construction and operation of an approximate 120-unit affordable rental housing project (the "Project"), and Optionor is willing to grant Optionee such option, subject to the terms and conditions of this Agreement.
- **NOW, THEREFORE**, in consideration of TEN AND NO/100 DOLLARS (\$10.00) paid by Optionee to Optionor, the mutual covenants set forth herein, and for other good and valuable consideration, the receipt and legal sufficiency of which are hereby acknowledged, Optionee and Optionor do hereby agree as follows:
- 1. <u>Grant of Option</u>. Optionor hereby sells, transfers, conveys and grants unto Optionee and its assigns, an exclusive and irrevocable option (the "<u>Option</u>") to be given, granted and conveyed a lease of the Premises for the development, construction and operation of the Project. During the Option Period (defined below), the parties hereby agree to negotiate in good faith a form of lease for the Project at the Premises (the "<u>Lease</u>"). The Lease shall incorporate at least the following terms:
 - a. <u>Lease Term</u>. The term of the Lease shall be seventy-five (75) years.
- b. <u>Lease Rent</u>. A lease rent of \$1.00 per year for the full term of the Lease shall be payable in advance in a lump sum payment of SEVENTY-FIVE AND NO/100 DOLLARS (\$75.00) upon the execution of the Lease.
- c. <u>Use</u>. The Optionee shall use or cause the Premises to be used for the purposes of developing, constructing, operating and maintaining the following: (a) a multifamily rental housing project consisting of approximately 120 number of units (including 1 manager's unit) known as Hale Mahaolu Ke Kahua (the "<u>Project</u>"), 100% of which (approximately 120) units) shall be affordable to families at or below 140% of the U.S. Department of Housing and Urban Development area median income ("<u>AMI</u>")(the "<u>Affordable Units</u>"). The Project shall also contain 3,000 square feet of community space, which community space will be made available to the tenants of the Project, as well as Optionor.
- 2. Option Period. The term of this Agreement shall be for forty-eight (48) calendar months from the Effective Date ("Option Period").

- 3. <u>Deposit for Option</u>. The deposit to be paid by Optionee to Optionor for the Option granted hereunder shall be ONE THOUSAND AND NO/100 DOLLARS (\$1,000.00) ("Option Deposit"), which Option Deposit shall be deposited by Optionee with Old Republic Title & Escrow of Hawaii, Ltd. ("Escrow") upon the full execution and delivery of this Agreement. In the event Optionee elects to terminate this Agreement on or before the expiration of the Due Diligence Period (defined below), Escrow shall immediately return and release the Option Deposit to Optionee and this Agreement shall be deemed terminated. In the event Optionee fails to terminate this Agreement by providing notice thereof to Optionor on or before the expiration of the Due Diligence Period or if Optionee notifies Optionor and Escrow in writing that it has waived the due diligence condition described in Section 5 prior to the expiration of the Due Diligence Period, the Option Deposit shall become nonrefundable and released and paid by Escrow to Optionor and the short form described in Section 12.13 shall be recorded in the Bureau of Conveyances of the State of Hawaii.
- 4. Feasibility Condition. Commencing on the Effective Date and continuing for a period of one (1) year thereafter (the "Due Diligence Period"), Optionee and its agents, consultants and representatives, shall have the right at reasonable times and with not less than one (1) calendar day's prior written notice to Optionor, to enter upon the Premises to engage in investigatory work, including but not limited to surveying work, soil testing and boring, hydrological studies, environmental studies, wetlands studies, studies to determine the availability and adequacy of utilities, studies to verify zoning, studies to determine the availability of building and other permits, and studies to determine the feasibility of the site for Project development as contemplated under this Agreement. Optionee agrees to defend, indemnify, and hold Optionor harmless from and against any liability, in contract or in tort related in any way to Optionee's due diligence, investigatory work, and entrance onto the Premises by Optionee or any person or entity at Option's direction, excluding, however, any liability directly caused by Optionor's gross negligence or willful conduct. Optionee shall also ensure and guaranty that all contractors, subcontractors, and other persons performing work on or related to the Premises by or through Optionee are properly licensed and insured as may be required by law. Optionee agrees that under no circumstances shall Optionee's work on or in relation to the Premises during the Due Diligence Period result in any lien being placed upon the Premises and should such a lien arise, Optionee shall immediately discharge the lien in full and shall pay all reasonable expenses of Optionor, if any, related to the same. Optionor agrees and acknowledges that Optionee may, at Optionee's sole cost and expense, have a metes and bounds survey and title report prepared of the Premises, and that the legal description of the Premises as shown on the survey or title report shall thereafter become the legal description of the Premises. After completing the investigatory work, Optionee shall restore the site substantially to the condition existing prior to Optionee's investigation work on the site. The Due Diligence Period may be extended by the mutual written agreement of the parties.

Within five (5) days following the Effective Date, Optionor shall provide Optionee with true and correct copies of the following documents (collectively, the "<u>Due Diligence Documents</u>"): (i) all current and applicable Premises related leases, licenses, title reports, title documents, and any Premises related land, environmental, soils, engineering, agricultural or other surveys, studies or reports made by or received by Optionor in the past 15 years to the extent they are in Optionor's possession; and (ii) all other documents and information in Optionor's possession and control that are reasonably related and currently applicable to the Premises.

If Optionee determines, in Optionee's sole discretion and judgment, that the Premises or the proposed Project is not suitable to Optionee for any reason, Optionee shall

have the right to terminate this Agreement by providing written notice thereof to Optionor on or before the expiration of the Due Diligence Period, whereupon the Option Deposit shall be returned to Optionee and Optionor and Optionee shall have no further liability or obligation to each other under this Agreement except as otherwise expressly provided under this Agreement. If Optionee affirmatively waives its termination right in writing prior to the end of the Due Diligence Period or fails to exercise its termination right on or before the expiration of the Due Diligence Period, the Option Deposit shall be paid and released to Optionor and this Agreement shall remain in full force and effect.

- 5. **Exercise of Option**. In order for Optionee to exercise the Option and be entitled to the Lease, the following conditions must have been fulfilled:
- a. Prior to the expiration of the Option Period, Optionee shall deliver to Optionor a written notice ("<u>Exercise Notice</u>") notifying Optionor that Optionee intends to be granted the Lease for the Premises in accordance with this Agreement
- b. At the time of the Exercise Notice; (i) Optionee shall be solvent; (ii) Optionee shall not be involved in any voluntary or involuntary bankruptcy or similar action; and Optionee shall not be in default under this Agreement.
- c. At the time of the Exercise Notice; (i) Optionor shall be solvent; (ii) Optionor shall not be involved in any voluntary or involuntary bankruptcy or similar action; and Optionor shall not be in default under this Agreement.
 - The Term shall not have terminated or expired.
- e. Optionee shall: (i) have been awarded and received funds from HHFDC, lenders, and/or investors that Optionee shall have deemed sufficient in its sole discretion and judgment to permit development of the Project, or (ii) Optionee shall have waived such contingency in writing.
- f. Optionee shall have received all required or desirable entitlements, permits, and government approvals in Optionee's sole discretion and judgment to permit development of the Project
- g. The Lease shall have been approved in writing by Optionor, Optionee, Optionee's lenders and investors, and the Hawaii Housing Finance and Development Corporation, a public body and body corporate and politic of the State of Hawaii.
- 6. Real Property Taxes. Any real property taxes, ad valorem taxes or other special assessment taxes attributable to the Premises during the Term of this Agreement shall be paid by Optionor, provided however, Optionee shall pay any increase in real property taxes, ad valorem taxes or other special assessment taxes that arises solely out of the Optionee's use or proposed use of the Premises for a Project.
- 7. <u>Continuing Right of Entry; Inspections and Investigations</u>. Optionor hereby grants to Optionee, its officers, agents, employees and independent contractors the right and privilege, at any time during the Term, with reasonable notice, to enter upon the Premises to perform or cause to be performed any and all due diligence investigations, studies, inspections or tests relating to Optionee's intended Project, including, without limitation, meteorological testing, test borings of the soil, environmental audits, engineering studies, cultural or historical

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studies, endangered species or other habitat studies, physical surveys of the Premises, the access or utility easements or rights of way, harbor and shoreline studies and any other tests or studies relating to the Project or the planning, permitting, development and operation thereof. Optionee shall provide Optionor with reasonable notice for access to the Premises, and Optionee shall provide Optionor and Optionor's tenant with such information or evidence of insurance which Optionor may reasonably require. Optionee shall not unreasonably interfere with Optionor's or Optionor's tenant's use of the Premises in conducting these activities. Optionee's right of entry, inspection, and investigations shall be subject to Optionee's ongoing obligation to indemnify, defend, and hold Optionor harmless (excluding, however, any liability directly caused by Optionor's gross negligence or willful conduct), to require that those performing work by or on behalf of Optionee maintain required insurance, and to not permit and immediately discharge any liens relating to such work, all as set forth in paragraph 4 above.

- 8. <u>Further Acts</u>. Optionor shall cooperate with Optionee in executing any documents necessary to protect Optionee's rights under this Agreement or Optionee's use of the Premises and to take such action as Optionee may reasonably require to effectuate the intent of this Agreement. Optionor hereby irrevocably appoints Optionee or Optionee's agent as Optionor's agent to file applications on behalf of Optionor with federal, state and local governmental authorities which applications relate to Optionee's intended use of the Premises, including, but not limited to, land use and zoning applications and building permits.
- 9. Assignment. This Agreement and all rights, title and interest of Optionee are fully assignable by Optionee to another entity owned by, or under common ownership of Optionee provided that, except as otherwise provided herein, Optionee shall not be released from liability hereunder without the prior written consent of Optionor, which consent shall not be unreasonably withheld, conditioned, or delayed. Notwithstanding the foregoing, in the event Optionee assigns this Agreement to a Hawaii limited partnership in which Optionor, or a single-member entity owned and/or controlled by Optionor, is managing general partner, then Optionor shall be released from all liability upon such assignment. Except as otherwise provided above, the Option and this Agreement shall not be assigned by Optionee without Optionor's prior written approval.
- 10. <u>Broker</u>. Each party confirms that they are not represented by a broker in connection with this transaction, and each party agrees to indemnify the other party and to hold the other party harmless against any claim, loss, damage or expense of whatsoever nature, including, without limitation, attorneys' fees and the costs and expenses of litigation arising from or relating to any fees, commissions or other compensation demanded by any brokers or finders purporting to act on behalf of the indemnifying party hereto.
- 11. <u>Condition of Title</u>. Optionor hereby agrees from and after the date hereof until the termination of this Agreement or the execution of the Lease, that (i) Optionor will take no action that will adversely affect title to or the development of the Premises; (ii) Optionor will not mortgage, encumber, or permit the encumbrance of all or any portion of the Premises without Optionee's prior written consent, excluding, however, any encumbrances relating to refinancing of any existing loans affecting the Premises; and (iii) Optionor will not enter into any written or oral contracts or agreements with the respect to the Property that will materially interfere with its ability to perform under this Agreement.

12. Miscellaneous.

- 12.1 <u>Successors and Assigns</u>. Each and all of covenants and conditions of this Agreement shall inure to the benefit of and shall be binding upon the respective heirs, executors, administrators, and successors and assigns by Optionee and Optionor. As used in this Section, the term "successors" shall refer to the successors to all of substantially all of the assets of a party and to a party's successors by merger or consolidation.
- 12.2 <u>Notices</u>. All notices, requests, demands, and other communications required or permitted under this Agreement shall be in writing (including facsimile communications) and shall be (as elected by the person giving such notice) hand delivered by messenger or courier service, telecommunicated with confirming copy by mail, or mailed by united states mail (postage prepaid), registered or certified, return receipt requested, addressed as follows:

If to Optionor: Maui Economic Opportunity, Inc.

P.O. Box 2122

Kahului, Hawaii 96733 Attention: Ned Davis

If to Optionee: Highridge Costa Development Company, LLC

330 West Victoria Street Gardena, California 90248 Attention: Mohannad Mohanna

With a copy to: Settle Meyer Law, LLLC

900 Fort Street Mall, Suite 1800

Honolulu, Hawaii 96813 Attention: Scott W. Settle

Each notice shall be deemed delivered (i) on the date delivered by personal delivery (ii) on the date telecommunicated if by facsimile with confirmed answer back during business hours at the recipient's address and at 9:00 a.m. on the next succeeding business day if not transmitted during business hours, and (iii) three (3) business days after deposit in the United States mail (postage prepaid) if by registered or certified mail. By giving to the other parties at least five (5) days' written notice, the parties to this Agreement and their respective successors and assigns shall have the right from time to time at any time during the term of this Agreement to change their respective addresses and each shall have the right to specify as its address any other address.

- 12.4 <u>Entire Agreement</u>. This Agreement and its exhibits constitute the entire agreement between the parties hereto pertaining to the subject matter hereof, and the final, complete and exclusive expression of the terms and conditions thereof. All prior agreements, representations, negotiations and understandings of the parties hereto, oral or written, express or implied, are hereby superseded and merged herein.
- 12.5 <u>Time of Essence</u>. Time is of the essence of every provision of this Agreement in which time is an element.
- 12.6 **Governing Law**. This Agreement and the exhibits attached hereto shall be governed by and construed in accordance with the laws of the State of Hawaii.

- 12.7 <u>Invalidity of Provision</u>. If any provisions of this Agreement as applied to either party or to any circumstances shall be adjudged by a court of competent jurisdiction to be void or unenforceable for any reason.
- 12.8 <u>Amendments</u>. No addition to or modification of any provision contained in this Agreement shall be effective unless fully set forth in writing by both Optionee and Optionor.
- 12.9 <u>Counterparts; Facsimile</u>. This Agreement may be executed by facsimile machine and in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute but one and the same instrument.
- 12.10 **Exhibits**. All exhibits to this Agreement are incorporated herein by this reference as though fully set forth in the body hereof.
- 12.11 <u>Time References</u>. Any references in this Agreement to time for performance of obligations or elapsed time shall mean consecutive calendar days, months, or years unless otherwise explicitly indicated herein. In the event that the day on which Optionee or Optionor is required to take any action under the terms of this Agreement is not a business day, such action shall be taken on the next succeeding business day.
- 12.12 <u>Construction of Agreement</u>. The agreements contained herein shall be construed in favor of or against either party, but shall be construed as if both parties prepared this Agreement.
- 12.13 Recording of Short Form. The parties agree to record a short form memorandum of this Agreement at the Bureau of Conveyances of the State of Hawaii in accordance with and subject to Section 3, which short form shall be in the form attached hereto as Exhibit B.

[Signatures on following page]

OPTIONOR:

MAUI ECONOMIC OPPORTUNITY, INC., a HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC, a Delaware limited liability company

By:

Debra Cabebe
Its CEO

IN WITNESS WHEREOF, the parties have executed this Agreement as of the day and

year first above written.

OPTIONOR:

MAUI ECONOMIC OPPORTUNITY, INC., a HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC, a Delaware limited liability company

By:

Debra Cabebe
Its CEO

By:

Mohannad Mohanna Its President

IN WITNESS WHEREOF, the parties have executed this Agreement as of the day and

LAND COURT

REGULAR SYSTEM

RETURN BY (X) MAIL () PICK-UP

Settle Meyer Law LLLC 900 Fort Street Mall, Suite 1800 Honolulu, Hawaii 96813 Attn: Scott W. Settle, Esq.

TMK No.: (2) 3-3-001-106-0000

This document contains ____ pages

MEMORANDUM OF OPTION TO LEASE AGREEMENT

(Affordable Housing Project)

This Memorandum of Option Agreement (this "Memorandum") is made as of the 7th day of February, 2020, by and between MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation ("Optionor"), and HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC, a Delaware limited liability company ("Optionee").

RECITALS

- A. Optionor is the owner of the property described on attached $\underline{\textbf{Exhibit A}}$ (the "Premises").
- B. Optionor and Optionee entered into an Option Agreement ("Agreement") as of the date hereof (the "Effective Date"), with a term of forty-eight (48) calendar months from the Effective Date, together with extension rights, as described in the Agreement.
- C. The parties desire to enter into this Memorandum which is to be recorded in order that third parties may have notice of the interest of Optionee in the Premises.
- NOW, THEREFORE, in consideration of payments and covenants provided in the Agreement to be paid and performed by Optionee, Optionor hereby sells, transfers, conveys and grants unto Optionee and its assigns, an exclusive and irrevocable option, as defined in the Agreement, to be given, granted and conveyed a lease of the Premises for the development, construction and operation of an affordable housing project, as more particularly described in the Agreement. All of the terms, conditions, provisions, and covenants of the Agreement are hereby incorporated into this Memorandum by reference as though fully set forth herein, and the

Agreement and this Memorandum shall be deemed to constitute a single instrument or document. Should there be any inconsistency between the terms of this Memorandum and the Agreement, the terms of the Agreement shall prevail.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

IN WITNESS HEREOF, the parties have executed this Memorandum as of the date set forth above.

OPTIONOR:	OPTIONEE:
MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation	HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC, a Delaware limited liability company
By: Debra Cabebe Its CEO	By: Mohannad Mohanna Its President
Its Manager	

CALIFORNIA ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

	e of California nty of Los Angele	s	
On	January 30, 2020	before me,	LaShon S. Gilbreath, Notary Public
			(insert name and title of the officer)
perso	onally appeared Mohan	nad H. Mohann	na .
who subs his/h	proved to me on the basis cribed to the within instrun er/their authorized capacit	of satisfactory e ment and acknow ty(ies), and that b	vidence to be the person(s) whose name(s) is/are reledged to me that he/she/they executed the same in by his/her/their signature(s) on the instrument the person(s) acted, executed the instrument.
	ify under PENALTY OF P graph is true and correct.	ERJURY under t	he laws of the State of California that the foregoing

LASHON S. GILBREATH Notary Public - California

Los Angeles County Commission # 2147594 My Comm. Expires Mar 26, 2020

WITNESS my hand and official seal.

Signature La Shon & Billreath (Seal)

forth above.

OPTIONOR:

MAUI ECONOMIC OPPORTUNITY, INC., a HIGHRIDGE COSTA DEVELOPMENT COMPANY, LLC, a Delaware limited liability company

By:

Debra Cabebe
Its CEO

By:

Mohannad Mohanna
Its President

IN WITNESS HEREOF, the parties have executed this Memorandum as of the date set

Its Manager

STATE OF HAWAII)) ss)	
affirmed, did say and acknowled free act and deed of such	day of February, 2000 pe be, to me personally known, who, nowledge that such person executed the for person, and if applicable in the capacity instrument in such capacity. Notary Public, State of Hawa Print Name: Jennifer My commission expires:	mc6w- ii instrument as the
Document Date: Notary Name: Doc. Description:	2/1/20 # of Page Jenniferlynn McGurn Memorandum of Lease Agreement	S: 6 Ond Circuit LYNN

NOTARY CERTIFICATION

EXHIBIT A LEGAL DESCRIPTION OR DEPICTION OF PREMISES

M



STATE OF HAWAII
BUREAU OF CONVEYANCES
RECORDED
MAY 01, 2007 08:01 AM
Doc No(s) 2007-077748

ISI CARL T. WATANABE REGISTRAR OF CONVEYANCES

CONVEYANCE TAX: \$0.00

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LAND COURT SYSTEM

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After Recordation Return by Mail (X) Pickup () To:

TA-377372D

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T.M.K.: (2) 3-3-001-016 (por.)

QUITCLAIM DEED

THIS INDENTURE, made on this JUN 0 8 2006, by and between KEHALANI HOLDINGS COMPANY, INC., a Hawaii corporation, whose address is Alakea Corporate Tower, 1100 Alakea Street, 27th Floor, Honolulu, Hawaii 96813, and MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation, whose address is 99 Mahalani Street, Wailuku, Maui, Hawaii 96793, hereinafter referred to as the "GRANTOR", and MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation, whose address is 99 Mahalani Street, Wailuku, Maui, Hawaii 96793, hereinafter referred to as the "GRANTEE".

WIINESSEIH:

That the Grantor, for and in consideration of the sum of ONE AND NO/100 DOLLAR (\$1.00), to Grantor in hand paid by the Grantee, the receipt of which is hereby acknowledged, does hereby grant, convey, and forever quitclaim unto the Grantee, as

Tenant in Severalty, its successors and assigns, forever, the property described in Exhibit "A" attached hereto and made a part hereof.

AND the reversions, remainders, rents, issues and profits thereof, and all of the estate, right, title and interest of the Grantor, both at law and in equity, therein and thereto.

TO HAVE AND TO HOLD the same, together with all improvements, rights, easements, privileges and appurtenances thereon or thereunto belonging or appertaining or held and enjoyed therewith, unto the said Grantee as aforesaid, forever.

The terms "Grantor" and "Grantee", as and when used herein, or any pronouns used in place thereof, shall mean and include the masculine or feminine, the singular or plural number, individuals or corporations, and their and each of their respective successors, heirs, personal representatives and assigns, according to the context thereof. If these presents shall be signed by two or more Grantors or by two or more Grantees, all covenants of such parties shall for all purposes be joint and several.

The parties hereto agree that this instrument may be executed in counterparts, each of which shall be deemed an original, and said counterparts shall together constitute one and the same agreement, binding all of the parties hereto, notwithstanding all of the parties are not signatory to the original or the same counterparts. For all purposes, including, without limitation, recordation, filing and delivery of this instrument, duplicate unexecuted and unacknowledged pages of the counterparts may be discarded and the remaining pages assembled as one document.

IN WITNESS WHEREOF, the undersigned executed these presents the day and year first above written.

KEHALANI HOLDINGS COMPANY, INC., a Hawaii corporation

Ву

Stanford S. Carr

(PRINT NAME)

ts <u>President</u> (PRINT POSITION)

MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation

By Salks	
(SIGNATURE)	
Sananda K. Baz	
(PRINT NAME)	
11s EXECUTIVE DIrector	:
(PRINT POSITION)	

STATE OF HAWAII

COUNTY OF MAUI

On OLIOW W. 2000 before me appeared SAMANGA K. EAZ , to me personally known, who, being by me duly sworn, did say that he is the Executive Director of MAUI ECONOMIC OPPORTUNITY, INC., a Hawaii nonprofit corporation, and that said instrument was signed on behalf of said MAUI ECONOMIC OPPORTUNITY, INC. by authority of its Board of Directors and said officers

acknowledged said instrument to be the free act and deed of said MAUI ECONOMIC

) SS.

OPPORTUNITY, INC. and that said corporation has no corporate seal.

NOTARY R

(notary's signature)

(print/type name of notary)

Notary Public, in and for said County and

State.

My commission expires:

10.209

STATE OF HAWAII)	
CITY AND COUNTY OF HONOLULU)	
On June 8, 2006 Stanford S. Carr , to me personally say that <u>he</u> is the <u>President</u> of Hawaii corporation, that the seak affixed to the off said xoorporation and that said instrument corporation by authority of its Board of Direct instrument to be the free act and deed of said	KEHALANI HOLDINGS COMPANY, INC., a serioregoing instrument is the serporate seed to was signed and seededk in behalf of said tors, and the said officer acknowledged said
	<u>Seslin K. Scott</u> (notary's signature)
Q·s.	Leslie K. Scotts (print/type name of notary) Notary Public, in and for said County and State.
	My commission expires: Oct. 8,2007

EXHIBIT "A" LOT 1-C

PAUKUKALO LARGE-LOT SUBDIVISION

AT PAUKUKALO, WAIEHU, WAILUKU, MAUI, HAWAII

BEING A PORTION OF GRANT 3343 TO CLAUS SPRECKELS
BEING ALSO A PORTION OF LOT 1, PAUKUKALO LARGE-LOT SUBDIVISION

Beginning at the Southeast corner of this Lot, being also the Northeast corner of Lot 1-B, Paukukalo Large-Lot Subdivision, the coordinates of said point of beginning referred to Government Survey Triangulation Station "LUKE" being 11,352.04 feet North and 887.43 feet West and running by azimuths measured clockwise from True South:

- 1. 102° 44' 413.27 feet along Lot 1-B, Paukukalo Large-Lot Subdivision;
- Thence, along Kahekili Highway on a curve to the right with radius of 1,800.00 feet the chord azimuth and distance being:

198° 44' 43" 110.24 feet;

- 3. 200° 30' 1,664.46 feet along Kahekili Highway;
- 4. Thence, along Kahekili Highway on a curve to the right with radius of 1,050.91 feet the chord azimuth and distance being:

203° 46' 15" 119.92 feet;

- 5. 297° 02' 30" 18.97 feet along Kahekili Highway;
- 6. 207° 02' 30" 150.00 feet along Kahekili Highway;
- 7. 297° 02' 30" 20.00 feet along Kahekili Highway;
- 8. 207° 02' 30" 12.11 feet along Kahekili Highway;

9. Thence, along Kahekili Highway on a curve to the left with radius of 776.20 feet the chord azimuth and distance being: 203° 11' 30" 104.24 feet: 10. 282° 46' 30" 111.07 feet along Waiehu Beach Road; 12° 46' 30" 11. 43.44 feet along Lot 81, Waiehu Heights Subdivision, Unit II (File Plan 1567); 12. 323° 18' 20" 98.02 feet along Lots 81 and 80, Waiehu Heights Subdivision, Unit II (File Plan 1567); 328° 43' 10" 13. 45.20 feet along Lot 80, Waiehu Heights Subdivision, Unit II (File Plan 1567); 12° 45' 20" 91.70 feet along Lots 80 and 79, Waiehu 14. Heights Subdivision, Unit II (File Plan 1567); 15. 33° 40' 40" 91.23 feet along Lots 78 and 77, Waiehu Heights Subdivision, Unit II (File Plan 1567); 42° 17' 20" 16. 236.59 feet along Lots 77, 76, 75 and 74, Waiehu Heights Subdivision, Unit II (File Plan 1567); 17. 26° 18' 201.19 feet along Lots 74, 73, 72 and 71, Waiehu Heights Subdivision. Unit II (File Plan 1567); 3° 52' 18. 146.66 feet along Lots 71, 70 and 69, Waiehu Heights Subdivision, Unit II (File Plan 1567); 9° 44' 50" 19. 237.36 feet along Lots 69, 68, 67, 66 and 65, Waiehu Heights Subdivision, Unit II (File Plan 1567); 20. 38° 18' 236.38 feet along Lots 65, 64, 63, 62 and 61, Waiehu Heights Subdivision, Unit II (File Plan 1567); 21. 34° 22' 20" 168.26 feet along Lots 61, 60 and 59, Waiehu Heights Subdivision, Unit II (File Plan 1567);

22.	18° 13'	30"	222.62 fe	eet along Lots 59 and 58, Waiehu Heights Subdivision, Unit II (File Plan 1567) and Lot 157, Waiehu Heights Subdivision (File Plan 1482);
23.	347° 51'	40"	73.62 fe	eet along Lot 157, Waiehu Heights Subdivision (File Plan 1482);
24.	349° 07'	40"	176.08 fe	eet along Lot 157, Waiehu Heights Subdivision (File Plan 1482);
25.	348° 11'	30"	135.68 fe	set along Lot 157, Waiehu Heights Subdivision (File Plan 1482) and Lot 92, Waiehu Heights Subdivision, Unit III (File Plan 1715);
26.	353° 25'	30"	88.66 fe	eet along Lots 92 and 93, Waiehu Heights Subdivision, Unit III (File Plan 1715) to the point of beginning and containing an



871 Kolu Street, Suite 201 Wailuku, Hawaii 96793

March 21, 2006

R. T. TANAKA ENGINEERS, INC.

Kirk T. Tanaka

Licensed Professional Surveyor

Certificate No. 7223-LS

area of 11.476 Acres.

License Expires: April 30, 2006

Being a portion of the same premises conveyed to Grantor as follows:

- 1. Quitclaim Deed dated June 27, 2005, recorded in the Bureau of Conveyances of the State of Hawaii as Document No. 2005-139364.
- 2. Warranty Deed dated December 15, 1993, recorded in the Bureau of Conveyances of the State of Hawaii as Document No. 93-208060.

TOGETHER WITH all easements or claims of easements, if any.

SUBJECT, HOWEVER, to any and all encumbrances, easements, reservations, restrictions presently of record, if any.

EXHIBIT J.

Letters of Authorization

Waiehu Housing, LP

330 W. Victoria Street Gardena, CA 90248

March 16, 2021

Lori Tsuhako, Director Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793

SUBJECT:

Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK

(2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Tsuhako:

This letter is provided by Waiehu Housing, LP to confirm its authorization given to Munekiyo Hiraga to prepare, file, process, and obtain all necessary regulatory permits and approvals for the subject project, including but not limited to a Chapter 343, HRS Environmental Assessment, State Land Use District Boundary Amendment (DBA), and an affordable housing project approval from the Maui County Council pursuant to Chapter 2.97 of the Maui County Code (MCC).

Should you have any questions or require additional information, please do not hesitate to contact me, via email at monte.heaton@housingpartners.com.

Sincerely.

Mohannad H. Mohanna

President of Highridge Costa Development Company, LLC, its Managing General Partner

CC:

Chris Sugidono, Munekiyo Hiraga

Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Development Company Monte Heaton, Highridge Costa Development Company Harrison Herzberg, Highridge Costa Development Company

K \DATA\Highridge\Waiehu AH PERMITTING\Applications\Ch 2.97\LOA.doc

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A notary public or other officer completing this certificate ver to which this certificate is attached, and not the truthfulness	ifies only the identity of the individual who signed the document s, accuracy, or validity of that document.
who proved to me on the basis of satisfactory eviden to the within instrument and acknowledged to me that	Patricia Licea Notary Public Here Insert Name and Title of the Officer H. Mohanna Name(s) of Signer(s) Ince to be the person(s) whose name(s) is/are subscribed at he/she/they executed the same in his/her/their
authorized capacity(ies), and that by his/her/their sign upon behalf of which the person(s) acted, executed the	
PATRICIA LICEA Notary Public - California Los Angeles County Commission # 2252353 My Comm. Expires Aug 3, 2022	I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct. WITNESS my hand and official seal.
Place Notary Seal and/or Stamp Above	Signature of Notary Public
	IONAL
	deter alteration of the document or form to an unintended document.
Description of Attached Document, Title or Type of Document: Warehu Housin Document Date: March 16, 2021	Number of Pages:
Signer(s) Other Than Named Above:	
Capacity(ies) Claimed by Signer(s) Signer's Name: Corporate Officer – Title(s): Partner – Limited General Individual Attorney in Fact Trustee Guardian of Conservator Other: Signer is Representing:	☐ Corporate Officer — Title(s): ☐ Partner — ☐ Limited ☐ General ☐ Individual ☐ Attorney in Fact ☐ Trustee ☐ Guardian of Conservator ☐ Other:





P.O. Box 2122 Kahului, HI 96733 808-249-2990 Fax: 808-249-2991 www.meoinc.org

March 16, 2021

NOTE: Original letter of authorization was mailed to Department of Housing and Human Concerns on 3/16/21

Lori Tsuhako, Director Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793

SUBJECT: PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY AT TMK (2)3-3-001:106, WAIEHU, MAUI, HAWAI'I

Dear Ms. Tsuhako:

This letter is provided by Maui Economic Opportunity, Inc., owner of the subject property, to confirm its authorization given to Waiehu Housing, LP as Applicant, and Munekiyo Hiraga, as consultant, to prepare, file, process, and obtain all necessary regulatory permits and approvals for the subject project, including but not limited to a Chapter 343, HRS Environmental Assessment, State Land Use District Boundary Amendment (DBA), and an affordable housing project approval from the Maui County Council pursuant to Chapter 2.97 of the Maui County Code (MCC).

Should you have any questions or require additional information, please do not hesitate to contact me, via email at debbie.cabebe@meoinc.org or at 243-4300.

Sincerely,

Debbie Cabebe, SPHR

CHIEF EXECUTIVE OFFICER

cc: Chris Sugidono, Munekiyo Hiraga
Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa Development Company
Monte Heaton, Highridge Costa Development Company
Harrison Herzberg, Highridge Costa Development Company

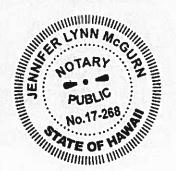
The Promise of Community Action

Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.



STATE OF F	tawaii)
COUNTY OF _) SS.)

On this	e Cabebe	of <u>March</u> , 20 <u>21</u> , before me appeared
		to me personally known, who, being by me duly sworn, did say
that he/she is the	CEO	of Main Economic Opportunity, Inc.
, a Hawaii no	n-profit corporation,	which said corporation does not have a corporate seal as such, and that
said instrument was s	signed in behalf of s	aid corporation by authority of its Board of Directors, and the said
		re the free act and deed of said corporation



Jennifus Lynn McGun Pright Name: Gennier Lynn McGun Notary Public, State of <u>Hawaii</u>

My commission expires: 6/25/21

Doc. Date: 3/14/21 # Pages: 2

Notary Name: Jennifer Lynn McGurn

-2 Circuit

Doc. Description:
Letter to Dept-of Housingand

Human Concerns dated 3/14/21 (Stamp or Seal)

Notary Signature Date

NOTARY CERTIFICATION

Date

NOTARY CERTIFICATION

EXHIBIT K.

Site Photos



1. View of subject property grounds looking south



2. View of subject property grounds looking west



3. View of subject property grounds looking north



4. View of subject property grounds looking south



5. Storage containers at south end of property



. Water collection tanks





7. Possible water well



8. Water storage totes



9. Aquaponic beds



10. Debris



11. Portable shed building



12. Property grounds with thatch roof structure





13. East side of property looking south



14. Property grounds with thatch roof structure



15. Ditch with vegetation growth along north and eastern perimeters of property



16. Subject property grounds looking south



17. Subject property ground with portable shed structure



18. Adjacent property to the north





19. Adjacent property to the west



20. Adjacent intersection to the northwest



21. Adjacent properties to the east



22. Adjacent property to the south



FINAL ENVIRONMENTAL ASSESSMENT

Final Environmental Assessment

HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY WAIEHU, MAUI, HAWAI'I

(TMK NO. (2)3-3-001:106)

VOLUME I OF II
(Final Environmental Assessment)

Prepared for:
Waiehu Housing, LP

June 2022

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Objectives, and Policies

Executive Summary

Project Name:	Hale Mahaolu Ke Kahua Affordable Housing Community
Type of Document:	Final Environmental Assessment
Legal Authority:	Chapter 343, Hawai'i Revised Statutes Chapter 11-200.1, Hawai'i Administrative Rules (Environmental Impact Statement Rules)
Anticipated Determination:	Finding of No Significant Impact (FONSI)
Applicable Environmental Assessment review "Trigger":	Use of State/County lands and County funds
Location:	Maui Island Waiehu TMK No. (2) 3-3-001:106
Landowner:	Maui Economic Opportunity, Inc. 99 Mahalani Street Wailuku, Hawaiʻi 96793
Applicant:	Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248 Contact: Monte Heaton Phone No.: (424) 258-2910
Approving Agency:	County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793 Contact: Buddy Almeida Phone No.: (808) 270-7805
Consultant:	Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793 Contact: Chris Sugidono Phone: (808) 244-2015
Project Summary:	In response to the current and projected shortage of affordable housing in Maui County, Waiehu Housing,

LP (Applicant) proposes to develop a 120-unit affordable rental housing community in Waiehu, Maui, Hawai'i. The subject property is identified by TMK (2)3-3-001:106 (Parcel 106) and covers an area of approximately 11.476 acres. The project site is bounded by the intersection of Kahekili Highway and Waiehu Beach Road to the north, Waiehu Heights is located immediately to the east, while lands designated as the Piihana Project District lie to the south and west. Parcel 106 is largely vacant, but historically, the subject property was farmed by Wailuku Agribusiness Co., Inc. and its forbearers for the cultivation of pineapple and sugar cane. More recently, the property was used for the cultivation of macadamia nuts. Agricultural production ceased on December 31, 1999. Although agricultural operations ceased some time ago, many macadamia nut trees are still on the property. The subject property was acquired by Hawaii Land & Farming (HL&F) in 2004. HL&F formally conveyed the 11.476-acre parcel to Maui Economic Opportunity, Inc. (MEO) in June of 2008.

The proposed project will be 100 percent affordable, providing rental housing for residents earning 60 percent or less of the Area Median Income (AMI) and will be developed in cooperation with Hale Mahaolu. The project will consist of 120 multi-family residential units, housed in 13 2-story buildings, including 28 1-bedroom units, 60 2-bedroom units, and 32 3-bedroom units, as well as a 3,477 square foot (sq. ft.) non-profit building, a 3,231 sq. ft. clubhouse, landscaping, and related improvements. A total of approximately 274 parking stalls and two (2) loading stalls will also be provided. Access to the project site will be provided by three (3) driveway entrances off of Kahekili Highway.

The subject property is designated "Urban" and "Agricultural" by the State Land Use Commission, "Project District 2 (Piihana)" and "Agriculture" by the Wailuku-Kahului Community Plan, and "Interim" and "Agricultural" by Maui County Zoning. The project site is situated within the County of Maui's Urban Growth Boundary as set forth by the Maui Island Plan. The subject property is not located in the Special Management Area (SMA) of the island of Maui.

The Applicant proposes to seek a fast track affordable housing project approval and District Boundary Amendment from the Maui County Council pursuant to Chapter 2.97 of the Maui County Code (MCC). The

Chapter 2.97 track housing application review process was approved by the Maui County Council in December of 2018 via Ordinance 4941. The Chapter 2.97 approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction for subdivisions. development standards improvement of land, and the construction of the units thereon. It is noted that pursuant to Section 2.97.120, MCC, an exemption from State Land Use District Boundary Amendment procedural requirements can be requested for projects less than 15 acres. The subject project area is less than 12 acres. As such, the Applicant will be seeking the State Land Use District Boundary Amendment, to be reviewed by the Maui County Council concurrent with the Chapter 2.97, MCC application approval request, without the need for an application or Maui Planning Commission review.

It is anticipated that offsite improvements potentially affecting State of Hawai'i and County of Maui Right-of-Way (ROW) lands will be required for the proposed project. As such, this Chapter 343, Hawai'i Revised Statutes (HRS) Environmental Assessment (EA) has been prepared due to use of State/County ROW lands. The Chapter 343, HRS EA will serve as the primary technical supporting document for the Chapter 2.97 fast track housing application. As the Chapter 2.97 fast track application will be the first discretionary approval sought for the project, DHHC is the Approving Agency for the Chapter 343, HRS EA.

List of Acronyms

AIS Archaeological Inventory Survey

ALISH Agricultural Lands of Importance to the State of Hawaii

AMI Area Median Income

AMP Archaeological Monitoring Plan

AMSL Above Mean Sea Level

ASTM American Society for Testing and Materials

BMPs Best Management Practices

cf Cubic Feet

CFR Code of Federal Regulations cfs Cubic Feet per Second CIA Cultural Impact Assessment

CIZ Change of Zoning

CO2 EQ Carbon dioxide equivalent CPA Community Plan Amendment

CWRM Commission on Water Resource Management

CZM Coastal Zone Management

DA Department of Army

DEM Department of Environmental Management
DHHC Department of Housing and Human Concerns

DOT Department of Transportation

DLNR Department of Land and Natural Resources

DOE Department of Education
DOH Department of Health
DPW Department of Public Works

DWS Department of Public Works

DWS Department of Water Supply

EA Environmental Assessment

EPA Environmental Protection Agency

ESA Environmental Site Assessment

FEMA Federal Emergency Management Agency

FONSI Findings of No Significant Impact

GHG Greenhouse Gases

HAR Hawai'i Administrative Rules HCM Highway Capacity Manual

HCZMP Hawai'i Coastal Zone Management Program

HDOT Hawai'i Department of Transportation

HL&F Hawai'i Land & Farming HRS Hawai'i Revised Statutes

HUD Housing and Urban Development

IPCC Intergovernmental Panel on Climate Change

km kilometer

LCA Land Commission Award

LOS Level of Service
LSB Land Study Bureau
MCC Maui County Code

MEO Maui Economic Opportunity, Inc.

mgd Million Gallons per Day

MIP Maui Island Plan

NPDES National Pollutant Discharge Elimination System

PZUE Puuone sand

RGB Rural Growth Boundary

ROW Right-of-Way

SHPD State Historic Preservation Division
SLR-XA Sea Level Rise Exposure Area
SMA Special Management Area
TIAR Traffic Impact Analysis Report

TMK Tax Map Key

UGB Urban Growth Boundary

USACE U.S. Army Corps of Engineers
USDA U.S. Department of Agriculture
USFWS U.S. Fish and Wildlife Service

W-K WWRF Wailuku-Kahului Wastewater Reclamation Facility

PROJECT OVERVIEW

I. PROJECT OVERVIEW

A. PROPERTY LOCATION, EXISTING USE, AND LAND OWNERSHIP

In response to the current and projected shortage of affordable housing in Maui County, Waiehu Housing, LP (Applicant) along with development partner, Hale Mahaolu, proposes to develop a new 120-unit affordable rental housing community in Waiehu, Maui, Hawaiʻi. See Figure 1. The subject property is identified as TMK (2)3-3-001:106 (Parcel 106) and covers an area of approximately 11.476 acres. See Figure 2. The project site is bounded by the intersection of Kahekili Highway and Waiehu Beach Road to the north, Kahekili Highway to the west, the Waiehu Heights single-family residential community to the east, and Piihana Project District lands to the south. Other uses in the vicinity of the proposed project include agricultural subdivisions to the northwest and southwest inland (mauka) of Kahekili Highway, as well as the Department of Hawaiian Home Lands, Waiehu Kou residential subdivisions, the Oceanview Estates subdivision, and the Waiehu Municipal Golf Course further to the north. Parcel 106 is largely vacant, but historically the subject property was farmed by Wailuku Agribusiness Co., Inc. and its forbearers for the cultivation of pineapple and sugar cane. More recently, the property was used for the cultivation of macadamia nuts. Agricultural production ceased on December 31, 1999. Although agricultural operations ceased some time ago, many macadamia nut trees are still on the property. The subject property was acquired by Hawaii Land & Farming (HL&F) in 2004. HL&F formally conveyed the 11.476-acre parcel to Maui Economic Opportunity, Inc. (MEO) in June of 2008.

The current owner of Parcel 106 is Maui Economic Opportunity, Inc., (MEO). The nonprofit formerly operated the Ke Kahua Farm project on the property, where volunteers planted taro and other plants when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves. The Applicant and MEO plan to enter into a long-term lease to develop the affordable housing community.

B. PROPOSED ACTION

The proposed project will be 100 percent affordable, providing all 120 rental units housing for residents earning 60 percent or less of the Area Median Income (AMI). The new community will be managed and operated by Hale Mahaolu. The project will provide 120 multi-family residential rental units, housed in 13 2-story buildings. See **Figure 3**. The new

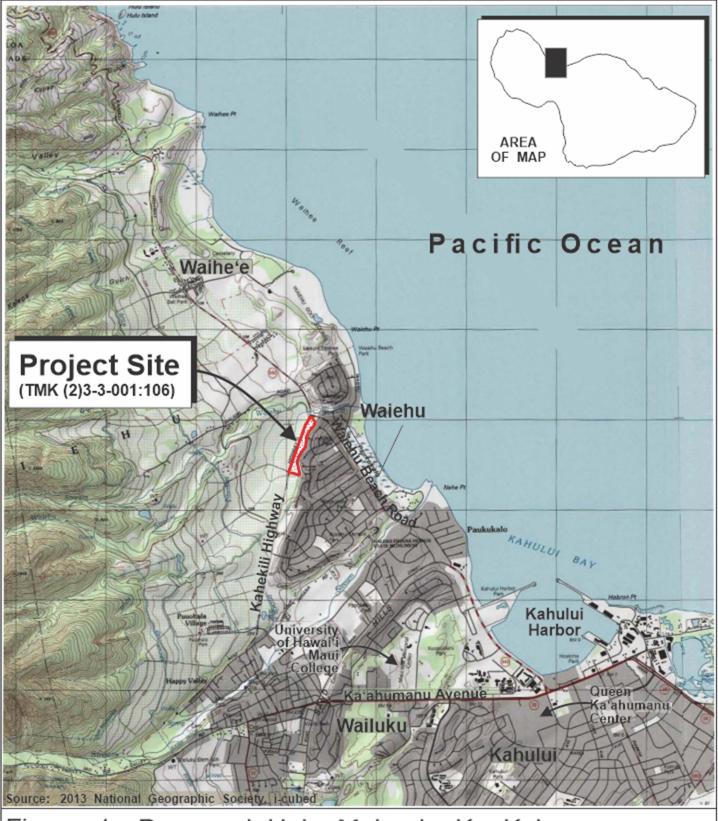


Figure 1 Proposed Hale Mahaolu Ke Kahua
Affordable Housing Community
Regional Location Map

0 1750 Feet 875 3500

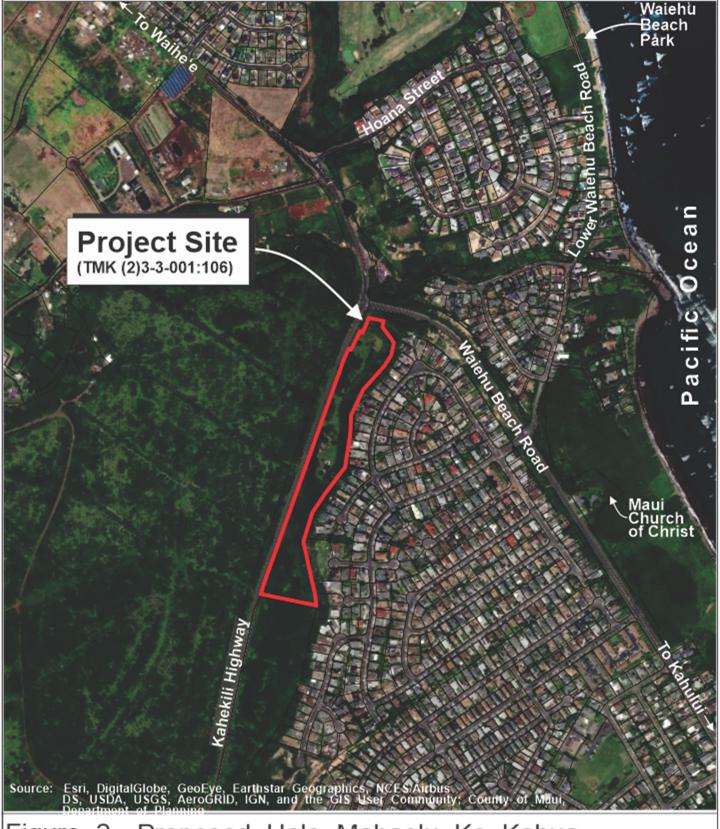


Figure 2 Proposed Hale Mahaolu Ke Kahua
Affordable Housing Community
Project Location Map

0 Feet 175 700



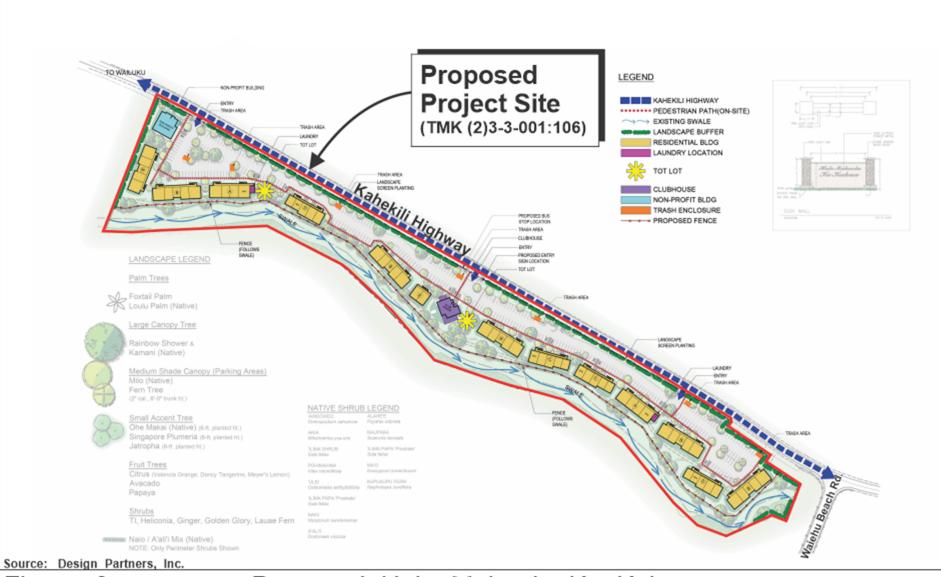


Figure 3



Proposed Hale Mahaolu Ke Kahua Affordable Housing Community Conceptual Site Plan

NOT TO SCALE



community will consist of 28 1-bedroom units, 60 2-bedroom units, and 32 3-bedroom units. In addition to the residential units, a 3,477 square foot (sq. ft.) non-profit building, a 3,231 sq. ft. clubhouse, landscaping, and related improvements are proposed as part of the project. A total of approximately 274 off-street parking stalls and two (2) loading stalls will also be provided. Access to the project site will be via three (3) new driveway entrances off of Kahekili Highway. See **Appendix "A"**.

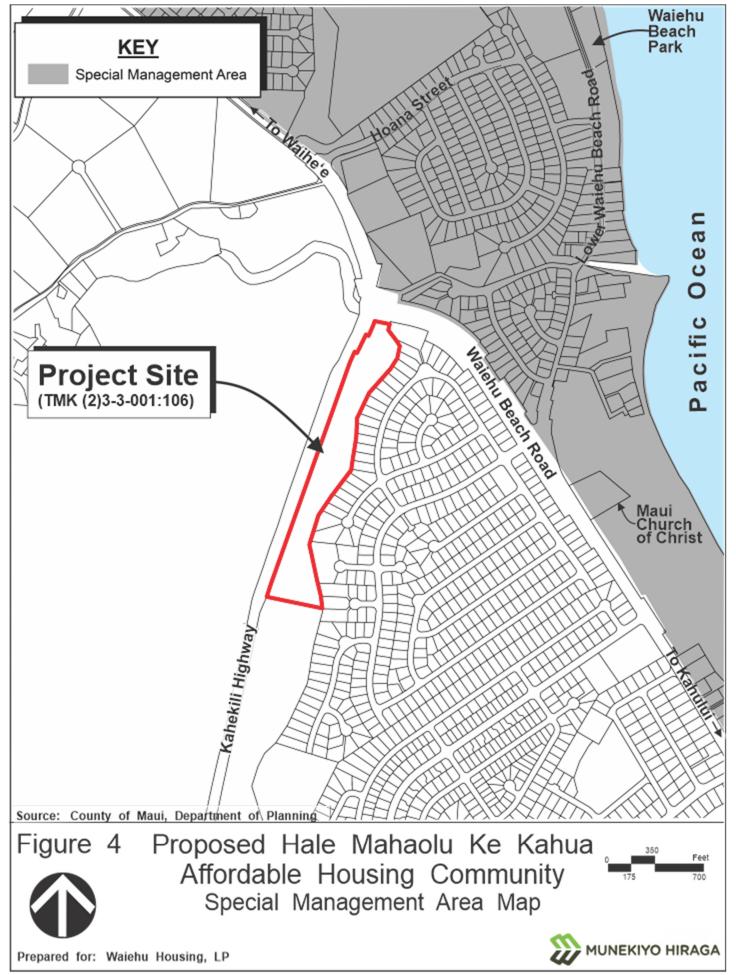
The subject property is designated "Urban" and "Agricultural" by the State Land Use Commission, "Project District 2 (Piihana)" and "Agriculture" designation by the Wailuku-Kahului Community Plan, and "Interim" and "Agricultural" district by Maui County Zoning. The project site is situated within the County of Maui's Urban Growth Boundary as set forth by the Maui Island Plan. The subject property is not located in the Special Management Area (SMA) of the island of Maui. See **Figure 4**.

C. CHAPTER 343, HAWAI'I REVISED STATUTES

The proposed project also involves installation of infrastructure along Kahekili Highway and Waiehu Beach Road, which are State and County right-of-ways, respectively. Use of these lands are triggers for preparation of an Environmental Assessment (EA) pursuant to Chapter 343, Hawai'i Revised Statutes (HRS). As the proposed project is not able to meet the criteria for a Chapter 343, HRS exemption for affordable housing projects, this EA has been prepared in support of the Chapter 2.97, Maui County Code (MCC) application. As the Chapter 2.97, MCC application will be the first discretionary approval sought for the project, the County of Maui, Department of Housing and Human Concerns (DHHC) is the Approving Agency for the Chapter 343, HRS EA.

D. MAUI COUNTY CODE SECTION 2.97 APPROVAL

The Applicant proposes to seek a fast tracked affordable housing project approval from the Maui County Council pursuant to Chapter 2.97 of the MCC. The Chapter 2.97, MCC application review process was approved by the Maui County Council in December of 2018 via Ordinance 4941. The Chapter 2.97, MCC approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon provided that the project still meets the minimum requirements for health and safety. Among other exemptions, the Applicant will be seeking exemptions from Change in Zoning and Community Plan Amendment consistency requirements. It is noted that pursuant to Section 2.97.120, MCC, an exemption from State Land Use District Boundary Amendment procedural requirements can be requested for projects less than 15 acres. The subject project area is less than 12 acres. As such the Applicant will be seeking an exemption to enable the State Land Use District Boundary Amendment, to be reviewed by the Maui County Council concurrent with the Chapter 2.97, MCC application approval



request, without the need for an application or Maui Planning Commission review.

E. PROJECT TIME SCHEDULE AND COSTS

Construction of the proposed project will commence upon the MCC Chapter 2.97 approval by the Maui Council and upon receipt of building permit approval. The applicant is targeting to start construction in the first or second quarter of 2023, once entitlement and construction permit approvals have been obtained for the project. The project will be built in a single phase over an estimated 16 months, with completion targeted around the third quarter of 2024. The total cost of the proposed project is estimated to be \$33.5 million.

DESCRIPTION OF THE EXISTING ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES



II. DESCRIPTION OF THE EXISTING ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES

A. PHYSICAL SETTING

1. Surrounding Land Uses

a. Existing Conditions

The project site was formerly used for agricultural cultivation by Wailuku Agribusiness. In recent years, Wailuku Agribusiness has abandoned the cultivation of many of fields around Wailuku. The subject parcel was previously used for sugar cane and more recently, the growing and harvesting of macadamia nuts, taro, and other crops as part of the Ke Kahua Farm project under MEO. The northwestern boundary of the property borders the makai side of the Kahekili Highway at the intersection of Waiehu Beach Road and the eastern boundary abuts the Waiehu Heights residential community.

Surrounding land uses include the Waiehu Heights Subdivision to the east, the Piihana Project District to the south; and agricultural homesteads and vacant agricultural land to the west. Other uses in the vicinity include agricultural subdivisions and the Department of Hawaiian Home Lands, Waiehu Kou residential subdivisions, the Oceanview Estates subdivision, and the Waiehu Municipal Golf Course further to the north.

b. Potential Impacts and Mitigation Measures

The proposed project is located adjacent to existing urbanized areas of Waiehu. The proposed project is compatible with the surrounding existing residential uses of the area. In the context of surrounding land uses, the proposed project is not anticipated to have a significant adverse effect on the surrounding landscape. The proposed project will provide much needed affordable rental housing in an area central to employment opportunities and services.

2. Climate

a. <u>Existing Conditions</u>

Like most areas of Hawai'i, Waiehu's climate is relatively unform yearround. Maui's tropical latitude, its position relative to storm tracts and the Pacific anticyclone, and the surrounding ocean combine to produce this stable climiate. Variation in climate among different regions on Maui is largely left to local terrain.

Data collected at the Kahului Airport station show that daily temperatures in the region range between an average low of 71.8 degrees and a high of 79.7 degrees Fahrenheit. On average, February is the coolest month with an average temperature of 72.4 degrees and September as the warmest month with an average temperature of 83 degrees (County of Maui, Office of Economic Development, 2019).

Rainfall in the region is seasonal, with most precipitation occurring between December and May. Precipitation data for Waihe'e Valley shows an average annual rainfall of 35.90 inches (County of Maui, Office of Economic Development, 2019).

b. Potential Impacts and Mitigation Measures

The proposed project involves the development of 120 affordable housing units, housed in thirteen 2-story buildings, a clubhouse, a non-profit building, parking, landscaping, and related improvements. The proposed project will not adversely impact climatic conditions in and around the area.

3. <u>Agricultural Lands</u>

a. **Existing Conditions**

In 1977, the State of Hawai'i, Department of Agriculture developed a classification system to identify Agricultural Lands of Importance to the State of Hawai'i (ALISH), based primarily, though not exclusively, on soil characteristics of the underlying land. The three (3) classes of ALISH lands are "Prime", "Unique", and "Other Important" agricultural land, with the remaining non-classified lands termed "Unclassified". When utilized with modern farming methods, "Prime" agricultural lands have soil quality, growing season, and moisture supply needed to produce sustained crop yields economically; while "Unique" agricultural lands contain a combination of soil quality, growing season, and moisture supply to produce sustained yields of a specific crop. "Other Important" agricultural

lands include those important agricultural lands that have not been rated as "Prime" or "Unique". The project site is located on lands that are designated as "Prime" and "Other" agricultural land by the ALISH map. See **Figure 5**. Additionally, the University of Hawai'i, Land Study Bureau (LSB) developed the Overall Productivity Rating, which classified soils according to five (5) levels, with "A" representing the class of highest productivity soils and "E" representing the lowest. The majority of lands underlying the proposed project site are rated "B", with a small portion unclassified by LSB. See **Figure 6**.

b. Potential Impacts and Mitigation Measures

The project site is largely overgrown with grasses and macadamia nut trees and in the past has been used as an illegal dump site. As mentioned previously, MEO formerly operated the Ke Kahua Farm project on the property, where volunteers planted taro and other crops when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves.

The proposed project will utilize the property for needed affordable rental housing. The proposed affordable housing development is considered an infill development, as the property is located adjacent to existing urbanized areas with other similar residential subdivisions, and nearby infrastructure systems. The proposed actions will occur on property that is currently agriculturally unproductive. As the lands are not currently actively cultivated, there are no anticipated adverse impacts to agriculturally productive lands as a result of the proposed action. Further, on the island of Maui, approximately 70,714 acres of the total land area of the island are within the ALISH "Prime" designation. As such, the use of 11.47 acres or approximately 0.02 percent of the "Prime" designated 70,714 acres on Maui for much needed affordable rental housing is not considered a substantial adverse impact in the context of the overall "Prime" designated lands on Maui. As such, significant adverse impacts to agricultural productivity are not anticipated as a result of the proposed project.

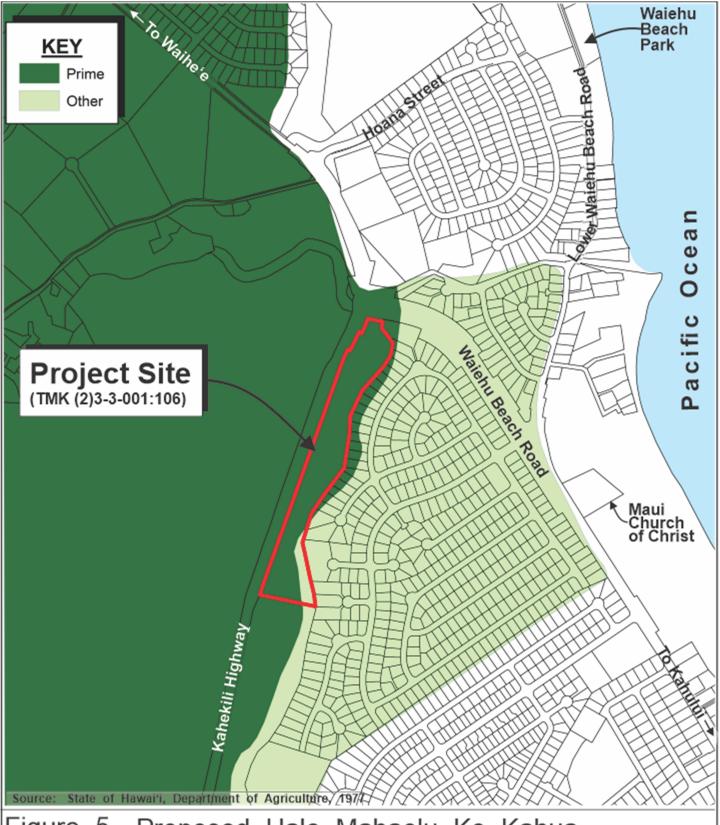


Figure 5 Proposed Hale Mahaolu Ke Kahua
Affordable Housing Community
Agricultural Lands of Importance to the

0 Feet

Prepared for: Waiehu Housing, LP

State of Hawaii Map



4. <u>Topography and Soils Characteristics</u>

a. **Existing Conditions**

The project area is characterized by sloping land from the southeast to northwest at approximately three (3) percent which ranges from 155 feet above mean sea level (AMSL) in the southeast corner to 48 feet AMSL in the northwesterly corner. There is an existing bank along the easterly boundary of the property.

The project site consists of soils within the Pulehu-Ewa-Jaucas association, which is found in alluvial fans and basins and is characterized by deep, well-drained soils (U.S. Department of Agriculture (USDA), 1972). See **Figure 7**.

The soils within the project site are classified as lao clay (IaA and IdB), and Puuone sand (PZUE). See **Figure 8**. Iao clay is characterized as having slow runoff and not more than slight erosion hazard for 0 to 3 percent slopes, moderately slow permeability, medium runoff and slight to moderate erosion hazard for 3 to 7 percent slopes, and medium runoff and moderate erosion hazard for 7 to 15 percent slopes. Puuone sand permeability is moderately rapid, runoff is slow, and the hazard of wind erosion is moderate to severe for 7 to 30 percent slopes (USDA, 1972).

b. <u>Potential Impacts and Mitigation Measures</u>

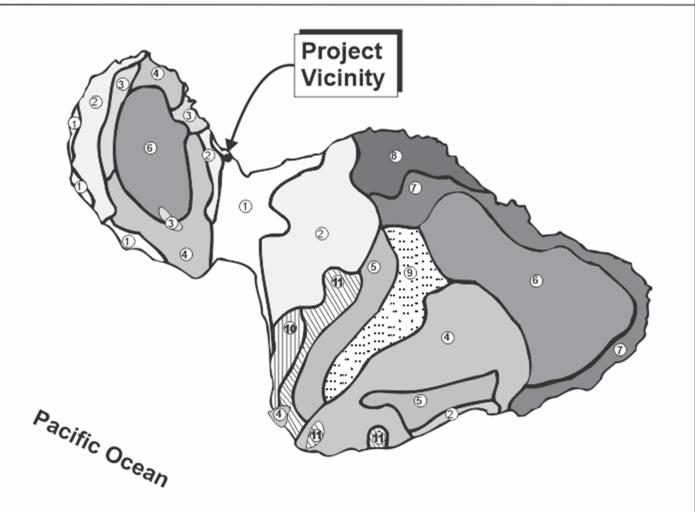
Grubbing and grading will be required for project implementation. The project will comply with Chapter 20.08, Soil Erosion and Sediment Control, of the Maui County Code. An erosion control plan will be prepared to minimize soil erosion from wind and rain, and, if applicable, a grading plan will be prepared and submitted for review and approval to the Development Services Administration, County Department of Public Works.

During the construction phase, temporary erosion control measures will be implemented to minimize soil loss and erosion hazards. The design intent of the development plan will be to utilize the existing topography to the greatest extent practicable and to limit the need for extensive grading. Development of the project will include the implementation of site-specific Best Management Practices (BMPs) during the construction to provide erosion control and minimize impacts to downstream properties. See **Appendix "B"**.

LEGEND

- Pulehu-Ewa-Jaucas association
- Waiakoa-Keahua-Molokai association
- (3) Honolua-Olelo association
- Rock land-Rough mountainous land association
- Puu Pa-Kula-Pane association
- Hydrandepts-Tropaquods association

- 7 Hana-Makaalae-Kailua association
- 8 Pauwela-Haiku association
- Laumaia-Kaipoipoi-Olinda association
- Keawakapu-Makena association
- Kamaole-Oanapuka association



Map Source: U.S. Department of Agriculture, Soil Conservation Service, 1972

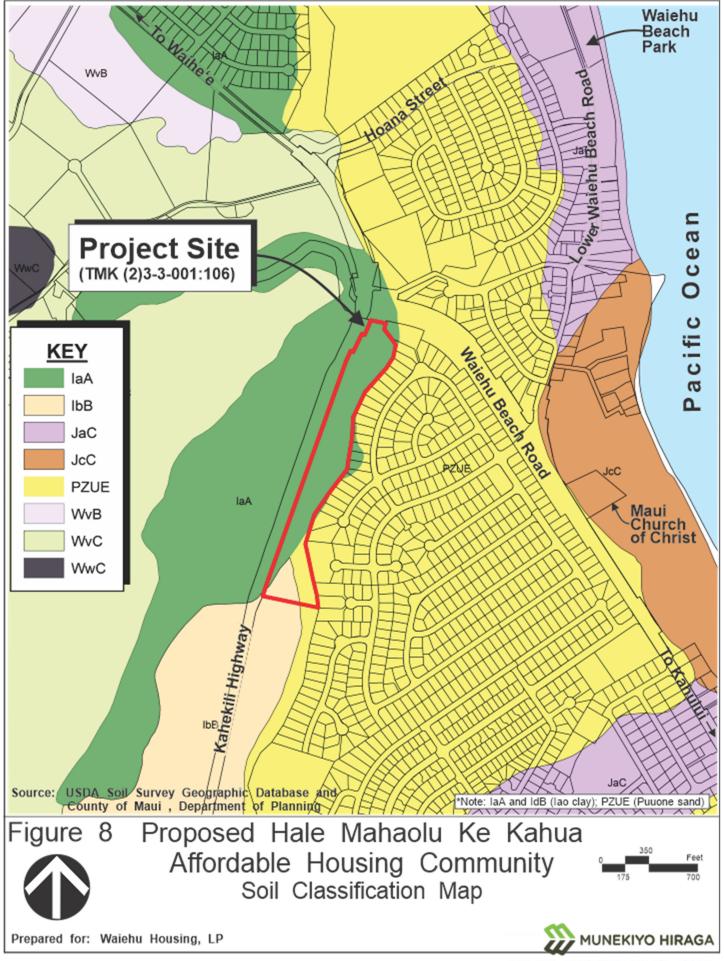
Figure 7 Proposed Hale Mahaolu Ke Kahua Affordable Housing Community



Soil Association Map

MUNEKIYO HIRAGA

NOT TO SCALE



BMPs may include:

- 1. Prevention of cement products, oil, fuel, and other toxic substances from falling or leaching into the water
- 2. Prompt and proper disposal of all loosened and excavated soil and debris material from drainage structure work
- 3. Retention of existing ground cover until the last possible date
- 4. Stabilization of denuded areas by sodding or planting, as soon as possible
- 5. Implementation of sediment trapping measures and basins
- Control of access and vehicular movement across disturbed areas
- 7. Early construction of drainage features
- 8. Minimization of construction time

The project will also include post-construction BMPs, which will improve the quality of stormwater runoff from the proposed development. The drainage design criteria will be to minimize any alterations to the natural pattern of the existing onsite surface runoff. The proposed drainage plan will meet the requirements of Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui" and Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices".

Additionally, the Applicant prepared a geotechnical report for the project site and it concluded that the site may be developed for the proposed project. See **Appendix "C"**. The Applicant intends to utilize slope stabilization materials to the greatest extent practicable.

Upon completion of construction, significant adverse impacts to topography or soil characteristics are not anticipated. No development will occur on the bank along the eastern boundary of the project site.

5. Flood, Tsunami Hazards and Sea Level Rise

a. **Existing Conditions**

As indicated by the Flood Insurance Rate Map for the County of Maui, the project site is located within Zone X. The Zone X designation corresponds to areas of minimal flood hazard, which are the areas outside the Special

Flood Hazard Area and higher than the elevation of the 0.2-percent-annual-chance flood. See **Figure 9**.

The project site is located approximately 0.5 mile inland from the shoreline and is not within the tsunami inundation zone. See **Figure 10.** Additionally, it is noted that the proposed improvements are located outside of the projected 3.2-ft. sea level rise exposure area as identified in the Hawai'i Sea Level Rise Vulnerability and Adaptation Report published in 2017 by the Hawai'i Climate Change Mitigation and Adaptation Commission.

b. <u>Potential Impacts and Mitigation Measures</u>

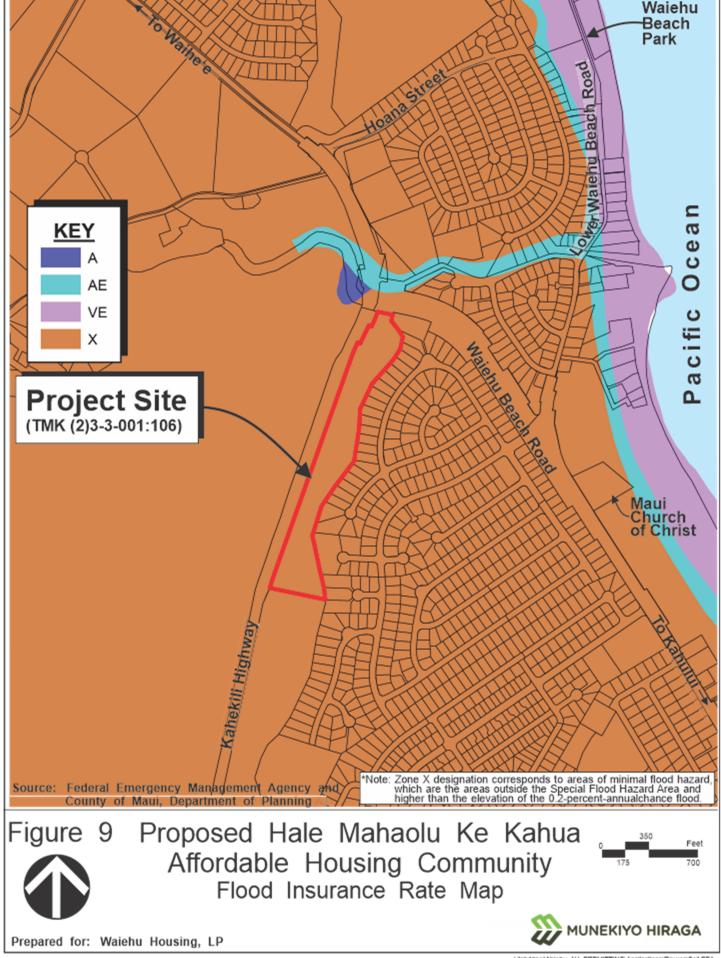
As the property is located within Flood Zone X, no impacts from regional flood-related conditions are expected with implementation of the project. The Applicant is, however, aware of previous localized flooding events within the vicinity of the project site. MEO has reported to the Applicant that debris blocking a culvert to the north of the Kahekili Highway and Waiehu Beach Road intersection has caused the drainage issues and flooding. The State of Hawai'i, Department of Transportation (HDOT) is responsible for maintaining the culvert and clears trash and debris from the culvert, which has mitigated the issue. Once the proposed project is constructed and operational, Hale Mahaolu will coordinate with HDOT on ensuring the culvert is clear and operating properly during heavy rain events. This project will also be designed to meet the County's drainage rules and stormwater quality rules.

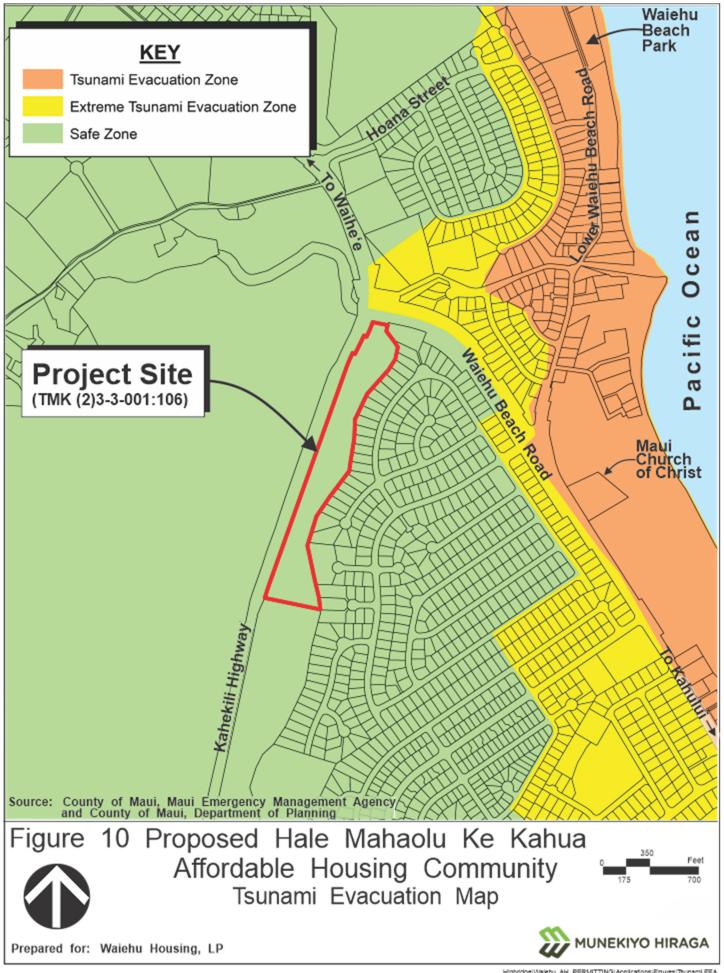
The proposed project is intended to be beneficial as the proposed drainage improvements will provide protection to nearby properties from ongoing erosion and flooding due to severe weather events. The improvements are also located beyond the tsunami inundation zone and the projected 3.2-ft. sea level rise exposure area for the property. As such, the project is not anticipated to be affected by flood and tsunami hazards.

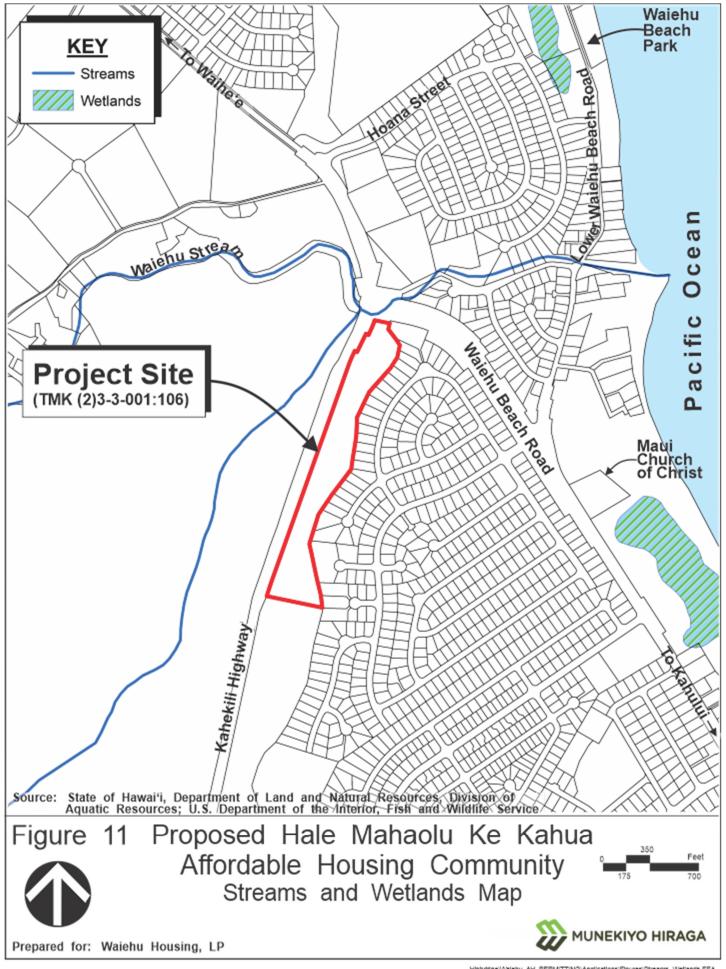
6. Streams and Wetlands

a. Existing Conditions

The South Waiehu Stream is located to the northeast of the project site across from Kahekili Highway. See **Figure 11**. South Waiehu Stream is a perennial stream with a total length of approximately 14.7 miles originating in the West Maui Mountains near Puu o Kaupo. The South Waiehu Stream flows into the ocean north of Paukukalo.







b. <u>Potential Impacts and Mitigation Measures</u>

An approved jurisdictional determination was issued by the Honolulu District U.S. Army Corps of Engineers on December 23, 2008, indicating the proposed project site consisted entirely of uplands and contained no waters of the United States. See **Appendix "D"**. Coordination with the agency's regulatory branch has and will continue by the Applicant to ensure no U.S. waters are impacted by the proposed project.

During construction, Best Management Practices (BMPs) will be carried out to ensure the proposed project will not adversely impact adjacent and downstream properties. Dust control fences and temporary drainage diversion channels will be constructed to prevent fugitive dust and stormwater runoff from entering adjacent properties. In the long term, the proposed project is not anticipated to adversely impact adjacent properties, streams or wetlands in the vicinity of the project site.

7. Flora and Fauna

a. **Existing Conditions**

A biological survey by Robert Hobdy was prepared for the proposed project. See **Appendix "E"**. A walk-through botanical survey method was used following routes to ensure that all parts of the project area were covered. Areas most likely to harbor native or rare plants such as gullies were more intensively examined. Notes were made on plant species, distribution and abundance as well as on terrain and substrate.

The vegetation on the property consists of a forest of macadamia nut trees (Macadamia integrifolia) with dense strands of Guinea grass (Megathyrsus maximus) along the margins. Other common species were koa haole (Leucaena leucocephala) and straggler daisy (Calyptocarpus vialis). A total of 56 plant species were recorded during two (2) site visits to the property. Of these, only popolo (Solanum americanum) was a naturally occurring native Hawaiian plant, while an additional three (3) native species, hao (Rauvolfia sandwicensis), 'a'ali'i (Dodonaea viscosa) and keahi (Sideroxylum polynesicum), had been recently planted as part of a landscape plan on the northern end of the property. Also planted were five (5) species of Polynesian introductions: 'ulu (Artocarpus altilis), niu (Cocos nucifera), noni, (Morinda citrifolia), kukui (Aleurites moluccana) and milo (Thespesia populnea). The remaining 48 plant species were a mix of nonnative former crop plants, ornamentals and weed species.

A walk-through fauna survey method was conducted in conjunction with the botanical survey. All parts of the project area were covered. Field observations were made with the aid of binoculars and by listening to vocalizations. Notes were made on species, abundance, activities and location, as well as observations of trails, tracks, scat and signs of feeding. In addition, an evening visit was made to the area to record crepuscular activities and vocalizations and to see if there was any evidence of occurrence of the Hawaiian hoary bat (*Lasiurus cinereus semotus*) in the area.

No mammal species were observed during two (2) site visits to the property.

While not seen during the survey, rats (*Rattus spp.*), mice (*Mus domesticus*), Mongoose (*Herpestes auropunctatus*), feral cats (*Felis catus*) and domestic dogs (*Canis familiaris*) would be expected to occur within this type of habitat. Rats and mice feed on seeds, fruits and fallen macadamia nuts, while mongoose and cats are predators of these rodents and birds. A special effort was made to look for any occurrence of the native Hawaiian hoary bat by making an evening survey on the property. No bats were detected or observed.

Birdlife was moderate in species diversity in this mostly forested habitat. Eleven (11) species were observed during two (2) site visits. Taxonomy and nomenclature follow American Onithologists' Union (2020). Two (2) species were common. The zebra dove (*Geopelia striata*) and the common chicken (*Gallus gallus*). Less common were the northern cardinal (*Cardinalis cardinalis*), spotted dove (*Streptopelia chinensis*), house finch (*Carpodacus mexicanus*) and common myna (*Acridotheres tristis*). Five (5) species were of rare occurrence. One (1) indigenous native bird was seen, kōlea or Pacific golden plover (*Pluvialis fulva*), which is a common migratory species that breeds in the arctic and overwinters in Hawai'i and other Pacific islands.

Insect life was moderate in diversity. Just eight (8) species were observed during two (2) site visits. Taxonomy and nomenclature follow Nishida et al (1992). Two (2) species were common, the beet webworm moth (*Spoladea recurvalis*) and the southern house mosquito (*Culex quinquefasciatus*). Three (3) insects were less common, the Asian spiny-backed spider (*Gasteracantha mammosa*), the dung fly (*Musca sorbens*) and the cabbage butterfly (*Pieris rapae*). Three (3) others were of rare occurrence. One (1) indigenous native dragonfly was seen, the pinao or globe skimmer (*Pantala*).

flavescens), which is a common species in Hawai'i and in many other tropical parts of the world.

b. <u>Potential Impacts and Mitigation Measures</u>

All the plant species recorded within the project area are common, widespread species. None of the plant species are endemic (i.e., unique to the Hawaiian Islands). There are no known rare or endangered terrestrial plant species in the project area, as such the proposed project will not have any adverse impacts on rare or endangered plant species.

While no threatened or endangered species were found during the fauna survey, the project includes implementing measures to avoid and minimize adverse impacts on threatened and endangered species which have potential to exist in the region as recommended by the USFWS as may be needed. These measures include the following:

<u>Hawaiian hoary bat:</u> The construction plans for the project will include notes that woody plants greater than 15 feet tall will not be removed or trimmed during the Hawaiian hoary bat breeding season (June 1 to September 15). Barbed wire fencing is not included in this proposed work.

<u>Seabirds:</u> Should any night work occur requiring artificial illumination for the project, such work will be avoided during the seabird fledgling season (approximately September 1 through December 15). Outdoor lights will be shielded and directed downwards to avoid upward directed accent lighting in order to minimize impacts to seabirds.

8. <u>Archaeological Resources</u>

a. **Existing Conditions**

Consultation with State Historic Preservation Division (SHPD) has been initiated for this project in accordance with Hawai'i Revised Statutes (HRS) 6E-8. See **Appendix "F"**.

No historic properties have been identified within the project area. The project area was the subject of an Archaeological Inventory Survey (AIS) including subsurface testing with negative findings in 2008 when another proposal for development was assessed for the subject property. The AIS carried out in 2008, termed an Archaeological Assessment due to negative findings, was reviewed and accepted by the SHPD on June 13, 2008 (Log No.: 2008.2334; Doc. No.: 0806PC23). See **Appendix "F-1"**.

b. <u>Potential Impacts and Mitigation Measures</u>

The Archaeological Assessment indicated no further archaeological investigation is recommended for the project site. See **Appendix "F-2"** and refer to **Appendix "F-1"**.

Given the subject property's history, there is little likelihood of uncovering any archaeological deposits. However, the Archaeological Assessment recommends archaeological monitoring during construction-related activities. Thus, as a precautionary measure, an Archaeological Monitoring Plan (AMP) was prepared for the project and submitted to SHPD on October 20, 2020, with the HRS 6E consultation package. See **Appendix** "G". SHPD issued an acceptance letter of the AMP on November 10, 2021. See **Appendix** "G-1".

Cultural Surveys Hawai'i, Inc. prepared the AMP in June 2020. Onsite archaeological monitoring shall be conducted for all project-related ground disturbance. One (1) archaeological monitor will be assigned to each piece of ground-disturbing equipment in operation at all times and in all locations throughout the project area. Any departure from this will occur only after consultation with and written concurrence from SHPD.

The monitoring fieldwork will likely encompass the documentation of subsurface archaeological deposits (e.g., trash pits, structural remnants) and will employ current standard archaeological recording techniques. This will include drawing and recording the stratigraphy of excavation profiles where cultural features or artifacts are exposed, as well as representative profiles. These exposures will be photographed, located on project area maps, and sampled. Photographs and representative profiles of excavations will be taken even if no historically significant sites are documented. As appropriate, sampling will include the collection of representative artifacts, bulk sediment samples, and/or the onsite screening of measured volumes of feature fill to determine feature contents.

With implementation of the archaeological monitoring, no significant adverse impacts to archaeological resources are anticipated as a result of the proposed project.

9. <u>Cultural Resources</u>

a. <u>Existing Conditions</u>

A Cultural Impact Assessment (CIA) was prepared by Cultural Surveys Hawai'i, Inc. See **Appendix "H"**. The purpose of the CIA was to gain an understanding of traditional cultural practices within and in the vicinity of the project area and identify any potential effects on these practices that may occur during, or as a result of, the implementation of the proposed project.

In terms of traditional Hawaiian perspectives of the island, the project site is situated within the Waiehu Ahupua'a, which was once an independent land district and did not reside in any other *moku*. Along with Waihe'e Ahupua'a, the *moku* was referred to as Nā Poko. The project area is a part of what is more commonly known as Nā Wai 'Ehā (The Four Waters) which consists of Waikapū, Wailuku, Waiehu, and Waihe'e. The Waiehu Ahupua'a was a popular place for *ali'i* to dwell, including famous surfing spots Niukūkahi and 'A'awa. Traditional history describes Waiehu as a place of abundance; from the mountain to the sea. Residents of Waiehu had bountiful access to freshwater to help feed their *lo'i kalo* and their *kula*. The waters of Waiehu provided opportunity for various fishing practices and ocean recreational activity.

Waiehu is known to have many Land Claim Awards (LCA) referencing many *'ili 'āina, lo'i kalo*, and *kula*. The project area resides within LCA 8559B*M, which was granted to William C. Lunalilo. This LCA document includes approximately 2,000 acres of land in Waiehu, however, it does not specify definitive boundaries or land use for this 'āpana. In the mid-1800s, Waiehu was known to have a small-scale sugar mill, and in Waihe'e, there was the Waihe'e Sugar Company. These two (2) sugar plantations once produced sugar on their own until eventually being absorbed under the Wailuku Sugar Company. Since the start of the sugar plantation, water diversion has been an issue amongst the residents of Maui, including Waiehu and the other ahupua'a of Nā Wai 'Ehā. Water was being diverted from these streams in order to irrigate the sugar fields, leaving many Native Hawaiian and other residents with little to no access of water. The diversion of water affected many Native Hawaiians and other residents' ability to farm kalo and other produce.

The CIA establishes the context for the cultural historical background of the Waiehu Ahupua'a with documentation of the traditions of the region prior to Western arrival. This background explores the value of place names in

interpreting cultural practices. The CIA also documents *moʻolelo* (traditional stories) and their role in explaining the creation of lands and resources. Finally, the CIA reviews the history of the region, including post-contact milestones, up to the modern era. All of the above establishes the context for understanding cultural practices within the Waiehu Ahupuaʻa, thereby enabling the formulation and implementation of a sound CIA methodology.

b. <u>Potential Impacts and Mitigation Measures</u>

The CIA prepared for the project involved a literature review and community outreach which consisted of talk-story interviews. In order to identify individuals with knowledge of the traditional cultural practices within and adjacent to the proposed project site, contact was initiated with government agencies, advisory councils, local community organizations, and traditional cultural practitioners, as well as *kamaʻāina* (local residents) and *kūpuna* (knowledgeable elders) with generational ties to the proposed project area via a community outreach letter and project related figures. Community outreach letters were sent to 73 individuals, organizations and agencies. In most cases, two (2) or three (3) attempts were made to establish contact. In all, five (5) responded, including two (2) that provided written testimony and two (2) *kamaʻāina* and/or *kūpuna* met with CSH for in-depth interviews. Refer to **Appendix "H"**.

Based on the results of community consultation and background research conducted as part of the CIA, the following cultural practices were identified within the Waiehu Ahupua'a:

- Kalo farming
- 2. Fishing
- 3. Limu gathering
- 4. Burial practices

No on-going cultural practices were identified within the project area during community consultation for this CIA. However, the project area is located adjacent to an inland sand dune complex where numerous human burials have been documented. The project area is also located in the general vicinity of on-going subsistence-based kalo farms.

The following items were highlighted during the CIA as important considerations regarding the project.

- 1. Awareness of weather patterns
- 2. Awareness of potential for impacts from tidal events
- 3. Community impacts from an increase in noise and traffic
- 4. Community impacts from an increase in water usage
- 5. Community impacts from runoff as a result of an increase in asphalt/concrete surfaces
- 6. Understanding the need for truly affordable housing for local Maui residents

The CIA's recommendations and the Applicant's proposed mitigation measures are summarized as follows:

- Project construction workers and all other personnel involved in the construction and related activities of the project should be informed of the possibility of inadvertent cultural finds, including human remains. In the event that any potential historic properties are identified during construction activities, all activities will cease and the SHPD will be notified pursuant to Hawai'i Administrative Rules (HAR) §13-280-3. In the event that *iwi kūpuna* are identified, all earth moving activities in the area will stop, the area will be cordoned off, and the SHPD and Police Department will be notified pursuant to HAR §13-300-40. In addition, in the event of an inadvertent discovery of human remains, the completion of a burial treatment plan, in compliance with HAR §13-300 and HRS §6E-43, is recommended.
- In the event that iwi kūpuna and/or cultural finds are encountered during construction, project proponents should consult with cultural and lineal descendants of the area to develop a reinterment plan and cultural preservation plan for proper cultural protocol, curation, and long-term maintenance.

The Applicant will be incorporating these recommendations into its planning process as the project plans become further defined. With implementation of the Archaeological Monitoring Plan using the mitigation measures discussed above, the proposed project is not anticipated to present significant adverse impacts on cultural resources.

10. Air Quality

a. <u>Existing Conditions</u>

There are no point sources of airborne emissions in the immediate vicinity of the project site. Although minimal, airborne pollutants are largely attributable to vehicular exhaust utilizing nearby roadways. Windblown dust from fallow fields is another source of indirect emissions in the region. These sources, however, are intermittent and prevailing winds quickly disperse the particulates generated by these temporary sources. Overall, the air quality in the region is considered good.

b. Potential Impacts and Mitigation Measures

In the short term, construction related activities for the proposed project will be the primary source of airborne pollutants affecting the surrounding area. Site work involving clearing, grubbing, and grading operations will generate fugitive dust. Appropriate BMPs, such as frequent watering of exposed surfaces and regular maintenance of construction equipment, will be utilized to minimize air quality impacts associated with project construction.

The proposed affordable housing project is not an action which will generate significant adverse long-term air quality impacts.

11. **Greenhouse Gas Considerations**

a. **Existing Conditions**

Greenhouse gases (GHG) (carbon dioxide, methane, nitrous oxide, and fluorinated gases) trap heat in the earth's atmosphere. In the context of climate and ocean warming, increases in levels of atmospheric GHG have been attributed to human activity (IPCC, 2017). Within the State of Hawai'i, the energy sector (including fossil fuel burning to produce electricity, transportation, waste incineration, and natural gas systems) is identified as the source of 89.7 percent of GHG emissions (Hawai'i Department of Health, 2019). Other sources of GHG emissions include industrial facilities, agriculture and forestry, and waste treatment, such as landfills, composting, and wastewater treatment.

The Federal Greenhouse Gas Reporting Program (40 CFR Part 98) requires mandatory reporting of GHG emissions from sources that emit 25,000 metric tons or more of carbon dioxide equivalent (CO2 EQ) per year in the United States. Categories of use which are generally associated with this level of reporting include power plants, petroleum and natural gas

systems, refineries and other heavy manufacturing processes. On Maui, the facilities operating at or above the 25,000 metric ton level include Maui Electric Company's Kahului Power Plant, Maalaea Power Plant, and the Central Maui Landfill (U.S. EPA, 2019).

b. Potential Impacts and Proposed Mitigation Measures

The proposed action involves development of 120 affordable multi-family units and related improvements and is not considered to be a substantial generator of GHG emissions. Further, in the context of the GHG Reporting Program (25,000 metric tons of CO2 EQ), the relative effects GHG emissions (CO2 EQ) during construction from earthmoving equipment and transportation of materials to and from the project site, will be short term and are not considered significant. Based on the foregoing, the proposed action is not anticipated to create significant direct and indirect foreseeable GHG emissions. This action does not fall within the threshold of mandatory GHG reporting.

12. Noise

a. <u>Existing Conditions</u>

There are no fixed noise generators in the vicinity of the project site. Existing background noise levels are primarily attributable to vehicular traffic on Kahekili Highway, as well as intermittent noise generated by aircraft travelling to and from Kahului Airport.

b. Potential Impacts and Mitigation Measures

Ambient noise conditions may be temporarily affected by construction activities. Heavy construction machinery, such as backhoes, dump trucks, front-end loaders, paving equipment, and material-transport vehicles are anticipated to be the dominant noise-generating sources during the construction period of the proposed improvements. Sound attenuating construction equipment will be used where practicable and necessary, to mitigate noise impacts caused by construction. Night-time construction activity is not anticipated for the proposed project. A State of Hawai'i, Department of Health Noise Permit will be obtained for the project as may be applicable. Once completed, the proposed project itself is not expected to significantly impact the existing noise conditions.

13. <u>Hazardous Materials</u>

a. Existing Conditions

The project site is on former agricultural lands. Agricultural production has since ceased on the property, and the site was used in the past for sugar cane cultivation and more recently macadamia nut harvesting. However, due to its former agricultural use, there may be the potential for residual hazardous materials, such as pesticides.

b. <u>Potential Impacts and Mitigation Measures</u>

A Phase 1 Environmental Site Assessment (ESA) and follow-up Subsurface (Soils) Investigation were conducted by Partner Engineering and Science, Inc. (Partner) to determine if the site of the proposed project may have residual hazardous materials resulting from the past site activities, in particular agricultural cultivation. See to **Appendix "I"**.

Site reconnaissance and records review for the subject property and the surrounding area were conducted and revealed no evidence of recognized environmental conditions, as defined by American Society for Testing and Materials (ASTM), in connection with the property. The ESA noted that agricultural chemicals were not detected at or above regulatory levels and Partner recommended no further investigation with respect to the former onsite agricultural use. Refer to **Appendix "I"**.

While fertilizers, herbicides, and pesticides may be used to help establish new plantings, the intent is to limit their use to the extent practicable.

Based on the findings of the ESA, there are no hazardous or regulated substances on the project site and, as such, no adverse impacts are anticipated.

14. Scenic and Open Space Resources

a. <u>Existing Conditions</u>

The property is located on the eastern side of the West Maui Mountains. The project site lies below the level of Kahekili Highway to the west, and is at the bottom of a steep embankment to the east. Only the West Maui Mountains are immediately visible to the west of the property.

b. <u>Potential Impacts and Mitigation Measures</u>

The project is not expected to significantly impact existing views from Kahekili Highway, or of the West Maui Mountains from Waiehu Heights Subdivision. The site plan has been designed to maintain a low profile with 2-story buildings. Aesthetically, the design of the buildings will be in harmony with traditional architectural styles found in the surrounding neighborhood and provide a sense of place.

15. <u>Beach and Mountain Access</u>

a. <u>Existing Conditions</u>

The project is located approximately 0.5 mile from the nearest coastline and approximately a half mile from the foot of the West Maui Mountains. Although subsistence-based kalo farms exist in the general vicinity, the CIA conducted for the proposed project concluded that there are ongoing cultural practices occurring within the project area.

b. <u>Potential Impacts and Mitigation Measures</u>

There are no traditional access trails identified in close proximity to the proposed project area. Accordingly, there are no anticipated adverse impacts to beach and mountain access from the proposed project.

B. SOCIO-ECONOMIC ENVIRONMENT

1. **Population and Demography**

a. Existing Conditions

The proposed project is located in Waiehu, Maui, within the Wailuku-Kahului Community Plan region.

Maui County's population in 2020 was approximately 164,754, an increase of approximately six (6) percent since 2010, when the population stood at 154,930 (U.S. Census Bureau, 2020). The population in the Waihee-Waiehu (Census Designated Place) increased from 8,841 in 2010, to about 9,234 in 2020 (U.S. Census Bureau, 2020). Baseline projections of the resident population for the overall Wailuku-Kahului Community Plan region for the years 2025 and 2030 are 65,995 and 71,223, respectively (County of Maui, Planning Department, June 2006).

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project is not a direct population generator. It is anticipated that the inhabitants of the proposed project currently reside in Maui County and will be relocating from other higher cost housing rentals, and/or overcrowded residences. As such, the project is not anticipated to have significant adverse impacts on population or demographic trends of the overall Wailuku-Kahului region and/or the Waihee-Waiehu area.

2. Economy

a. <u>Existing Conditions</u>

According to the data from the State Department of Labor and Industrial Relations, there were 71,900 non-agricultural jobs in Maui County in February 2022 (Department of Labor and Industrial Relations, 2022). Jobs in the retail trade industry accounted for 9,100, or 12.7 percent, of the total jobs in the County, and jobs in the leisure and hospitality industry accounted for 21,600 jobs, or 30 percent (Department of Labor and Industrial Relations, 2022).

Hawai'i's economy through 2019 was strong, with record-setting visitor arrivals and low unemployment. However, the COVID-19 pandemic has had far reaching impacts on the economy on Maui, in Hawai'i, and across the nation and world. Stay-at-home regulations and travel quarantines aimed to curb the spread of COVID-19 virus in Hawai'i caused many businesses to shut down or drastically reduce operations. Unemployment in Maui County and the State reached record levels in 2020, but has steadily improved through 2022. In October 2020, unemployment in Maui County stood at 22.5 percent. In January 2022, unemployment in Maui County stood at 6.7 percent (Department of Labor and Industrial Relations, 2022).

b. <u>Potential Impacts and Mitigation Measures</u>

On a short-term basis, the project will support construction and construction-related employment. Local union labor will be employed and it is estimated the project will create approximately 50 construction jobs.

Over the long term, the proposed rental housing community provides an affordable alternative to residents who are unable to pay for market-rate rentals and homes. The project is not anticipated to have significant adverse impacts on labor conditions due to the nature of the proposed improvements.

3. Housing

a. <u>Existing Conditions</u>

An estimated 1,721 units (ownership and rental units) are needed for U.S. Housing and Urban Development (HUD) Area Median Income (AMI) of less than 30 percent for the island of Maui by the year 2025. An estimated 777 units are needed for HUD AMI of 30 to 50 percent and 492 units are needed for HUD AMI of 50 to 60 percent (SMS, 2019).

b. <u>Potential Impacts and Mitigation Measures</u>

Of the total 120 affordable multi-family units, twelve (12) units will be rented at 30 percent or less of the HUD AMI and 107 units will be rented at 60 percent or less of the HUD AMI. The proposed project also includes one (1) exempt manager unit.

C. PUBLIC SERVICES

1. Police and Fire Protection

a. **Existing Conditions**

The project site is within the service area of the Maui Police Department's District I Wailuku patrol district which services the Wailuku-Kahului region. The Maui Police Station is located at 55 Mahalani Street, Wailuku, approximately two (2) miles southeast of the project site. The district includes management level officers, field police officers, and additional personnel, consisting of public safety aides and administrative support staff (Maui Police Department, 2019).

Fire prevention, suppression, and protection services for the Wailuku-Kahului region are provided by the County Department of Fire and Public Safety's Wailuku and Kahului Fire Stations. The Wailuku Fire Station is located approximately 2.2 miles south of the project site at 21 Kinipopo Street, while the Kahului Fire Station is located 4.6 miles to the northeast on Dairy Road.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed action is limited to the development of 120 affordable multifamily housing units and related improvements. Construction activities will not require road closures nor detour routes. As such, the proposed improvements will not adversely impact police or fire prevention and safety services.

From a long-term perspective, the proposed project is not anticipated to affect the capabilities of police and fire services. The existing operational limits of police and fire services will not be extended or affected by implementation of the proposed project.

2. Medical Services

a. <u>Existing Conditions</u>

Maui Memorial Medical Center serves as the island's only major medical facility. Located in Wailuku, approximately 3.2 miles southeast of the project site, the 214-bed facility provides general, acute, and emergency care services for the island's residents and visitors (County of Maui, 2019). In addition, the Kaiser Permanente Maui Lani Elua Clinic and Kaiser Permanente Medical Clinic, Maui Medical Group, and other private medical and dental offices provide health care services for the region's residents and visitors.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project will not adversely affect medical services in the area. During project construction, detour routes will not be necessary. As such, medical responders and services will continue to have access to the areas surrounding the project site.

3. Solid Waste

a. **Existing Conditions**

Residential refuse collection is provided by the County's Department of Environmental Management, Solid Waste Division. Private refuse collectors provide solid waste disposal services for commercial and institutional accounts. With the exception of the Hāna region, residential and commercial solid waste from throughout the island is transported to the Central Maui Landfill at Pu'unēnē, about seven (7) miles to the southeast of the project site. The Central Maui Landfill has been determined to have available capacity sufficient for meeting current and projectected waste disposal needs in the County up to the year 2026 (Gershman, Brickner & Bratton, Inc., 2009). The development of a planned solid waste facilities project by the County adjacent to the Central Maui Landfill is expected to further extend the available capacity of the landfill.

b. <u>Potential Impacts and Mitigation Measures</u>

Solid waste management protocols will be developed for the disposal of materials resulting from construction activities for the proposed project. Upon completion of construction, waste collected will be picked up by a private refuse collection service provider and disposed at the Central Maui Landfill. The proposed project is not anticipated to adversely impact the County's solid waste collection and disposal capabilities and capacities.

4. <u>Education Facilities</u>

a. <u>Existing Conditions</u>

The State Department of Education (DOE) operates several schools within the Wailuku-Kahului region consisting of six (6) elementary schools, two (2 intermediate schools, and two (2) high schools. There are also several private schools providing educational services to students from kindergarten to high school. The DOE-operated schools are as follows in **Table 1**.

Table 1. Enrollment at Department of Education Schools

School	Year 2020 to 2021		
Baldwin High School	1,299		
Maui High School	2,100		
'Īao Intermediate School	889		
Maui Waena Intermediate School	1,100		
Kahului Elementary School	901		
Lihikai Elementary School	816		
Pomaikai Elementary School	565		
Puu Kukui Elementary School	735		
Waihe'e Elementary School	601		
Wailuku Elementary School	626		
Source: Department of Education, 2020.			

The University of Hawai'i - Maui College in Kahului is the primary higher education institution serving Maui.

b. <u>Potential Impacts and Proposed Mitigation Measures</u>

The proposed project and associated improvements are not anticipated to generate population growth since most of the future residents of the

affordable housing project are expected to already be residing in Maui County, but may redistribute population from one area to the Waiehu community. As such, significant adverse impacts on educational facilities are not anticipated. The Applicant will be coordinating with the State Department of Education regarding school impact fees for the project.

5. Recreational Resources

a. **Existing Conditions**

Central Maui has numerous recreational facilities offering diverse opportunities for the region's residents. These facilities include several County parks and beach parks in the Waihe'e-Waiehu region including, Richard Pablo Caldito Sr. Park, Leisure Estates Park, Waiehu Beach Park, Waiehu Heights Park, Waiehu Terrace Park and Waihe'e Beach Park. State parks in the region include Haleki'i-Pihana Heiau State Monument and Waihe'e Ridge Trail. Waiehu Municipal Golf Course, which is less than a mile away from the project area, is another popular public recreational facility.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project is not expected to have significant adverse impact to public recreational opportunities. As noted above, most of the future residents of the affordable housing project are expected to already be residing in Maui County. As such, the proposed project may redistribute population from one area to the Waiehu community, rather than increase overall population. BMPs will be carried out during construction to avoid adverse impacts to water quality and stormwater runoff onto downstream properties. As such, no significant adverse impacts to recreational opportunities are anticipated.

D. INFRASTRUCTURE

1. Roadways

a. <u>Existing Conditions</u>

A Traffic Impact Analysis Report (TIAR) was prepared for the proposed project by Austin, Tsutsumi & Associates, Inc. See **Appendix "J"**. The study addressed the following:

- (1) Existing traffic operating conditions at key intersections during the weekday morning (AM) and afternoon (PM) peak hours of traffic within the study area.
- (2) Traffic projections for Year 2024 without the Project including traffic generated by other known developments in the vicinity of the Project in addition to an ambient growth rate. These other known developments are projects that are currently under construction or known new/future developments that are anticipated to affect traffic demand and operations within the study area.
- (3) Traffic projections for Year 2024 with the Project, which includes Year 2024 without Project traffic volumes in addition to traffic volumes generated by the Project.
- (4) Recommendations as needed to mitigate any impacts resulting from the addition of Project traffic.

The following roadways are located in the vicinity of the project area:

Kahekili Highway is a two-way roadway. This roadway begins to the south at its intersection with Mokuhau Road and Piihana Road and North Market Street and extends northward and then westward, generally following the coastline until it transitions to Honoapi'ilani Highway west of its intersection with Honokohau Valley Road.

<u>Waiehu Beach Road</u> is generally a north-south, two-way roadway that begins to the south at its intersection with Kahului Beach Road and Lower Main Street, and extends northward and terminates at its intersection with Kahekili Highway near the Waiehu Stream.

Eha Street is a two-way, two-lane, east-west roadway that provides access to commercial and residential areas. Eha Street begins to the west at its intersection of Wili Pa Loop and Imi Kala Street and continues eastward until its intersection with Waiehu Beach Road.

<u>Main Street</u> is an east-west, two-way, two-lane roadway that provides connectivity to commercial areas in Wailuku. Main Street begins to the east at its intersection with Lower Main Street and Ka'ahumanu Avenue and continues westward where it splits into 'Tao Valley Road and West Alu Road. Along Main Street near Central Avenue and High Street, marked curbside parking is available.

<u>Central Avenue</u> is a north-south, two-way, two-lane roadway that begins to the north at its intersection with Mill Street and continues southward until its intersection with Main Street.

<u>High Street</u> is a north-south, two-way, two-lane, County roadway that begins to the north at its intersection with Vineyard Street and continues southward until its intersection with Keanu Street, where it transitions to Honoapi'ilani Highway.

<u>Lower Waiehu Beach Road</u> is a two-way, two-lane local roadway that begins to the west at its intersection with Waiehu Beach Road and Wailupe Drive and extends northeast generally following the coastline until it terminates at Waiehu Beach Park.

<u>Market Street</u> is a north-south, two-way, two-lane roadway that begins to the north as North Market Street at its intersection with Kahekili Highway, Piihana Road and Mokuhau Road, and extends southward until its intersection with Main Street, where it transitions into South Market Street. Market Street is a two-way, two-lane roadway between its northern terminus and Vineyard Street. Between Vineyard Street and Main Street, Vineyard Street is a one-lane, one-way northbound roadway.

<u>Mill Street</u> is an east-west, two-way, two-lane roadway that begins to the west at its intersection with North Market Street and extends westward until it terminates to the east at its intersection with Lower Main Street. Mill Street serves a number of businesses and homes in Wailuku.

<u>Mokuhau Road</u> is an east-west, two-way, two-lane roadway that begins to the east at its intersection with Kahekili Highway, Piihana Road, and North Market Street, and extends westward until it terminates in a cul-de-sac near the Konko Mission of Wailuku.

<u>Piihana Road</u> is an east-west, two-way roadway that begins to the west at its intersection with Kahekili Highway, Mokuhau Road, and North Market Street and extends eastward for approximately one mile, where it terminates in a cul-de-sac. Piihana Road serves mostly residential and agricultural uses.

<u>Vineyard Street</u> is an east-west, two-way, two-lane roadway that begins to the east as a cul-desac near the Vineyard Street/Mission Street intersection and extends westward until it transitions into Ilina Street about 600 feet west of Uhiwai Place.

<u>Wailupe Drive</u> is a two-way, two-lane roadway that provides access for residences in Waiehu Heights. Wailupe Drive begins to the east at its intersection with Waiehu Beach Road and Lower Waiehu Beach Road and extends westward and southwest until it terminates in a cul-de-sac near its intersection with Olena Street.

Based on traffic count data, the weekday AM and PM peak hours of traffic were determined to occur between 6:45 AM to 7:45 AM, and 4:00 PM to 5:00 PM, respectively. It should be noted that due to COVID-19, traffic volumes throughout Maui were significantly lower than normal levels. For this reason, turning movement counts that were collected in 2016 to 2019, prior to COVID-19, were utilized for this study. Based on early consultation with State DOT and County Department of Public Works, the use of historic counts were acceptable to reflect existing conditions.

Regional observations gained from the TIAR indicate that the Waiehu area in the immediate vicinity of the project is largely comprised of single-family homes, with a few community parks. This area is served by Waiehu Beach Road and Kahekili Highway, the two (2) regional roadways that provide access to schools and commercial areas in Kahului and Wailuku. During the AM peak hour as residents leave for work and school, southbound Waiehu Beach Road experiences extensive queueing which stems from the Waiehu Beach Road/Eha Street intersection and at its maximum queue, extends over one (1) mile near to the Kahekili Highway/Waiehu Beach Road intersection. The length of time in queue can vary between 6 to 15 minutes from the back of the maximum queue to clear the Waiehu Beach Road/Eha Street intersection.

As a result of the queue spillback along Waiehu Beach Road, right-turning movements from side streets turning onto southbound Waiehu Beach Road can experience slower progression or blockages, resulting in varying lengths of side street queues. However, these right-turn vehicles were also observed to slowly but consistently filter into the Waiehu Beach Road queue, which helped to process lengthy side street queues. The congestion along Waiehu Beach Road generally lasted for about an hour and dissipated completely by 8:00 AM.

Also during the AM peak period (roughly 7:15 AM to 7:45 AM), southbound traffic along Kahekili Highway was observed to queue from the Happy Valley area and extend between Puuohala Road and Makaala Drive. By 8:00 AM, all queues had dissipated. The length of time in queue can vary between 4 to 8 minutes. No persistent queueing was observed along Kahekili Highway or Waiehu Beach Road during the PM peak hour.

Main Street experiences relatively slow-moving stop-and-go traffic conditions due to on-street parking stalls, pedestrian crossing and numerous businesses and driveways throughout the stretch in the study area.

An intersection analysis within the project study area was performed based on a Level of Service (LOS) analysis. LOS is a qualitative measure used to describe the conditions of traffic flow at intersections, with values ranging from free-flow conditions at LOS A to congested conditions at LOS F. The Highway Capacity Manual (HCM), 6th Edition, includes methods for calculating volume to capacity ratios, delays, and corresponding Levels of Service that were utilized in this analysis. The intersections listed below were analyzed due to their proximity to the project. A summary of the existing conditions at each intersection follows:

(1) Kahekili Highway/Waiehu Beach Road (unsignalized)

All movements operate at LOS C or better across both peak hours. All approaches are currently single shared lanes.

(2) Kahekili Highway/Makaala Road (unsignalized)

All movements operate adequately at LOS C or better across both peak hours.

(3) Waiehu Beach Road/Eha Street (signalized)

During the AM peak hour, the Eha Street and Nukuwai Place approaches and Waiehu Beach Road northbound left-turn and southbound through movements operate at LOS F. Turning movements suggest that a significantly high volume, about one-third of the total southbound Waiehu Beach Road volume in the AM peak hour, turns right onto Eha Street. An existing right-turn storage lane is provided, but is relatively short (150 ft. long) due to the constraints of the upstream bridge over Wailuku River that limits the lengthening of this right-turn pocket.

Access to the short right-turn pocket is sometimes blocked by spillback of the southbound through movement, and the short length forces right-turning vehicles to decelerate in the through lane, resulting in slow progression and queuing along southbound Waiehu Beach Road.

(4) Main Street/Central Avenue (signalized)

All movements at this intersection operate at LOS D or better across both peak hours with the exception of the southbound left-turn movement, which operates at LOS E during the AM peak hour due to the coordinated signal timings which favor progression along Main Street. Queues along Central Avenue can back near to Vineyard Street in the southbound direction for portions of the AM and PM peak periods.

(5) Main Street/High Street (signalized)

All movements operate at LOS B or better across both peak hours. During both peaks, southbound traffic can queue back from Main Street to Vineyard Street in part, due to the single shared lane approach. Traffic along the northbound approach varies during the AM peak hour due to commuter traffic and school related traffic.

(6) Waiehu Beach Road/Wailupe Drive/Lower Waiehu Beach Road

During the AM and PM peak hours, the eastbound and westbound stop-controlled movements along Wailupe Drive and Lower Waiehu Beach Road operate at LOS E/F, though these movements continued to operate under capacity.

(7) Waiehu Beach Road/Makaala Drive

All movements at the Waiehu Beach Road/Makaala Drive intersection operate at LOS D or better across both peak hours, with the exception of the eastbound right-turn movement, which operates at LOS F during the AM peak hour due to high southbound Waiehu Beach Road traffic conflicting with a high 417-vehicle right-turn volume from Makaala Drive. Similar to the Waiehu Beach Road/Wailupe Drive/Lower Waiehu Beach Road intersection, extensive queueing during the AM peak hour along Waiehu Beach Road resulted in the eastbound Makaala Drive right-turn movement experiencing slower progression, but they consistently filtered into the slow-moving Waiehu Beach Road queue. Queues along Makaala Drive ranged from 10 to 40 vehicles long and at its longest, require 2 to 4 minutes to turn onto Waiehu Beach Road.

The northbound left-turn movement volume along Waiehu Beach Road exceeds 300 vehicles during the PM peak hour, but observations indicate that frequent gaps in traffic resulted in minimal delays and queues. Left-turn queues remained within the left-turn storage lane, with queues only stacking from 1 to 3 vehicles at a time.

(8) Kahekili Highway/Makaala Drive

All movements operate adequately at LOS C or better across both peak hours.

(9) Kahekili Highway/Market Street/Mokuhau Road/Piihana Road

All movements at this intersection operate at LOS D or better across both peak hours with the exception of the westbound approach along Piihana Road, which operates at LOS E during the AM peak hour, though significantly under capacity.

(10) Market Street/Mill Street

During the AM peak hour, lengthy southbound congestion occurs along Market Street, primarily stemming from this intersection. An existing left-turn storage lane is provided, but is relatively short (100 ft. long). This short left-turn lane along Market Street locks up southbound left-turn vehicles in the same queue as through vehicles, lengthening the queues beyond Happy Valley.

The westbound Mill Street left-turn movement operates at LOS F during the AM and PM peak hour. However, observations show that mainline traffic along Market Street frequently stopped to allow left-turns to proceed, resulting in significantly less delays and queues. Average westbound approach queues were relatively minimal with only 1 to 4 vehicles and occasional maximum queues of 5 to 7 vehicles.

(11) Mill Street/Central Avenue

All movements operate at LOS D or better across both peak hours. Left- and right-turn movements into Central Avenue towards Main Street and right-turns out of Central Avenue towards Imi Kala Drive are relatively high, ranging from 150 to 250 vehicles. All approaches are shared lane approaches with no storage lanes. Queues can vary based on platoons of conflicting vehicles, but no consistent congestion was observed.

(12) Market Street/Vineyard Street

This four-way stop controlled intersection operates adequately with all movements at LOS D or better. Based on AM observations, southbound traffic occasionally spilled back into the Market Street/Mill Street intersection, which partly contributed to heavy AM congestion on Kahekili Highway.

b. <u>Potential Impacts and Mitigation Measures</u>

The TIAR evaluated projected traffic conditions for 2024 for two (2) scenarios – one without the project and the other with the project.

Base Year 2024 (without Project)

Traffic is expected to increase by 30 to 60 vehicles along Kahekili Highway and 10 to 15 vehicles along Waiehu Beach Road in the vicinity of the project site by 2024. Based on these increases, most intersections will operate similar to existing conditions, with the exception of the Kahekili Highway/Market Street/Mokuhau Road/Piihana Road and Market Street/Vineyard Street Intersections.

Future Year 2024 (with Project)

The project is anticipated to generate 64 (79) trips during the AM (PM) peak hours. Regionally, the majority of project trips will route to/from the greater Kahului-Wailuku areas and will add about 10 to 35 vehicles along Waiehu Beach Road and 5 to 10 vehicles along Kahekili Highway. This corresponds to a 3.46 percent increase in traffic from base conditions along both Kahekili Highway and Waiehu Beach Road. With the added project trips, operations at the study intersections are generally anticipated to be similar to Base Year 2024 conditions (without the Project). Refer to **Appendix "J"**.

The Waiehu Beach Road/Eha Street intersection is anticipated to operate generally similar to Base Year 2024 conditions (without the Project), with slight increases in delay. The existing heavy AM queue along Waiehu Beach Road will continue to occur. The project will only add 32 vehicles along Waiehu Beach Road along the critical southbound direction during the AM peak hour, which translates to approximately one (1) car every two (2) minutes on average, and will account for approximately 2.4 percent of the traffic at the intersection during Future Year 2024 projections. The overall delays will increase by about 5 seconds during the AM and PM peak hours.

Numerous movements at the Market Street/Vineyard Street intersection will continue operating with the same LOS E/F as Base Year conditions. The project will minimally add 1 to 3 vehicles for various turn movements, which should not significantly worsen forecast operations.

The project's Driveways 1 and 3 are proposed to operate as right-in, rightout intersections, while Driveway 2 is proposed as a full access intersection. Due to relatively low turning movements generated by the project, signals are not warranted and all intersections are recommended to be unsignalized with stop control along the westbound project exit approaches.

At all three (3) project driveways, a northbound entering right-turn deceleration lane is recommended. For the full-access Driveway 2, it is anticipated that only one (1) of the two (2) auxiliary lanes (southbound left-turn lane or northbound right-turn lane) can be accommodated due to right-of-way constraints. If this is the case, the provision of the southbound left-turn lane should be prioritized over the northbound right-turn lane. All movements at all three (3) of the project driveways are anticipated to operate at LOS B or better across both peak hours.

As vacant lands along Kahekili Highway get developed, speeds should be enforced to ensure vehicles adhere to posted 30 mph speed limits. Northbound traffic along Kahekili Highway will continue to be relatively low with only 200 to 280 northbound vehicles per peak hour, or on average 4 to 5 vehicles per minute. This should provide numerous gaps for entering left-turn and exiting right-turn project vehicles to complete turns with less conflicts and delays. With low northbound traffic, no northbound queues were observed at the Kahekili Highway/Waiehu Beach Road intersection. Therefore, queue spillback into the nearest project's Driveway 1 should not occur.

Considering the proposed project's minimal (3.46 percent) increase to existing traffic conditions for the region, no significant impacts are anticipated. Coordination with the County and State will continue during the development of the proposed project, and appropriate BMPs will be implemented before, during, and after construction.

Future County/State Roadway Improvements

The Maui Metropolitan Planning Organization prepared <u>The Hele Mai Maui Long Range Transportation Plan 2040</u> dated December 2019. The Hele Mai Maui LRTP 2040 Plan identifies various long-range transportation improvements for the island of Maui, many of which are improvements

previously identified as future planned, programmed or funded improvements by Maui County or The State of Hawaii. Two (2) major long range regional roadway extension improvements are identified in the plan for Imi Kala Street, however, neither are anticipated to be constructed by Year 2024:

• <u>Imi Kala Street Extension (Phase I) and Imi Kala Bridge</u> <u>Improvements</u>

This regional improvement would provide a new paved roadway stemming from Kahekili Highway to the north and traversing south, intersecting with Piihana Road and terminating at the south end at the existing Imi Kala Street/Wili Pa Loop/Eha Street intersection.

<u>Imi Kala Street Extension (Phase II)</u>

This improvement is planned by Maui County and would provide a new paved roadway stemming from the existing Imi Kala Street/Mill Street intersection and traverse south, adjacent to St. Anthony School, terminating at the south end at Lower Main Street.

Both improvements are major capacity improvement projects that will alleviate some of the existing AM traffic congestion along both Kahekili Highway and Waiehu Beach Road.

It is noted that the Applicant has been coordinating with the State Department of Transportation regarding review of the project's TIAR. HDOT issued a letter accepting the TIAR and confirming a fair share determination for the project on February 7, 2022. See **Appendix "J-1"**.

2. Water

a. <u>Existing Conditions</u>

There are no existing waterlines along Kahekili Highway adjacent to the project site. Refer to **Appendix "B"**. There are existing County Department of Water Supply (DWS) 8-inch and 12-inch waterlines along Kahekili Highway to the north of the Waiehu Beach Road intersection. Both waterlines traverse onto Waiehu Beach Road from Kahekili Highway.

Water storage in this area is from an existing 1.0 million gallon reservoir located approximately 6,000 feet to the west of the project site at an elevation of 490 feet. The sources for this system are from wells located in Upper Waiehu and Waihe'e.

b. <u>Potential Impacts and Mitigation Measures</u>

In accordance with the DWS's Domestic Consumption Guidelines for multifamily development, the average daily demand for the project is approximately 70,800 gallons per day. Water flow demand for multi-family development is 2,000 gallons per minute for a 2-hour duration. There are no existing fire hydrants in the vicinity of the project site. The subject parcel was part of a large-lot subdivision, and some improvements, such as water service and fire protection, were not required until the development of the individual large lots. The project shall install approximately 2,000 feet of 8-inch waterline along Kahekili Highway and fire hydrants will be installed with a maximum spacing of 250 feet.

The use of non-potable water features, such as rainwater harvesting systems for irrigation, will be evaluated and incorporated as practicable and feasible. The Applicant will be using reclaimed water for its non-potable water needs, such as irrigation of the project's landscaping, which will include drought-tolerant native plants.

Affordable housing projects per County policy have priority on County water service. As such, it is anticipated that the proposed project will be served by County water services. Domestic water and fire flow calculations will be prepared and submitted during the building permit process. Water meter and fire protection improvements will be made, as necessary, to meet the requirements of the Department of Water Supply and Department of Fire Prevention and Public Safety.

Upon completion of construction, adverse impacts to water services and facilities in the region are not anticipated.

3. Wastewater

a. Existing Conditions

There are no existing gravity sewerlines in the immediate vicinity of the project site. The nearest wastewater facility is an existing 6-inch forcemain along Waiehu Beach Road. Refer to **Appendix "B"**.

Wastewater collected from the Wailuku and Waihe'e areas are transported to the Wailuku-Kahului Wastewater Reclamation Facility (W-K WWRF) located approximately 3.9 miles northeast of the project site.

According to the Wastewater Reclamation Division, County of Maui, as of July 28, 2020, the W-K WWRF has a capacity of 7.9 million gallons per day

(mgd). The average flow into the W-K WWRF is approximately 5.8 mgd, and the allocated capacity is 6.9 mgd. The remaining capacity is approximately 1.0 mgd. The remaining affordable housing allocation is 0.29 mgd (of 0.34 mgd).

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project will generate approximately 30,600 gallons of wastewater daily. The onsite sewerage collection system will be designed to accommodate this flow. Refer to **Appendix "B"**.

The nearest gravity sewer connection is located approximately 1,500 feet from the proposed site, along Waiehu Beach Road. Connection to this system will require a lift station for the project. The wastewater generated from the project will be transported to the W-K WWRF. At the present time and as confirmed by the County of Maui, Department of Environmental Management (DEM), the reclamation facility has sufficient capacity to accommodate the additional wastewater generated from the proposed project. As such, with the development of a lift station and development of the onsite sewage collection system by the Applicant, the proposed project is not anticipated to adversely impact wastewater services or the capacity of the wastewater system in the area.

4. Drainage

a. Existing Conditions

Currently there are no drainage improvements on the project site. Onsite stormwater runoff generally sheet flows in a southwest to northeast direction toward Waiehu Beach Road. There is an existing 48-inch culvert near the intersection of Waiehu Beach Road and Kahekili Highway. It is estimated that the existing 50-year, 1-hour storm runoff from the project site is 7.868 cubic feet per second (cfs), corresponding to a runoff volume of 23,605 cubic feet (cf). Refer to **Appendix "B"**.

b. <u>Potential Impacts and Mitigation Measures</u>

After the development of the proposed project, it is estimated that the 50-year, 1-hour storm runoff will be 22.205 cfs, corresponding to a runoff volume of 49,961 cf. The increase in runoff will be 14.337 cfs, with an increase in runoff volume of 26,356 cf (23,605 cf to 49,961 cf). Refer to **Appendix "B"**. Onsite runoff will be intercepted by catch basins located within the paved parking area and conveyed to a subsurface drainage system. The subsurface drainage system will consist of a perforated

drainline embedded in crushed rock, which will be wrapped with a layer of filter fabric. Surface runoff entering the perforated pipe will be allowed to infiltrate into the ground. The drainage system will be designed to accommodate the increase in surface runoff volume from a 50-year, 1-hour storm for the proposed project. The proposed project will not alter the grades or capacity of the existing swale.

The design intent of the development plan will be to utilize the existing topography to the greatest extent practicable and to limit the need for extensive grading. Development of the project will include the implementation of site-specific BMPs during the construction to provide erosion control and minimize impacts to downstream properties.

BMPs may include, but not limited to, the following:

- (a) Prevention of cement products, oil, fuel, and other toxic substances from falling or leaching into the water;
- (b) Prompt and proper disposal of all loosened and excavated soil and debris material from drainage structure work;
- (c) Retention of existing ground cover until the last possible date;
- (d) Stabilization of denuded areas by sodding or planting as soon as possible;
- (e) Implementation of sediment trapping measures and basins;
- (f) Control of access and vehicular movement across disturbed areas;
- (g) Early construction of drainage features; and
- (h) Minimization of construction time.

In addition, an application for a National Pollutant Discharge Elimination System (NPDES) permit for construction will be submitted to the State Department of Health (DOH) for review and approval prior to the start of construction. The project will also include post-construction BMPs, which will improve the quality of storm water runoff from the proposed development.

As previously mentioned, the Applicant is aware of previous localized flooding events within the vicinity of the project site. MEO has reported to the Applicant that debris blocking a culvert to the north of the Kahekili Highway and Waiehu Beach Road intersection has caused drainage issues

and flooding. The HDOT is responsible for maintaining the culvert and clears trash and debris from the culvert, which has mitigated the issue. Hale Mahaolu will coordinate with HDOT on ensuring the culvert is clear and operating properly during heavy rain events.

The drainage design criteria will be to minimize any alterations to the natural pattern of the existing onsite surface runoff. The proposed drainage plan will meet the requirements of Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui" and Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices".

5. Electricity, Telephone Systems, and Cable Television Services

a. **Existing Conditions**

Electrical, telephone, and cable television services for the Wailuku-Kahului region are provided by Hawaiian Electric Company, Ltd. (HECO), Hawaiian Telcom, and Spectrum, respectively. Overhead utility lines are located along Kahekili Highway in the vicinity of the project area.

b. <u>Potential Impacts and Mitigation Measures</u>

The project is not anticipated to have an adverse impact on existing electrical, telephone, or cable television systems, nor is it expected to extend existing service area limits. Early project coordination will be carried out with the service providers to ensure services can be delivered to the project site in a timely basis.

E. CUMULATIVE AND SECONDARY IMPACTS

Cumulative impacts are defined by Title 11, Chapter 200.1, Hawai'i Administrative Rules (HAR), Environmental Impact Statement Rules as:

...the impact on the environment which results from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

A "secondary impact" or "indirect effect" is defined by Title 11, Chapter 200.1, HAR as

...effects which are caused by the action and later in time or farther removed in distance, but is still reasonably foreseeable.

Another context for analyzing secondary and cumulative impacts is defined by the time horizon within which "reasonably foreseeable" conditions may occur. From a local

planning standpoint, the future context for development is established by the Maui County General Plan (General Plan). The General Plan defines parameters for growth. The document plans for the horizon year 2030 and "reasonably foreseeable" conditions may be considered within this future context.

The Maui County General Plan, as set forth in Chapter 2.80.B of the Maui County Code, provides for the update of the County General Plan. The General Plan is a long-term, comprehensive blueprint for the physical, economic, environmental development and cultural identity of the County through 2030. The components of the General Plan include the following:

- The Countywide Policy Plan provides broad policies and objectives which portrays
 the desired direction of the County's future. It includes a countywide vision,
 statement of core principles, and objectives and policies for population, land use,
 the environment, the economy, and housing.
- The Maui Island Plan (MIP) provides a land use strategy and natural hazard strategy to protect life and property, an implementation strategy, and milestone measurements. An essential element of the MIP is a Managed and Directed Growth Plan which identifies existing and future land use patterns and determines planned growth.
- The nine (9) Community Plans provide implementing actions based on consistency with the Countywide Policy Plan and MIP's vision, goals, objectives, and policies.

A discussion of how the proposed project is consistent with specific goals, objectives, and policies of the Countywide Policy Plan, Maui Island Plan, and Wailuku-Kahului Community Plan is presented in Chapter III of this EA document.

Whereas the Countywide Policy Plan covers planning goals and objectives at the broadest levels, and the regional Community Plans consider specific regional needs and opportunities, the MIP may be viewed as a parallel plan, as it address functional elements of the General Plan, and islandwide growth parameters.

The MIP is used by the County Council, Maui Planning Commission, County administration and the community as a policy foundation for day-to-day decision making by doing the following:

- Providing direction for the development of future policies and regulations (for example, zoning and other ordinances, guidelines and area-specific plans that describe what kind of development can occur where);
- Providing policies to help determine the appropriateness of development proposals; and

Assigning resource for capital investments and programmatic initiatives.

The Directed Growth Plan, which is a key element of the MIP, provides a framework for managing outcomes of growth based on analysis of natural hazards, sensitive lands, cultural resources, scenic corridors, and related environmental and human community parameters. An important component of the Directed Growth Plan are maps that delineate urban and rural growth areas. Referred to as Urban and Rural Growth Boundaries, these maps set the boundaries for the physical limits of development. In so doing, the Directed Growth Plan seeks to manage the use of non-urban and non-rural resources important in sustaining the island to the year 2030. The project site is located within an Urban Growth Boundary.

The assessment of cumulative and secondary impacts is undertaken in the context of planned growth recommended by the General Plan, particularly the MIP and its Urban Growth boundary maps. The proposed urban growth boundaries provide the basis for acknowledging that the proposed project will facilitate implementation of the General Plan, as mandated by County Charter. As such, the proposed project is located in an area identified to be suitable for urban uses, including multi-family residential development. The assessment of the environmental, historic, cultural and socio-economic parameters included investigation of background and cumulative conditions pertaining to cultural, traffic and drainage impacts, and mitigative measures to minimize or avoid adverse long-term impacts.

It should be noted that a residential housing development, Waiehu Residential Community, is planned for a 238-acre parcel to the west of Kahekili Highway and the Hale Mahaolu Ke Kahua Affordable Housing Community. Approximately 158 acres of land will be developed as a new 752-unit affordable housing project, along with associated infrastructure, roadways, and amenities such as park space, walking trails, and landscaping. The development includes 184 multi-family units and 568 single-family units as well as retail space of approximately 17,400 square feet and three (3) parks totaling 6.3 acres (Chris Hart & Partners, Inc., Waiehu Residential Community, December 2021).

A Draft Environmental Assessment was published for the Waiehu Residential Community on December 23, 2021, which evaluated potential impacts and contemplated a number of infrastructure improvements and fair share contributions as mitigating measures. The project is anticipated to be developed in several phases - beginning in 2024 and planned to be complete by 2032. The project is being developed by a separate and independent entity that is undergoing its own Chapter 343, HRS environmental review process, which includes the study of potential impacts and mitigation measures.

As described in Chapter I of this document, the Hale Mahaolu Ke Kahua Affordable Housing Community is being developed in partnership with the Applicant (Waiehu Housing, LP), MEO, and Hale Mahaolu, which will be managing the housing community.

The property is owned by MEO and will be leased to the Applicant for \$1 per year. The development is limited to 120 affordable multi-family housing units and related improvements on an 11.47-acre parcel. This proposed 100 percent affordable housing community has independent utility from the aforementioned Waiehu Residential Community, and potential impacts and proposed mitigation measures have been assessed as part of this Final EA.

In summary, the proposed action is limited to the development of the proposed Hale Mahaolu Ke Kahua Affordable Housing Community by the Applicant and its development partners, and is separate and distinct from any future development in the area that may be considered or proposed by other entities. The project is not a phase or increment of a larger total undertaking; a necessary precedent for another project; a commitment to some larger project; or one of a series of individual actions planned by the Applicant in the reasonably foreseeable future. As such, planning of the proposed project is being undertaken solely by the Applicant and its development partners. The project does not rely on future actions proposed by other projects, including improvements to existing infrastructure, and construction of the proposed project can begin upon receipt of the necessary entitlement and construction permit approvals.

RELATIONSHIP TO GOVERNMENTAL PLANS, OLICIES, AND CONTROLS POLICIES, AND CONTROLS



III. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS

A. <u>STATE LAND USE DISTRICTS</u>

Pursuant to Chapter 205, Hawai'i Revised Statutes (HRS), all lands in the State have been placed into one (1) of four (4) major land use districts by the State Land Use Commission. These land use districts are designated "Urban", "Rural", "Agricultural", and "Conservation". The majority of the project site is located within the "Agricultural" district, with a small area in the northeastern portion of the subject property in the "Urban" district. See Figure 12. The Applicant proposes to seek a fast track affordable housing project approval from the Maui County Council pursuant to Chapter 2.97 of the Maui County Code (MCC). The Chapter 2.97 Fast Track Housing application review process was approved by the Maui County Council in December of 2018 via Ordinance 4941. The Chapter 2.97, MCC application approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon. Though the Applicant will be seeking a District Boundary Amendment (DBA) from the Maui County Council (for a project that is less than 15 acres), an exemption from the need to submit a DBA application and certain other procedural requirements will be requested as part of the Chapter 2.97. MCC application. This will allow for the County Council to bypass Maui Planning Commission review and take action on the DBA request concurrently during its review of the Chapter 2.97, MCC application. The area of the parcel that will require a DBA to "Urban" is 9.798 acres based on a District Boundary interpretation obtained from the State Land Use Commission. See Appendix "K".

B. <u>LAND USE COMMISSION RULES, CHAPTER 15-15, HAWAI'I</u> ADMINISTRATIVE RULES

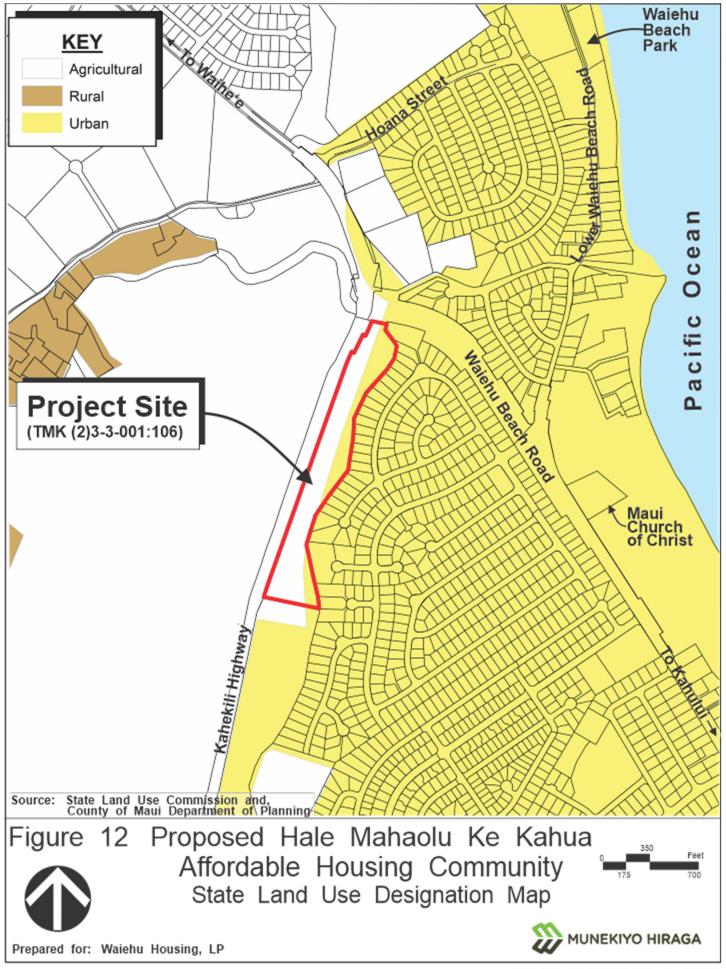
The reclassification of the subject property is in conformance with the following standards of the "Urban" district set forth in Chapter 15-15(18), Hawai'i Administrative Rules (HAR):

Chapter 15-15(18)

 It shall include lands characterized by "city-like" concentrations of people, structures, streets, urban level services and other related land uses.

Discussion and Response:

The proposed project is located in close proximity to the Waiehu Heights single-family residential community to the east, agricultural subdivisions to the northwest and southwest inland (mauka) of Kahekili Highway, as well as the Waiehu Kou



Department of Hawaiian Home Lands residential subdivisions and Waiehu Municipal Golf Course further to the north. The project site is within the Waiehu Urban Growth Boundary (UGB) of the Maui Island Plan (MIP) with a dominant pattern of urban settlement and services in the immediate area.

- It shall take into consideration the following specific factors:
 - a. Proximity to centers of trading and employment except where development would generate new centers of trading and employment.
 - b. Availability of basic services such as schools, parks, wastewater systems, solid waste disposal, drainage, water, transportation systems, public utilities, and police and fire protection.

Discussion and Response:

The proposed project is bounded by the intersection of Kahekili Highway and Waiehu Beach Road to the north and Kahekili Highway to the west. It is located less than a mile from Paukūkalo to the southeast, which provides employment to residents through many commercial and industrial businesses. Also, the project site is located less than two (2) miles from Happy Valley and Wailuku Town to the south, which is the County seat of government and a center of trading and employment.

Several County parks and beach parks are located near the proposed project in the Waihe'e-Waiehu region including, Richard Pablo Caldito Sr. Park, Leisure Estates Park, Waiehu Beach Park, Waiehu Heights Park, Waiehu Terrace Park and Waihe'e Beach Park. State parks in the region include Haleki'i-Pihana Heiau State Monument and Waihe'e Ridge Trail. Waiehu Municipal Golf Course is also less than a mile away from the project area.

Basic infrastructural services, such as transportation systems, water and sewer services are available in close proximity to the project site. Both public and private schools and public parks are near the project site. Drainage improvements will comply with County of Maui standards. Police, fire, and medical services also presently serve the project area and they are located near the project site.

• It shall include lands with satisfactory topography, drainage, and reasonably free from the danger of any flood, tsunami, unstable soil condition, and other adverse environmental effects.

Discussion and Response:

Elevations on the site range from approximately 48 feet above mean sea level at the project site's northwesterly corner to approximately 155 feet (AMSL) at the project site's southeasterly corner. The project site generally slopes toward Waiehu Beach Road, averaging approximately three (3) percent.

The project site is located in Flood Zone "X" which represents areas outside of the 0.2 percent annual chance flood plain. The project site is located outside of the tsunami inundation zone and the 3.2-ft. Sea Level Rise Exposure Area (SLR-XA). Currently there are no drainage improvements on the project site. Onsite stormwater runoff generally sheet flows in a southwest to northeast direction toward Waiehu Beach Road. The drainage system will be designed to accommodate the increase in surface runoff volume from a 50-year, 1-hour storm for the proposed project. The design intent of the development plan will be to utilize the existing topography to the greatest extent practicable and to limit the need for extensive grading.

 Land contiguous with existing urban areas shall be given more consideration than noncontiguous land, and particularly when indicated for future urban use on state or county general plans.

Discussion and Response:

Lands pertaining to the subject project are adjacent to areas already in the "Urban" district, including the Waiehu Heights single-family residential community to the east and Waiehu Kou Department of Hawaiian Home Lands residential subdivisions to the north. The project site is also located within the UGB of the Maui Island Plan.

• It shall include lands in appropriate locations for new urban concentration to areas of urban growth as shown on the state and county general plans.

Discussion and Response:

The subject property is an appropriate location for an "Urban" district classification as it is immediately adjacent to developed lands already in the urban district classification. The project site is within the UGB of the MIP and is an ideal extension of the Waiehu Heights single-family residential community, which borders the project parcel. From a land use standpoint, the property's location is considered appropriate for workforce residential housing development as it is bordered by housing development and is in close proximity to existing urban residential developments, infrastructure, and public services.

• It shall not include lands, the urbanization of which will contribute towards scattered spot urban development, necessitating unreasonable investment in the public infrastructure or support services.

Discussion and Response:

The proposed reclassification and application for affordable rental housing project pursuant to Chapter 2.97, MCC approval does not contribute to scattered spot urban development. The project site is adjacent to existing residential subdivisions and near commercial centers in Paukūkalo, Happy Valley and Wailuku Town. The project site is within the UGB . The project site is located in close proximity of Wailuku Town – center of government services. The proposed development will not necessitate unreasonable public investment in infrastructural facilities or public services. The Applicant will comply with all applicable provisions regarding rules and regulations pertaining to infrastructure facilities.

• It may include lands with a general slope of twenty percent or more if the commission finds that those lands are desirable and suitable for urban purposes and that the design and construction controls, as adopted by any federal, state or county agency, are adequate to protect the public health, welfare and safety, and the public's interest in the aesthetic quality of the landscape.

Discussion and Response:

The subject property is characterized as lands having an average slope of three (3) percent, and is suitable for urban uses.

C. HAWAI'I STATE PLAN

Chapter 226, HRS, also known as the Hawai'i State Plan, is a long-range comprehensive plan which serves as a guide for the future long-term development of the State by identifying goals, objectives, policies, and priorities, as well as implementation mechanisms. The Plan consists of three (3) parts. Part I includes the Overall Theme, Goals, Objectives, and Policies; Part II includes Planning, Coordination, and Implementation; and Part III establishes Priority Guidelines. Part II of the State Plan covers its administrative structure and implementation process. An analysis of the project's applicability to Part I and Part III of the Hawai'i State Plan is provided in **Appendix** "L-1".

The overall theme of the Hawai'i State Plan is governed by the following general principles.

- 1. Individual and family self-sufficiency
- 2. Social and economic mobility

3. Community or social well-being

In consonance with the foregoing principles, the Hawai'i State Plan identifies three (3) clarifying goals:

- 1. A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.
- A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical wellbeing of the people.
- 3. Physical, social, and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.

This section of the environmental assessment examines the applicability of the proposed action as it relates to the objectives, policies, and priority guidelines of the Hawai'i State Plan, as set forth in HRS Sections 226-5 through 226-27.

A summary of the project's relationship to the Hawai'i State Plan, as detailed in **Appendix** "L-1" is provided below. The methodology for the analysis involves examining the project's applicability to the Hawai'i State Plan's goals, objectives, and policies. "Applicability" refers to a project's need, purpose and effects, and how these advance or promote a particular set of goals, objectives and priority guidelines. In assessing the relationship between a proposed action and the Hawai'i State Plan, an action may be categorized in one of the following groups:

1. <u>Directly applicable</u>: the action and its potential effects directly advances or promotes the objective, policy or priority guideline.

Example: A county project to develop a new water source and related transmission facilities would be directly applicable to the objectives and policies for Facility Systems-Water (HRS 226-16) which states "(5) Support water supply services to areas experiencing critical water problems".

2. <u>Indirectly applicable</u>: the action and its potential effects indirectly supports or advances the objective, policy or priority guideline.

Example: The county water source project cited above supports other related objectives and policies for the economy (HRS 226-6, General), which, by example, states: "(9) Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives". In this case, the principle purpose of the

project was not to create new construction activities, but nonetheless, supports this policy by creating temporary construction activity during the implementation of the project. In this instance, the proposed action may be deemed to be indirectly applicable to the objective and policy of the Hawai'i State Plan.

3. **Not applicable**: the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Hawai'i State Plan.

Example: That same county water source improvement project referenced above, may not have direct or indirect linkage to objectives and policies for the economy-Federal Expenditures (HRS 226-9) which states: (1) Encourage the sustained flow of federal expenditures in Hawaii that generates long-term government civilian employment. From the standpoint of the agency proposing the water system improvement, and assuming no Federal Funding for the project, there is an unlikely intent that the proposed water source project would be connected to or reliant upon the foregoing policy. Hence, from the standpoint judiciously applied policy analysis, the proposed action would be considered not applicable to the policy.

In general, a proposed action's applicability to the objectives, policies and priority guidelines of the Hawai'i State Plan is judged on the basis of the action's direct or indirect relationship to the respective objectives, policies and priority directions. It is recognized that the categorization of "applicability" is subject to interpretation and should be appropriately considered in the context of local and regional conditions.

The assessment presented below summarizes the objective(s) for each policy/planning category of the Hawai'i State Plan, followed by a response which consolidates the assessments provided in **Appendix "L-1"**. The responses examines whether the proposed action is directly applicable, indirectly applicable or not applicable to the respective Hawai'i State Plan objectives, policies and priority guidelines.

HRS 226-5 Objective and policies for population

The Hawaii State Plan's objective for population is to guide population growth to be consistent with the achievement of physical, economic, and social objectives of HRS 226.

Response:

The proposed project directly supports the objectives and policies for population as it will be implemented on vacant lands located within an UGB as established by the Maui Island Plan, in a developed area in Waiehu, in close proximity to existing services government, business, commercial destinations and employment opportunities in Wailuku and Kahului.

HRS 226-6 Objectives and policies for the economy--in general

In summary, planning for the State's economy in general shall be directed to increased and diversified employment, income and job choice opportunities, and a growing and diversified economic base.

Response:

The proposed action indirectly supports the general objectives and policies for the economy by supporting construction activity which contributes to increased employment opportunities, job choices, and living standards. Businesses positively affected by the proposed project are those which support construction such as building contractors and building trades, material suppliers, equipment rental companies, and landscape companies.

HRS 226-7 Objectives and Policies for the economy—agriculture

The objectives for agriculture seek to sustain the viability of sugar and pineapple industries, ensure growth and development of diversified agriculture, and ensure that the agriculture industry continues as an essential component of the State's well-being.

Response:

The proposed project will be situated in Waiehu on largely vacant land adjacent to a residential subdivision. As mentioned previously, MEO formerly operated the Ke Kahua Farm project on the property, where volunteers planted taro and other crops when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves. As such, the State's goals with respect to the economy and the role of agriculture are not applicable to the project.

HRS 226-8 Objective and policies for the economy—visitor industry

The visitor industry objective recognizes that the visitor industry constitutes a major component of Hawaii's steady economic growth.

Response:

The proposed action is not directly or indirectly applicable to the objective and policies for the visitor industry. The proposed action has no implications for enhancement or growth of the visitor industry.

HRS 226-9 Objective and policies for the economy—federal expenditures

This objective seeks a stable federal investment base as an integral component of Hawaii's economy.

Response:

The proposed action is not reliant on federal funding, and does not directly or indirectly advance the objective and policies for strengthening or increasing federal expenditures for the betterment of Hawai'i's economy.

HRS 226-10 Objective and policies for the economy—potential growth and innovative activities

The objective for potential growth and innovative activities is directed towards the development and expansion of the economy to increase and diversify Hawaii's economic base.

Response:

As a affordable housing project, the proposed action does not directly or indirectly affect the development and expansion of innovative activities to increase and diversify Hawai'i's economic base.

HRS 226-10.5 Objectives and policies for the economy—information industry

The objective for the information industry recognizes that broadband and wireless communication capability and infrastructure are foundations for an innovative economy which will position Hawaii as a leader in this field in the Pacific region.

Response:

The proposed action does not directly or indirectly affect Hawai'i's capacity to be a leader in the broadband and wireless communications industries, nor does it affect these innovative industries in advancing Hawai'i's economic position in the Pacific.

HRS 226-11 Objectives and policies for the physical environment--land-based, shoreline, and marine resources

The objectives for land-based, shoreline, and marine resources seeks the prudent use of land-based, shoreline, and marine resources, and the effective protection of Hawaii's unique and fragile environmental resources.

Response:

The proposed project will utilize Best Management Practices (BMPs) to ensure that natural resources such as steep slopes and the coastal environment are not impacted by construction activities. The use of BMPs also ensures compatibility between land-based and water-based functions, resources, and ecological systems. No work will be carried out on the existing steep slope on the subject property. The flora/fauna survey conducted as part of the environmental review process represents an effort to protect any rare and endangered plant and animal species, and their

habitats native to Hawai'i that may be present in the vicinity of the proposed action. No rare or endangered plant or animal species were found in the project area.

HRS 226-12 Objective and policies for the physical environment- scenic, natural beauty, and historic resources

With regard to scenic, natural beauty and historic resources, it is the State's objective to enhance scenic assets, natural beauty and multi-cultural/historical resources.

Response:

The project has been carefully designed taking into consideration building profiles and massing so as to not adversely impact scenic views and vistas. The proposed project will be developed in the vicinity of residential subdivisions. All buildings will be 1- and 2-stories in height. Landscape on the property will be carefully considered to provide aesthetic viewplanes. Archaeological investigations identified no historic properties on the site. Nevertheless, archaeological monitoring will be conducted during construction in accordance with the approved Archaeological Monitoring Plan (AMP). Landscaping proposed in connection with the project is intended to enhance the project's visual relationship with its immediate surrounding environs.

HRS 226-13 Objectives and policies for the physical environment--land, air, and water quality

The objectives for land, air, and water quality is directed at the maintenance and pursuit of improved quality of Hawaii's land, air and water resources, and greater public awareness and appreciation of Hawaii's environmental resources.

Response:

The proposed project will be implemented on vacant land adjacent to the Waiehu Heights residential subdivision, in proximity to existing infrastructure and services. Maintaining land, air, and water quality are directly and indirectly advanced by the proposed action. Construction BMPs will be used to manage and control erosion control during grading operations to minimize downstream water quality impacts. Work on the project is not anticipated to be affected by natural hazards, and the highest standards of design and construction practices will be employed for the proposed project.

HRS 226-14 Objective and policies for facility systems—in general

Having water, transportation, waste disposal, and energy and telecommunications systems that support Statewide social, economic, and physical objectives is the focus of this planning category.

Response:

The proposed action is indirectly applicable to the general objective and policies for facility systems. As an affordable, multi-family residential housing project, the proposed action can be serviced by existing infrastructure systems.

HRS 226-15 Objectives and policies for facility systems--solid and liquid wastes

The objectives for solid and liquid waste addresses the maintenance of basic public health and sanitation standards relating to the treatment and disposal of solid and liquid wastes, and the provision of adequate sewerage facilities in keeping with housing, employment, mobility and related needs.

Response:

The proposed project indirectly supports the objectives and goals for solid and liquid waste facility systems as it will connect to the County wastewater system. Coordination will be undertaken with the County Department of Environmental Management (DEM) as it relates to connection to the County's wastewater system. Furthermore, construction waste will be disposed at the County's Central Maui Landfill or appropriate construction recycling centers.

HRS 226-16 Objective and policies for facility systems—water

The objective for water is to adequately accommodate domestic, agricultural, commercial, industrial, recreational and related needs within resource capabilities.

Response:

The proposed project indirectly supports the objective and polices for water facility systems enhancement as it is located in an area that is serviced by existing County water infrastructure. Coordination will be undertaken with the County Department of Water Supply (DWS) regarding connection to the County's water system which has given priority to affordable housing projects. Upon completion of the proposed project, adverse impacts to water services and facilities in the region are not anticipated.

HRS 226-17 Objectives and policies for facility systems—transportation

An integrated multi-modal transportation system that meets statewide needs and promotes the efficient, economic, safe and convenient movement of people and goods, and which will accommodate planned growth is the objective for facility systems—transportation.

Responses: The proposed project indirectly supports the objectives and policies of transportation facility systems as it is located in proximity to existing public bus routes and in an area designated for planned urban growth.

HRS 226-18 Objectives and policies for facility systems—energy

The objective for energy is multi-pronged, seeking dependable, efficient, and economic statewide energy systems; increased energy security and self-sufficiency; greater diversification of energy generation; reduction, avoidance or sequestration of greenhouse gas emissions, and prioritizing utility customers from a social and financial interest standpoint.

Response:

The proposed project will utilize energy efficient fixtures and appliances. Should funding be available, photovoltaic solar panels will be installed to reduce the development's dependence on fossil-fuel based energy.

HRS 226-18.5 Objectives and policies for facility systems—telecommunications

A dependable, efficient and economical statewide telecommunications system along with adequate, reasonably priced, and dependable telecommunications services to accommodate demand are the objectives for telecommunications.

Response:

The proposed action does not directly or indirectly affect telecommunications systems dependability, efficiency, and cost parameters. In particular, the proposed project does not promote research and development of telecommunications systems and resources and does not advance efficient management and use of existing telecommunications systems and services.

HRS 226-19 Objectives and policies for socio-cultural advancement--housing

The objectives for housing encompass greater opportunities for Hawaii's people to secure reasonably priced, safe, sanitary and livable homes; the orderly development of residential areas sensitive to community needs and other land uses; and the development and provision of affordable rental housing.

Response:

The proposed project is directly applicable to the objectives and policies related to housing as it provides needed additional affordable housing in Waiehu. In addition, the project will be implemented in proximity to a developed area with existing infrastructure and services in Central Maui.

HRS 226-20 Objectives and policies for socio-cultural advancement—health

Fulfillment of basic individual health needs, maintenance of sanitary and environmentally healthful community conditions; and elimination of health disparities by identifying and addressing the social determinants of health are the objectives for health.

Response:

The proposed action does not directly or indirectly affect the objectives and policies for health. The proposed action does not affect individual health needs, sanitation and health conditions, and health disparities.

HRS 226-21 Objective and policies for socio-cultural advancement—education

The provision of a variety of educational opportunities that enable individuals to fulfill their needs, responsibilities and aspirations is the objective for education.

Response:

Through the payment of impact fees, the proposed project indirectly supports the objectives and policies for education by supporting the provision of adequate and accessible educational services and facilities in Central Maui.

HRS 226-22 Objective and policies for socio-cultural advancement--social services

The objective for social services is improved public and private social services and activities that enables individuals, families and groups to become more self-reliant and confident to improve their well-being.

Response:

The objective and policies for improving public and private social services are indirectly supported by the proposed action through the provision of affordable housing opportunities.

HRS 226-23 Objective and policies for socio-cultural advancement—leisure

The objective for leisure is the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.

Response:

As a residential project, the proposed action indirectly advances the objective and policies for leisure. The proposed project includes a community building for social gathering and community activity space for residents.

HRS 226-24 Objective and policies for socio-cultural advancement--individual rights and personal well-being

The individual rights and personal well-being objective seeks to increase opportunities and protection of individual rights to enable achievement of socio-economic needs and aspirations.

Response:

The proposed residential project does not directly or indirectly affect the objective and policies related to individual rights and personal well-being.

HRS 226-25 Objective and policies for socio-cultural advancement--culture

Enhancement of cultural identities, traditions, values, customs, and arts of Hawaii's people reflects the objective for culture.

Response:

A Cultural Impact Assessment (CIA) was prepared for the proposed project as part of the environmental review process. The CIA fosters increased knowledge of native Hawaiian cultural practices, as well as the history of the project area. In this context, the proposed action indirectly advances the objective and policies related to culture.

HRS 226-26 Objectives and policies for socio-cultural advancement--public safety

The objectives for public safety seek to provide assurance of public safety and adequate protection of life and property for all people; optimum organizational readiness and capability in emergency management during civil disruptions, wars, natural disasters, and other major disturbance; and promotion of a sense of community responsibility for the welfare and safety of Hawaii's people.

Response:

The proposed action does not directly or indirectly affect the objectives and policies for public safety. In particular, the project does not address protection of life and property parameters, organizational readiness and capacity, and community responsibility for peoples' welfare and safety.

HRS 226-27 Objectives and policies for socio-cultural advancement--government

The objective for government encompasses efficient, effective and responsive government services and fiscal integrity, and responsibility, and efficiency in state and county governments.

Response:

The proposed action has indirect applicability to the objectives and policies for government. In particular, the project will comply with regulatory requirements which advance transparency in the flow of project-related information to the public. Such requirements include the Chapter 343, HRS environmental review process.

Priority Guidelines

"Priority guidelines" means those guidelines which shall take precedence when addressing areas of statewide concern. This section addresses applicability criteria to the priority guidelines set forth in HRS 226-103.

Priority guidelines of the Hawai'i State Plan covers the economy, population growth and land resources, crime and criminal justice, affordable housing, quality education,

sustainability, and climate change adaptation. Applicability assessment for each of the foregoing issue areas are presented below:

1. <u>Economic Priority Guidelines</u>

Response:

The proposed action indirectly supports the economic priority guidelines by supporting construction activity which contributes to increased employment opportunities, job choices, and living standards. Pending funding availability, the project will include solar energy systems for the development, thereby advancing measures to lessen dependence on fossil fuel based energy.

2. <u>Population Growth and Land Resources Priority Guidelines</u>

Response:

The proposed project supports population growth and land resources priority guidelines as it will be developed on vacant land in Waiehu. In addition, the project will be implemented adjacent to a developed area in Central Maui, in proximity to existing infrastructure and services.

3. Crime and Criminal Justice Priority Guidelines

Response:

The proposed action does not directly or indirectly affect the priority guidelines for crime and criminal justice.

4. <u>Affordable Housing Priority Guidelines</u>

Response:

The proposed project directly affects the priority guidelines for affordable housing as it will provide 120 units of affordable housing for those earning 60 percent or less of the Area Median Income. The proposed project will be developed on vacant land, in an area that is close to the government, business, and commercial centers of Wailuku and Kahului.

5. Quality Education Priority Guidelines

Response:

The proposed action does not directly or indirectly affect the priority guidelines for education.

6. <u>Sustainability Priority Guidelines</u>

Response:

The proposed action supports smart growth principles and is being developed within the County's UGB. Sustainability measures, such as energy efficient and water conserving fixtures, will be incorporated into the project design.

7. <u>Climate Change Adaptation Priority Guidelines</u>

Response:

The proposed project indirectly supports the climate change priority guidelines as it will be implemented in an area that is outside of natural landscape features such as flood zones as well as the 3.2-foot projected SLR-XA in order to avoid impacts related to climate change.

D. STATE FUNCTIONAL PLANS

A key element of the Statewide Planning System is the Functional Plans which set forth the policies, statewide guidelines, and priorities within a specific field of activity. There are 13 Functional Plans which have been developed by the state agency primarily responsible for a given functional area. Together with the County General Plans, the State Functional Plans establish more specific strategies for implementation. In particular, State Functional Plans provide for the following:

- Identify major Statewide priority concerns
- Define current strategies for each functional area
- Identify major relationships among functional areas
- Provide direction and strategies for departmental policies, programs, and priorities
- Provide a guide for the allocation of resources
- Coordinate State and County roles and responsibilities in the implementation of the Hawai'i State Plan

Table 2 provides an assessment of the relationship between the proposed action and each of the 13 Functional Plans.

Table 2. Relation Between the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
1	Agriculture Functional Plan (1991)	Department of Agriculture	Continued viability of agriculture throughout the State	The proposed project will be developed on vacant land formerly used to grow and harvest macadamia nuts. However, production of macadamia nuts ceased in 1999 and the land has been fallow the past 20 years. Currently on the island of Maui, approximately 70,714 acres of the total land area of the island are within the ALISH "Prime" designation. As such, the use of 11.47 acres or approximately 0.02 percent of the "Prime" designated 70,714 acres on Maui to provide for much needed affordable housing rentals will not contravene the objectives and policies of this functional plan.
2	Conservation Lands State Functional Plan (1991)	Department of Land and Natural Resources	Addresses issues of population and economic growth and its strain on current natural resources; broadening public use of natural resources while protecting lands and shorelines from overuse; additionally, promotes the aquaculture industry	The proposed project will not utilize any State Conservation lands. Similarly, the project is located inland, and not near the coastline. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
3	Education State Functional Plan (1989)	Department of Education	Improvements to Hawaii's educational curriculum, quality of educational staff, and access to adequate facilities	The proposed project will comply with the requirement for school impact fees and will coordinate with the Department of Education on appropriate school impact fees. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
4	Employment State Functional Plan (1990)	Department of Labor and Industrial Relations	Improve the qualifications, productivity, and effectiveness of the State's workforce through better education and training of workers as well as efficient planning of economic development, employment opportunities, and training activities	The proposed action will result in the creation of construction jobs throughout the development period. This will provide local residents with opportunities to successfully compete in the workforce. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
5	Energy State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Lessen the reliance on petroleum and other fossil fuels in favor of alternative sources of energy so as to keep up with the State's increasing energy demands while also becoming a more sustainable island state; achieving dependable, efficient, and economical statewide energy systems	The proposed project will explore the option of solar panels for electricity, if feasible. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

Table 2. Relation Between the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
6	Health State Functional Plan (1989)	Department of Health	Improve health care system by providing for those who don't have access to private health care providers; increasing preventative health measures; addressing 'quality of care' elements in private and public sectors to cut increasing costs	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
7	Higher Education Functional Plan (1984)	University of Hawaii	Prepare Hawaii's citizens for the demands of an increasingly complex world through providing technical and intellectual tools	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
8	Historic Preservation State Functional Plan (1991)	Department of Land and Natural Resources	Preservation of historic properties, records, artifacts and oral histories; provide public with information/education on the ethnic and cultural heritages and history of Hawai'i	A previous archaeological inventory survey (AIS) was completed on the 11.476-acre site and no historic properties were found. Archaeological monitoring is proposed for project-related ground disturbing activities. Consultation with the State Historic Preservation Division has been initiated pursuant to Chapter 6E, HRS. A CIA was prepared for the proposed project and concluded that adverse impacts to cultural resources are not anticipated. The proposed action is in consonance with this functional plan.
9	Housing State Functional Plan (1989)	Hawaii Housing Finance and Development Corporation	Provide affordable rental and for-sale housing; increase homeownership and amount of rental housing units; acquiring public and privately-owned lands for future residential development; maintain a statewide housing data system	The proposed project provides additional affordable rental housing to households earning up to 60 percent of AMI in close proximity to transit and various public, recreational, and commercial services. In addition, the project will be implemented in proximity to a developed area with existing infrastructure and services in Central Maui. The proposed action is in consonance with this functional plan.
10	Human Services State Functional Plan (1989)	Department of Human Services	Refining support systems for families and individuals by improving elderly care, increasing preventative measures to combat child/spousal abuse and neglect; providing means for 'self-sufficiency'	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

Table 2. Relation Between the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
11	Recreation State Functional Plan (1991)	Department of Land and Natural Resources	Manage the use of recreational resources via addressing issues: (1) ocean and shoreline recreation, (2) mauka, urban, and other recreation opportunities, (3) public access to shoreline and upland recreation areas, (4) resource conservation and management, (5) management of recreation programs/facilities/areas, and (6) wetlands protection and management	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
12	Tourism State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Balance tourism/economic growth with environmental and community concerns; development that is cognizant of the limited land and water resources of the islands; maintaining friendly relations between tourists and community members; development of a productive workforce and enhancement of career and employment opportunities in the visitor industry	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
13	Transportation State Functional Plan (1991)	Department of Transportation	Development of a safer, more efficient transportation system that also is consistent with planned physical and economic growth of the state; construction of facility and infrastructure improvements; develop a transportation system balanced with new alternatives; pursue land use initiatives which help reduce travel demand	The proposed project will be implemented in proximity to existing State and County roadway facilities. A Traffic Impact Analysis Report (TIAR) has been prepared to assess the projected increase in traffic on these roadways. The TIAR that was prepared determined that the project will have a minimal increase in traffic for the region, an estimated 3.46 percent increase from forecast Base Year 2024 conditions. As such, no significant impacts are anticipated and all movements at the project's three (3) driveways are anticipated to operate at Level of Service B or better across peak hours. Coordination with the County and State on traffic mitigation measures will continue during the development of the proposed project, and appropriate BMPs will be implemented before, during, and after construction.

E. GENERAL PLAN OF THE COUNTY OF MAUI

As indicated by the Maui County Charter, the purpose of the general plan shall be to:

... indicate desired population and physical development patterns for each island and region within the county; shall address the unique problems and needs of each island and region; shall explain opportunities and the social, economic, and environmental consequences related to potential developments; and shall set forth the desired sequence, patterns and characteristics of future developments. The general plan shall identify objectives to be achieved, and priorities, policies, and implementing actions to be pursued with respect to population density, land use maps, land use regulations, transportation systems, public and community facility locations, water and sewage systems, visitor destinations, urban design, and other matters related to development.

Chapter 2.80B of the Maui County Code, relating to the General Plan and Community Plans, implements the foregoing Charter provision through enabling legislation which calls for a Countywide Policy Plan and a Maui Island Plan.

1. Countywide Policy Plan

The Countywide Policy Plan was adopted in March 2010 and is a comprehensive policy document for the islands of Maui County to the year 2030. The plan replaces the General Plan of the County of Maui 1990 Update and provides the policy framework for the development of the Maui Island Plan as well as for updating the nine (9) detailed Community Plans. The Countywide Policy Plan provides broad goals, objectives, policies and implementing actions that portray the desired direction of the County's future. Goals are intended to describe a desirable condition of the County by the year 2030 and are intentionally general. Objectives tend to be more specific and may be regarded as milestones to achieve the larger goals. Policies are not intended as regulations, but instead provide a general guideline for County decision makers, departments, and collaborating organizations toward the attainment of goals and objectives. Implementing actions are specific tasks, procedures, programs, or techniques that carry out policy. Discussion of the proposed project's applicability to the relevant goals, objectives, policies, and implementing actions of the Countywide Policy Plan is provided in Appendix "L-2".

As with the Hawai'i State Plan, the methodology for assessing a project's relationship to the Countywide Policy Plan involves examining the project's applicability to the Plan's goals, objectives, and policies. "Applicability" refers to a project's need, purpose and effects, and how they advance or promote a particular set of goals, objectives and policies. In assessing the relationship between a

proposed action and the Countywide Policy Plan, an action may be categorized in one of the following groups:

1. <u>Directly applicable</u>: the action and its potential effects directly advances, promotes or affects the relevant goal, objective, or policy.

Example: Using the same example as that provided for the Hawai'i State Plan, that of a County project to develop a new water source and related transmission facilities, such an action would be directly applicable to improving physical infrastructure. The relevant objective states: "Improve water systems to assure access to sustainable, clean, reliable, and affordable sources of water" (Objective I.1). A policy within this objective category states: "Ensure that adequate supplies of water are available prior to approval of subdivision or construction documents" (Policy I.1.a).

In this instance, the proposed action is considered to be directly applicable to the cited objective and policy.

2. <u>Indirectly applicable</u>: the action and its potential effects indirectly supports, advances or affects the objective, policy or priority guideline.

Example: The county water source project cited above supports the objective to: *Improve land use management and implement a directed-growth strategy* (Objective J.1). A related policy encompassed by this objective states: "Direct new development in and around communities with existing infrastructure and service capacity, and protect natural, scenic, shoreline, and cultural resources" (Policy J.1.h). In this case, the principle purpose of the project is not to create source specifically intended to improve land use management. Nonetheless, the proposed action indirectly supports the Countywide Policy Plan's directives relating to appropriate locations for new development.

3. **Not applicable:** the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Countywide Policy Plan.

Example: The county water source improvement project referenced above, may not have direct or indirect linkage to Objective D.1, which states: "In cooperation with the Federal and State governments and nonprofit agencies, broaden access to social and healthcare services and expand options to improve the overall wellness of the people of Maui County". Hence, from a policy analysis and linkage standpoint, the proposed action would be considered not applicable to this set of objectives and policies.

It is recognized that policy analysis is subject to interpretation and is best considered in the context of the proposed action's local and regional conditions.

The assessment presented below restates the goal for each policy/planning category followed by a response which consolidates and summarizes the assessments provided in **Appendix "L-2"**. The responses examine whether the proposed action is directly applicable, indirectly applicable or not applicable to the respective Countywide Policy Plan objectives, policies and implementing actions.

(A) PROTECT THE NATURAL ENVIRONMENT

Goal:

Maui County's natural environment and distinctive open spaces will be preserved, managed, and cared for in perpetuity.

Response:

The proposed project indirectly improves the opportunity for Maui County families to experience, live, and thrive in the natural beauty of our island home. This land will be managed and maintained for years to come while also providing much needed affordable housing. The project has been carefully designed taking into consideration building profiles and massing so as to not adversely impact scenic views and vistas. The proposed buildings will blend into the surrounding urban landscape.

The proposed project will utilize BMPs to ensure that natural resources such as the coastal environment is not impacted by construction activities. The use of BMPs also ensures compatibility between land-based and water-based functions, resources, and ecological systems. The flora/fauna survey conducted as part of the environmental review process represents an effort to appropriately identify any important biological resource considerations for the project.

(B) PRESERVE LOCAL CULTURES AND TRADITIONS

Goal:

Maui County will foster a spirit of pono and protect, perpetuate, and reinvigorate its residents' multi-cultural values and traditions to ensure that current and future

generations will enjoy the benefits of their rich island heritage.

Response:

The proposed community will be developed in an area away from culturally sensitive areas. A CIA was prepared for the proposed project as part of the environmental review process. The CIA fosters increased knowledge of native Hawaiian cultural practices, as well as the history of the project area. In this context, the proposed action advances the objective and policies related to preserving local cultures and traditions.

Archaeological investigations were conducted and determined that there are no historic properties on the site. In addition, archaeological monitoring will be carried out during ground altering activities to ensure no historic or cultural properties are adversely impacted.

(C) <u>IMPROVE EDUCATION</u>

Goal:

Residents will have access to lifelong formal and informal educational options enabling them to realize their ambitions.

Response:

Through the payment of impact fees to the Department of Education, the proposed project indirectly ensures the provision of adequate and accessible educational services and facilities in Central Maui. It will afford many families the opportunity to be closer in proximity to schools and services that can support their educational experience.

(D) <u>STRENGTHEN SOCIAL AND HEALTHCARE SERVICES</u>

Goal:

Health and social services in Maui County will fully and comprehensively serve all segments of the population.

Response:

Indirectly, this proposed project will support access to services. By providing affordable housing to families in a centrally located area, they will have easier access to utilize social and healthcare services, if needed.

(E) EXPAND HOUSING OPPORTUNITIES FOR RESIDENTS

Goal:

Quality, island-appropriate housing will be available to all residents.

Response:

The proposed project provides additional affordable rental housing opportunities for Maui County families in an area that is close to businesses, schools, and commercial centers. In addition, the project will be implemented in proximity to a developed area with existing infrastructure and services in Central Maui.

(F) STRENGTHEN THE LOCAL ECONOMY

Goal:

Maui County's economy will be diverse, sustainable, and supportive of community values.

Response:

During construction, the proposed project will provide job opportunities. After completion, families residing in the project will support the businesses in the local community, thus, indirectly impacting the economy in a positive way.

(G) IMPROVE PARKS AND PUBLIC FACILITIES

Goal:

A full range of island-appropriate public facilities and recreational opportunities will be provided to improve the quality of life for residents and visitors.

Response:

The proposed project will indirectly support the goal, objective, and policies of expanding access to recreational opportunities and community facilities to meet the needs of residents. The central location of the site of this project will provide easy access to existing recreational activities and community facilities. The project will also incorporate an onsite clubhouse building for residents.

(H) <u>DIVERSIFY TRANSPORTATION OPTIONS</u>

Goal:

Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Response:

The TIAR prepared for this project determined a minimal increase in traffic for the region. As such, no significant impacts are anticipated and all movements at the project's three (3) driveways are anticipated to operate at Level of Service B or better across peak hours. Coordination with the County and State on traffic mitigation measures will continue during the development of the proposed project, and appropriate BMPs will be implemented before, during, and after construction.

(I) IMPROVE PHYSICAL INFRASTRUCTURE

Goal:

Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies.

Response:

The proposed project indirectly supports the physical infrastructure objective and related policies as it is located in an area that is serviced by existing County water and wastewater infrastructure. Coordination will be undertaken with the DWS to determine if certain improvements to the County's water system will be required to service the project. Coordination will be undertaken with the DEM regarding wastewater connection. Construction waste will be disposed at the County's Central Maui Landfill or appropriate construction recycling centers. The proposed development may include solar panels for electricity, if feasible.

(J) PROMOTE SUSTAINABLE LAND USE AND GROWTH MANAGEMENT

Goal:

Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.

Response:

The proposed project will be developed on vacant land in Waiehu, within the UGB as designated by the County of Maui's Maui Island Plan. The project is located in a developed area in Central Maui, in proximity to existing infrastructure and services. The project will be developed in an area outside of the projected 3.2-foot SLR-XA.

As an urban project, the proposed action supports smart growth principles.

(K) STRIVE FOR GOOD GOVERNANCE

Goal:

Government services will be transparent, effective, efficient, and responsive to the needs of residents.

Response:

The permitting and environmental review processes involves opportunities for the public to provide input throughout the environmental review process and the County of Maui 2.97 affordable housing approval process. Opportunity for comments will be provided, pursuant to the environmental assessment review process, which provided the opportunity for public engagement and feedback.

(L) <u>MITIGATE CLIMATE CHANGE AND WORK TOWARD RESILIENCE</u>

Goal:

Minimize the causes and negative effects of climate change.

Response:

The proposed project will incorporate the use of energy efficient fixtures and appliances and will potentially install solar panels, if feasible. With this information in mind, the objectives and policies for the goal of minimizing the causes and negative effects of climate changes is indirectly applicable to the proposed project.

2. Maui Island Plan

The Maui Island Plan (MIP) is applicable to the island of Maui only, providing more specific policy-based strategies for population, land use, transportation, public and community facilities, water and wastewater systems, visitor destinations, urban design, and other matters related to future growth.

As provided by Chapter 2.80B, the MIP shall include the following components:

- 1. An island-wide land use strategy, including a managed and directed growth plan
- 2. A water element assessing supply, demand and quality parameters
- 3. A nearshore ecosystem element assessing nearshore waters and requirements for preservation and restoration
- 4. An implementation program which addresses the County's 20-year capital improvement requirements, financial program for implementation, and action implementation schedule
- 5. Milestone indicators designed to measure implementation progress of the MIP

The MIP addresses a number of planning categories with detailed policy analysis and recommendations which are framed in terms of goals, objectives, policies and implementing actions. These planning categories address the following areas:

- 1. Population
- 2. Heritage Resources
- 3. Natural Hazards
- 4. Economic Development
- 5. Housing
- 6. Infrastructure and Public Facilities
- 7. Land Use

Additionally, an essential element of the MIP is its directed growth plan which provides a management framework for future growth in a manner that is fiscally, environmentally, and culturally prudent. Among the directed growth management tools developed through the MIP process are maps delineating UGB, small town boundaries and rural growth boundaries. The respective boundaries identify areas

appropriate for future growth and their corresponding intent with respect to development character.

The proposed project is located within the UGB of the MIP. In this regard, it is consistent with the directed growth strategy defined via growth maps adopted in the MIP. See **Figure 13**.

A summary of the project's relationship to the MIP, as detailed in **Appendix "L-3"** is provided below. Following the assessment methodology used for the Hawai'i State Plan and the Countywide Policy Plan, the proposed action was reviewed with respect to its applicability to goals, objectives, and policies of the MIP. "Applicability" refers to a project's need, purpose and effects, and how these advance or promote a particular set of goals, objectives and priority guidelines. In assessing the relationship between a proposed action and the MIP, an action may be categorized in one of the following groups:

1. <u>Directly applicable</u>: the action and its potential effects directly advances or promotes the objective, policy or priority guideline.

Example: Again, using a county project to develop a new water source and related transmission facilities as an example, a project of this nature would be directly applicable to the MIP's Objective 6.3.2, which states: "Increase the efficiency and capacity of the water systems in striving to meet the needs and balance the island's water needs". As well, this action would directly advance the MIP's Policy 6.3.2.f, which states: "Acquire and develop additional sources of potable water". The need, purpose and effects of the proposed new water source project is directly applicable to the foregoing objective and policy.

2. <u>Indirectly applicable</u>: the action's potential effects indirectly supports or advances the objective, policy or priority guideline.

Example: The county water source project cited above supports the MIP's Objective 7.3.2 which states: "Facilitate more self-sufficient and sustainable communities". Additionally, this kind of action is indirectly applicable to the related MIP Policy 7.3.2.f, which states: "Facilitate the development of housing by focusing projects in locations where land and infrastructure costs facilitate the development of affordably-priced housing". In this case, the principle purpose of the project was not to specifically facilitate the development of affordably-priced housing. However, the project's contribution to adequate infrastructure systems is supportive of the policy. In this instance, the proposed action may be deemed to be indirectly applicable to the objective and policy of the MIP.

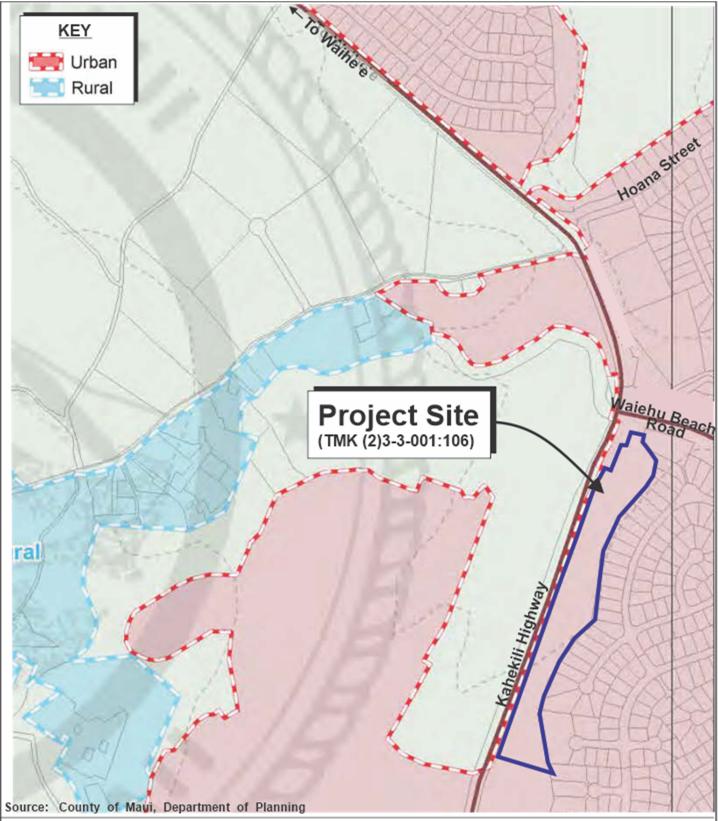


Figure 13 Proposed Hale Mahaolu Ke Kahua
Affordable Housing Community
Urban Growth Boundary Map
for the Waiehu Area

NOT TO SCALE

Prepared for: Waiehu Housing, LP

MUNEKIYO HIRAGA

3. **Not applicable:** The action and its potential effects have no direct or indirect relationship to the objectives and policies of the Maui Island Plan.

Example: That same county water source improvement project referenced above, may not have direct or indirect linkage to the MIP's Objective 4.2.1, which states: "Increase the economic contribution of the visitor industry to the island's environmental well-being for the island's residents' quality of life". In this case, there is no reasonably deduced direct or indirect relationship between the proposed action and Objective 4.2.1. Hence, the proposed action would be considered not applicable to the objective.

In general, a proposed action's applicability to the MIP is assessed on the basis of the action's direct or indirect relationship to the respective objectives, policies and implementing actions.

The assessment presented below summarizes the goals for each policy/planning category of the MIP, followed by a response which consolidates and summarizes the assessments provided in **Appendix "L-3"**. The responses examines whether the proposed action is directly applicable, indirectly applicable or not applicable to the respective MIP objectives, policies and implementing actions.

CHAPTER 1 - POPULATION

Goal:

Maui's people, values, and lifestyles thrive through strong, healthy, and vibrant island communities.

Response:

The proposed project directly supports the goal on population and healthy and vibrant island communities. The proposed project provides additional affordable rental housing opportunities for Maui County families in Waiehu. Further, the proposed project will provide for additional housing options for local families seeking to live on Maui island to be closer to their families and local employment, education, and social opportunities.

CHAPTER 2 - HERITAGE RESOURCES

2.1 Cultural, Historical, and Archaeological Resources

Goal:

Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions.

Response:

The objective and policies related to respecting and protecting archaeological and cultural resources are indirectly applicable to the proposed project. A CIA was prepared for the proposed project as part of the environmental review process. The CIA fosters increased knowledge of native Hawaiian cultural practices, as well as the history of the project area. In this context, the proposed action advances the objective and policies related to preserving local cultures and traditions. Archaeological investigations identified no historic properties within the project site. Nevertheless, archaeological monitoring will be conducted during construction in accordance with the approved AMP. Landscaping proposed in connection with the project is intended to enhance the project's visual relationship with its immediate surrounding environs.

2.2 Shoreline, Reefs, and Nearshore Waters

Goal:

An intact, ecologically functional system of reef, shoreline, and nearshore waters that are protected in perpetuity.

Response:

The proposed project is located inland, and not in close proximity to the shoreline. With the spatial separation, there are no direct project considerations as it relates to shoreline management programming, reef health, coastal water quality, marine life or shoreline lands and access rights. However, inasmuch as the proposed action does involve grading and earth moving activities, the project may be considered to have indirect applicability to objectives and policies relating to coastal water quality. As such, appropriate BMPs will be implemented during construction to ensure that soil erosion and runoff do not adversely affect coastal waters.

2.3 Watersheds, Streams and Wetland

Goal:

Healthy watersheds, streams, and riparian environments.

Response:

The proposed project is not directly or indirectly applicable to the goal of maintaining healthy watersheds, streams, and riparian environments.

2.4 Wildlife and Natural Areas

Goal:

Maui's natural areas and indigenous flora and fauna will be protected.

Response:

The environmental review process for the proposed action included a flora and fauna survey addressing biological resources in the project area. This assessment addresses the objective of identification, protection (as applicable) and restoration of wildlife habitats.

2.5 Scenic Resources

Goal:

Maui will continue to be a beautiful island steeped in coastal, mountain, open space, and historically significant views that are preserved to enrich the residents' quality of life, attract visitors, provide a connection to the past, and promote a sense of place.

Response:

The objectives and policies relating to protecting and maintaining scenic resources are indirectly applicable to the proposed project. The proposed project will be implemented along Kahekili Highway, which provides views of the West Maui Mountains. The project has been carefully designed taking into consideration building profiles and massing so as to not adversely impact existing views and scenic vistas.

CHAPTER 3 - NATURAL HAZARDS

Goal:

Maui will be disaster resilient.

Response:

The objectives and policies related to making Maui disasterresilient are not directly or indirectly applicable to the proposed project. The proposed action is limited to the development of a new multi-family affordable housing project for Maui County families.

CHAPTER 4 - ECONOMIC DEVELOPMENT

4.1 Economic Diversification

Goal:

Maui will have a balanced economy composed of a variety of industries that offer employment opportunities and well-paying jobs and a business environment that is sensitive to resident needs and the island's unique natural and cultural resources.

Response:

The proposed project is indirectly applicable to the goal of economic diversification. The proposed project will generate short term construction-related employment opportunities, as well as supporting the construction industry as a whole, including local businesses that rely on said industry. Further, the proposed action will indirectly affect the local economy, as it is anticipated that residents of the project will support small businesses nearby. From a long-term prespective, the proposed project also provides affordable housing options for Maui County families.

4.2 Tourism

Goal:

A healthy visitor industry that provides economic well-being with stable and diverse employment opportunities.

Response:

The proposed project does not have direct or indirect relationships to the goal for tourism and its accompanying objectives for increasing the visitor industry's contributions to our island's quality of life, managing future visitor unit expansion, and maximizing residents' benefits from the visitor industry.

4.3 Agriculture

Goal:

Maui will have a diversified agricultural industry contributing to greater economic, food, and energy security and prosperity.

Response:

The proposed project does not have direct or indirect relationships to the goal for agriculture and its related objectives for consumption for locally produced fruits and vegetables, maintaining or increasing agriculture's share in the local economy, and expanding diversified agricultural production. The proposed project is located on vacant agricultural land. The proposed action is a prudent use of land that has been underutilized for many years to benefit Maui County families with affordable rental housing that is centrally located and in proximity to government services and employment opportunities.

4.4 Emerging Sectors

Goal:

A diverse array of emerging economic sectors.

Response:

The proposed project does not have direct or indirect relationships to the goal for emerging sectors. The accompanying objectives for increased investment in and expansion of emerging industries, and increased development of renewable energy technologies are not affected by the proposed action.

4.5 Small Business Development

Goal:

Small businesses will play a key role in Maui's economy.

Response:

The proposed project consists of the development of a new multi-family affordable housing complex in Waiehu. Though the goal of making small businesses play a key role in Maui's economy is not directly applicable to the proposed project, it is anticipated that residents of the project will support small, locally-owned businesses that are in the

vicinity. As such, the objective and policies related to small-business development are indirectly applicable to the proposed action.

4.6 Health Care Sector

Goal:

Maui will have a health care industry and options that broaden career opportunities that are reliable, efficient, and provide social well-being.

Response:

The proposed project does not have direct or indirect relationships to the goal for the health care and its related objectives for expanding the economic benefits of the health care sector, increasing efficiency of the health care delivery system, minimizing the costs of health care, and expanding Maui's alternative health care system.

4.7 Education and Workforce Development

Goal:

Maui will have effective education and workforce development programs and initiatives that are aligned with economic development goals.

Response:

The goal for education and workforce development is not directly or indirectly applicable to the proposed action. As well, the related objectives of improving preschool and K to 12 education, increasing higher education certificates and degrees, and developing more jobs in the STEM-related sectors are not affected by the proposed project. The proposed project will also comply with the requirement for school impact fees and will coordinate with the Department of Education on appropriate school impact fees.

CHAPTER 5 - HOUSING

Goal:

Maui will have safe, decent, appropriate, and affordable housing for all residents developed in a way that contributes to strong neighborhoods and a thriving island community.

Response:

The proposed project provides 120 units of affordable rental housing in Central Maui for local families earning 60 percent or less of the AMI. The proposed development will be located near other urban areas, making prudent use of existing infrastructure and resources.

CHAPTER 6 - INFRASTRUCTURE AND PUBLIC FACILITIES

6.1 Solid Waste

Goal:

Maui will have implemented the ISWMP thereby diverting waste from its landfills, extending their capacities.

Response:

The proposed project is indirectly applicable to the goal of solid waste. Solid waste generated by the project during construction will be recycled to the extent practicable and disposed at appropriately permitted construction waste disposal sites. Recycle bins will be provided for residents of the project to divert waste and to minimize impact on landfill capacity.

6.2 Wastewater

Goal:

Maui will have wastewater systems that comply with or exceed State and Federal regulations; meet levels-of-service needs; provide adequate capacity to accommodate projected demand; ensure efficient, effective, and environmentally sensitive operation; and maximize wastewater reuse where feasible.

Response:

The proposed project is indirectly applicable to the goal on wastewater. The proposed project will connect to the County wastewater system. Coordination will be undertaken with the DEM regarding connection to the County system and any required upgrades to the wastewater system to service the proposed project.

6.3 Water

Goal:

Maui will have an environmentally sustainable, reliable, safe, and efficient water system.

Response:

The goal related to water systems is indirectly applicable to the proposed project. The project site is located in an area that is serviced by existing County water infrastructure. Coordination will be undertaken with the DWS regarding connection to the County's water system.

6.4 Transportation

Goal:

An interconnected, efficient, and well-maintained, multimodal transportation system.

Response:

The proposed project site is located near bus stops for the Waihe'e Villager Route 8, which passes by the north end of the property area on Waiehu Beach Road. There are 4-foot paved shoulders available for bicyclists on both sides of Kahekili Highway between Waiehu Beach Road and Piihana Road. Kahekili Highway is currently a "signed shared roadway", which is a roadway shared by both vehicles and bicycles that accommodates bicycles through wider vehicular travel lanes or paved shoulders. Given its location, the project indirectly supports the objectives of providing a multimodal transportation system that respects and enhances the natural environment, scenic views, and the surrounding community's character.

6.5 Transit

Goal:

An island-wide transit system that addresses the needs of residents and visitors and contributes to healthy and livable communities.

Response:

The proposed project is indirectly applicable to the goals and objectives for transit, specifically those relating to the advancement of an integrated island-wide transit system. The Maui Public Bus system's Waihe'e Villager Route 8

passes along the north end of the project area on Waiehu Beach Road, and serves a number of locations throughout Waiehu, Waihe'e and Kahului.

6.6 Parks

Goal:

Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all.

Response:

The proposed project indirectly supports the goal on parks and wilderness areas connected by a network of greenways, bikeways and roads that are accessible to all. Though the proposed project mainly consists of the development of a 120 multi-family affordable housing units, the proposed action also consists of the inclusion of a clubhouse for residents. The proposed project is centrally located and connected by existing roadways and bikeways to local recreational parks and natural resource areas in the Waiehu region.

6.7 Public Facilities

Goal:

Maui will have adequate public facilities that meet the diverse needs of residents.

Response:

The proposed action is indirectly applicable to the goal for adequate public facilities. The project includes a clubhouse building for residents, as well as a non-profit facility and, thereby, promotes the objective of more effective planning for public facilities which meet community needs.

6.8 Schools and Libraries

Goal:

Maui will have school and library facilities that meet residents' needs and goals.

Response:

Through the payment of impact fees to the DOE, the proposed project indirectly ensures the provision of adequate and accessible educational services and facilities in Central Maui. Further, the objective and policy related to providing connectivity between neighborhoods and schools is indirectly supported by the proposed action, as there are paved shoulders for pedestrians and bicycles on Kahekili Highway adjacent to the project site.

6.9 Health Care

Goal:

All of Maui residents will have the best possible health care to include healthy living, disease prevention, as well as acute and long-term care.

Response:

The proposed action does not have direct or indirect relationships to the goal for healthcare. In this context, the project does not advance or promote the objectives for greater healthcare system autonomy, increase long-term care capacity and alternatives, support home care and community based programs, and improve preventative medicine and primary health care.

6.10 Energy

Goal:

Maui will meet its energy needs through local sources of clean, renewable energy, and through conservation.

Response:

The proposed project will incorporate the use of energy efficient fixtures and appliances and will potentially install solar panels, if feasible. With this information in mind, the objectives and policies for the goal of meeting Maui's energy needs through local sources of clean, renewable energy and through conservation is indirectly applicable to the proposed project.

6.11 Harbors and Airports

Goal:

Maui will have harbors and airports that will efficiently, dependably, and safely facilitate the movement of passengers and cargo.

Response:

The goal for harbors and airports are not applicable to the proposed project. In particular, the project does not advance or promote the upgrading of harbor and airport facilities, and establishing appropriately planned and functional small boat harbors.

CHAPTER 7—LAND USE

7.1 Agricultural Lands

Goal:

Maui will have a prosperous agricultural industry and will protect agricultural lands.

Response:

The proposed project will be developed on vacant land in Waiehu that has not been used for productive agricultural activities for over 20 years. Moreover, the project site is situated adjacent to residential neighborhoods and in proximity to existing infrastructure services. Given the abundance of agricultural land on Maui and the dire need for affordable housing, implementation of the proposed project will not adversely affect agriculture productivity on Maui.

7.2 Rural Areas

Goal:

Maui will have a rural landscape and lifestyle where natural systems, cultural resources and farm lands are protected and development enhances and compliments the viability and character of rural communities.

Response:

The proposed project is located within the UGB as designated by the County of Maui MIP. The proposed project is not applicable with these policies related to keeping Maui's rural landscape protected.

7.3 Urban Areas

Goal:

Maui will have livable human-scale urban communities, an efficient and sustainable land use pattern, and sufficient housing and services for Maui residents.

Response:

The proposed project is directly applicable to the goal of livable human-scale urban communities. The proposed project provides 120 affordable rental housing units and related improvements for Maui County families in Waiehu. The proposed project has been carefully designed to be in harmony with the the surrounding residential development and provides an efficient and sustainable land use pattern for a multi-family residential development. The project site is in proximity to businesses and public facilities that are offered to the community. The proposed multi-family development will be consistent with the character of Waiehu while also remaining respectful of open space. Further, the proposed project has and continues to seek community involvement and input in the land use planning process. Ongoing coordination with various State and County agencies will continue as detailed project plans are developed.

CHAPTER 8—DIRECTED GROWTH PLAN

8.1 Urban and Small Town Growth Area

Goal:

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

Response:

The proposed project is located within the UGB of the County of Maui's MIP. The project is in consonance with the objective and policies of the MIP and within an area planned for growth.

8.2 Rural Growth Area

Goal:

Maui will maintain opportunities for agriculture and rural communities through sound planning and clearly defined development expectations

Response:

The proposed project is located within the UGB of the MIP and the objectives and policies related to Rural Growth Boundaries are not applicable.

8.3 Protected Area Policy

Policy:

The Protected Areas in Diagram E-1, NW-1, N-1, NE-1, S-1, SE-1, and WC-1 should be concurrently reviewed with Table 8-2 and with any proposed land uses that may result inan adverse impact on a Protected Area. The County Council and the Administration should be notified if a Protected Area may be compromised by a development proposal.

Response:

Protected areas, as defined in Table 8-2 of the MIP are those lands categorized as preservation, park, greenbelt, greenway, and sensitive land. The proposed action does not occur on protected areas as delineated on Diagram WC-1.

F. WAILUKU-KAHULUI COMMUNITY PLAN

The proposed project is located within the Wailuku-Kahului Community Plan which covers the Central Maui region with boundaries from the northern shoreline from Poelua Bay to Baldwin Park on the north, Kailua Gulch and Lowrie Ditch on the east, Spanish Road to Waikapū to Honoapiʻilani Highway to Pohakea Guild on the south, and the Wailuku Judicial District boundary on the west. See **Figure 14**.

The Wailuku-Kahului Community Plan region is one (1) of nine (9) community plan regions established in the County of Maui. Each region's growth and development is guided by a Community Plan. The County's Community Plan reflects current and anticipated conditions in the Wailuku-Kahului region and advances planning goals, objectives, policies, and implementation considerations to guide decision-making in the region. The primary purpose of the Community Plan is to outline a detailed agenda for carrying out these policies and objectives. The Wailuku-Kahului Community Plan was adopted by the County of Maui through Ordinance Number 3061, and became effective on June 5, 2002.



Figure 14 Proposed Hale Mahaolu Ke Kahua
Affordable Housing Community
Wailuku-Kahului Community Plan Map

NOT TO SCALE

Prepared for: Waiehu Housing, LP

The majority of the subject property is designated for "Agriculture" use and a small southern portion of the subject property is designated "Project District 2 (Pi'ihana)". As indicated by the Wailuku-Kahului Community Plan, Project District 2 (Pi'ihana):

...should be oriented toward providing low and moderate income units with a mixture of housing types ranging from single family to multi-family units. Land for 20 percent of the housing units will be made available as a joint venture with the County for housing to meet the County's needs. Public amenities should include a park and open space system of pedestrian ways, greenbelts and buffer zones along major transportation routes. The project district should be compatible in scale to adjacent single family areas. Circulation should reflect a unified pattern with adjacent land uses.

The MCC Chapter 2.97 approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon. Among exemptions, the Applicant will be seeking exemption from MCC Chapter 19.510, Application and Procedures for a Community Plan Amendment and an exemption will be sought from MCC 2.80B which requires Community Plan land use consistency to allow the project to proceed without obtaining a Community Plan Amendment to "Multi-Family".

Further, the proposed project is consistent with the following goal and objectives and policies of the Wailuku-Kahului Community Plan as outlined below.

CULTURAL RESOURCES

Goal:

Identification, protection, preservation, enhancement, and where appropriate, use of cultural practices and sites, historic sites and structures, and cultural landscapes and view planes that:

- Provide a sense of history and define a sense of place for the Wailuku-Kahului region; and
- Preserve and protect native Hawaiian rights and practices customarily and traditionally exercised for subsistence, cultural and religious purposes in accordance with Article XII, Section 7, of the Hawaii State Constitution, and the Hawaii Supreme Court's PASH opinion, 79 HAW. 425 (1995).

Objective and Policy:

Preserve the character and integrity of historic sites in the Wailuku-Kahului region.

<u>Discussion and Response</u>: Consultation has been initiated with the SHPD pursuant to Chapter 6E, HRS. An AIS was prepared in 2008 for the 11.476-acre area in Waiehu. In its acceptance letter of the AIS, the SHPD concurred with the AIS and further stated that an AMP would suffice should any ground disturbing construction take place. Refer to **Appendix "G"** and **Appendix "G-1"**. SHPD also issued an acceptance letter of the AMP on November 10, 2021. Refer to **Appendix "G-1"**. Should any archaeological resources be discovered during ground altering activities, work shall cease in the immediate area of the find and mitigation coordination will be undertaken with the SHPD.

In addition, a CIA was prepared for the proposed project and noted that no on-going cultural practices were identified within the project area. Refer to **Appendix "H"**. However, if any cultural finds are encountered during construction, consultation with cultural and lineal descendants of the area is recommended to develop a reinterment plan and cultural preservation plan for proper cultural protocol, curation, and long-term maintenance.

HOUSING

Goal:

A sufficient supply and choice of attractive, sanitary and affordable housing accommodations for the broad cross section of residents, including the elderly.

Objectives and Policies:

- 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.
- 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.

<u>Discussion and Response:</u> The proposed project will be developed on vacant land in Waiehu. It will provide much needed affordable housing opportunities for Maui County families in an area that is close to existing residential developments as well as businesses, schools, and the commercial centers of Central Maui.

<u>GOVERNMENT</u>

Goal:

Government that demonstrates the highest standards of fairness; responsiveness to the needs of the community; fiscal integrity; effectiveness in planning and implementation of programs and projects; a fair and equitable approach to taxation and regulation; and efficient, results-oriented management.

Objective and Policy:

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

<u>Discussion and Response:</u> The proposed housing project will be implemented in a developed area in Central Maui, in proximity to existing infrastructure and services.

G. COUNTY ZONING

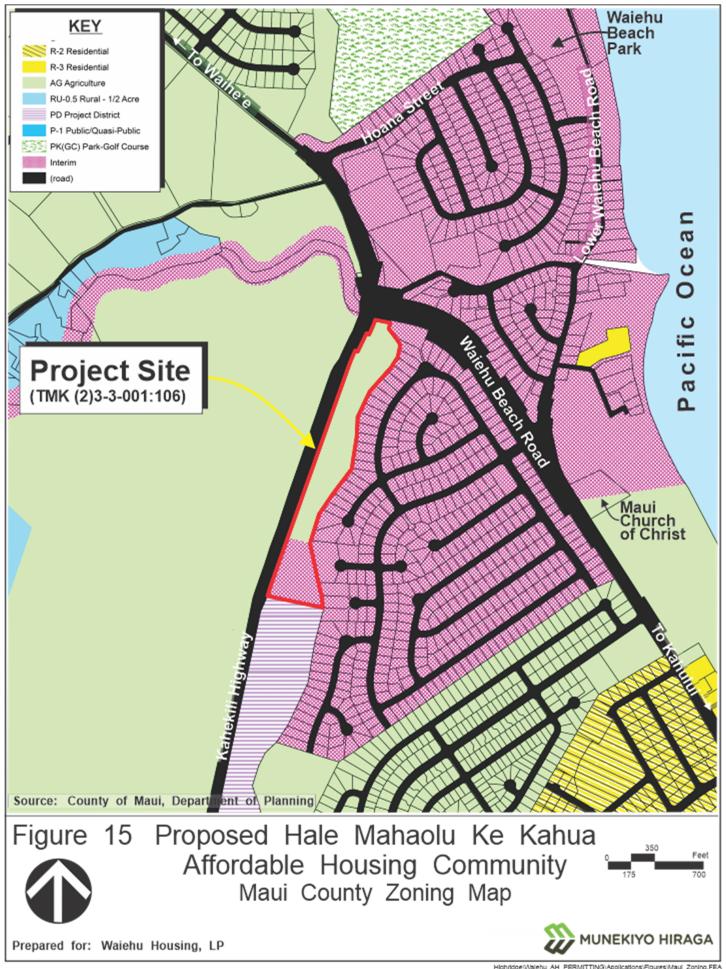
The land underlying the proposed project site is zoned "Agricultural" district and "Interim" district by the Maui County Zoning Ordinance. See **Figure 15**. As noted previously, the MCC Chapter 2.97 approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon. Among exemptions, the Applicant will be seeking exemptions from MCC Title19, Zoning, Article 1, Interim Zoning Provisions and MCC Chapter 19.30A, "Agricultural" district, to allow the use of "A-1, Apartment" district standards instead. This exemption will permit the development of multifamily residential uses without the need to obtain a Change of Zoning. Discussion of the MCC Chapter 2.97 exemption requests is provided in Section I of this Chapter.

H. HAWAI'I COASTAL ZONE MANAGEMENT PROGRAM

The Coastal Zone Management Area, as defined in Chapter 205A, HRS, includes all the lands of the State. As such, the proposed activities lie within the Coastal Zone Management Area.

The relevant objectives and policies of the Hawai'i Coastal Zone Management (CZM) Program, along with a detailed discussion of how the proposed actions do not conflict with these objectives and policies, is discussed below.

Land uses are required to comply with the provisions and guidelines contained in Chapter 205A, HRS, entitled "Coastal Zone Management," as described below:



1. Recreational Resources

Objective:

Provide coastal recreational opportunities accessible to the public.

Policies:

- a. Improve coordination and funding of coastal recreational planning and management; and
- b. Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by
 - i. Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;
 - ii. Requiring restoration of coastal resources that have significant recreational and ecosystem value, including but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable:
 - iii. Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;
 - iv. Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;
 - v. Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;
 - vi. Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters:
 - vii. Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and
 - viii. Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting that dedication against the requirements of section 46-6.

Response: The project site is located inland and away from the coastline. BMPs such as temporary drainage swales and detention basins will be implemented during construction to ensure stormwater runoff is channeled to appropriate drainage facilities onsite and will not impact downstream or adjacent properties. In the long-term project related drainage improvements will be carried out to retain the increase in stormwater runoff from the project onsite. The proposed project site is approximately 0.5 mile from the coastline. The proposed action is not anticipated to impact coastal recreational opportunities or affect existing public access to and along the shoreline.

2. <u>Historic/Cultural Resources</u>

Objective:

Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

- a. Identify and analyze significant archaeological resources;
- b. Maximize information retention through preservation of remains and artifacts or salvage operations; and
- c. Support state goals for protection, restoration, interpretation, and display of historic resources.

Response: Consultation with the SHPD has been initiated pursuant to Chapter 6E, HRS. An AIS was prepared in 2008 for the 11.467-acre area in Waiehu. In its acceptance letter of the AIS, the SHPD concurred with the AIS and further stated that an AMP would suffice should any ground disturbing construction take place. SHPD also issued an acceptance letter of the AMP on November 10, 2021. Should any archaeological resources be discovered during ground altering activities, work shall cease in the immediate area of the find and mitigation coordination will be undertaken with the SHPD. In addition, a CIA was prepared for the proposed project and noted that no on-going cultural practices were identified within the project area. However, if any cultural finds are encountered during construction, consultation with cultural and lineal descendants of the area is recommended to develop a reinterment plan and cultural preservation plan for proper cultural protocol, curation, and long-term maintenance.

3. Scenic and Open Space Resources

Objective:

Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- a. Identify valued scenic resources in the coastal zone management area;
- b. Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- c. Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- d. Encourage those developments that are not coastal dependent to locate in inland areas.

Response: As indicated previously, the proposed project is located inland and not on or near the shoreline. The proposed project is not anticipated to adversely impact coastal scenic and open space resources.

4. <u>Coastal Ecosystems</u>

Objective:

Protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- a. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources:
- b. Improve the technical basis for natural resource management;
- c. Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;
- d. Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and
- e. Promote water quantity and quality planning and management

practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

Response: The proposed project is located inland, away from coastal ecosystems and is, therefore, not anticipated to have adverse impacts on coastal/shoreline resources, including reefs and marine resources. Appropriate BMPs will be utilized to ensure that construction runoff is appropriately detained, minimizing any impact on coastal waters. In addition, an application for a National Pollutant Discharge Elimination System (NPDES) permit for construction will be submitted to the State Department of Health (DOH) for review and approval prior to the start of construction.

5. <u>Economic Use</u>

Objective:

Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- a. Concentrate coastal dependent development in appropriate areas;
- b. Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and
- c. Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:
 - i. Use of designated locations is not feasible;
 - ii. Adverse environmental effects and risks from coastal hazards are minimized; and
 - iii. The development is important to the State's economy.

Response: The proposed project is not a coastal dependent development. The project site is located inland from the shoreline. The proposed project will stimulate the economy through the generation of construction jobs. The proposed project does not contravene the objective and policies for economic use.

6. <u>Coastal Hazards</u>

Objective:

Reduce hazard to life and property from coastal hazards.

Policies:

- a. Develop and communicate adequate information about the risks of coastal hazards;
- b. Control development, including planning and zoning control, in areas subject to coastal hazards;
- c. Ensure that developments comply with requirements of the National Flood Insurance Program; and
- d. Prevent coastal flooding from inland projects.

Response: According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the area, the project site falls within Zone X (shaded), an area of minimal flooding. In addition, the project site is not located within the projected 3.2-foot SLR-XA. Drainage improvements will be designed in accordance with the Drainage Standards of the County of Maui to ensure that the project will not adversely affect downstream properties from the effects of flooding and erosion. Adverse impacts to hazard-sensitive areas are not anticipated. The project is not located in the Tsunami Evacuation zone.

7. Managing Development

Objective:

Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

- Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;
- b. Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and
- c. Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Response: Opportunities for agency and public review of the proposed action are provided pursuant to Chapter 343, HRS and the Maui County Code Section 2.97 approval process.

8. Public Participation

Objective:

Stimulate public awareness, education, and participation in coastal management.

Policies:

- a. Promote public involvement in coastal zone management processes;
- b. Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and
- c. Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Response: The project has, and will continue to address public awareness, education, and participation objectives. As noted above, the Applicant has undertaken outreach activities with a range of agencies and community stakeholders. See Chapter VIII and Chapter IX. Opportunities for agency and public review of the proposed action are also provided through the comment processes pursuant to Chapter 343, HRS.

9. Beach and Coastal Dune Protection

Objectives:

- a. Protect beaches and coastal dunes for:
 - i. Public use and recreation;
 - ii. The benefit of coastal ecosystems; and
 - iii. Use as natural buffers against coastal hazards; and
- b. Coordinate and fund beach management and protection.

Policies:

a. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;

- b. Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- c. Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- d. Minimize grading of and damage to coastal dunes;
- e. Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and
- f. Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.

Response: The project site is located inland, away from the shoreline and is not anticipated to impact shoreline processes.

10. Marine and Coastal Resources

Objective:

Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- a. Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- b. Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;
- c. Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;
- d. Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and
- e. Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal

resources.

Response: The project site is located inland, away from the ocean and is, therefore, not anticipated to have an impact on marine or coastal resources.

In addition to the foregoing objectives and policies and pursuant to Act 224 (2005), no Special Management Area Use Permit or Special Management Area Minor permit shall be granted for structures that allow artificial light from floodlights, uplights, or spotlights used for decorative or aesthetic purposes when the light:

- (1) Directly illuminates the shoreline and ocean waters, or
- (2) Is directed to travel across property boundaries toward the shoreline and ocean waters.

Further, this prohibition shall not apply to authorized users for government operations, security, public safety, or navigational needs, provided that a government agency or its authorized users shall make reasonable efforts to properly position or shield lights to minimize adverse impacts.

Response: The proposed project is located approximately 0.5 mile inland of the shoreline. The preliminary plans for the project will be designed to ensure that light fixtures are shielded and downward facing to comply with the dark sky lighting requirements and are not directed across property boundaries.

I. <u>CHAPTER 2.97, MAUI COUNTY CODE AFFORDABLE HOUSING</u> <u>APPROVAL</u>

As a 100 percent affordable rental housing project, the Aplicant will be seeking an affordable housing approval from the Maui County Council pursuant to Chapter 2.97 of the MCC. The Chapter 2.97, MCC application process will allow exemptions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of dwelling units thereon to support the development of affordable housing. The specific exemptions that will be included and requested as part of the Chapter 2.97, MCC approval are presented in **Table 3**.

Table 3. Chapter 2.97 Exemption List

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
1.	Requirements for acquiring disposal permit and payment of disposal charges	Title 8, Health and Safety, Maui County Code (MCC): Chapter 8.04, Refuse Collection and Landfills	MCC 8.04.040 Disposal Permits – Application and Suspension; MCC 8.04.050, Disposal Charges Exemption for project to dispose of construction waste during the construction of the project without the need to apply for a disposal permit and pay for disposal charges.	An exemption from the requirements to apply for a disposal permit and pay associated charges will provide cost savings and ensure that the project is financially feasible.
2.	Requirement for payment of wastewater assessment fees	Title 14, Public Services, MCC: Section 14.35, Wastewater Assessment Fees for Facility Expansion for the Wailuku/Kahului Wastewater Treatment System	MCC 14.35 Wastewater Assessment Fees for Facility Expansion for the Wailuku/Kahului Wastewater Treatment System Exemption to allow the project to receive its building permits without the need to pay wastewater assessment fees. Section 14.35.080, Exemptions, exempts developments comprised of 100% residential workforce housing units from the provisions of this chapter.	An exemption from the requirements to pay the wastewater assessment fee for the Wailuku/Kahului Wastewater Treatment System will advance the affordability objectives of the project.
3.	Requirement for payment of water system development fees	Title 14 – Public Services, MCC: Chapter 14.07 – Water System Development Fees	MCC 14.07 Water System Development Fees Exemption requested from Section 14.07 water system development fees to allow the project to receive its building permits without the need to pay water system development fees.	An exemption from the requirements to pay the water system development fees will advance the affordability objectives of the project.

 Table 3. Chapter 2.97 Exemption List

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
4.	Requirement to demonstrate water availability	Title 14 – Public Services, MCC: Chapter 14.12 – Water Availability	MCC 14.12 Water Availability Exemption requested from Section 14.12 Water Availability. Section 14.12.030, Exemptions, exempts developments comprised of 100% residential workforce housing units from the provisions of this chapter.	
5.	Requirements for payment of permit and inspection fees	Title 16, Buildings and Construction, MCC: Sections 16.04C, Fire Code 16.18B, Electrical Code 16.20B, Plumbing Code 16.26B, Building Code	MCC Title 16 Building and Construction Exemptions from MCC Chapters: • 16.04C, Fire Code, • 16.18B, Electrical Code, • 16.20B, Plumbing Code, and • 16.26B, Building Code, To exempt the project from payment of the fire, electrical, plumbing, and building permit, plan review, and inspection fees.	These exemptions provide savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.
6.	Requirements for payment of permit and inspection fees	Title 20, Environmental Protection, MCC: Chapter 20.08, Soil Erosion and Sedimentation Control Section 20.08.090, Grubbing and Grading Permit Fees	MCC 20.08.090, Grubbing and Grading Permit Fees An exemption is sought to payment of grubbing and grading permit and inspection fees. Section 20.08.090(D) exempts developments comprised of 100% residential workforce housing units from grubbing and grading permit fees.	This exemption provides savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.

 Table 3. Chapter 2.97 Exemption List

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
7.	Requirement for payment of park assessment fee	Title 18, Subdivisions, MCC: Chapter 18.16, Design Standards Section 18.16.320, Parks and Playgrounds	MCC, 18.16.320 Parks and Playgrounds An exemption is sought from the provision to pay park assessment fees. Pursuant to Section 18.16.320(I)(5) Park Assessment Fees are exempt for workforce housing projects.	This exemption provides savings to ensure the project is financially feasible. The project will provide two (2) play areas designed to serve the recreational needs of the residents living within the housing community. One play area will be centrally located near the clubhouse and the second located near a common laundry room.
8.	Requirements for number of parking stalls and number and sizes of loading areas	Title 19, Zoning, MCC: Chapter 19.36B, Off-Street Parking and Loading Sections 19.36B.020 Designated Number of Off-Street Parking Spaces 19.36B.030 Designated Number of Loading Spaces	An exemption from Section 19.36B.020 (Designated Number of Off-Street Parking Spaces) for off-street parking requirements for the proposed clubhouse, which will only be used by onsite residents and is not open to the public. An exemption from Section 19.36B.020 (Designated number of off-street parking spaces) for off-street parking for the proposed residential units to require only one stall per unit for the proposed 28 one bedroom units planned for the project. An exemption from Section 19.36B.030 to allow for reduced dimensions (8.5 ft. x 19 ft.) of the two (2) required loading spaces.	The proposed project will provide adequate parking for residents and the exemptions will enable flexibility in the number of parking stalls and dimensions of loading spaces. The requested exemptions would also minimize potential queuing issues by reducing the number of stalls near driveway entrances. This will further the affordability of the project. Smaller loading stalls, which can be used for moving vans and furniture delivery, would also improve the flexibility as to where they are located and make them more useful to the housing community. Larger stalls would require them to be located in areas that may not be as useful due to them requiring turning areas and back up space.

 Table 3.
 Chapter 2.97 Exemption List

	Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
9.	Urban standards relating to curb, gutters and sidewalks	Title 16.26B, Building and Construction MCC: Chapter 16.20B Building Code Title 18, Subdivision, MCC: Chapter 18.20 – Improvements	MCC 16.26B.3600, Improvements to Public Streets MCC 18.20.040, 18.20.070. and 18.20.080, Existing Streets, Sidewalks, Curbs, and Gutters. Exemption from constructing curbs, gutters, and sidewalks for the frontage of the project adjacent to Kahekili Highway.	This exemption will allow the Applicant to implement the project without providing improvements to public streets and ensuring the project is financially feasible. The exemption would also allow the provision of a northbound right-turn lane into the project at the central access, which would provide a safeguard from traffic spilling out onto Kahekili Highway.
10	Requirement for State Land Use District Boundary Amendment for Agricultural portion of Subject Property	Title 19, Zoning, MCC: Chapter 19.68 – State Land Use District Boundaries Chapter 19.510 - Application and Procedures Article 8, Chapter 8, Revised Charter of the County of Maui (1983), as amended	MCC 19.68 State Land Use District Boundaries MCC 19.510 Application and Procedures Article 8, Chapter 8, Revised Charter of the County of Maui (1983), as amended Exemptions from these provisions are sought to enable the District Boundary Amendment (DBA) request to proceed directly to the Maui County Council, without requiring the preparation of a DBA application and subsequent processing through the Maui Planning Commission. An ordinance for a DBA will be reviewed by the County Council concurrently with the MCC 2.97 application.	The project site is 11.476 acres and located within the State "Urban" and "Agricultural" Districts. This exemption would expedite the delivery of affordable workforce housing.

 Table 3. Chapter 2.97 Exemption List

Development Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
11. Requirements of Change of Zoning and all provisions relating to "Agricultural" and "Interim" development standards to allow the use of the "A-1" district zoning standards.	Title 19, Zoning, MCC: Chapter 19.02A, Interim Zoning Provisions and 19.30A, Agricultural District Chapter 19.12, Apartment District	MCC 19.510.040 Change of Zoning MCC 19.02A Interim Zoning Provisions MCC 19.30A Agricultural District Exemptions from these provisions to allow the project to proceed without obtaining a Change of Zoning approval and to permit the development and use of the property for multi-family residential use according to the permitted uses, accessory uses and buildings, and development standards of the "A-1" District pursuant to the provisions set forth in Chapter 19.12, Apartment District.	The project site is zoned "Agricultural" and "Interim". These exemptions would expedite the delivery of affordable workforce housing by allowing the project to be developed in accordance with the "A-1" District zoning provisions, which are more applicable to the proposed development, without the need to obtain a Change of Zoning.
12. Requirement for General Plan, Community Plan Consistency	Title 2, Administration and personnel, MCC: Chapter 2.80B, General Plan and Community Plans	MCC 2.80B, General Plan and Community Plans An exemption from MCC 2.80B to allow the project to be implemented (1) without a Community Plan Amendment; and (2) without the need for consistency to be demonstrated between the community plan and zoning designations.	These exemptions would expedite the delivery of affordable workforce housing. The project site is located within the Urban Growth Boundary of the Maui Island Plan.

UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES



IV. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

In the short term, the proposed project will result in unavoidable construction-related impacts, including air quality impacts during construction and noise impacts generated by construction equipment and activities. Air quality impacts will be mitigated by following Best Management Practices (BMPs) during construction to minimize air quality impacts to surrounding properties such as dust screens around active construction areas, and regular sprinkling of water to reduce dust. In addition, there may be temporary noise impacts associated with construction equipment and vehicles. These noise and air quality impacts will be temporary in nature, occurring only during the construction period, and will be mitigated to the extent practicable through implementation of BMPs.

The proposed project commits a small area of land, about 11.47 acres, for the construction of the project and associated improvements. Other resources which will be committed in the implementation of the proposed action include material and fuel resources. The project will result in short-term beneficial impacts related to temporary construction employment and spending.

The proposed project is intended to have a positive effect on the delivery of affordable housing in Maui County to those residents earning 60 percent or less of the Area Median Income.

ALTERNATIVES TO THE PROPOSED ACTION



V. ALTERNATIVES TO THE PROPOSED ACTION

This section presents a summary of the alternatives that were considered during the process of selecting the preferred alternative for the project.

A. <u>PREFERRED ALTERNATIVE</u>

The preferred alternative involves the development of 120 affordable multi-family housing units, a not-for-profit building, clubhouse and related improvements. The 100 percent affordable housing community provides rental units for residents earning 60 percent or less of the area median income (AMI). The units will be housed in 13 2-story buildings and consist of 28 1-bedroom units, 60 2-bedroom units, and 32 3-bedroom units.

In addition to the residential units, a 3,477 square foot (sq. ft.) non-profit building, a 3,231 sq. ft. clubhouse, landscaping, and related improvements are proposed as part of the project. A total of approximately 274 off-street parking stalls and two (2) loading stalls will also be provided. Access to the project site will be via three (3) new driveway entrances off of Kahekili Highway.

B. <u>DESIGN ALTERNATIVE</u>

A variety of alternative designs and uses were considered for the project site. The site's narrow configuration restricted potential site plans and it was determined by the Applicant that multi-family rentals were the most feasible alternative to address Maui's affordable housing needs. Multi-family rentals also allow the Applicant to leverage the most substantial sources of non-county financial resources, including tax-exempt bonds, low income housing tax credits (federal and state), and state Rental Housing Revolving Funds.

C. NO ACTION ALTERNATIVE

Under the "no action" alternative, the project site would remain "as is". The "no action" alternative is not considered to be in the best interest of Maui residents earning 60 percent or less of the AMI as the "no action" alternative would not provide new affordable housing opportunities. In this context, the proposed project is considered the most appropriate alternative.

D. DEFERRED ACTION ALTERNATIVE

A deferral of the proposed action means that the development proposal would be pursued at a later point in time. The deferral alternative is not considered viable from a project implementation standpoint. The Applicant's commitment to financing, planning, design, and construction of the affordable housing units allows for the project to proceed at this time. Delays in project implementation will likely result in higher development costs and

believes that the	project can be	viably develo	ped under curre	dequacy. The Appli nt market and finan tive" is not consid	cing

SIGNIFICANCE CRITERIA ASSESSMENT

VI. SIGNIFICANCE CRITERIA ASSESSMENT

The proposed project involves the development of 120 affordable multi-family housing units, a not-for-profit building, clubhouse and related improvements.

Pursuant to Chapter 343, Hawai'i Revised Statutes (HRS), and Chapter 200.1 (Title 11), Environmental Impact Statement Rules, Hawai'i Administrative Rules (HAR), the proposed action, its expected primary and secondary consequences, and the cumulative as well as the short-term and long-term effects of the action have been evaluated in accordance with the Significance Criteria of Section 11-200.1-13 of the Administrative Rules. An evaluation of the proposed project in relation to the Significance Criteria is presented below:

1. <u>Irrevocably commit a natural, cultural, or historic resource.</u>

There are no known rare, threatened, or endangered species of flora, fauna, avifauna, or important habitats located within the project site. Nevertheless, as recommended by the U.S. Fish and Wildlife Services (USFWS) and as may be needed, the Applicant will implement mitigation measures for Hawaiian hoary bat and native seabirds. As noted earlier, an Archaeological Assessment of the project site was accepted by the State Historic Preservation Division (SHPD) in 2008. Refer to **Appendix "F"** and **Appendix "F1"**.

An Archaeological Monitoring Plan associated with ground disturbing subsurface activities for the proposed project has been prepared in accordance with the rules of the SHPD to ensure that if human skeletal remains are identified during subsurface work, that the protocol concerning the inadvertent discovery of human remains pursuant to the HAR is followed. The Archaeological Monitoring Plan was reviewed and approved by the SHPD and will be implemented during construction to identify, document, and record any historic properties inadvertently identified, and to provide appropriate mitigation methods, as necessary. Refer to **Appendix "G"** and **Appendix "G-1"**.

In addition, a CIA was prepared for the proposed project and noted that no ongoing cultural practices were identified within the project area. Refer to **Appendix "H"**.

The proposed project is not anticipated to involve an irrevocable commitment to loss or destruction of any natural or cultural resource.

2. Curtail the range of beneficial uses of the environment

There are no significant adverse impacts to climate, topography, or soils anticipated to result from the proposed project. There are also no known rare, threatened, or endangered species of flora, fauna, or avifauna located within the project site. Though not identified during the flora and fauna survey, as recommended by the USFWS and as may be

needed, the Applicant will implement mitigation measures for Hawaiian hoary bat and native seabirds. Refer to **Appendix "E"**.

Through implementation of both construction and permanent BMPs, the proposed project is not anticipated to adversely affect the water quality in the nearshore waters. Refer to **Appendix "B"**.

The proposed project will be implemented adjacent to existing residential developments, and the commitment of land resources for the proposed action will not curtail the range of beneficial uses of the environment. The project site, although designated for agricultural use, and is designated as "Prime" agricultural lands by the Agricultural Lands of Importance to the State of Hawai'i (ALISH), has not been in agricultural production since 1999. On the island of Maui, approximately 70,714 acres of the total land area of the island are within the ALISH "Prime" Designation, which represents approximately 15 percent of the island. As such, the use of 11.467 or 0.02 percent of the "Prime" designated 70,714 acres on Maui is not considered a substantial adverse impact in the context of the overall Prime designated lands on Maui. The proposed use of the site for development of affordable housing is compatible with adjacent residential uses.

The project site and surrounding lands are within the Urban Growth Boundary (UGB) of the Maui Island Plan (MIP). As such, the proposed project will not curtail the beneficial use of the project area.

3. <u>Conflict with the State's environmental policies or long-term environmental goals established by law.</u>

The proposed project involves the development of 120 affordable multi-family housing units and related improvements. This environmental review process is being carried out for the project to ensure the proposed action does not have significant adverse environmental impacts. As such, the proposed project does not conflict with the State's Environmental Policy and Guidelines as set forth in Chapter 344, HRS.

Section 344-3. Environmental Policy

It shall be the policy of the State, through its programs, authorities, and resources to:

(1) Conserve the natural resources, so that land, water, mineral, visual, air and other natural resources are protected by controlling pollution, by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics in a manner which will foster and promote the general welfare, create and maintain conditions under which humanity and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of the people of Hawai'i.

4. <u>Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community or State.</u>

The proposed project will directly benefit low income families that are earning less than 60 percent or less of the AMI by providing affordable housing for this target group. In addition, the proposed project will have a positive impact on the local economy by providing construction and construction-related employment. Therefore, the proposed project will have a positive short-term effect on economic and social welfare. From a long-term perspective, the proposed project will ensure affordable housing and will be available for residents earning 60 percent or less of the AMI.

The cultural impact assessment did not identify any ongoing traditional or cultural practices occurring within the project site.

No substantial adverse long-term economic or social welfare impacts to the community, County or State are, therefore, anticipated.

5. Have a substantial adverse effect on public health.

The project is not anticipated to result in long-term air or noise impacts. Furthermore, the proposed action is not anticipated to create significant direct or indirect foreseeable greenhouse gas (GHG) emissions, and does not fall within the threshold of mandatory GHG reporting. As such, no adverse impact to public health or welfare is anticipated as a result of the proposed action.

During the construction period, appropriate BMPs will be implemented to mitigate potential air quality and noise impacts. Following construction, long-term adverse public health impacts resulting from the proposed project are not anticipated.

6. <u>Involve adverse secondary impacts, such as population changes or effects on public facilities.</u>

The proposed project will provide needed additional affordable housing units in Waiehu. While some residents of the affordable housing project may come from off island, most are expected to relocate from other areas on Maui. As such, the project is not anticipated to involve substantial secondary impacts due to population change. Secondary impacts on public facilities are not anticipated. The Applicant will provide the necessary onsite and offsite infrastructure to support the proposed project. No substantial changes or effects on public facilities are expected with project implementation.

As such, the project is not anticipated to result in significant adverse secondary impacts. The proposed infrastructure improvements are not anticipated to significantly adversely impact public facilities or services.

7. <u>Involve a substantial degradation of environmental quality.</u>

The proposed project provides 120 units of affordable housing for residents earning 60 percent or less of the AMI.

No substantial degradation of environmental quality resulting from the action is anticipated. BMPs and appropriate erosion control measures will be utilized during the construction period. Drainage system improvements will be constructed in accordance with applicable regulatory design standards to ensure that surface runoff will not have an adverse effect on adjacent or downstream properties. Any potential short-term impacts to air and noise quality during the construction phase of the project will be mitigated through employing BMPs. In the long term, the project will not adversely impact air quality and ambient noise.

As previously discussed in Chapter II of this EA document, significant adverse impacts to natural resources, cultural resources, and the natural environment are not anticipated.

8. <u>Be individually limited but cumulatively has substantial adverse effect upon the environment or involves a commitment for larger actions.</u>

The proposed Hale Mahaolu Ke Kahua Affordable Housing Community and related improvements are not anticipated to cumulatively have a significant adverse impact on the physical environment and does not represent a commitment for larger action. See Chapter II, Section E.

9. <u>Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat.</u>

Rare, threatened or endangered species of flora, fauna, avifauna or their habitats are not expected to be adversely affected by the proposed project as none were identified in the flora/fauna survey conducted for the project. Though not identified during the flora and fauna survey, as recommended by the USFWS and as may be needed, the Applicant will implement mitigation measures for Hawaiian hoary bat and native seabirds. Refer to **Appendix "E"**.

10. Have a substantial adverse effect on air or water quality or ambient noise levels.

Construction activities will result in short-term air quality and noise impacts. BMPs for dust control measures, such as temporary diversion channels and retention basin, regular watering and sprinkling, and erection of dust screens will be implemented to minimize construction-related air quality impacts, as warranted. Equipment mufflers or other noise attenuating equipment, as well as proper equipment and vehicle maintenance and other BMPs are anticipated to mitigate noise from construction activities. Erosion control measures implemented during construction will reduce the amount of silt and stormwater runoff flowing downstream. Refer to **Appendix "B"**.

Based on the discussion provided above, the proposed project is not anticipated to significantly detrimentally affect air or water quality or ambient noise levels.

11. Have a substantial adverse effect on or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

The project site is situated inland and is not anticipated to have any adverse impact upon coastal waters or resources, beaches, estuaries, or other fresh water bodies.

According to the Federal Emergency Management Agency's Flood Insurance Rate Maps currently in effect, the project site falls within Zone X (unshaded), an area of minimal flooding. The project site is located outside of the tsunami inundation zone. In addition, the project site is located outside of the 3.2-foot projected sea level rise exposure area.

12. <u>Have a substantial adverse effect on scenic vistas and viewplanes, during day or night, identified in county or state plans or studies.</u>

The proposed project has been designed to fit with the surrounding environment as a low-profile community, with a maximum building height of two (2) stories and is not anticipated to adversely affect scenic vistas or viewplanes.

13. Require substantial energy consumption or emit substantial greenhouse gases.

The proposed action will involve the short-term commitment of fuel for equipment, vehicles, and machinery during construction activities. However, this use is not anticipated to result in a substantial consumption of energy resources or substantial emission of greenhouse gasses. In the long term, the project will create an additional demand for electricity. However, this demand will not be substantially or excessively more than the energy consumed by similar developments throughout the region. The proposed project will incorporate the use of energy efficient fixtures and appliances and will potentially install solar panels, if feasible.

Based on the aforementioned findings, the Department of Housing and Human Concerns has issued a Finding of No Significant Impact (FONSI) for the project.

LIST OF PERMITS AND APPROVALS



VII. LIST OF PERMITS AND APPROVALS

The following permits and approvals are anticipated to be required prior to the implementation of the project:

State of Hawai'i

- 1. Chapter 343 Hawai'i Revised Statutes, Environmental Assessment
- 2. National Pollutant Discharge Elimination System (NPDES), as applicable
- 3. Community Noise Permit, as applicable

County of Maui

- 1. State Land Use District Boundary Amendment (for property less than 15 acres)
- 2. Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Approval
- 3. Construction Permits (Grading, Building, Electrical, Plumbing)

PARTIES CONSULTED
DURING THE
PREPARATION OF THE
DRAFT ENVIRONMENTAL
ASSESSMENT; LETTERS
RECEIVED AND
RESPONSES TO
SUBSTANTIVE
COMMENTS



VIII. PARTIES CONSULTED DURING THE PREPARATION OF THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED AND RESPONSES TO SUBSTANTIVE COMMENTS

The following agencies were consulted in preparation of the Draft Environmental Assessment (EA). Agency comments and responses to substantive comments are included herein.

Federal Agencies

- U.S. Department of the Army Army Corps of Engineers Pacific Ocean Division Building 525, Suite 300 Fort Shafter, HI 96858-5440
- Ms. Michelle Bogardus, Island Team Leader U. S. Fish and Wildlife Service 300 Ala Moana Blvd., Rm. 3-122 Honolulu, HI 96850
- Mr. Gordon Wong, Manager
 U. S. Department of Transportation
 Federal Aviation Administration
 Honolulu Airports District Office
 Airports Western Pacific Region
 Box 50244
 Honolulu, HI 96850
- Mr. Kahana Stone, Soil Conservationist U.S. Department of Agriculture Natural Resources Conservation Service 77 Hookele Street, Suite 202 Kahului, HI 96732

State Agencies

- Mr. Curt Otaguro, Comptroller State of Hawai'i Department of Accounting and General Services 1151 Punchbowl Street, #426 Honolulu, HI 96813
- Ms. Denise Albano, Chair State of Hawai'i Department of Agriculture 1428 South King Street Honolulu, HI 96814-2512

- Mr. M. Kaeo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, HI 96809
- Dr. Christina Kishimoto, Superintendent State of Hawai'i Department of Education P.O. Box 2360 Honolulu, HI 96804
- Mr. William Aila, Jr., Chair State of Hawai'i Department of Hawaiian Home Lands P.O. Box 1879 Honolulu, HI 96805
- Dr. Elizabeth Char, Director State of Hawai'i Department of Health 1250 Punchbowl St., Room 325 Honolulu, HI 96813
- Mr. Alec Wong, P.E., Chief State of Hawai'i Department of Health Clean Water Branch Hale Ola, Room 225 2827 Waimano Home Road Pearl City, HI 96782
- 12. State of Hawai'i Department of Health Environmental Health Administration P.O. Box 3378 Honolulu, HI 96801

- 13. Ms. Patti Kitkowski State of Hawai'i Department of Health Maui Sanitation Branch 54 South High Street, Room 300 Wailuku, HI 96793
- 14. Mr. Keith Kawaoka, Acting Director State of Hawai'i Department of Health Office of Environmental Quality Control 235 S. Beretania Street, Suite 702 Honolulu, HI 96813
- 15. Mr. Lene Ichinotsubo State of Hawai'i Department of Health Solid and Hazardous Waste Branch 2827 Waimano Road, Suite 100 Pearl City, HI 96782-1407
- 16. Ms. Suzanne Case, Chairperson State of Hawai'i Department of Land and Natural Resources P. O. Box 621 Honolulu, HI 96809
- 17. Dr. Alan Downer, Administrator
 State of Hawai'i
 Department of Land and Natural Resources
 State Historic Preservation Division
 via email: DLNR.Intake.SHPD@hawaii.gov
 cc: Susan Lebo
- 18. State of Hawai'i Department of Land and Natural Resources State Historic Preservation Division, Maui via email: <u>DLNR.Intake.SHPD@hawaii.gov</u> cc: Susan Lebo, Lehua Soares, Garnet Clark, Iolani Kauhane, and Andrew McCallister
- Mr. Jade Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, HI 96813
- 20. Ms. Denise Iseri-Matsubara, Executive Director State of Hawai'i Hawai'i Housing Finance and Development Corporation 677 Queen Street Honolulu, HI 96813

- 21. Major General Kenneth Hara, Adjutant General State of Hawai'i Department of Defense 3949 Diamond Head Road Honolulu, HI 96816
- Dr. Sylvia Hussey, Chief Executive Officer State of Hawai'i
 Office of Hawaiian Affairs
 N. Nimitz Highway, Suite 200 Honolulu, HI 96817
- 23. Ms. Mary Alice Evans, Director State of Hawai'i Office of Planning P. O. Box 2359 Honolulu, HI 96804
- 24. Mr. Dan Orodenker, Executive Officer State of Hawai'i State Land Use Commission P.O. Box 2359 Honolulu, HI 96804

Maui County Agencies

- Council Chair Alice Lee County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 26. Honorable Riki Hokama County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 27. Honorable Tasha Kama County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- Honorable Kelly King County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- Honorable Mike Molina County of Maui Maui County Council 200 South High Street Wailuku, HI 96793

- Honorable Tamara Paltin County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- Council Vice-Chair Keani Rawlins-Fernandez
 County of Maui
 Maui County Council
 200 South High Street
 Wailuku, HI 96793
- 32. Honorable Shane Sinenci County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 33. Honorable Yuki Lei Sugimura County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 34. Mr. Herman Andaya, Administrator County of Maui Maui Emergency Management Agency 200 South High Street Wailuku, HI 96793
- 35. Mr. Eric Nakagawa, Director County of Maui Department of Environmental Management 2050 Main Street, Suite 2B Wailuku. HI 96793
- 36. Chief David Thyne County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, HI 96732
- Ms. Lori Tsuhako, Director County of Maui Department of Housing and Human Concerns
 Main Street, Suite 546
 Wailuku, HI 96793
- Ms. Karla Peters, Director County of Maui Department of Parks and Recreation 700 Halia Nakoa Street, Unit 2F Wailuku, HI 96793

- Ms. Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku. HI 96793
- 40. Chief Tivoli Faaumu County of Maui Maui Police Department 55 Mahalani Street Wailuku, HI 96793
- Ms. Rowena Dagdag-Andaya, Director County of Maui Department of Public Works 200 South High Street Wailuku, HI 96793
- 42. Mr. Marc Takamori, Director County of Maui Department of Transportation David Trask Building, Suite 102 2145 Kaohu Street Wailuku, HI 96793
- Mr. Jeffrey Pearson, Director County of Maui Department of Water Supply 200 South High Street, 5th Floor Wailuku, HI 96793
- Ms. JoAnn Inamasu, Director County of Maui
 Office of Economic Development 2200 Main Street, Suite 305 Wailuku, HI 96793
- 45. Mayor Michael Victorino County of Maui Office of the Mayor 200 South High Street Wailuku, HI 96793

Other Agencies

- 46. Hawaiian Telcom 60 South Church St Wailuku, HI 96793
- 47. Mr. Allen Baybayan, Principal Engineer Hawaiian ElectricP.O. Box 398 Kahului, HI 96733

48. Spectrum 158 Ma'a Street Kahului, HI 96732

 Mr. Rogelio Aricayos, President Waiehu Terrace Community Association c/o Destination Maui, Inc. 841 Alua Street, Suite 102 Wailuku HI 96793

50. Mr. Roy Oliveira, President
Waiehu Kou Phase 3 Association
Email address:
waiehukouphase3association@hotmail.com

51. Mr. Bryan Sarasin, Sr., Vice-Chairman Waihe'e Community Association Email address: bryancs@mauigateway.com

52. Mr. Kyle Nakanelua, Committee Member Aha Moku o Maui Email address: kyle.nakanelua@gmail.com

53. Mr. Kaniloa Kamaunu Aha Moku o Maui Email address: bkofmor@gmail.com



United States Department of the Interior

FISH AND WILDLIFE SERVICE



Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850

In Reply Refer To: 01EPIF00-2020-TA-0105

December 22, 2020

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793

Subject: Response to your Request for a Technical Assistance for Waiehu Affordable

Housing Community in Waiehu, Maui.

Dear Mr. Sugidono:

Thank you for your recent correspondence requesting early consultation on species biology, habitat, or life requisite requirements. The Pacific Islands Fish and Wildlife Office (PIFWO) of the U.S. Fish and Wildlife Service (Service) appreciates your efforts to avoid or minimize effects to protected species associated with your proposed actions. We provide the following information for your consideration under the authorities of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*), as amended.

Due to significant workload constraints, PIFWO is currently unable to specifically address your information request. The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. Based on your project location and description, we have noted the species most likely to occur within the vicinity of the project area, in the **May Occur In or Near Project Area** column. Please note this list is not comprehensive and should only be used for general guidance. We have added to the PIFWO website, located at https://www.fws.gov/pacificislands/promo.cfm?id=177175840 recommended conservation measures intended to avoid or minimize adverse effects to these federally protected species and best management practices to minimize and avoid sedimentation and erosion impacts to water quality.

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

INTERIOR REGION 12
PACIFIC ISLANDS

IDAHO, MONTANA*, OREGON*, WASHINGTON
*PARTIAL

American Samoa, Guam, Hawaiʻi, Northern Mariana Islands

If you are representing a federal action agency, please use the official species list on our website for your section 7 consultation. You can find out if your project occurs in or near designated critical habitat here: https://ecos.fws.gov/ipac/.

Under section 7 of the ESA, it is the Federal agency's (or their non-Federal designee) responsibility to make the determination of whether or not the proposed project "may affect" federally listed species or designated critical habitat. A "may affect, not likely to adversely affect" determination is appropriate when effects to federally listed species are expected to be discountable (*i.e.*, unlikely to occur), insignificant (minimal in size), or completely beneficial. This conclusion requires written concurrence from the Service. If a "may affect, likely to adversely affect" determination is made, then the Federal agency must initiate formal consultation with the Service. Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation.

Implementing the avoidance, minimization, or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination for your project. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats, and defines measures to minimize and mitigate those adverse effects.

We appreciate your efforts to conserve endangered species. We regret that we cannot provide you with more specific protected species information for your project site. If you have questions that are not answered by the information on our website, you can contact me at christina richards@fws.gov or by telephone at 808-792-9400.

Sincerely,

DIANE Digitally signed by DIANE SETHER

Date: 2020.12.22
09:23:14 - 10'00'

Acting Island Team Manager Pacific Islands Fish and Wildlife Office

The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. For your guidance, we've marked species that may occur in the vicinity of your project, this list is not comprehensive and should only be used for

general guidance.

Scientific Name	Common Name / Hawaiian Name	Federal Status	May Occur In or Near Project Area	
Mammals				
Lasiurus cinereus semotus	Hawaiian hoary bat/ 'ōpe'ape'a	Е	\boxtimes	
Reptiles				
Chelonia mydas	Green sea turtle/honu - Central North Pacific distinct population segment (DPS)	T		
Erectmochelys imbricata	Hawksbill sea turtle/ Honu 'ea	Е		
Birds				
Anas wyvilliana	Hawaiian duck/ koloa	Е		
Branta sandvicensis	Hawaiian goose/ nēnē	Е		
Fulica alai	Hawaiian coot/ 'alae kea	Е		
Gallinula galeata sandvicensis	Hawaiian gallinule/ 'alae 'ula	Е		
Himantopus mexicanus knudseni	Hawaiian stilt/ Ae'o	Е		
Oceanodroma castro	Hawai'i distinct population segment (DPS) of the Band- rumped storm-petrel - 'akē'akē	Е		
Pterodroma sandwichensis	Hawaiian petrel/ 'ua'u	Е	\boxtimes	
Puffinus auricularis newelli	Newell's shearwater/ 'a'o	T	\boxtimes	
Ardenna pacificus	Wedge-tailed Shearwater/ 'ua'u kani	MBTA		
Buteo solitarius	Hawaiian hawk/ 'io	MBTA		
Gygis alba	White Tern/ manu-o-kū	MBTA		
Insects				
Manduca blackburni	Blackburn's sphinx moth	E	\boxtimes	
Hyleaus anthracinus	Anthracinan yellow-faced bee	Е	\boxtimes	

Hyleaus assimulans	Assimulans yellow-faced	Е	\boxtimes
	bee		
Hyleaus facilis	Easy yellow-faced bee	Е	\boxtimes
Hyleaus hilaris	Hilaris yellow-faced bee	Е	
Hyleaus longiceps	Longhead yellow-faced bee	Е	\boxtimes

Plants				
Scientific Name	Common Name or Hawaiian Name	Federal Status	Locations	May Occur In or Near Project Area
Abutilon menziesii	Koʻoloaʻula	Е	O, L, M, H	Alta
Achyranthes splendens var. rotundata	'Ewa hinahina	E	0	
Bonamia menziesii	No common name	Е	K, O, L, M, H	
Canavalia pubescens	'Āwikiwiki	Е	Ni, K, L, M	
Colubrina oppositifolia	Kauila	Е	O, M, H	
Cyperus trachysanthos	Pu'uka'a	Е	K, O	
Gouania hillebrandii	No common name	Е	Mo, M	
Hibiscus brackenridgei	Ma'o hau hele	Е	O, Mo, L, M, H	
Ischaemum byrone	Hilo ischaemum	Е	K, O, Mo, M, H	
Isodendrion pyrifolium	Wahine noho kula	Е	O, H	
Marsilea villosa	'Ihi'ihi	Е	Ni, O, Mo	
Mezoneuron kavaiense	Uhiuhi	Е	O, H	
Nothocestrum breviflorum	'Aiea	Е	Н	
Panicum fauriei var. carteri	Carter's panicgrass	Е	Molokini Islet (O), Mo	
Panicum niihauense	Lau'ehu	Е	K	
Peucedanum sandwicense	Makou	Е	K, O, Mo, M	
Pleomele (Chrysodracon) hawaiiensis	Halapepe	Е	Н	
Portulaca sclerocarpa	ʻIhi	Е	L, H	
Portulaca villosa	ʻIhi	Е	Le, Ka, Ni, O, Mo, M, L, H, Nihoa	
Pritchardia affinis (maideniana)	Loulu	Е	Н	
Pseudognaphalium sandwicensium var. molokaiense	'Ena'ena	Е	Mo, M	×
Scaevola coriacea	Dwarf naupaka	Е	Mo, M	\boxtimes

Schenkia (Centaurium) sebaeoides	'Āwiwi	Е	K, O, Mo, L,	
Sesbania tomentosa	ʻŌhai	Е	Ni, Ka, K, O, Mo, M, L, H, Necker, Nihoa	
Tetramolopium rockii	No common name	T	Mo	
Vigna o-wahuensis	No common name	Е	Mo, M, L, H, Ka	

Location key: O=Oʻahu, K=Kauaʻi, M=Maui, H=Hawaiʻi Island, L=Lānaʻi, Mo=Molokaʻi, Ka=Kahoʻolawe, Ni=Niʻihau, Le=Lehua



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

September 9, 2021

Diane Sether, Acting Island Team Manager U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Ms. Sether:

Thank for your early consultation comment letter dated December 22, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we acknowledge the general requirements, guidance, and recommendations described in your letter.

Thank you again for your input. We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Ch. Sh

Chris Sugidono Senior Associate

CEJS:ab

CC:

Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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Natural Resources Conservation Service

Pacific Islands Area Kahului Field Office

December 15, 2020

77 Hookele St., # 202 Kahului, HI 96732

Voice 808-871-5500 ext. 3 Fax 855-878-2454 Mr. Chris Sugidono, Senior Associate Munekiyo Hiraga 305 High St Suite 104 Wailuku, HI 96793

Subject: Chapter 343, Hawai'i Revised Statues, Early Consultation

Request for Proposed Waiehu Affordable Housing

Community at TMK (2)3-3-001:106, Waiheu, Maui, Hawai'i

Dear Mr. Smith and Ms. Rivera:

I have no comments.

111

Gerald Gregory

Sincerely,

District Conservationist



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Gerald Gregory, District Conservationist United States Department of Agriculture Natural Resources Conservation Service Pacific Islands Area Kahului Field Office 77 Hookele Street, #202 Kahului, Hawai'i 96732

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Mr. Gregory:

Thank for your early consultation comment letter dated December 15, 2020, on the subject project. We very much appreciate you taking the time to provide us with the input during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we acknowledge that the United States Department of Agriculture (USDA) has no comments to offer at this time.

We appreciate your input and will include a copy of your letter and this response in the Draft Environmental Assessment (EA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015.

Very truly yours,

U. 37

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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DAVID Y. IGE GOVERNOR



COMPTROLLER

AUDREY HIDANO DEPUTY COMPTROLLER

STATE OF HAWAII DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)20.205

DEC 10 2020

Mr. Chris Sugidono Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Maui, Hawaii 96793

Dear Mr. Sugidono:

Subject:

Early Consultation Request for

Proposed Waiehu Affordable Housing Community

Waiehu, Maui, Hawaii TMK: (2) 3-3-001:106

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Ms. Dora Choy of the Public Works Division at 586-0488.

Sincerely,

CHRISTINE L. KINIMAKA Public Works Administrator

DC:mo

c: Mr. Wade Shimabukuro, DAGS-MDO



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

September 9, 2021

Christine L. Kinimaka, Public Works Administrator State of Hawai'i Department of Accounting and General Services P.O. Box 119 Honolulu, Hawai'i 96810-0119

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Ms. Kinimaka:

Thank for your early consultation comment letter dated December 20, 2020, on the subject project. We very much appreciate you taking the time to provide us with the input during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we acknowledge that the Department of Accounting and General Services has no comments to offer at this time.

We appreciate your input and will include a copy of your letter and this response in the Draft Environmental Assessment (EA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

CC:

Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa

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DAVID Y. IGE



SUZANNE D. CASE

KAMANA BEAMER, PH.D. MICHAEL G. BUCK ELIZABETH A. CHAR, M.D. NEIL J. HANNAHS WAYNE K. KATAYAMA PAUL J. MEYER

M. KALEO MANUEL

REF: RFD.5377.6

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

P.O. BOX 621 HONOLULU, HAWAII 96809

December 18, 2020

TO: Chris Sugidono, Senior Associate

Munekiyo Hiraga

FROM: M. Kaleo Manuel, Deputy Director

Commission on Water Resource Management

SUBJECT: Chapter 343, Hawaii Revised Statutes, Early Consultation Request for Proposed Waiehu

Affordable Housing Community

FILE NO.: RFD.5377.6 TMK NO.: (2) 3-3-001:106

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/cwrm.

Our comments related to water resources are checked off below.

X	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.
74	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.
X	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.
X	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/
X	6.	We recommend the use of alternative water sources, wherever practicable.
G.	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.
X	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

Chris Sugidono Page 2 December 18, 2020

		http://	www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.	
X	9.	There may be the potential for ground or surface water degradation/contamination and recon approvals for this project be conditioned upon a review by the State Department of Health an developer's acceptance of any resulting requirements related to water quality.		
Ø	10	a Wat	roposed water supply source for the project is located in a designated water management area, and ser Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the ement to use dual line water supply systems for new industrial and commercial developments.	
7	11	A Well Construction Permit(s) is (are) are required before the commencement of any well work.		
%	12	A Pun the pr	np Installation Permit(s) is (are) required before ground water is developed as a source of supply for oject.	
W	13	affect	is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be ed by any new construction, they must be properly abandoned and sealed. A permit for well donment must be obtained.	
%	14		nd-water withdrawals from this project may affect streamflows, which may require an instream flow ard amendment.	
W	15		eam Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed r banks of a steam channel.	
7	16	A Stre	eam Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or d.	
%	17		ition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) face water.	
%	18	deterr	lanned source of water for this project has not been identified in this report. Therefore, we cannot mine what permits or petitions are required from our office, or whether there are potential impacts to resources.	
X	OTH	ER:	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.	

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

M. Kaleo Manuel, Deputy Director State of Hawai'i Department of Land and Natural Resources Commission on Water Resource Management P. O. Box 621 Honolulu, Hawai'i 96809

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Manuel:

Thank for your early consultation comment memorandum dated December 18, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- 1. The Applicant appreciates the recommendation and is working with the County's Department of Water Supply (DWS) to review the proposed project.
- The Applicant appreciates the recommendation and will consider installing water efficient fixtures as well as implementing water efficient practices, wherever feasible.
- 3. Best Management Practices (BMPs) such as temporary drainage swales and detention basins will be implemented during construction to ensure stormwater runoff is channeled to appropriate drainage facilities onsite and will not impact downstream or adjacent properties. In the long-term, project related drainage improvements will be carried out to retain the increase in stormwater runoff from the project onsite. Further information on stormwater management BMPs for the proposed project will be provided in the Draft Environmental Assessment (EA).

M. Kaleo Manuel, Deputy Director September 9, 2021 Page 2

- 4. The Applicant appreciates the recommendation and will consider the use of alternative water sources, wherever practicable.
- 5. The Applicant appreciates the recommendation and will consider adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawai'i, wherever practicable.
- 6. Construction BMPs will be used to manage and control erosion control during grading operations to minimize downstream water quality impacts. Work on the project is not anticipated to be affected by natural hazards, and the highest standards of design and construction practices will be employed for the proposed project. Additionally, the Applicant is in consultation with the State Department of Health and will be sending a copy of the Draft EA to the department when it is published. Further information on construction BMPs for the proposed project will be provided in the Draft EA.
- 7. In accordance with the Department of Water Supply's Domestic Consumption Guidelines for multi-family development, the average daily demand for the proposed project is approximately 67,200 gallons per day. Water flow demand for multi-family development is 2,000 gallons per minute for a 2-hour duration. Affordable housing projects, per County policy, have priority on County water service. As such, it is anticipated that the proposed project will be served by County water service. Domestic water and fire flow calculations will be prepared and submitted during the building permit process. Water meter and fire protection improvements will be made, as necessary, to meet the requirements of the Department of Water Supply and Department of Fire Prevention and Public Safety. Further information on potential impacts on water resources for the proposed project will be provided in the Draft EA.

M. Kaleo Manuel, Deputy Director September 9, 2021 Page 3

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch. ST

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Ashley Otomo, Otomo Engineering, Inc.

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STATE OF HAWAI'I

DEPARTMENT OF EDUCATION

P.O. BOX 2360 HONOLULU, HAWAI`I 96804

OFFICE OF FACILITIES AND OPERATIONS

December 17, 2020

Chris Sugidono Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Re: Early Consultation Request in the preparation of a Draft Environmental Assessment for the Waiehu Affordable Housing Community, Waiehu, Maui, Hawaii, TMK (2)3-3-001:106

Dear Mr. Sugidono:

The Hawaii State Department of Education (HIDOE) has the following comments in the preparation of a Draft Environmental Assessment for the proposed Waiehu Affordable Housing Community Project (Project). The Project will utilize the County of Maui affordable housing review process to develop 120 apartment units targeting residents with Area Median Incomes at or below 60 percent on approximately 11.486 acres of land located at Waiheu, Island of Maui, at TMK (2)3-3-001:106.

The HIDOE schools servicing the Project are Waihee Elementary, Iao Middle, and Baldwin High. Waihee Elementary has excess capacity and will continue to have excess capacity over the next five years. Both Iao Middle and Baldwin High are over capacity and will continue to be over capacity over the next five years.

When the Project is mature and turnover stabilized, we would expect roughly 26 HIDOE students will reside there.

The Project is located within the Central Maui School Impact Fee District (District). The district and impact fee amounts were adopted by the Board of Education on November 18, 2010. For school impact fee purposes, apartments are considered multi-family unit. The fee amount per unit for the district is \$2,371.

Thank you for the opportunity to comment. Should you have questions, please contact Robyn Loudermilk, School Lands and Facilities Specialist of the Facilities Development Branch, Planning Section, at (808) 784-5093 or via email at robyn.loudermilk@k12.hi.us.

Respectfully

Roy Ikeda

Public Works Manager, TA

Planning Section

RI:rll

c: Kathleen Dimino, Complex Area Superintendent, Baldwin/Kekaulike/Maui Complex



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Roy Ikeda, Public Works Manager State of Hawai'i Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Mr. Ikeda:

Thank for your early consultation comment letter dated December 17, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

The Applicant is aware of the requirement for school impact fees and will contact the Department of Education to discuss this matter further.

Thank you again for your input. We will include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch X

CEJS:ab

cc:

Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa

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JOSH GREEN LT. GOVERNOR STATE OF HAWAII



WILLIAM J. AILA, JR
CHAIRMAN
HAWAIIAN HOMES COMMISSION

TYLER I. GOMES
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII DEPARTMENT OF HAWAIIAN HOME LANDS

P. O. BOX 1879 HONOLULU. HAWAII 96805 December 22, 2020

In reply refer to: PO-20-282

Mr. Chris Sugidono, Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793 planning@munekiyohiraga.com

Aloha e Mr. Sugidono:

Subject:

Chapter 343 Early Consultation for Proposed Waiehu Affordable Housing

Community, Waiehu, Maui at TMK (2) 3-3-001:106

The Department of Hawaiian Home Lands acknowledges receiving the request for comments on the above-cited project. We commend your efforts in building affordable housing on Maui. Upon review of the materials submitted, the proposed project is located in close proximity to two native Hawaiian Homestead Communities. The project is approximately 0.3 miles south east of the Department of Hawaiian Home Lands' (DHHL) Waiehu community and 0.5 miles west-north-west of DHHL's Paukukalo community. DHHL offers the following comments regarding the proposed project:

More information is needed to understand the impacts that waiving planning, zoning and construction standards will have on a region where 537 native Hawaiian homestead leases have been awarded. The project as proposed is requesting exemptions from the process of making changes to land uses at all levels; the project district, community, County and State levels. While affordable housing is important, exempting the project from all land use evaluation processes will have lasting, permanent impacts to the community. The request to exempt the project from the evaluation and approval process for changing State lands designated "agriculture" to "urban" is reasonable for small projects (less than 15 acres) that have existing County zoning and community districts that are comparable to the States "Urban" land use designation. In such instances, the exemption tool works to align the State land use designation quickly with local land uses. However, in this situation, the County zoning and community land uses are already in alignment with the current State land use designation, "agriculture." Therefore, an exemption from the State Land Use District Boundary Amendment process does not appear to be justified and potentially negatively impact DHHL's existing homestead communities without adequate mitigation measures.

The project as proposed will change the density of lands from the current 0.5 housing units per acre under Maui's Agriculture District to 10 housing units per acre. A thorough

Mr. Chris Sugidono December 22, 2020 PO-20-282 Page 2 of 2

discussion and evaluation should be included in the draft Environmental Assessment (EA) regarding how this project will impact the DHHL's existing homestead communities, and what will be done to mitigate the project's impact.

State case law recognizes that DHHL water reservations and uses are a protected Public Trust purpose of water. Additionally, HRS 174C-101 (a) protects reservations of water "for current and foreseeable development and use" of water by DHHL, consistent with Section 221 of the Hawaiian Homes Commission Act. The EA should address any impacts this project could have on both DHHL's water current and future reservation and use.

As the environmental assessment documents are developed, it is important that DHHL's beneficiaries are informed of potential impacts, proposed mitigations, and evaluation of alternatives to the location and scope of the proposed project. DHHL and Hawaiian Home Commission Act (HHCA) beneficiary groups formed on Maui should be included in future consultation conducted regarding this project. We recommend contacting the following groups as part of your consultation process. They may have information regarding cultural and historic resources to share and may have an interest in obtaining more information regarding your project.

Paukukalo Hawaiian Homestead Community Assoc. Waiehu Kou Community Homestead Association Waiehu Kou Phase 3 Association, Inc. Waiehu Kou Residence Lots, Phase II Association Inc.

Mahalo for the opportunity to provide comments. If you have any questions, please contact Malia Cox, at 620-9500 or via email at <u>malia.m.cox@hawaii.gov</u>.

Aloha,

William J. Aila Jr., Chairman Hawaiian Homes Commission

Copy: Paukukalo Hawaiian Homestead Community Assoc. -via email Waiehu Kou Community Homestead Association-via email

Waiehu Kou Phase 3 Association, Inc. -via email

Waiehu Kou Residence Lots, Phase II Association Inc. -via email



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

William J. Aila Jr., Chairman State of Hawai'i Department of Hawaiian Home Lands Hawaiian Homes Commission P. O. Box 1879 Honolulu, Hawai'i 96805

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i (PO-20-282)

Dear Mr. Aila:

Thank for your early consultation comment letter dated December 22, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates the comment from Department of Hawaiian Home Lands (DHHL). It should be noted, however, that the proposed project area is split designated "Urban" and "Agricultural" by the State Land Use District (SLUD); split designated "Project District 2" and "Agriculture" by the Wailuku-Kahului Community Plan (WKCP); and split designated "Interim" and "Agricultural" district by Maui County Zoning. It also should be clarified (following consultation with the State Land Use Commission and the Office of Planning) that a SLUD District Boundary Amendment will indeed be sought from the Maui County Council for this project.
- 2. The Applicant appreciates the comment and acknowledges the concern raised by DHHL. Further information on impacts to surrounding communities will be provided in the Draft Environmental Assessment (EA).
- The Applicant appreciates the comment regarding DHHL water reservations and uses. Domestic water and fire flow calculations will be prepared and submitted for

William J. Aila Jr., Chairman September 9, 2021 Page 2

the proposed project during the building permit process. Water meter and fire protection improvements will also be made, as necessary, to meet the requirements of the Department of Water Supply and Department of Fire Prevention and Public Safety. Adverse impacts to water services and facilities in the region are not anticipated. Further information on potential impacts on water resources for the proposed project will be provided in the Draft EA. A Preliminary Engineering Report will also be included and discussed in the Draft EA.

4. The Applicant appreciates the recommendation and will be pursuing further community engagement opportunities as part of the Environmental Assessment (EA) process. It should be noted that the Applicant has reached out to various community/neighborhood associations near the proposed project, including Waiehu Kou Phase 3 Association, as part of its early consultation process. A Cultural Impact Assessment (CIA) report also was prepared to gain an understanding of traditional cultural practices within and in the vicinity of the project area and identify any potential effects on these practices that may occur during, or as a result of, the implementation of the proposed project. Community outreach letters were sent to a range of individuals, organizations and agencies, including residents living near the proposed project area. Further information on cultural and historic resources within and surrounding the project area will be provided in the Draft EA, including a copy of the CIA report.

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Ch Sh

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu
Debbie Cabebe, Maui Economic Opportunity
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
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DAVID Y. IGE



ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII DEPARTMENT OF HEALTH

P. O. BOX 3378 HONOLULU, HI 96801-3378 In reply, please refer

LUD – 2 3 3 001 106 Prop Waiehu Aff Housing Community ID 5431

December 17, 2020

Mr. Chris Sugidono, Senior Associate Munekiyo Haraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Email: planning@munekiyohiraga.com

Dear Mr. Sugidono:

Subject: Chapter 343, Hawaii Revised Statutes, Early Consultation Request for Proposed

Waiehu Affordable Housing Community, TMK (2) 3-3-001: 016, Waiehu, Maui

Proposed 120 residential units (Kahekili Highway)

Thank you for allowing us the opportunity to provide comments for the subject project. If connection to the County of Maui's sewer system is not available for the subject development, a wastewater system shall be provided in compliance with Chapter 11-62, Hawaii Administrative Rules (HAR), "Wastewater Systems." The use of individual wastewater system will not be allowed for the development. A wastewater treatment plant would be required to be installed.

Please be informed that the proposed wastewater systems for the subdivision/development may have to include design considerations to address any effects associated with the construction of and/or discharges from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices. In addition, all wastewater plans must conform to applicable provisions of Chapter 11-62, HAR.

Should you have any questions, please call Mr. Mark Tomomitsu of my staff at (808) 586-4294.

Sincerely,

SINA PRUDER, P.E., CHIEF

Wastewater Branch

LM/MST:Imj

c: Mr. Roland Tejano, WWB-Maui



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Sina Pruder, P.E., Chief State of Hawai'i Department of Health P.O. Box 3378 Honolulu, Hawai'i 96801-3378

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Chief Pruder:

Thank for your early consultation comment letter dated December 17, 2020, on the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The wastewater generated from the project will be disposed of via the County of Maui's Wailuku-Kahului Wastewater Reclamation Facility. Based on preliminary feedback from the County, the treatment plant has sufficient capacity to accommodate the additional wastewater generated from the proposed project. However, the Applicant will need to install a sewer line extension and a lift station as part of the project. This improvement is currently being assumed as part of the project plans.
- In regards to design considerations, coordination has and will continue to be undertaken with the County Department of Environmental Management (DEM) as it relates to connection to the County's wastewater system. Furthermore, construction waste will be disposed at the County's Central Maui Landfill or appropriate construction recycling centers. The Applicant will also conform to all applicable provisions of Chapter 11-62, Hawai'i Administrative Rules (HAR).

Sina Pruder, P.E., Chief September 9, 2021 Page 2

Thank you again for your input. We will include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

U- 82

Chris Sugidono Senior Associate

CEJS:ab

Grant Chun, Hale Mahaolu CC:

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\EC\ECL Response\DOH.docx



ELIZABETH A. CHAR, M.D.

STATE OF HAWAII
DEPARTMENT OF HEALTH
Maui District Health Office
54 South High St. Rm. #301
Wailuku, HI 96793

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

December 14, 2020

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Mr. Sugidono:

Subject:

Chapter 343, Hawaii Revised Statues, Early Consultation Request for Proposed

Waiehu Affordable Housing Community, Waiehu, Maui, Hawaii

TMK: (2) 3-3-001:106

Thank you for the opportunity to review this project. We have the following comments to offer:

We were not able to make comments for this project as the wastewater system was not satisfactorily addressed for our review. Please provide type of wastewater disposal method that will be used for this project. If you have any questions please call Roland Tejano, Environmental Engineer, at 808 984-8232.

It is strongly recommended that you review the department's website at https://health.hawaii.gov/epo/landuse/ and any comments specifically applicable to this project should be adhered to.

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

Sincerely,

Patti Kitkowski

District Environmental Health Program Chief

Ahwslu

c Sina Pruder, Acting EMD Administrator



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Patti Kitkowski, District Environmental Health Program Chief State of Hawai'i Department of Health Maui District Health Office 54 South High Street, Room #301 Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Kitkowski:

Thank for your early consultation comment letter dated December 14, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following response to your comments:

- The wastewater generated from the project will be transported to the County of Maui's Wailuku-Kahului Wastewater Treatment Facility. Based on preliminary feedback from the County, the treatment plant has sufficient capacity to accommodate the additional wastewater generated from the proposed project. However, the Applicant will need to install a sewer line extension and a lift station as part of the project. This improvement is currently being assumed as part of the project plans.
- The Applicant appreciates the link provided to DOH standard comments, and will follow all DOH rules and regulations as may be applicable to this project.

Patti Kitkowski, District Environmental Health Program Chief September 9, 2021 Page 2

Thank you again for your input, we will include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

CC - SC

CEJS:ab

Grant Chun, Hale Mahaolu CC:

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Walehu AH PERMITTING\Applications\EC\ECL Response\DOH Maui.docx





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

December 21, 2020

Munekiyo Hiraga Attn: Mr. Chris Sugidono, Senior Associate

305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Mr. Sugidono:

SUBJECT: Proposed Waiehu Affordable Housing Community located at Kahekili

Highway and Waiehu Beach Road, Kahului, Island of Maui; TMK: (2) 3-3-

via email: planning@munekiyohiraga.com

001:106 on behalf of Highridge Costa Development Company

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 pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division-Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji Land Administrator

Enclosures

cc: Central Files





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

		Dece	ember 11, 2020	
ROM	1:	ME	MORANDUM	
TO:		X Div. of Forestry & Wing Div. of State Parks X Commission on Wate Office of Conservation X Land Division – Mau X Historic Preservation Russell Y. Tsuji, Land A Proposed Waiehu Affo Kahekili Highway and V TMK: (2) 3-3-001:106 Munekiyo Hiraga on be	cean Recreation (DLNR.ENGR@hawaii.gov) Vildlife (rubyrosa.t.terrago@hawaii.gov) Viter Resource Management (DLNR.CWRM@hawaii.gov) Vition & Coastal Lands UI District (daniel.l.ornellas@hawaii.gov) Vition (DLNR.Intake.SHPD@hawaii.gov) Vition (DLNR.Intake.SHPD@hawaii.gov) Administrator Fordable Housing Community Waiehu Beach Road, Kahului, Island of Maui; Vitional Community Waiehu Beach Road, Kahului, Island of Maui; Vitional Community Vitio	
	we will assume your agency has no nis request, please contact Darlene u.			
			() We ha	eve no objections. eve no comments. enerts are attached. Carty S. Chang, Chief Engineer Engineering Division Dec 15, 2020

Attachments

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES ENGINEERING DIVISION

LD/Russell Y. Tsuji

Ref: Proposed Waiehu Affordable Housing Community

Location: Kahekili Highway and Waiehu Beach Road, Kahului,

Island of Maui

TMK(s): (2) 3-3-001:106

Applicant: Munekiyo Hiraga on behalf of Highridge Costa Development

Company

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4896.

Signed: CARTY S. CHANG, CHIEF ENGINEER

Date: Dec 15, 2020



CC:

Central Files



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

December 11, 2020

MEMORANDUM

MEMORANDOM								
TO:	DLNR Agencies: Div. of Aquatic ResourcesDiv. of Boating & Ocean Recreation X_Engineering Division (DLNR.ENGR@hawaii.gov) X_Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)Div. of State Parks X_Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)Office of Conservation & Coastal Lands X_Land Division - Maui District (daniel.l.ornellas@hawaii.gov) X_Historic Preservation (DLNR.Intake.SHPD@hawaii.gov)							
FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land Administrator Proposed Waiehu Affordable Housing Community Kahekili Highway and Waiehu Beach Road, Kahului, Island of Maui; TMK: (2) 3-3-001:106 Munekiyo Hiraga on behalf of Highridge Costa Development Company							
Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by December 21, 2020 .								
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 Darlene Nakamura at darlene.k.nakamura@hawaii.gov . Thank you.								
	We have no objections. We have no comments. Comments are attached. Signed: Print Name: Daniel Ornellos Division: Land - MDLO Date: 12/14/20							
Attachments								





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

December 30, 2020

Munekiyo Hiraga Attn: Mr. Chris Sugidono, Senior Associate

305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Mr. Sugidono:

SUBJECT: Proposed Waiehu Affordable Housing Community located at Kahekili

Highway and Waiehu Beach Road, Kahului, Island of Maui; TMK: (2) 3-3-

via email: planning@munekiyohiraga.com

001:106 on behalf of Highridge Costa Development Company

Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated December 21, 2020 enclosed are comments from the Division of Forestry & Wildlife on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji Land Administrator

Enclosures

cc: Central Files





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

December 11, 2020

MEMORANDUM

TO:	DLNR Agencies:Div. of Aquatic ResoDiv. of Boating & Oc X Engineering Division X Div. of Forestry & WiDiv. of State Parks X Commission on WateOffice of Conservation X Land Division – Maui X Historic Preservation	ean Recreation (DLNR.ENGR@ Idlife (rubyrosa. er Resource Ma on & Coastal La District (daniel	@hawaii.gov) t.terrago@hawaii.gov) nagement (DLNR.CWRM@hawaii.gov) nds l.ornellas@hawaii.gov)		
	Russell Y. Tsuji, Land Administrator Proposed Waiehu Affordable Housing Community Kahekili Highway and Waiehu Beach Road, Kahului, Island of Maui; TMK: (2) 3-3-001:106 Munekiyo Hiraga on behalf of Highridge Costa Development Company d for your review and comment is information on the above-referenced ease submit any comments by December 21, 2020.				
comments. Sho		tions about the gov. Thank you () We have a government of the community	ve no objections. ve no comments. ents are attached. DAVID G. SMITH, Administrator		
		Division: Date:	Division of Forestry and Wildlife Dec 28, 2020		

Attachments

cc: Central Files

158





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

December 28, 2020

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA FIRST DEPUTY

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
RUREAU OF CONNEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Log no. 2933

MEMORANDUM

TO:

RUSSELL Y. TSUJI, Administrator

Land Division

FROM:

DAVID G. SMITH, Administrator

Division of Forestry and Wildlife

SUBJECT:

Division of Forestry and Wildlife Comments for the Early Consultation

Request for the Proposed Waiehu Affordable Housing Community

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding review of the proposed Waiehu Affordable Housing Community in Waiehu on Maui, TMK: (2) 3-3-001:106. The proposed project consists of constructing 120 multi-family residential rental units, housed in 13 2-story buildings, a non-profit building, a community center, landscaping and 285 off-street parking stalls.

The State listed Blackburn's Sphinx Moth (BSM; *Manduca blackburni*) has a historic range that encompasses the project area. Larvae of BSM feed on many nonnative hostplants that include tree tobacco (*Nicotiana glauca*) which grows in disturbed soil. We recommend contacting our Maui DOFAW office at (808) 984-8100 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. To avoid harm to BSM, DOFAW recommends removing plants less than one meter in height or during the dry time of the year. If you remove tree tobacco over one meter in height or disturb the ground around or within several meters of these plants they must be checked thoroughly for the presence of eggs and larvae.

State listed waterbirds such as the Hawaiian Duck (*Anas wyvilliana*), Hawaiian Stilt (*Himantopus mexicanus knudseni*), Hawaiian Coot (*Fulica alai*) and Hawaiian Goose or Nēnē (*Branta sandvicensis*) have the potential to occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction activities, then all activities within 100 feet (30 meters) should cease, and the bird should not be approached. Work may continue after the bird leaves the area of its own accord. If a nest is discovered at any point, please contact the Maui DOFAW office at the aforementioned number.

DOFAW is concerned about attracting vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongoose. Additionally, construction and improvements to the area are likely to increase the number of users and may generate more predator attractants. We recommend

taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.

The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of the project area and may roost in nearby trees. If any site clearing is required this should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW.

DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g. Little Fire Ants), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Maui Invasive Species Committee at (808) 573-6472 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (https://sites.google.com/site/weedriskassessment/home). We recommend that you refer to www.plantpono.org for guidance on selection and evaluation for landscaping plants.

We note that artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. For illustrations and guidance related to seabird-friendly light styles that also protect the dark, starry skies of Hawai'i please visit: https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Koa Matsuoka, Protected Species Habitat Conservation Planning Associate at (808) 587-4149 or koa.matsuoka@hawaii.gov.

Sincerely,

for

DAVID G. SMITH Administrator



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP-VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

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

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Tsuji:

Thank for your letters dated December 21, 2020, and December 30, 2020, regarding the subject project. We very much appreciate you taking the time to provide us comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to the comments from your Divisions which are presented in the same order as they appear in your letters:

ENGINEERING DIVISION

We acknowledge the flood hazard requirements and guidance provided.

MAUI DISTRICT LAND OFFICE (MDLO)

We acknowledge that the MDLO does not have any comments.

DIVISION OF FORESTRY AND WILDLIFE

The Applicant appreciates the comment and acknowledges the recommendation regarding the protection of the State listed Blackburn's sphinx moth. The environmental review process for the proposed action will include completion of a Flora and Fauna Survey addressing biological resources in the project area. This assessment will address the objective of identification, protection, as applicable,

Russell Tsuji, Land Administrator September 9, 2021 Page 2

and restoration of wildlife habitats. Further information on the survey and mitigation measures will be provided in the Draft Environmental Assessment (EA).

- 2. The Applicant appreciates the comment and acknowledges the guidance regarding the protection of State listed waterbirds. As mentioned above, a Flora and Fauna Survey will be completed as part of the environmental review process for this project. A copy of the Flora and Fauna Survey will be included and discussed in the Draft EA.
- 3. The Applicant appreciates the comment and acknowledges the concern regarding attracting vulnerable birds to the project area. Measures to minimize the potential for this to be a concern will be evaluated and incorporated into the project design.
- 4. The Applicant appreciates the comment and acknowledges the recommendation regarding the protection of the State listed Hawaiian hoary bat. As mentioned above, a Flora and Fauna Survey will be completed as part of the environmental review process for this project. A copy of the Flora and Fauna Survey will be included and discussed in the Draft EA.
- 5. The Applicant appreciates the recommendation and will be pursuing further community engagement opportunities as part of the environmental review process.
- 6. The Applicant appreciates the comment and acknowledges the recommendation to use native plant species for landscaping the project area. Further information regarding the proposed landscaping plan for the project will be included in the Draft EA.
- 7. The Applicant appreciates the comment and acknowledges the concern over artificial lighting adversely impacting seabirds passing through the project area at night. All lighting for the project will be fully shielded and downward facing in compliance with County lighting ordinance requirements.

Russell Tsuji, Land Administrator September 9, 2021 Page 3

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Cl. 82

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Lena Tamashiro, Design Partners Inc.

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STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

December 17, 2020

JADE T. BUTAY

Deputy Directors
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO: DIR 1085 STP 8.3084

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Mr. Sugidono:

Subject: Early Consultation for Hawaii Revised Statutes Chapter 343

Proposed Waiehu Affordable Housing Community

Waiehu, Maui, Hawaii

Tax Map Key: (2) 3-3-001:106

Thank you for your letter dated December 1, 2020. The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject early consultation request letter and understands the project is proposed to be a new 120-unit affordable rental housing community in Waiehu, Maui. The project will be constructed on an approximately 11.476-acre site south of the intersection of Kahekili Highway (State Route 340, County Route 330) and Waiehu Beach Road (State Route 3400). The project is also proposed to include a community center, a non-profit building, and 285 parking stalls. Access to the site will be via three new driveways along Kahekili Highway.

The HDOT has the following comments:

Airports Division (HDOT-A)

- 1. The Waiehu Affordable Housing Community project site is approximately four miles from Kahului Airport. All projects within five miles from Hawaii State airports are advised to read the <u>Technical Assistance Memorandum (TAM)</u> for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
- 2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the <u>Code of Federal Regulations</u>, <u>Title 14</u>, <u>Part 77.9</u>, 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,

Page 2

- 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 the airport, the applicant and future residents should be aware of potential single event noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over the project location.
- 4. Although the project is located outside of the 55 DNL (Day-Night Average Sound Level) noise contours on the 1998 Noise Exposure Map for Kahului Airport, the applicant and future residents should be aware of the proximity of the airport flight paths and potential single event noise from aircraft operations.
- 5. The HDOT-A recommends that the developer incorporates measures to minimize hazardous wildlife attractants in compliance with <u>FAA Advisory Circular 150/5200-33C</u>, <u>Hazardous Wildlife Attractants On Or Near Airports</u> for guidance. If the project results in a wildlife attractant, these effects shall be immediately mitigated by the developer upon notification by the HDOT-A and/or FAA.

Highways Division (HDOT-HWY)

- 1. The segment of Kahekili Highway adjacent to the site is under County jurisdiction and access approval would be required from the County. However, there is potential for adverse impacts to HDOT roadway traffic and safety conditions at the intersection of Kahekili Highway and Waiehu Beach Road. Specific concerns include but are not limited to the following:
 - a. The northernmost driveway appears to be very close the intersection. Please analyze for queuing issues.
 - b. Every driveway represents potential conflict points among motor vehicles, pedestrians, and bicyclists. An increased number of these conflict points and reduced distances between them compromise the safety performance of the roadway. We recommend the number of access points be reduced, and that right-in right-out traffic flow at the driveways be considered.
 - c. HDOT recently reviewed the early consultation materials for the proposed Waiehu Residential Community Project on a 241-acre parcel (Tax Map Key: (2) 3-3-002:031) which is located on the opposite (western) side of Kahekili Highway. This large-scale development, as well as other developments that may be proposed in the area could contribute significant adverse cumulative effect on traffic and safety. HDOT-HWY recommends contacting Chris Hart and Partners, Inc. to discuss the two projects. There may be potential for combining efforts to address HDOT comments relevant to both projects.
- 2. A Traffic Impact Assessment Report (TIAR) shall be prepared by a licensed engineer and be included in the Draft Environmental Assessment (DEA). The study area should

include intersections potentially affected by the project including the Kahekili Highway and Waiehu Beach Road intersection. The TIAR should include:

- a. Description of existing trip generation at the site, existing traffic conditions and multimodal routes in the study area.
- b. Forecasted traffic and multimodal conditions in the horizon year (year at full project build-out) without the project and with the project.
- c. Analysis of existing and future safety conditions.
- 3. The TIAR and DEA should include a discussion of any direct, indirect and cumulative traffic impacts generated by the project as well as other nearby developments on the State Highway and propose mitigation, as needed.
- 4. In accordance with HDOT guidelines, the Applicant shall mitigate all transportation impacts due to the project to maintain the operating Level of Service (LOS) and delay level conditions at the "without project condition" for all horizon years. In addition, should the LOS without the project be lower than the desirable HDOT threshold of LOS "D", the agency may be required to provide mitigation improvements to improve the State facilities to LOS D or better with the project condition.
- 5. The Bike Plan Hawaii identifies a future bikeway on Waiehu Beach Road beginning at the intersection with Kahekili Highway and extends east. Consider including a bike path within the landscaped area of the site plan that would provide safe access to the future bikeway for residents. Explore opportunities to improve connectivity with adjacent developments.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely

JADE T. BUTAY Director of Transportation



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Jade T. Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, Hawai'i 96813-5097

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'l (DIR 1085; STP 8.3084)

Dear Ms. Butay:

Thank for your early consultation comment letter dated December 17, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Airports Division (HDOT-A)

- 1. The Applicant appreciates the comment and acknowledges the guidance provided in the Technical Assistance Memorandum.
- The Applicant acknowledges the comment regarding the submittal of a FAA Form 7460-1. It should be noted, however, that the project is over 20,000 feet away from Kahului Airport.
- The Applicant acknowledges the comment that there is a potential for noise and related impacts from aircraft operations for future residents living within the proposed new community.
- 4. The Applicant notes the information provided regarding awareness of the airport flight paths and potential noise from aircraft operations for future residents.

Jade T. Butay, Director September 9, 2021 Page 2

 The Applicant appreciates the comment and will review the guidance provided relating to FAA Advisory Circular 150-5200-33C, Hazardous Wildlife Attractants on or Near Airports.

Highways Division (HDOT-HWY)

- 1. We note the comments regarding driveway access to the proposed project. The project proposes to restrict the northernmost and southernmost accesses to right-in, right-out (RIRO) only, and maintain full access at the middle intersection to allow both left and right turns entering and exiting the project. All intersections will be designed to County standards. More detailed information regarding traffic will be provided in the Traffic Impact Analysis Report (TIAR), a copy of which will be provided in the Draft Environmental Assessment (EA). Further, information will be obtained on the Waiehu Residential Community Project, as appropriate, during the TIAR preparation process.
- The Applicant acknowledges the comment and will prepare a TIAR for the proposed project and include it in the Draft EA. The TIAR will include analysis and discussion on the aforementioned items.
- The Applicant acknowledges the comment and will prepare a TIAR for the proposed project and include it in the Draft EA. The TIAR will include analysis and discussion on the aforementioned items.
- 4. The Applicant acknowledges the comment regarding the HDOT threshold of LOS. The Applicant will also mitigate all transportation impacts due to the proposed project, in accordance with HDOT guidelines.
- 5. The Applicant appreciates the comment and acknowledges the request to consider including a bike path within the landscaped area of the proposed site as well as explore opportunities to improve connectivity with adjacent developments.

Jade T. Butay, Director September 9, 2021 Page 3

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates K:\DATA\Highridge\Walehu AH PERMITTING\Applications\EC\ECL Response\SDOT.docx



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813 Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

MARY ALICE EVANS

DIRECTOR

OFFICE OF PLANNING

Telephone: (808) 587-2846 Fax: (808) 587-2824 Web: http://planning.hawaii.gov/

DTS 202012041112NA

December 23, 2020

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

Dear Mr. Sugidono:

Subject: Early Consultation Request for a Draft Environmental Assessment

For the Proposed Waiehu Affordable Housing Community,

Waiehu, Maui

TMK: (2) 3-3-001: 106

Thank you for the opportunity to provide comments for the Early Consultation Request of a Draft Environmental Assessment (Draft EA) for the proposed Waiehu Affordable Housing Community.

The Applicant, Highridge Costa Development Company, along with Hale Mahaolu proposes to develop a 120-unit 100% affordable rental housing community in Waiehu, Maui. The units will be offered at rental prices affordable to households with 60% or less of the area median income. The project will consist of 13 two-story residential buildings, a 3,500-sq. ft. non-profit building, a 3,000-sq. ft. community center, and off-street parking for 285 vehicles.

The project is situated on approximately 11.476 acres of land south of the intersection of Kahekili Highway and Waiehu Beach Road and is bordered to the west by Kahekili Highway, a State roadway, and by the Waiehu Heights residential subdivision to the east. The Applicant proposes to provide access to the site through three new driveways off Kahekili Highway. One portion of the site is within the State Land Use Urban District, but the other portion is in the Agricultural District, and a State Land Use Reclassification from the Agricultural to the Urban District is required. The land in the Agricultural District is rated "B" by the Land Study Bureau. The entire site is within the Urban Growth Boundary on the Maui Island Plan.

The Applicant proposes an expedited affordable housing project approval from the Maui County Council under Chapter 2.97 of the Maui County Code (MCC) and, specifically under MCC § 2.97.120, an exemption from the requirements for a State Land Use District Boundary

Mr. Chris Sugidono December 23, 2020 Page 2

Amendment for lands less than 15 acres in size.

The Office of Planning (OP) has the following comments to offer:

1. State Land Use District Boundary Amendment (DBA)

The authority to exempt affordable housing projects from "all statutes, ordinances, charter provisions, and rules of any government agency relating to planning, zoning, construction standards..." is provided by Hawaii Revised Statutes (HRS), § 201H-38. OP disagrees with and opposes the exemption of a State DBA through the 201H exemption process as contrary to the intent of the statute. Based on the provisions of HRS § 201H-38, neither the counties nor the State can specifically exempt a State DBA. The § 201H-38 (a) exemption covers "...<u>all</u> statutes, ordinances, charter provisions, and rules of any government agency relating to planning, zoning, construction standards..." Whether a DBA is included within this exemption, or within "all..." is nullified by 201H-38 (a) (4), which is a condition to the exemption and requires an expedited review by the Land Use Commission (LUC) of DBAs for projects greater than 15 acres. Under statutory interpretation, it is presumed that a statute will be interpreted so as to be internally consistent. It would be inconsistent to both allow an exemption of the DBA process <u>and</u> require an expedited DBA process.

While the counties can similarly expedite the DBA review, the counties cannot be less restrictive than the LUC in the administration of their DBA reviews and are therefore similarly constrained by § 201H-38 to <u>not</u> allow the DBA exemption.

As noted by the Applicant, MCC, § 2.97.120 provides for an exemption from the requirements of MCC, Chapter 19.68 that governs the usual process by which the County approves State Land Use DBAs of lands less than 15 acres. Under Chapter 19.68, a DBA requires review by the County Department of Planning and approval by the County Planning Commission before final approval by the County Council. Section 2.97.120 allows applicants for affordable housing projects to bypass the Planning Commission and go directly to the County Council for approval. OP has no objection to this expedited process. However, when the County Council approves the affordable housing project, it must also approve a State Land Use DBA.

2. The Hawaii State Planning Act

The Hawaii Revised Statutes (HRS) Chapter 226, serves as a guide for long-term development for the State. It provides 1) goals, objectives, and policies; 2) the allocation of resources through planning coordination and implementation efforts; and 3) priority guidelines for the State. The Draft EA should include a discussion on the provisions of Hawaii Revised Statutes (HRS) Chapter 226, as they pertain to this housing development.

Mr. Chris Sugidono December 23, 2020 Page 3

As this plan relates to affordable housing projects, HRS § 226-19 Objectives and policies for socio-cultural advancement – housing; and HRS § 226-106 – Affordable Housing both involve themes related to home ownership, rental housing, and meeting housing needs of the low- and moderate-income groups. The Draft EA should consider this, as well as any other applicable provision of HRS Chapter 226.

3. Hawaii Coastal Zone Management (CZM) Program

The CZM area is defined as "all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the U.S. territorial sea" (HRS § 205A-1).

In implementing the objectives and supporting policies of the Hawaii CZM program, agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development. As this project will require approval from State Land Use Commission, and multiple agencies within the County of Maui, to aide in their decision-making process, the Draft EA should include analysis on the project's consistency with the objectives and supporting policies of the Hawaii CZM Program, HRS § 205A-2, as amended. Compliance with HRS § 205A-2 is an important component for satisfying the requirements of HRS Chapter 343.

4. Stormwater Runoff, Erosion, and Water Resources

Pursuant to Hawaii Administrative Rules (HAR) § 11-200.1-18(d)(7) – identification and analysis of impacts and alternatives considered; to ensure that nearshore marine resources near Kahului Harbor and its coastal vicinities remain protected, the negative effects of stormwater inundation and sediment loading surrounding the proposed project site should be evaluated.

Issues that may be examined include, but are not limited to, project site characteristics in relation to flood and erosion prone areas, potential vulnerability of water resources, the shoreline, and examining any increase of permeable surfaces in the area. Developing mitigation measures for the protection for surface water resources and the coastal ecosystem should take this into account, pursuant to HAR § 11-200.1-18(d)(8).

To assist in the development of stormwater runoff strategies, OP has developed guidance documents on this subject. We recommend consulting these stormwater evaluative tools when developing mitigation approaches for polluted runoff. They offer useful techniques to keep land-based pollutants and sediment in place, while considering the management practices best suited for the topography of the area and the types of contaminants potentially affecting nearby water resources. The evaluative tools can be used during the design process

Mr. Chris Sugidono December 23, 2020 Page 4

of stormwater mitigation strategies include:

- <u>Hawaii Watershed Guidance</u> provides direction on mitigation strategies for urban development activities that will safeguard watersheds and implement watershed plans. http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI_Watershed Guidance Final.pdf;
- <u>Stormwater Impact Assessments</u> can be used to identify and analyze information on hydrology, sensitivity of coastal and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area. http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_imapct/final_stormwater_impact_assessments_guidance.pdf.; and
- Low Impact Development (LID), A Practitioners Guide covers a range of structural BMPs for stormwater control management, onsite infiltration techniques, and water reuse methods that minimize negative environmental impacts. http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf

If you have any questions regarding this comment letter, please contact Aaron Setogawa of our Land Use Division at (808) 587-2883 (email at aaron.h.setogawa@hawaii.gov) or Joshua Hekekia of our CZM Program at (808) 587-2845.

Sincerely,

Mary Alice Evans

Mary Alice Evans

Director

cc. Lori Tsuhako, County of Maui Department of Housing and Human Concerns Michele Chouteau McLean, County of Maui Planning Department Dan Orodenker, Land Use Commission



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Mary Alice Evans, Director State of Hawai'i Office of Planning P. O. Box 2359 Honolulu, Hawai'i 96804

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i (DTS 202012041112NA)

Dear Ms. Evans:

Thank for your early consultation comment memorandum dated December 23, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates the comment and guidance regarding the State Land Use District Boundary Amendment (DBA) process. As noted in the comment, the Applicant will seek to bypass the Maui Planning Commission and go directly to the County Council for approval of the DBA, as allowed under Section 2.97.120. The Applicant acknowledges that OP has no objection to this expedited process, and understands that the County Council will need to approve the proposed affordable housing project as well as the State Land Use DBA.
- 2. The Applicant appreciates the comment and acknowledges Hawai'i Revised Statutes (HRS) Chapter 226 regarding the Hawai'i State Plan. Further information on how the proposed project addresses the priorities and objectives of the Hawai'i State Plan will be provided in the Draft Environmental Assessment (EA).
- 3. The Applicant appreciates the comment and acknowledges HRS Chapter 205A regarding the Hawai'i Coastal Zone Management (CZM) Program. Further information on how the proposed project addresses the objectives and supporting policies of the Hawai'i CZM Program will be provided in the Draft EA.

Mary Alice Evans, Director September 9, 2021 Page 2

The Applicant appreciates the comment regarding the protection for surface water 4. resources and the coastal ecosystem. The Applicant will be implementing stormwater mitigation strategies and will take into consideration the Office of Planning's guidance documents on the subject in preparation of the Draft EA.

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:ab

Grant Chun, Hale Mahaolu Debbie Cabebe, Maui Economic Opportunity

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K.:\DATA\Highridge\Walehu AH PERMITTING\Applications\EC\ECL Response\OP.docx

DAVID Y. IGE Governor

JOSH B. GREEN Lieutenant Governor

MIKE McCartney
Director



LAND USE COMMISSION

Department of Business, Economic Development & Tourism State of Hawai'i

DANIEL E. ORODENKER Executive Officer

BERT SARUWATARI Planner

SCOTT A.K. DERRICKSON AICP

RILEY K. HAKODA Planner/Chief Clerk

FRED A. TALON Drafting Technician

December 10, 2020

To:

Chris Sugidono Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

RE:

Proposed Waiehu Affordable Housing Community HRS Chapter 343, Early Consultation Request TMK (2) 3-3-001: 106

Pursuant to your letter received December 4, 2020, regarding this matter, we have the following comments:

- The subject property is split-districted State Urban and State Agricultural. We
 recommend seeking a State Land Use District Boundary Interpretation to identify the
 exact acreage in each of these districts. A form to request a boundary interpretation can
 be found on our website home page at http://luc.hawaii.gov/
- The subject property is less than 15 acres and will require a State Land Use District Boundary Amendment ("DBA") by the County pursuant to HRS §205-3.1(b) and (c). The DEA should list a State DBA as a required approval.
- The letter indicates that the applicant plans to seek exemptions from a State DBA. Based
 on the provisions in HRS §201H-38, neither the counties nor the State can specifically
 exempt a DBA regardless of anything contained in, or implied in section 2.97.120, MCC.
 A DBA application should be filed and approved through the County land use process.

Should you have any questions please contact me or Riley Hakoda at 587-3822.

Aloha

Daniel E. Orodenker Executive Officer

cc:

Mary Alice Evans, OP

Michele McLean, Maui County Planning



Karlynn K. Fukuda PRESIDENT Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Daniel E. Orodenker, Executive Officer State of Hawai'i Land Use Commission P. O. Box 2359 Honolulu, Hawai'i 96804

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Orodenker:

Thank for your early consultation comment memorandum dated December 10, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates the comment and acknowledges the recommendation.
 The Applicant has requested a boundary interpretation from the State Land Use Commission to identify the exact acreage of the "Urban" and "Agriculture" designated areas within the project area.
- The Applicant acknowledges the comment and requirement. The Draft EA will list the State Land Use District Boundary Amendment (DBA) as a required approval.
- 3. The Applicant acknowledges the comment and requirement. It should be noted that the Applicant will be seeking approval of a State Land Use DBA from the County Council, as allowed under Section 2.97.120, Maui County Code, for affordable housing project applicants. The State Office of Planning also issued a letter to the Applicant stating that it had no objection to this expedited process, and understands that the County Council will be the approving authority for both the proposed affordable housing project application, as well as the State Land Use DBA.

Daniel E. Orodenker, Executive Officer September 9, 2021 Page 2

Thank you again for your input and we welcome your further review and comments on the Draft Environmental Assessment (EA) when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Ch X

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\EC\EC\ Response\SLUC.docx

Council Chair Alice L. Lee

Vice-Chair Keani N.W. Rawlins-Fernandez

Presiding Officer Pro Tempore Tasha Kama

Councilmembers
Riki Hokama
Kelly Takaya King
Michael J. Molina
Tamara Paltin
Shane M. Sinenci
Yuki Lei K. Sugimura



COUNTY COUNCIL

COUNTY OF MAUI 200 S. HIGH STREET WAILUKU, MAUI, HAWAII 96793 www.MauiCounty.us

December 15, 2020

Munekiyo Hiraga 305 High Street, Suite 104 Wailuku HI 96793

Dear Mr. Sugidono:

SUBJECT: Early Consultation Request for Proposed Waiehu

Affordable Housing Community at TMK (2)3-3-00:106,

Attention: Chris Sugidono, Sr. Assoc.

Via Email: chris@munekiyohiraga.com

Waiehu, Maui, Hawai'i

In response to your December 1, 2020 request for early consultation regarding the captioned project, we offer the following comments:

- 1. It is widely recognized that Maui County has an existing severe shortage of affordable housing, particularly in the lower Area Median Income (AMI) categories. The community should welcome any opportunity to add to our housing stock, particularly projects that target the lower AMI categories. Unfortunately, the community seems to be seeking the "perfect project." The community also seems to define a project as "perfect" if it is in someone else's neighborhood. As such, we strongly recommend that before the applicant submits for approval under MCC 2.97, that a series of public meetings be held, most likely on-line, inviting the Waiehu Heights, Waiehu Terrace and Happy Valley communities to comment on the proposal.
- 2. Your letter indicated that the project would be seeking both State and County funding to assist with the provision of supporting infrastructure. We would be remiss if we did not note the current state of both State and County budgets. Given the dramatic loss of revenue experienced by the State of Hawaii and the expected loss of projected revenue for Maui County, the project should not expect to rely on County funding to meet its required infrastructure needs. Appropriating funds from the County's

Chris Sugidono, Munekiyo-Hiraga / Early Consultation Proposed Waiehu Affordable Housing Community
December 15, 2020
Page 2

Affordable Housing fund will be difficult if the project does not have widespread community support.

3. Traffic is an issue of community concern in this area of the County. There are only two crossings of the Wailuku River (Kahekili Highway and Waiehu Beach Road). Both of these facilities are congested during peak hours – particularly in the morning when parents take their children to Waihee Elementary School. The need for an additional crossing has been recognized in the past with proposals for additional development in this area of the County. Given the budgetary constraints, the applicant may want to consider the establishment of a Community Facilities District (CFD) to provide the revenue to pay for the facility. We would recommend that discussions regarding the establishment of the CFD should happen with the County Administration (Department of Housing and Human Concerns, and Department of Public Works) prior to the submittal of the MCC 2.97 application.

Thank you for the opportunity to provide our early consultation comments.

Sincerely,

TASHA KAMA

Presiding Officer Pro Tempore



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Honorable Tasha Kama Maui County Council 200 South High Street Wailuku, Hawai'i 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Councilmember Kama:

Thank for your early consultation comment letter dated December 15, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates the comment and recommendation. As mentioned in your comment, the Hale Mahaolu Ke Kahua Affordable Housing Community is a 100 percent affordable housing project servicing residents earning 60 percent or less of the Area Median Income (AMI). The Applicant has reached out to various community/neighborhood associations and Aha Moku representatives to request comments as part of its early consultation process. This list included Waiehu Terrace Community Association, Waihe'e Community Association and Waiehu Kou Phase III Association. Subsequently, the Applicant met with Waihe'e Community Association board members to address any questions and concerns involving the proposed project. In addition, the Applicant also plans to hold a public meeting to receive comments on the Draft EA/2.97 application.
- The Applicant appreciates the comment and acknowledges the budgetary issues facing both the State and County. Further information regarding the proposed project's financing will be provided in the Chapter 2.97 application.

Honorable Tasha Kama September 9, 2021 Page 2

The Applicant appreciates the comment and acknowledges the community concern regarding traffic in the area. The Applicant also notes the suggestion to consider establishing a Community Facilities District to fund any roadway infrastructure improvements. The Applicant will be working with the County Department of Housing and Human Concerns and Department of Public Works to address traffic impacts and potential mitigations. Further information including a Traffic Impact Analysis Report will be provided in the Draft EA and Chapter 2.97 application.

Thank you again for your input and we welcome your further review and comments on the Draft Environmental Assessment (EA) when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch ST

CEJS:ab

cc: Grant Chun, Hale Mahaolu
Debbie Cabebe, Maui Economic Opportunity
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Tyler Fujiwara, Austin, Tsutsumi & Associates
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MICHAEL P. VICTORINO Mayor

ERIC A. NAKAGAWA, P.E. Director

SHAYNE R. AGAWA, P.E. Deputy Director

MICHAEL P. RATTE Solid Waste Division

SCOTT R. ROLLINS, P.E. Wastewater Reclamation Division

TAMARA L. FARNSWORTH Environmental Protection & Sustainability Division





COUNTY OF MAUI DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

2050 MAIN STREET, SUITE 2B WAILUKU, MAUI, HAWAII 96793

November 6, 2020

Mr. Mohannad H. Mohanna Highridge Costa Development Company, LLC 330 W. Victoria Street Gardena. CA 90248

SUBJECT:

WAIEHU APARTMENTS TMK (2) 3-3-001:106

WAIEHU, MAUI, HI 96793

Dear Mr. Mohanna:

This letter is response to your undated will serve letter request received on 11-2-2020. It is intended to provide information describing the nature and limitation of the wastewater service that could be provided to the subject project. Our review of your request has concluded that:

- 1. The subject project proposed to be developed by Highridge Costa Development Company, LLC consists of approximately 120 apartment units, a manager's living unit, manager's office, clubhouse, 3000 s.f. Community Center, fitness center, computer room and a separate 3,500 s.f. office building for Maui Economic Opportunity.
- 2. Estimated wastewater flows for the project were not included in your request. We attempted to assess the proposed project based on your included description. We projected that the development could produce an estimated 40,000 gpd of wastewater. At the current time, the WWRF has adequate capacity to accept and treat the expected flows from the project. Please provide engineering calculations for the estimated flows for verification.
- 3. Wastewater treatment for the subject project would be provided by the Wailuku/Kahului Wastewater Reclamation Facility (WWRF). This facility is owned and operated by the County of Maui and currently processes approximately 5.8 million gallons per day (mgd) of wastewater. To date the County has allocated 6.9 mgd of the plants 7.9 mgd capacity.

Mr. Mohannad H. Mohanna November 6, 2020 Page 2 of 2

- 4. Proper assessment of the projects effect on the County's wastewater collection system is reliant on knowing the connection point to the existing sewer system. This project is not immediately adjacent to existing collection lines and the connection point was not identified in your request. We would prefer a connection on Waiehu Beach Road which would require an extension of the existing gravity sewer system by the developer. Please provide your proposed location for connection to the County system to enable us to complete an evaluation.
- 5. Based on the project location and geography it appears that a pump station and force main would be required to convey wastewater to the County collection system at any location. Note that these failities would remain privately owned and operated.
- 6. Note that capacity cannot be guaranteed until building permits are issued. There is always a possibility that adequate capacity may not be available if construction is delayed, a significant number of other projects are developed, or regulatory conditions change.

Should you have any questions or require any additional information regarding our ability to serve this project, do not hesitate to contact me at (808) 270-8230.

Sincerely

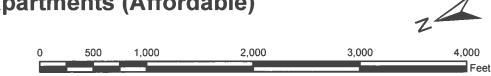
ERIC A. NAKAGAWA, P.E.

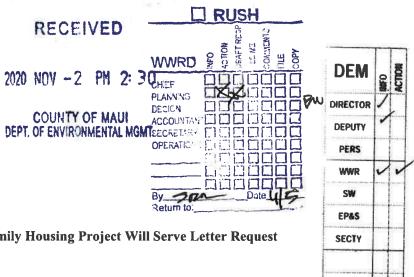
Director of Environmental Management

xc: Wastewater Reclamation Division

dc: Harrison Herzberg (Harrison.herzberg@housingpartners.com







Eric Nakagawa, Director

Department of Environmental Management

2050 Main Street, Suite 2B

Wailuku, HI 96793

Re: Waiehu Apartments 100% Affordable Family Housing Project Will Serve Letter Request

Dear Mr. Nakagawa,

I am writing to request a will serve letter from the Department of Environmental Management that affirms that the wastewater division has sufficient capacity for the intended use of our new construction 100% affordable housing project. Please see below for greater detail of the project:

Name of project: Waiehu Apartments

Approximate address: Southeast corner of Kahekili Hwy & Waiehu Beach Rd

Tax Map Key No: (2) 3-3-001-106-0000

Project Description: The proposed project will consist of two 8-unit buildings, ten 10-unit buildings, and one 4-unit building containing, in total, 120 apartment units and related improvements. Of the 120 units, 30 units will be one-bedroom units (approximately 550 square feet sq.ft.), 58 units will be two-bedroom units (approximately 850 square feet sq.ft.), and 32 units will be three-bedroom units (approximately 1100 sq.ft.). Amenities at the property will include a clubhouse, manager's office, fitness room, computer room, playground, 3,000 square foot community center, and a property manager's living unit. Additionally, there will be a 3,500 square foot building for local non-profit, Maui Economic Opportunity, Inc. (MEO), to run their programs out of. The project will provide 250 residential parking stalls, 35 parking stalls for MEO, and 2 loading stalls. All units will be set aside for individuals and families earning 60% or less of area median income.

Party requesting will serve letter:

Mohannad H. Mohanna, President Highridge Costa Development Company, LLC 330 W. Victoria Street, Gardena, CA 90248

If possible, I would also like to request that a digital copy of the letter be sent to harrison.herzberg@housingpartners.com in advance of the original. Thank you for your help.

Sincerely,

Mohannad H. Mohanna



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Eric Nakagawa, Director County of Maui Department of Environmental Management 2050 Main Street, Suite 2B Wailuku, Hawai'i 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Nakagawa:

Thank for your letter dated November 6, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The proposed project is estimated to generate approximately 30,600 gallons of wastewater daily. The onsite sewerage collection system will be designed to accommodate this flow. The applicant appreciates the confirmation that the Wailuku/Kahului Wastewater Reclamation Facility (WWRF) has adequate capacity to accept and treat the expected flows from the project. A copy of the Preliminary Engineering Report will be provided in the Draft Environmental Assessment (EA).
- The Applicant appreciates and acknowledges the comment regarding the WWRF.
- The nearest gravity sewer connection is located approximately 1,500 feet from the proposed site, along Waiehu Beach Road. Connection to this system will require installation of a sewer line extension and a lift station for the project. This improvement will be incorporated into the plans for the project.
- The Applicant appreciates and acknowledges the comment regarding the pump station and force main facilities. Please see our response above to the preceding comment.

Eric Nakagawa, Director September 9, 2021 Page 2

 The Applicant acknowledges the comment regarding capacity not being guaranteed until building permits are issued.

Thank you again for your input and we welcome your further review and comments on the Draft Environmental Assessment (EA) when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch Sh

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Ashley Otomo, Otomo Engineering, Inc.

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From: Shayne Agawa [mailto:Shayne.Agawa@co.maui.hi.us]

Sent: Thursday, February 18, 2021 9:50 AM **To:** Chris Sugidono < chris@munekiyohiraga.com>

Subject: RE: FW: Save-the-Date: AHMN Working Group Meeting 01/26/21

Hi Chris,

Ok. I am also attaching the comments from our SWD to this email. It is just a standard workforce housing comments sheet from SWD and not particular to any individual project. I've asked them to give comments that are more tailored to an individual AHMN project but they are very short staffed and have been utilizing the attached comment sheet as a type of catch-all when it comes to affordable housing projects.

Thank you, Shayne

Shayne R. Agawa, P.E. Deputy Director

County of Maui
Department of Environmental Management
2050 Main Street, Suite 2B
Wailuku, HI 96793

Phone: (808)270-8230 Fax: (808)270-8234

COUNTY OF MAUI SOLID WASTE DIVISION COMMENTS

GENERAL REQUIREMENTS:

	All projects must comply with Maui County code	All projects must comply with Maui County code(s) Chapter 8.04 pertaining to refuse collection and landfills.						
	For all projects, demolition, new construction, remodel projects etc., applicants are requested to divert all re-usable materials throughout the project, maximizing efficiency and resource allocation to lessen the burden on the County of Maui landfill and resources. (For additional information regarding recycling options contact the County of Maui Environmental Protection and Sustainability Division. https://www.mauicounty.gov/742/Environmental-Protection-Sustainability-)							
	Should there be any significant revisions or changes to the proposed document(s), permit or project under review other than what was originally submitted for review, the Solid Waste Division (SWD) reserves the right to revise comments accordingly.							
	Refer to the following SWD link for general SWD information: https://www.mauicounty.gov/1017/Solid-Waste-Refuse-Services-and-Information							
LAN	NDFILL:							
	If construction and/or demolition (C&D) is expect approved prior to delivery to the local https://www.mauicounty.gov/1739/Commercial-C customers must also have a valid landfill Disposany significant revisions or changes to the permi	landfill. Please ConstructionDemo-Wal Permit/Account.	e see the SWE <u>aste-Accept</u> for de The Solid Waste Di	D website link: <u>C&D Wa</u> etails. In addition to a C&	aste Acceptance or D Number, commercial			
	To obtain a landfill permit to dispose of commercial waste please pick up at a County landfill or download from the SWD website.							
	Hazardous wastes are not accepted at County landfills. However, special wastes such as asbestos, contaminated soil, and canec may be permitted upon request. Contact landfill to inquire and/or make arrangements for special wastes.							
	Check the latest County of Maui Rates and Fees schedule for tipping fees (and potentially reduced fees for oil-free earthen material, soil, rock, concrete, crushed glass, etc. if it can be reclaimed for landfill use).							
	MAU	I COUNTY LANDFILL	HOURS OF OPERA	TION	\neg			
	101222500000	'0-6153)	Hana Landfill	8:00 am to 2:30 pm (808-264-6313)				
	Ct1 M : 1 16:11		Molokai Landfill	8:00 am to 2:30 nm				

	MAUI COUNTY LANDFIL	L HOURS OF OPER	RATION	
	6:00am to 3:00 pm (808-270-6153)	Hana Landfill	8:00 am to 2:30 pm (808-264-6313)	
Central Maui Landfill	C&D hrs 6:00 am to 1:00 pm Monday - Friday, excluding County holidays	Molokai Landfill	8:00 am to 2:30 pm (808-553-3869)	
		Lanai Landfill	8:00 am to 2:30 pm (808-559-0689)	
	Holiday hours vary	check SWD website		

REF	USE COLLECTION:		
	For County refuse collection services, notification to the Solid Waste Division shall be provided if the streets are planned to be dedicated to the County after project completion. This will allow resource allocation, planning, and budgeting to be established in order to serve Count dedicated streets.		
	If proposed streets are private and/or not dedicated to the County, per Maui County Code, they will not be serviced by County Residential Refuse Collection service.		
	Any new County refuse collections service requests shall submit a formal request to the Solid Waste Division for Refuse Service Assessr based upon a first-come first-served basis. If ample capacity in equipment and manpower does not currently exist, any required additi Division resources would have to be budgeted, approved and commissioned prior to service commencing. Should any new subdivision new phases of subdivisions wish to have County refuse service included, a SW System Development Fee per each residential lot sha assessed prior to subdivision approval.		
	No new gated communities will be provided with County refuse service.		
	Refer to SWD link: Routing Schedule or https://www.mauicounty.gov/DocumentView.aspx?DID=8416 for roads or streets already serviced by the County.		

ADDITIONAL COMMENTS / PERMIT APPROVAL STIPULATIONS:

- This section is used by SWD Division reviewer(s) to add any additional comments/notes/stipulations that may pertain to the specific project being proposed.
- A. County Council approval is required for the exemption of landfill disposal fees (during construction) in accordance with Title 8, Maui County Code, Health and Safety, Chapter 8.04 Refuse Collection and Landfill.
- B. Refuse collection shall be provided by a private waste hauler.



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Shayne Agawa, Deputy Director County of Maui Department of Environmental Management 2050 Main Street, Suite 2B Wailuku, HI 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Agawa:

Thank for your email dated February 18, 2021, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following response to your comments which have been presented in the same order as your letter.

- The Applicant will comply with applicable County rules and regulations pertaining to refuse collection and landfills.
- The Applicant appreciates and acknowledges the comment to lessen the burden on the County of Maui landfill and resources. Opportunities to divert construction waste away from landfill disposal will be evaluated and implemented, as feasible.
- The Applicant appreciates and acknowledges the comment that Solid Waste Division (SWD) reserves the right to revise its comments should there be any significant revisions or changes to project plans.
- The Applicant appreciates and will review the SWD link provided for general SWD information.
- The Applicant will submit a Construction and Demolition application for processing, as applicable, should construction and/or demolition waste be expected to be disposed of at the Central Maui Landfill.

Shayne Agawa, Deputy Director September 9, 2021 Page 2

- The Applicant appreciates and acknowledges the guidance provided regarding application for a landfill permit to dispose of commercial waste.
- The Applicant appreciates and acknowledges the information provided regarding hazardous/special wastes and County landfills.
- The Applicant appreciates and acknowledges the information provided regarding the County of Maui Rates and Fees schedule for tipping fees.
- The Applicant appreciates and acknowledges the guidance provided regarding County refuse collection services and notification to SWD.
- The Applicant appreciates and acknowledges the information provided regarding private streets and County Residential Refuse Collection service.
- The Applicant appreciates and acknowledges the information provided regarding new County refuse collections service requests.
- The Applicant appreciates and acknowledges the comment regarding gated communities. The proposed project will not be a gated community.
- The Applicant appreciates and acknowledges the information provided regarding roads or streets already serviced by the County.

Thank you again for your input. We will include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch Sh

CEJS:ab

cc: Grant Chun, Hale Mahaolu
Debbie Cabebe, Maui Economic Opportunity
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa

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MICHAEL P. VICTORINO Mayor

DAVID C. THYNEFire Chief

BRADFORD K. VENTURA

Deputy Fire Chief





DEPARTMENT OF FIRE & PUBLIC SAFETY

FIRE PREVENTION BUREAU COUNTY OF MAUI 313 MANEA PL. WAILUKU, HI 96793

December 17, 2020

Munekiyo Hiraga Attn: Chris Sugidono, Senior Associate 305 High St. Suite 104 Wailuku, HI 96793

SUBJECT: EARLY CONSULTATION REQUEST

PROPOSED WAIEHU AFFORDABLE HOUSING COMMUNITY

TMK: (2) 3-3-001:106 WAILUKU, MAUI, HAWAII

Dear Chris Sugidono,

Thank you for allowing our office to provide comment on the proposed project. As per your request, comments are provided below:

- There are no objections in regards to the information provided as part of the Early Consultation Request for the Proposed Waiehu Affordable Housing Community.
- This project shall incorporate fire prevention measures to address the concern of wildland fires posed by vacant lands abutting the project. At a minimum, 30 feet of defensible space shall be provided between the proposed structures associated with this project and undeveloped lands abutting the project. Our office is willing to assist on this matter.
- Our office does reserve the right to comment on the proposed project during the building permit review process should detailed plans for this project be routed to our office for review. At that time, fire apparatus access, water supply for fire protection, and fire and life safety requirements associated with the subject project will be formally reviewed.

If there are any questions or comments, please feel free to contact me at (808) 876-4693 or by email at paul.haake@mauicounty.gov.

Sincerely,

Paul Hanke

Paul Haake, Captain - Fire Prevention Bureau



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

VICE PRESIDENT

Paul Haake, Captain County of Maui Department of Fire and Public Safety Fire Prevention Bureau 313 Manea Place Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Captain Haake:

Thank for your early consultation comment letter dated December 17, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates and acknowledges that the Fire Prevention Bureau has no objections in regard to the proposed project.
- The Applicant appreciates and acknowledges the comment regarding wildland fire
 prevention measures. A minimum of 30 feet of defensible space will be provided
 between the proposed residential structures and any surrounding undeveloped
 lands.
- The Applicant acknowledges the comment regarding your Department's reserved right to comment on the proposed project during the building permit review process.

Paul Haake, Captain September 9, 2021 Page 2

Thank you again for your input. We will include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Ch Sh

CEJS:ab

CC: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Walehu AH PERMITTING\Applications\EC\ECL Response\DF&PS.docx

MICHAEL P. VICTORINO Mayor

LORI TSUHAKO Director

LINDA R. MUNSELL Deputy Director



DEPARTMENT OF HOUSING& HUMAN CONCERNS COUNTY OF MAUI 2200 MAIN STREET, SUITE 546 WAILUKU, MAUI, HAWAII 96793 PHONE: (808) 270-7805



December 4, 2020

Chris Sugidono, Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Subject:

Chapter 343, Hawaii Revised Statutes, Early Consultation Request for Proposed Waiehu Affordable Housing Community located at

TMK (2) 3-3-001:106, Waiehu, Maui, Hawaii

Dear Mr. Sugidono:

The Department has reviewed the information submitted for the above subject project. Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code. The owner will be required to execute a Residential Workforce Housing Agreement.

Please call Mr. Buddy Almeida of our Housing Division at 270-7355 if you have any questions.

Sincere

C. BUDDY ALMEIDA Housing Administrator

cc: Lori Tsuhako, Director of Housing and Human Concerns

TO SUPPORT AND EMPOWER OUR COMMUNITY TO REACH IT'S FULLEST POTENTIAL FOR PERSONAL WELL-BEING AND SELF-RELIANCE



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Lori Tsuhako, Director Department of Housing and Human Concerns County of Maui 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Ms. Tsuhako:

Thank for your early consultation comment letter dated December 4, 2020, on the subject project. We very much appreciate you taking the time to provide us with the comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we acknowledge that the project is subject to Chapter 2.96, Maui County Code. As such, the Applicant will work with the Department to execute a Residential Workforce Housing Agreement, as may be required.

We appreciate your input and will include a copy of your comment letter and this response in the Draft Environmental Assessment (EA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015.

Very truly yours,

Ch ST

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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MICHAEL P. VICTORINO Mayor

KARLA H. PETERS
Director

MARY A. KIELTY Deputy Director





DEPARTMENT OF PARKS AND RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793 Main Line (808) 270-7230 / Facsimile (808) 270-7942

December 11, 2020

Chris Sugidono, Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

Dear Mr. Sugidono:

SUBJECT: CHAPTER 343, HAWAII REVISED STATUTES, EARLY CONSULTATION REQUEST FOR PROPOSED WAIEHU AFFORDABLE HOUSING

COMMUNITY AT TMK: (2) 3-3-001:106; WAIEHU, MAUI, HAWAII

Thank you for the opportunity to review the proposed Waiehu Affordable Housing Community project. In review of the project, we note that the applicant is currently proposing to develop 120 affordable housing units and is planning to apply for Maui County Code 2.97 approval from the Maui County Council for the proposed development.

The Department of Parks and Recreation looks forward to reviewing the final application for compliance with Maui County Code 18.16.320. We have no further comments at this time.

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

Sincerely,

KARLA H. PETERS

Director of Parks and Recreation

Samual Marvel, Chief of Planning and Development

KHP:SM:csa



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Karla Peters, Director Department of Parks and Recreation 700 Hali-a Nakoa St, Unit 2 Wailuku, Hawai'i 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawaiii

Dear Ms. Peters:

Thank for your early consultation comment letter dated December 11, 2020, on the subject project. We very much appreciate you taking the time to provide us with the input during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we acknowledge that the Department of Parks and Recreation has no comments to offer at this time, but will review the final application for compliance with Maui County Code 18.16.320.

We appreciate your input and will include a copy of your letter and this response in the Draft Environmental Assessment (EA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015.

Very truly yours,

01. ST

Chris Sugidono Senior Associate

CEJS:ab

CC:

Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\EC\ECL Response\DPR.docxx

MICHAEL P. VICTORINO
Mayor

MICHELE CHOUTEAU MCLEAN, AICP
Director

JORDAN E. HART

Deputy Director





DEPARTMENT OF PLANNING

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

December 23, 2020

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Mr. Sugidono:

SUBJECT:

REQUEST FOR EARLY CONSULTATION REGARDING THE PREPARATION OF AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED WAIEHU AFFORDABLE RESIDENTIAL PROJECT, LOCATED ON KAHEKILI HIGHWAY, WAIEHU, ISLAND OF MAUI, HAWAII; TMK: (2) 3-3-001:106 (POR.) (EAC 2020/0013)

The Department of Planning (Department) is in receipt of the proposed Waiehu Affordable Residential Housing Project (Project) Request for Early Consultation in preparation of the Draft Environmental Assessment (DEA). The Department understands from your letter dated December 1, 2020, that "the proposed project will seek both State and County funding and will also involve installation of infrastructure improvements along Kahekili Highway, a County right-of-way. Use of State/County funds and County lands are triggers for the preparation of an Environmental Assessment (EA) pursuant to Chapter 343, Hawaii Revised Statutes (HRS). As the proposed project is not able to meet the criteria for a Chapter 343, HRS exemption for affordable housing projects, an EA will be prepared in support of the Chapter 2.97, Maui County Code (MCC) application." The Department of Housing and Human Concerns (DHHC) will be the Approving Authority for the Chapter 343, HRS EA.

The project will be 100 percent affordable, providing all 120 rental units as housing for residents earning 60 percent or less of the Area Median Income (AMI). The new community will be managed by Hale Mahaolu. The 120 multi-family rental units will be housed in 13 two-story buildings. In addition to the residential units, a 3,500 square foot non-profit building, a 3,000 square foot community center, landscaping, and related improvements are proposed as part of the project. Adequate off-street parking stalls and two loading stalls will be provided for the project. Access to the project is proposed via three driveways along Kahekili Highway. The Department offers the following comments.

1. The Department notes split land use designations for the parcel with regards to State Land Use District Boundaries, County Community Plan designations, and County Zoning. Provide maps/diagrams showing each of these designations and the "splits" for the project site in the DEA. Also, describe the Project District this parcel in included in and a short history of this Wailuku Project District designation.

- 2. Regarding road improvements and project access, three entry/exit points (driveways) from Kahekili Highway into the project appear excessive for a project of this size. Particular attention in the DEA traffic assessment should be given to analyze the recommended number of access points, the safety of left-turns out of the project and speeds along Kahekili Highway. Consideration should be given to the construction of "refuge" lanes on Kahekili Highway for vehicles making left-hand turns onto the Highway from the project and for left-hand turns into the project from the Highway. Furthermore, the Department would like to see an analysis of the potential of using a roundabout or traffic circle at an entrance to the project. Regarding access, a single access/driveway onto an arterial road may be sufficient. For example, Front Street Apartments with 142 units on 8.54 acres only has one access driveway from Kenui Street.
- 3. In regards to the adequacy of on-site parking, the Department recommends that the Applicant ask for a 19.36B MCC waiver of parking requirements for the community center pursuant to Chapter 2.97, MCC processing of this project. Simply stating that no additional parking is required for the community center as the facility will only serve residents is not correct. A waiver is required or additional parking for the community center must be provided.
- 4. The project should include at least a small, outdoor community recreational area/park to function as a gathering area with benches or a small playground, even if minimal in size such as between 5,000 to 10,000 square feet. Hale Mahaolu Lahaina Surf can be used as one example of how playgound equipment is incorporated into an open space area of an affordable housing complex (Lahaina Surf has 112 units on 4.35 acres).
- 5. A bus stop and a lighted crosswalk should be incorporated into the plan as part of the Highway improvements.
- 6. The Department would also like the Applicant to consider having adequate storage space on-site for lawn and other equipment.
- 7. Regarding the exemption from the application process and Maui Planning Commission review requirements of Chapter 19.68, MCC referring to State Land Use District Boundaries, the Department advises that the Applicant request a District Boundary Amendment from the Maui County Council as part of their affordable housing review pursuant to Chapter 2.97 of the MCC.
- 8. Do the units include a washer and dryer? If not, the Applicant should consider an onsite laundry facility for its residents (similar to Lahaina Surf, Front Street Apartments, Hale Mahaolu Kulamalu, Luana Gardens, etc.).
- 9. One or two additional trash locations should be added to the project. Trash locations are often inadequate for projects, especially with the increase in home deliveries of items and the need for cardboard box disposal and/or recycling.

Mr. Chris Sugidono, Senior Associate December 23, 2020 Page 3

- 10. A multi-use path should be constructed within the landscaped area (behind the units) connecting one end of the development to the other. It is difficult to determine if this is included in the conceptual site plan.
- The Department is particularly concerned about the project's proximity to 11. potential sand dunes. The issue of grading and ground disturbance in this location must be thoroughly reviewed and discussed in the DEA in the archaeological and cultural sections of the document with a description of potential impacts and mitigation measures to be employed should this project affect sand dune areas.
- The Department understands this is a 100 percent affordable project; however, it 12. encourages good design as this is a prominent location along Kahekili Highway. The Department requests that a review of the potential for installing photovoltaic panels be explored.
- 13. A pathway (gravel, cinders, grasscrete or concrete) should be installed between the parking lot and units so that pedestrians do not walk within the parking lot to get from one unit to another (it is difficult to ascertain if such a pathway is proposed in the project rendering). Connectivity between all buildings on both sides of the project is fundamental to ensure safety of all residents and visitors. Furthermore, the Applicant is encouraged to install midblock raises crosswalks or speed humps within the parking lot for pedestrian safety.
- 14. The landscaping plan should consider the incorporation and the use of bioswales, tailored to native plants, to capture urban storm water runoff from the parking lot.

Thank you for the opportunity to comment on the preparation of the DEA for the Waiehu Should you require further clarification, please contact Staff Planner Kurt Residential Project. Wollenhaupt at kurt.wollenhaupt@mauicounty.gov or at (808) 270-1789.

Sincerely,

MICHELE MCLEAN, AICP

mulhan

Planning Director

Clayton I. Yoshida, AICP, Planning Program Administrator (PDF) xc:

John S. Rapacz, Planning Program Administrator (PDF)

Kurt F. Wollenhaupt, Staff Planner (PDF)

Kathleen Aoki, Administrative Planning Officer (PDF)

Pam Eaton, Planning Program Administrator (PDF)

Paul Critchlow, Staff Planner (PDF)

Grant Chun, Executive Director (PDF)

Chris Sugidono, Senior Associate, Munekiyo Hiraga (PDF)

Project File

MCM:KFW:th

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Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

September 9, 2021

Michele Chouteau McLean, AICP, Director County of Maui Department of Planning One Main Plaza 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. McLean:

Thank for your early consultation comment letter dated December 23, 2020, regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant appreciates the comment regarding the underlying land use designations for the property. The project area is split designated "Piihana Project District", rather than "Wailuku Project District", according to the Wailuku-Kahului Community Plan. A description of the project area, including its underlying land use designations will be discussed in the Draft EA.
- 2. The Applicant appreciates the comment regarding access considerations. Upon early consultation with County Department of Public Works (DPW), three (3) unsignalized accesses were acceptable. To address Planning Department's comment, the project proposes to restrict the northernmost and southernmost accesses to right-in, right-out (RIRO) only and maintain full access at the middle intersection to allow both left- and right-turns entering and exiting the project. All intersections will be designed to County standards.

The left-turn storage lane length and sight distance at these intersections will be designed to account for actual operating speeds along Kahekili Highway. However,

Michele Chouteau McLean, AICP, Director September 9, 2021 Page 2

vehicle speeds along Kahekili Highway should be further enforced to adhere to the existing 30 miles per hour (mph) speed limit, especially as vacant parcels get developed adjacent to this corridor.

Regarding the potential use of a roundabout, the footprint of a roundabout would likely exceed the County's right-of-way within the existing roadway. More detailed information on traffic impacts from the proposed project will be provided in the Traffic Impact Analysis Report, a copy of which will be included in of the Draft EA.

- 3. The Applicant appreciates the comment and recommendation regarding pursuing a parking waiver for the community center. It should be noted that the Applicant has since clarified that the proposed "community center" will be identified more appropriately as a "clubhouse", considering it will only serve onsite residents and would not be open to the public. This clarification will be provided in the published Draft EA. The Applicant will be requesting an exemption from Section 19.36B.020 (Designated Number of Off-Street Parking Spaces) for off-street parking requirements for the proposed clubhouse.
- 4. The Applicant appreciates the comment and recommendation regarding providing an outdoor recreational area for residents. Preliminary plans include two (2) play areas and related amenities placed throughout the Hale Mahaolu Ke Kahua Affordable Housing Community. Further information regarding project and site plans will be provided in the Draft EA.
- 5. The Applicant appreciates the comment regarding a bus stop. The Applicant has engaged with the County Department of Public Works and County Department of Transportation, and will review the feasibility of incorporating a bus stop and lighted crosswalk in project plans.
- 6. The Applicant notes the comment regarding equipment storage space. Preliminary plans include one (1) maintenance room to be located within the clubhouse for onsite storage and equipment. Further information regarding project and site plans will be provided in the Draft EA.
- 7. The Applicant appreciates the recommendation regarding seeking a District Boundary Amendment from the County Council. The Applicant will be seeking exemption from application process and Maui Planning Commission review requirements of Chapter. 19.68, Maui County Code (MCC). This exemption would expedite the delivery of affordable workforce housing to the Waiehu community.
- 8. We note the comment regarding laundry facilities. Preliminary plans include two (2) onsite laundry facilities for residents of the Hale Mahaolu Ke Kahua Affordable

Michele Chouteau McLean, AICP, Director September 9, 2021 Page 3

Housing Community. Further information regarding project and site plans will be provided in the Draft EA.

- 9. The Applicant notes the comment regarding additional trash locations. Solid waste generated at the proposed housing community will be collected by private refuse collection companies and disposed at the Central Maui Landfill. Recycle bins will also be available for residents to use which will help divert solid waste from landfill disposal. Further information regarding project and site plans will be provided in the Draft EA.
- The Applicant notes the comment regarding a multi-use path within the proposed project area. Further information regarding project and site plans will be provided in the Draft EA.
- 11. The Applicant appreciates the comment and acknowledges the concerns about the proposed project's proximity to potential sand dunes. An Archaeological Inventory Survey and Cultural Impact Assessment have been prepared for the project area to study potential impacts and mitigation measures. An Archaeological Monitoring Plan will also be developed to guide construction of the proposed housing community. Further information and discussion on these matters will be available in the archaeological and cultural sections of the Draft EA.
- 12. The Applicant appreciates the comment and acknowledges the project's prominent location along Kahekili Highway. The proposed project will utilize energy efficient fixtures and appliances, and will consider the installation of photovoltaic solar panels, if funding is available.
- 13. The Applicant appreciates the comment and acknowledges the recommendation regarding connectivity and safety within the project area. Further information regarding project and site plans will be provided in the Draft EA.
- 14. The Applicant appreciates the comment and acknowledges the recommendations for the proposed project's landscaping plan. Further information regarding the proposed landscaping concept for the project will be provided in the Draft EA.

Michele Chouteau McLean, AICP, Director September 9, 2021 Page 4

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

U. X

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates K:\DATA\Highridge\Walehu AH PERMITTING\Applications\EC\ECL Response\Planning_Dept.docx



MICHAEL P. VICTORINO

MAYOR

OUR REFERENCE

YOUR REFERENCE

POLICE DEPARTMENT

COUNTY OF MAUI

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



TIVOLI S. FAAUMU CHIEF OF POLICE

DEAN M. RICKARD DEPUTY CHIEF OF POLICE

December 7, 2020

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Chapter 343, Hawaii Revised Statutes, Early Consultation Request

for Proposed Waiehu Affordable Housing Community

at TMK: (2) 3-3-001:106, Waiehu, Maui, Hawaii

Dear Mr. Sugidono:

This is in response to your letter dated December 1, 2020 requesting comments for the proposed Waiehu Affordable Housing Community.

In review of the submitted documents, we would like to recommend the project meets the minimal standards set forth by county codes and state laws. If the roads will be temporarily closed due to alternating traffic, we ask the project manager utilize flag men to conduct traffic control, as well as post proper signage along the routes during construction.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

TIVOLI S. FAAUMU

ssistant Chief John Jakubczak

Chief of Police



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

VICE PRESIDENT

John Jakubczak, Assistant Chief Police Department County of Maui 55 Mahalani Street Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Jakubczak:

Thank you for your early consultation comment letter dated December 7, 2020, on the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

The Applicant, acknowledges and will comply with your guidance, as follows:

- The proposed project will meet the minimum standards set forth by County codes and State laws.
- Utilize flag men to conduct traffic control if roads will be temporarily closed due to alternating traffic
- Post proper signage along the routes during construction

John Jakubczak, Assistant Chief September 9, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response in the Draft Environmental Assessment (EA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Cl: 352

CEJS:ab

cc: Grant Chun, Hale Mahaolu

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Co

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MICHAEL P. VICTORINO Mayor

ROWENA M. DAGDAG-ANDAYA Director

> JORDAN MOLINA Deputy Director

GLEN A. UENO, P.E., L.S. Development Services Administration

RODRIGO "CHICO" RABARA, P.E. Engineering Division

JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7845 Fax: (808) 270-7955





COUNTY OF MAUI DEPARTMENT OF PUBLIC WORKS 200 SOUTH HIGH STREET, ROOM 434

200 SOUTH HIGH STREET, ROOM 434 WAILUKU, MAUI, HAWAII 96793

January 27, 2021

Mr. Chris Sugidono, Senior Associate MUNEKIYO HIRAGA 305 High Street, Suite 104 Wailuku, Maui, Hawai'i 96793

Dear Mr. Sugidono:

SUBJECT: CHAPTER 343, HAWAI'I REVISED STATUTES, EARLY

CONSULTATION REQUEST FOR PROPOSED WAIEHU

AFFORDABLE HOUSING COMMUNITY;

TMK: (2) 3-3-001:106

We reviewed the early consultation request and have the following comments:

Comments from the Engineering Division:

- 1. Drainage improvements shall comply with the following:
 - Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui";
 - Title MC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"; and
 - Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control".
- Please note that per MC-15, natural drainageways with contributory areas greater than 100 acres shall have a drainage reserve based on the 100-year flooded width.
- 3. Submit traffic impact analysis report (TIAR) for review.
- 4. The following study intersections were previously discussed with Austin Tsutsumi and preliminarily agreed upon for the TIAR:
 - Kahekili Highway/Waiehu Beach Road (State DOT jurisdiction);

Mr. Chris Sugidono, Senior Associate January 27, 2021 Page 2

- Waiehu Beach Road/Eha Street (State DOT jurisdiction); and
- Kahekili Highway/Makaala Drive (County jurisdiction).

However, after further discussion, we would also like to include the following intersections to the TIAR:

- Waiehu Beach Road/Wailupe Drive/Lower Waiehu Beach Road (State DOT);
- Waiehu Beach Road/Makaala Drive (State DOT);
- Kahekili Highway/Piihana Road/Mokuhau Road/Market Street (County);
- Market Street/Mill Street (County);
- Market Street/Vineyard Street (County); and
- Mill Street/Central Avenue (County).

*Note: This list does not include any additional intersections the State DOT will require.

Please call Jordan Molina at 270-7845 if you have any questions regarding this letter.

Sincerely,

FOR

ROWENA M. DAGDAG-ANDAYA

Director of Public Works

RMDA:JM:da

XC:

Highways Division

Engineering Division

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Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

September 9, 2021

Rowena M. Dagdag-Andaya, Director County of Maui Department of Public Works 200 South High Street, Room 434 Wailuku, Hawai'i 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Dagdag-Andaya:

Thank for your early consultation letter dated January 27, 2021 regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- The Applicant acknowledges the comment and will follow all applicable rules and regulations related to drainage improvements.
- 2. The Applicant appreciates the comment and acknowledges the requirement.
- The Applicant acknowledges the comment and will prepare a Traffic Impact Analysis Report (TIAR), which will be provided in the Draft Environmental Assessment (EA).
- 4. The Applicant acknowledges the comment and appreciates the correspondence with the Department of Public Works. The Applicant will include analysis of the additional intersections in the TIAR, a copy of which will be provided in the Draft EA.

Rowena M. Dagdag-Andaya, Director September 9, 2021 Page 2

Thank you again for your input and we welcome your further review and comments on the Draft Environmental Assessment (EA) when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Cl. 32

CEJS:ab

Grant Chun, Hale Mahaolu CC:

Debbie Cabebe, Maui Economic Opportunity

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\EC\ECL Response\DPW.docx

MICHAEL P. VICTORINO Mayor

MARC I. TAKAMORI Director

MICHAEL B. DU PONT
Deputy Director





DEPARTMENT OF TRANSPORTATION

COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAII 96793 TELEPHONE: (808) 270-7511 FAX: (808) 270-7505

December 30, 2020

Munekiyo Hiraga Attention: Chris Sugidono, Senior Associate 305 High Street, Suite 104 Wailuku, HI 96793

SUBJECT: Chapter 343, Hawaii Revised Statutes, Early Consultation Request for Proposed Waiehu Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawaii

Dear Mr. Sugidono,

We appreciate the opportunity to provide comments on the Proposed Waiehu Affordable Housing Community.

The County Department of Transportation provides public transit services within the vicinity of the proposed affordable housing community project. In order for public transit to be considered for expansion in new areas, there are certain criteria that makes transit more accessible. Providing interconnecting sidewalks within and between project sites and having ample lighting in the evenings is also necessary for walkable communities and for the safety of potential residents and public transit riders.

Are there any plans for a pedestrian path on Kahekili Highway? Should additional projects be built as neighboring subdivision, those paths could be interconnected for future residents.

Planning for the future, should a bus stop be established fronting the project, will there be an optimal location for a future waiting space that riders could safely wait that's lighted with interconnected sidewalks leading into the development?

Please feel free to contact me if you have any questions.

Sincerely,

Marc Takamori Director

215



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

September 9, 2021

Marc Takamori, Director County of Maui Department of Transportation 200 South High Street Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Takamori:

Thank for your early consultation letter dated December 30, 2020 regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- 1. The Applicant appreciates the comment on public transit services and acknowledges the question regarding plans for a pedestrian path on Kahekili Highway. Currently, the Applicant will be requesting an exemption from constructing curbs, gutters, and sidewalks for the frontage of the proposed housing community adjacent to the highway. This exemption will ensure the project is financially feasible, though the Applicant will provide a greenway right-of-way along the highway fronting the project. Further information on the project and site plans will be provided in the Draft Environmental Assessment (EA).
- The Applicant appreciates the comment regarding a bus stop. The Applicant has engaged with the County Department of Public Works and County Department of Transportation, and will review the feasibility of incorporating a bus stop and lighted crosswalk in the project plans.

Marc Takamori, Director September 9, 2021 Page 2

Thank you again for your input and we welcome your further review and comments on the Draft Environmental Assessment (EA) when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

Cl. 32

CEJS:ab

Grant Chun, Hale Mahaolu CC:

Debbie Cabebe, Maui Economic Opportunity

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MICHAEL P. VICTORINO Mayor

JEFFREY T. PEARSON, P.E. Director

HELENE KAU

Deputy Director





DEPARTMENT OF WATER SUPPLY COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793

www.mauiwater.org

December 31, 2020

Mr. Chris Sugidono, Senior Associate MUNEKIYO HIRAGA

via email: chris@munekiyohiraga.com

Dear Mr. Sugidono:

SUBJECT: EARLY CONSULTATION REQUEST FOR HRS, CHAPTER 343

PROPOSED WAIEHU AFFORDABLE HOUSING COMMUNITY

TMK: (2) 3-3-001:106, Waiehu, Maui, Hawaii

Thank you for the opportunity to review and comment on the subject project, which includes the construction of 120-unit affordable housing rentals (housed in 13 2-story buildings), 3,500 square foot non-profit building, a 3,000 square foot community center, landscaping, and related improvements.

Based on the information provided and Table 100-18 of the Department's 2002 Water System Standards, the Department estimates that the additional water demand being requested for the project is approximately 73,210 gallons per day (see attached table), which is greater than the current 2020 allowance of 3,000 gallons per day, pursuant to the Department's Adminstrative Rules (Title 16, Chapter 201).

The following exemptions to the administrative rules may be applicable to this project, provided that project is determined to qualify for these exemptions and the water system has adequate capacity to meet the project's water needs:

- Residential development 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. Please be advised that the proposed non-profit building and community center may not qualify for this exemption.
- County, state or federal public facility projects, as defined in section 19.04.040, Maui County Code.

Pursuant to Maui County Code (MCC) 14.01.040, subdivisions are also defined as "the construction of a building or group of buildings, other than a hotel, on a single lot, parcel, or site which will contain, result, or be divided into four or more dwelling units." Since the project is proposing 120 residential dwelling units, the project is defined as a subdivision and shall be comply with subdivision

Mr. Chris Sugidono Proposed Waiehu Affordable Housing Community December 31, 2020 Page 2

requirements pursuant to MCC 14.05 and the Department's standards to provide an adequate water system for fire protection, domestic and irrigation water service. Water system improvement requirements may include, but are not limited to the following:

- Install 8-inch waterline along Kahekili Highway fronting subject property.
- Provide fire protection in accordance with the Department's Water System Standards (2002) and Maui County Code 14.050.090 – Fire protection, as may be amended.
- Provide water service in accordance with the Department's Water System Standards (2002) and Maui County Code 14.05.060 Water mains and appurtenances, as may be amended.
- Verify pressure is adequate to service proposed 2-story building.
- Deliver perpetual easements required for the water system improvements.
- Department of Fire and Public Safety's may have additional fire protection requirements during the building permit application process.

The project shall comply with the Department's rules and regulations and Water System Standards, applicable at the time of the department's approval of the building permit application.

Should you have any questions or need further information, please contact Tammy Yeh of our Engineering Division at (808) 270-7835 or via email at tammy.yeh@mauicounty.gov.

Sincerely,

WENDY TAOMOTO, P.E. Engineering Program Manager

TY

Enclosure: Estimated Water Demand Table prepared by DWS

cc: DWS Water Resources Division, Attn: Marti Buckner, via email: marti.buckner@mauicounty.gov

Estimated Water Demand for Waiehu Affordable Housing Community TMK 3-3-001:106

(Prepared by the Department of Water Supply on 12/31/2020)

				AVERAGE	AVERAGE	AVERAGE	TOTAL	TOTAL MAX
TOTAL AREA	TOTAL AREA		RESIDENTIAL	DAILY DEMAND	DAILY DEMAND	DAILY DEMAND	DEMAND	DEMAND
(SQ. FT.)	(ACRES)	LAND USE	UNITS	(GALS/UNIT)*	(GALS/SQ. FT.)	(GALS/ACRE)	(GALS/DAY)	(GALS/DAY
-	-	Multi-Family (Building A)	8	560	-	-	4,480	6,720
-	-	Multi-Family (Building A)	8	560	-	-	4,480	6,720
-	-	Multi-Family (Building B)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building B)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building B)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building B)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building B)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building C)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building C)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building C)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building C)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building C)	10	560	-	-	5,600	8,400
-	-	Multi-Family (Building D)	4	560	-	-	2,240	3,360
-	3	Landscaped Area	-	-	-	1,700	5,100	7,650
3,500	-	Non-Profit Building	-	-	0.14	-	490	735
3,000	-	Community Center	-	-	0.14	-	420	630
120							73,210	109,815

^{*}From Department of Water Supply's 2002 Water System Standards Table 100-18



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

September 9, 2021

Wendy Taomoto, P.E., Engineering Program Manager County of Maui Department of Water Supply 200 South High Street Wailuku, Hawaii 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Taomoto:

Thank for your early consultation letter dated December 31, 2020 regarding the subject project. We very much appreciate you taking the time to provide us with comments during the early stages of planning for this 100 percent affordable housing community.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- 1. The Applicant appreciates the comment and acknowledges the available exemption for 100 percent residential workforce housing units. The Applicant will be pursuing Chapter 2.97 fast-track approval from the Maui County Council for the Hale Mahaolu Ke Kahua Affordable Housing Community. As part of its application, the Applicant will be utilizing exemption from Maui County Code Section 14.12, or the requirement to demonstrate water availability. The proposed project is expected to be served by County water service and upon completion of construction, adverse impacts to water services and facilities in the region are not anticipated. Further information on projected water supply and demands, including a copy of the Preliminary Engineering Report, will be provided in the Draft Environmental Assessment (EA).
- The Applicant acknowledges the requirement to install an 8-inch waterline along Kahekili Highway fronting the project area.

Wendy Taomoto, P.E., Engineering Program Manager September 9, 2021 Page 2

- 3. The Applicant acknowledges the comment and will follow applicable rules and regulations related to fire protection.
- The Applicant acknowledges the comment and will follow applicable rules and regulations related to the Department of Water Supply's (DWS) Water System Standards.
- The Applicant acknowledges the comment and will confirm that pressure is adequate to service the proposed project's two-story buildings.
- 6. The Applicant acknowledges the comment and will deliver perpetual easements required for the water system improvements.
- 7. The Applicant acknowledges the comment and will comply with any additional fire protection requirements from the County Department of Fire and Public Safety.
- 8. The Applicant acknowledges the comment and will comply with applicable DWS rules and regulations.

Thank you again for your input and we welcome your further review and comments on the Draft EA when it is published by the State Office of Environmental Quality Control (OEQC). We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015.

Very truly yours,

Cl. 37

Chris Sugidono Senior Associate

CEJS:ab

cc: Grant Chun, Hale Mahaolu
Debbie Cabebe, Maui Economic Opportunity
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa

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Waihe'e Community Association P. O. Box 3134 Wailuku, HI, 96793

December 14, 2020

Munekiyo Hiraga Planning.Project Management.Sustainable Solutions. 305 High Street Wailuku, HI, 96793

via e.mail: munekiyohiraga.com

Mr. Chris Sugidono, Senior Associate

Dear Mr. Sugidono:

This letter is to acknowledge your letter dated December 1, 2020 concerning the Proposed Waiehu Affordable Housing Community at TMK (2)3-3-001:106 at Waiehu, Maui, Hawaii.

Because of the very narrow window offered the Community, the current Pandemic and the Holidays during this time of the year, the Board of the Waihee Community Association requests that the "Chapter 343, HRS Early Consultation Request" for the above be presented to a Waihee Community Association Board Meeting. This should be scheduled for the convenience of both the Applicant and the Board. Sometime in the first half of next month, January, would be fine. This way the Board will be more informed to present the proposal to our Community.

I look forward to your reply. My e.mail: gnparesa@hotmail.com; phone: 808-269-6611.

George Paresa, Jr., President

Thank you,

Waihe'e Community Association



Michael T. Munekiyo CHAIRMAN Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng

March 3, 2021

MEMORANDUM

To: George Paresa, Jr.

Waihe'e Community Association

From: Chris Sugidono, Senior Associate

Munekiyo Hiraga

Subject: Waihe'e Community Association Meeting on February 2, 2021 Regarding

the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Participants: George Paresa, Jr., Waihe'e Community Association

Brian Sarasin, Sr., *Waihe'e Community Association*James Crowe, *Waihe'e Community Association*Melvin Fukunaga, *Waihe'e Community Association*

Grant Chun, *Hale Mahaolu*Moe Mohanna, *Highridge Costa*Monte Heaton, *Highridge Costa*Harrison Herzberg, *Highridge Costa*Lena Tamashiro, *Design Partners*Johnny Wu, *Design Partners*Ashley Otomo, *Otomo Engineering*

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, *ATA*Mark Roy, *Munekiyo Hiraga*Chris Sugidono, *Munekiyo Hiraga*

Thank you for your Early Consultation letter dated December 14, 2020, and subsequent conference call meeting with the Applicant and consultant team on February 2, 2021, regarding the subject project. We very much appreciate you taking the time to provide us with the following comments and questions during the early stages of planning for this 100 percent affordable housing community.

Please see below a brief overview of the main comments that were discussed at our meeting as well as the Applicant team's responses:

1. Comment:

Question regarding vehicle access points and the possibility of installing a center turn lane.

Response:

The current proposed site plan includes three access points at project site, however, the Applicant is in the process of consulting with the County Department of Public Works. Any left-turn entry into the project site would be provided with a left-turn storage lane.

2. **Comment:**

Question regarding the title of the property if a restriction for agricultural classes and/or agricultural uses was placed on the property when it was donated to Maui Economic Opportunity, Inc. (landowner).

Response: The property has been used for agricultural endeavors in the past. We appreciate the comment and we will review this specific question with the landowner.

3. Comment:

Question regarding if a retaining wall (along the dune) is planned to minimize potential for erosion from the sand dune due to flooding. Flooding across the highway has been a concern in this area.

Response: The Applicant is still fairly early on in its preliminary design process. We will be studying the grading requirements for this project and we will make a decision regarding retaining wall requirements based on this evaluation.

4. Comment:

Question regarding if the Applicant intends to utilize the irrigation well to irrigate landscaping within the project.

Response: We will need to meet the requirements of the County in terms of water service, but we will look into this as a potential option if it feasible.

5. Comment:

Question regarding what kind of sewer system improvements will be required.

Response:

Based on preliminary feedback from the County, the Applicant will need to install a sewer line extension and a lift station as part of the project. This improvement is currently being assumed as part of the project plans.

6. Comment:

Question regarding the length of affordability for the units.

Response: The Hale Mahaolu Ke Kahua Affordable Housing Community will remain affordable for at least 60 years.

7. **Comment:**

Question regarding engagement of kupuna and cultural practitioners in the surrounding area of the project site.

Response: As part of the ongoing process to prepare a Draft Environmental Assessment (EA) for the project, a Cultural Impact Assessment (CIA) report was prepared to gain an understanding of traditional cultural practices within and in the vicinity of the project area and identify any potential effects on these practices that may occur during, or as a result of, the implementation of the proposed project.

> Community outreach letters were sent to a range of individuals, organizations and agencies - including traditional cultural practitioners and kupuna with generational ties to the proposed project area. No on-going cultural practices were identified within the project area during community consultation for the CIA. However, the applicant will be implementing various recommendations from the CIA to mitigate any potential impacts.

8. **Comment:**

Question regarding potential presence of burials and iwi kupuna along the sand dunes in the Waiehu area.

Response: An Archaeological Assessment (AA) of the proposed site was submitted to the State Historic Preservation Division (SHPD) for review. No historic properties have been identified within the project area, though the project area is located adjacent to an inland sand dune complex where a number of human burials have been documented in the past. The Applicant has prepared an Archaeological Monitoring Plan as a precautionary measure for the project and has submitted it to SHPD for review and acceptance.

9. Comment:

Question regarding whether any other community groups have been contacted by the Applicant.

Response:

Community outreach by the Applicant and consultant team is ongoing and will continue through the EA process. Among the other community groups who have been contacted and received a copy of the Early Consultation Letter, include the Waiehu Terrace Community Association, Waiehu Kou Phase 3 Association and Aha Moku o Maui representatives. A copy of the Draft EA will be provided to these groups, when available, for review and comment.

10. Comment:

General concern regarding increased traffic concerns in the surrounding area of the proposed project site.

Response:

The Applicant has prepared a Traffic Impact Analysis Report (TIAR) to study traffic impacts and develop recommended mitigation measures for the project area. As mentioned earlier, the project is still fairly early on in its preliminary design process, however, the Applicant continues to work with the County Department of Public Works and State Department of Transportation to address potential traffic issues in the area.

Mahalo again for your input and we welcome your further review and comments on the Draft EA when it is published and sent to Waihe'e Community Association. We will also include a copy of your comment letter and this response in the Draft EA. Should you have any questions or require further information regarding the proposed action, please feel free to contact me at 244-2015

Chris Sugidono Senior Associate

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CEJS:yp

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa

Debbie Cabebe, MEO

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The Honorable Alice Lee Kalana O Maui Building 200 South High St. Eighth Floor Wailuku, Hawaii 96793

Dear Council Member Lee,

I am requesting that the county deny funding to the development project proposed by Maui Economic Opportunity to be built on Tax Map Key (2) 3-3-001-106-0000 located in the 'ahupua'a of Waiehu. The proposed project falls within the metes and bounds of lands granted by Kamehameha I to our 'ohana and registered during the Māhele, creating an issue of title that must be addressed.

While we are not opposed to truly affordable housing projects, we nonetheless stress the need to recognize our undivided interest in the lands in question. The area has been in our family for generations as evidenced by native testimony submitted during the Māhele stating "the land at Waiehu is an ancient land from makua's, in the time of Kamehameha I. There is no dispute in this parcel. Our family has also had the area professionally surveyed according to the measurement contained in our Land Commission Award.

The 'ohana has also expressed concerns that the area is unsuitable for the proposed project due to the close proximity of culturally sensitive sites that may be affected by development, including Hawaiian burials belonging to the pu'uone sand dune complex which could be disturbed.

Our sincere hope is that Maui Economic Opportunity and the County of Maui will find a better location for the proposed project that can address the need for affordable housing while respecting the undivided interest of heirs to the lands in question.

Koe na'e ke kuleana o ke kanaka, Ohana Pehuino County of Maui DepartmentHousing One Main Plaza 2200 Main St #546 Wailuku, HI 96793

Dear LoriAnn Tsuhako,

I am requesting that the county deny funding to the development project proposed by Maui Economic Opportunity to be built on Tax Map Key (2) 3-3-001-106-0000 located in the 'ahupua'a of Waiehu. The proposed project falls within the metes and bounds of lands granted by Kamehameha I to our 'ohana and registered during the Māhele, creating an issue of title that must be addressed.

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The 'ohana has also expressed concerns that the area is unsuitable for the proposed project due to the close proximity of culturally sensitive sites that may be affected by development, including Hawaiian burials belonging to the pu'uone sand dune complex which could be disturbed.

Our sincere hope is that Maui Economic Opportunity and the County of Maui will find a better location for the proposed project that can address the need for affordable housing while respecting the undivided interest of heirs to the lands in question.

Koe na'e ke kuleana o ke kanaka, Ohana Pehuino Aloha Aha Moku O Wailuku,

February 11, 2021

We as Kuleana heirs of Pehuino the allodial title holder do not authorize action to develop our ancestral lands in the project site bounded by the intersection of Kahekili Highway and Waiehu Beach Road aka Kekahua of MEO.

Pehuino received his Land Commission Award 3386, on July 9, 1849 during the Great Mahele creating the Kuleana Act of 1851 amended in 1859. Title was alienated by Kamehameha III along with the Ali'i's of Ko Hawaii Pae Aina giving all rights to title of said property to Pehuino. This is referred to as an allodial title at which allodial title grants absolute authority to Pehuino having no incumbency. Action was adjudicated by the Land Commission. As mentioned in our Land Commission Award, that "Waiehu is an ancient land that was given by the Makua's (parents) of Kalili who is the wahine of Pehuino, in the time of Kamehameha I." We the heirs have recorded our claim with the Bureau of Conveyance on August 13, 2020 at 3:29 PM.

Mahalo for taking the time to consider our claim and hope all is well with the Aha Moku. If you have any questions, please contact me at (808) 298-0560 or Facebook Ka Poe Aipohaku a Pehuino.

Mahalo nui,

Heirs of Pehuino

The Aha Moku o Wailuku (AMOW) Council, after review of relevant documents including but not limited to genealogical records, Bureau of Conveyance and hearing testimony from generational residents of Waiehu, Maui do acknowledge the claim by Heirs of Pehuino. Heirs have sufficient evidence and generational presence to LAND COMMISSION AWARD in the ahupua'a of Waiehu to Pehuino. This particular parcel is also known as Ke Kahua having a quit claim deed held by Maui Economic Opportunity (MEO).

The heirs of Pehuino have filed their claims through the Bureau of Conveyance on August 13, 2020 at 3:29 PM. Therefore the heirs of Pehuino Ohana O Waiehu have claimed their undivided interest allowing the AMOW to also acknowledge their right to the cultural and traditional practices afforded that claim.

Reference to Universal Citation: HI Rev Stat § 172-11 (2015)

§172-11 Land patents on land commission awards; to whom, for whose benefit. Every land patent issued upon an award of the board of commissioners to quiet land titles, shall be in the name of the person to whom the original award was made, even though the person is deceased, or the title to the real estate thereby granted has been alienated; and all land patents so issued shall inure to the benefit of the heirs and assigns of the holder of the original award. [L 1872, c 21, §1; RL 1925, §568; RL 1935, §1587; RL 1945, §4641; RL 1955, §100-11; HRS §172-11]

Case Notes

Land commission award held good against later royal patent. 1 H. 69; 1 H. 90. Award cannot be collaterally attacked. 1 H. 90.

Certificate of award of land commission, with its accompanying survey, are admissible in evidence. 2 H. 202.

Patents based as awards do not confer or confirm title of later holders. It is merely a quitclaim interest of the government in lands. 3 H. 783; 11 H. 587, 589.

Court is inclined not to disturb the award of land commission long adjudicated. 5 H. 354. Mahele of 1848 considered and defined. 6 H. 195.

The AMOW Council urges the County of Maui to reassess matters of the proposed Project at Ke Kahua, Waiehu, in light of the Pehuino's heirs claim.

The County of Maui will find merit in the Pehuino claim and must pursue a systemic review to void all inappropriate contracts, agreements, permitting regarding said parcel and project and all processes advancing ground disturbing activity destructive to Pehuino Heirs and their claim to cultural and traditional practices, to malama aina the fresh waters, land, and ocean, their right to life above and below the surface or the County of Maui may err in extinguishing what county ordnance, state revised statutes cannot, not even constitutionally (by federal means) which is to alter those legally, vested rights acquired before and without the jurisdiction of domestic U.S. law.

Mahalo, Aha Moku O Wailuku



Peter A. Horovitz

2073 Wells Street, Suite 101 Wailuku, Hawaii 96793 Phone 808.242.5700 Fax 808.442.1255 pah@mhmaui.com

June 21, 2021

Via email: kahalajo@gmail.com

Kahala Johnson Political Science PhD. Candidate University of Hawai'i at Mānoa Department of Political Science

RE: LCA Award 3386:1, 2, & 3 to Pehuino (the "Pehuino LCAs"); Lot 1-C Paukukalo Large Lot Subdivision, TMK (2) 3-3-001-106 (the "MEO Property")

Dear Mr. Johnson:

I am a board member of Maui Economic Opportunity, Inc. ("MEO"). I am also a realestate attorney in Wailuku, Maui, but write to you in my capacity as a board member of MEO.

Debbie Cabebe forwarded me the recent e-mails and other communications received from you and others identifying themselves as (1) Heirs of Pehuino, (2) Aha Moko O Wailuku, and Koe na'e ke kuleana o ke kanaka, Ohana Pehuino (collectively the "Pehuino Heirs") regarding the above LCAs. I presume you have copies of those communications but I would be happy to provide you with copies if needed.

The Pehuino Heirs claim title to all or a portion of the MEO Property based on their belief that at least a portion of the MEO Property consists of the Pehuino LCAs. The Pehuino Heirs installed a gate on the MEO Property and posted a sign (attached) stating their claim. We do not presume to know the current state of title to the Pehuino LCAs. However, the Pehuino LCAs are not within any portion of the MEO Property.

The MEO Property is a portion of Royal Patent Grant 3343 to Claus Spreckles. The original grantee of the MEO Property was King Lunalilo, who claimed the MEO Property pursuant to Land Commission Award 8559:B20.1. I have attached both King Lunalilo's and Mr. Spreckles' grants. I have enclosed a map from OHA's Kipuka database that shows the location of the MEO Property outlined in yellow. Finally, I enclose a map from OHA's Kipuka database showing the location of the Pehuino LCAs. As you can see, the Pehuino LCAs were never included within LCA 8559:B20.1 to Lunalilo, or RP Grant 3343 to Clause Spreckles. Indeed, the Pehuino LCAs are located approximately one (1) mile away from the MEO Property.

We do not know whether the Pehuino Heirs have valid claims to any or all of the Pehuino LCAs. It is clear, however that the Pehuino Heirs are occupying the wrong property. We would respectfully request that the Pehuino Heirs remove themselves from the MEO Property by not later

June 21, 2021 Page 2

than Friday, June 25, 2021. If I can provide any further information, please do not hesitate to contact me.

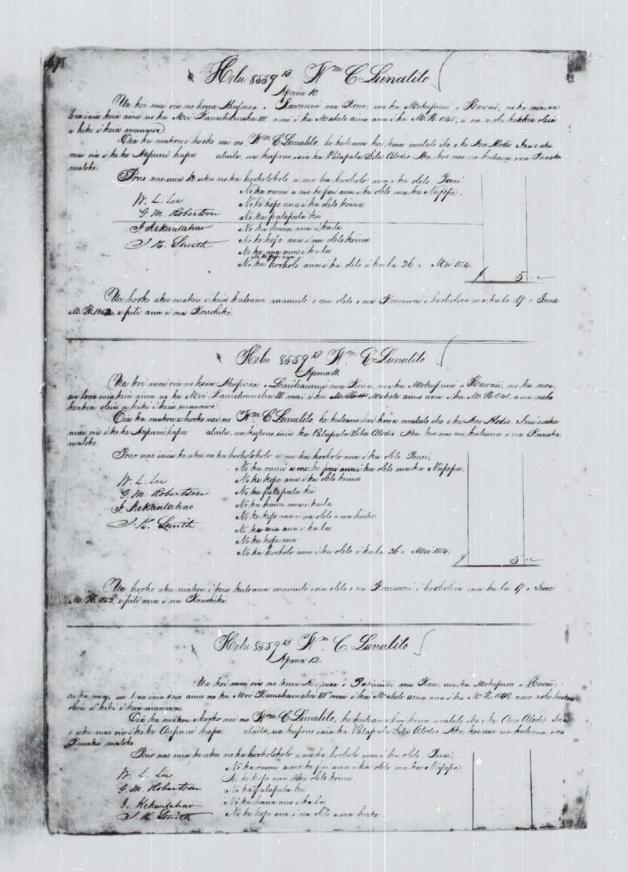
Sincerely

Peter A. Horovitz

Enclosures:

- 1. LCA 8559:B20.1 to Lunalilo
- 2. RP Grant 3343 to Claus Spreckles
- 3. LCA 3386:1, 2, and 3 to Pehuino
- 4. Kipuka database mapping of MEO Property
- 5. Kipuka database mapping of Pehuino LCAs
- 6. Pehuino Heirs signage on MEO Property

cc: MEO



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eli ka hana ava hala M. L. Lec 9 M Robertion 2. Kekaulahan alio ke hope ana vara olelo anashorke alio ka ann ana o kala W.K. Shith Me ha keja ana. Ale ka perhele ana i ka olile i ka la 26 . Me i 1844 . The hocke aku makewihia kuliura mamuli one olile one Francis e hockelia maka la 19 June At. A. E. 2, a full awa i'ma Konchite Cla ker men via ne kena Grand Shepana . Reacu ma Sano, ininakeli anna ma Sano, Con ho maken wheche ne no I'm & Lemalle he kulemant Ina v sete mai ora i he he Clupum hapa alada, na hupono i ana ha Palapata Sila Aledia. Ata koe mai na huliane Some man win he who we ka korholehelo a mu ha hechelo ana i ha elelo Ini. eto ka rome ame helpar anes ha olde maka etapepa eto ka rome ame helpar anes ha olde maka etapepa eto ka helpa anes ha olde maka etapepa eto ka halapata kii eto ka han ame ikada eto ka ka han ama ikada eto ka ka han ama ikada eto ka ka han ama ikada eto ika la 26 ette 1844. M. L. lu 4 m Roberton A Rikaulahas W.K. Smit Was horks aka mathon ihiakulana mamule ona olelo o na Havason idiocholow maka la 19. June ello H. M. 2, e file zna ina Konolisti * Hole 8059 19 Sym & Suspelile on the Suspelile on the Suspense of Makahumulan ma Sile, make Thanker was an me kees Shepan on Makahernelen ma Sile, me ha ell chefun . Kineii, nel i i kee man me ha ell chefun i she man i ha ell chefun and me ha ell chefun and me ha ell che and mehi has i kee manaan. Ou ka maken e herfe me ne Il m & Lunalile, he kuluna her hone malele she che Are Alete. Man made mai marke alle che che Are me en mai marke allefune hope alaila; un huper en a la la la fala fala Alete Alete she her me en ma handa maleka. Tone now with when me has hochelekelo a me has her belo and her dele Time . No ka rum anne he for and he dele me ha elippa.

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1181 No he hop and it woold it had a 26 , Min 1991 Ma herke ahu maken i keia kuliuna manneli one olitoona Kanawai i herhelein na kalu 19 Sum Min ker men me me kenn Shupura . Theker mer Hile, ma ka Mirkupuni . Kawani, ne ka men hua ama ne ka Ma Manuhamuha II mais ka Makelaina ana ika Ma 16. 16. 16. ana neho keakea chin ikm schooks nei me Jon C. Lienalile, he kuliana hei kona malate ike e ke line na ike ke Auguni hapa alula, na kufano iaia hai hi topata Ella Aledir e na kanaka maleke alordio Ina wuhw may Aka how nav ma huleana e mu hanaka maleke. I me ku horholo ana i ka olele. Time. No ka sumi ame ke fai ara i ka olelo Suno.
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Noka hama ame i ka la M. L. law 4. M. Robertion & Kikaulahao Dr. Smith Noku kopuna Moka hocholo am i ka olile i ka la 26 . Mi 1874 Man hoche ahu makeuri hua huleanamanuli o na olete o na Kanaloui i hecholora ma ka la The kor mewow no kona Auguar . Acapaku ana Republik, ma ka Ma hopun . Munisme ko Make while a kine manage the her meine Ma & Linalite he kultana her kome malale its o he And Olodie Ina white maine is he he Cufurnihafar alaita wa kufene iaia in Milapala dila Olodie Men her ma wawa na histoma o ma Manaka malehe.

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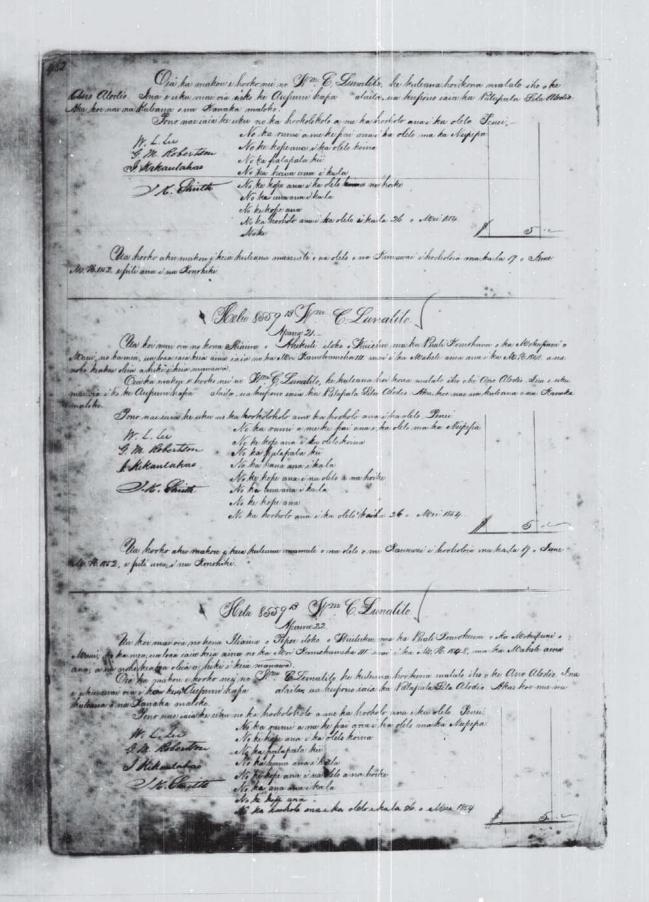
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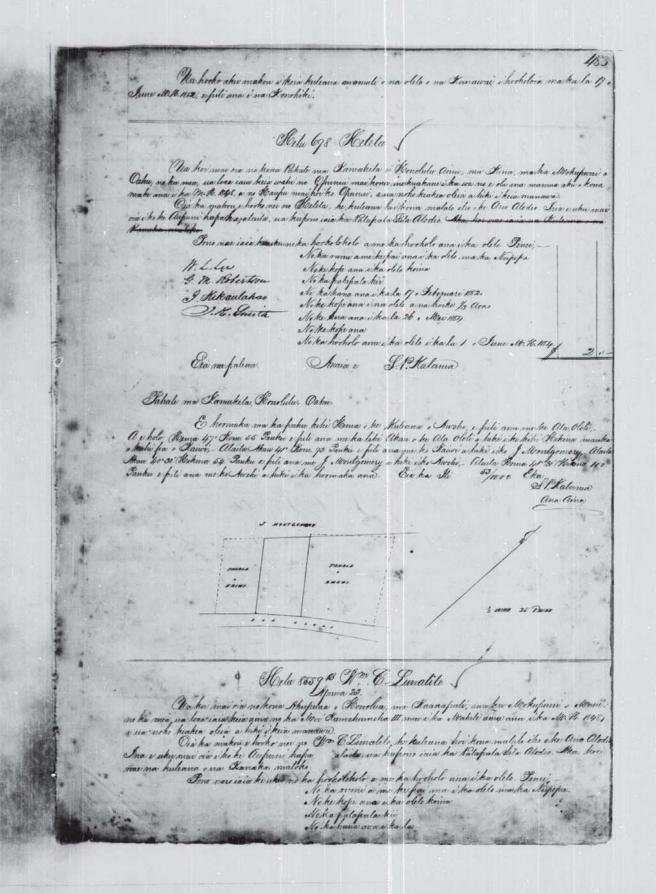
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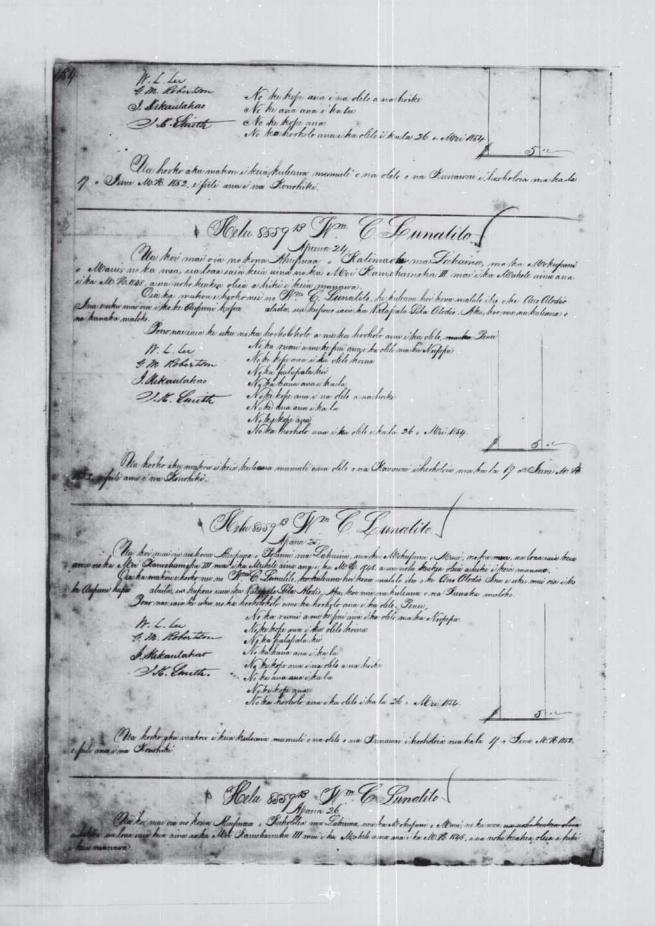
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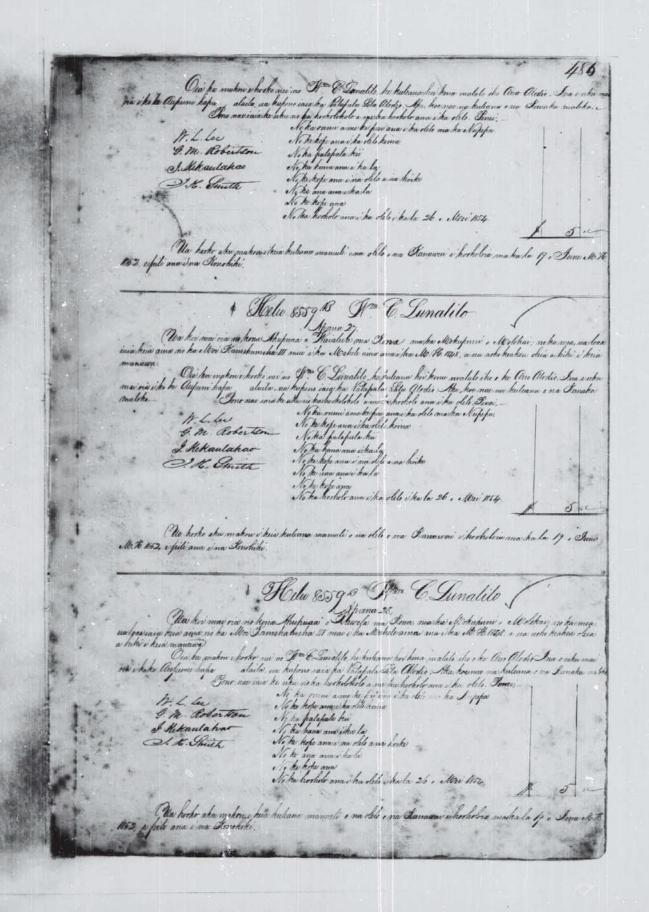
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ROYAL PATENT.

(GRANT.)

Halakana, By the Brace of God, King of the Hawaiian Islands,

By this His Royal Palent, makes known to all men, that he half for himself, his hoirs and successors, this day granted and given unto blue I packets under and by wither of the previous of em Act of the logislature Assembly of the hours in Islands appoint on the 21th day of July 1812 intitled the Act to cultivize the homeissmore of borner hands to convey culture portions of such hands to blue I present in satisfaction of all part into the Royal Suchequer, all that piece of Land situate at in Marchetter

and known as the Ohnpuna of Marbuth, with the His thounder thereinte belonging

Seguning at a red wood post and fule of stone on the sea shore adjuning the land of Hamaknupoko at the place called Rapulandua from which first the I recomment survey dation on Jumene bear Si's When and wine Sograf to time 1062 feet along Teamaking poke to Kerne Kapoo Stil Chice 3013 feet along Hamuknapoke to pile of stones, at Aukukerhanni \$22'3' 6 time 934 feet to a large wet called Olopura, which forms the corner of Meuluka. Rulimaila and Comatenapoke Thence Saliti C. time (Sista C magn) 1304 feet along Halimoile to Surpili Thence S21'17' to true (So le magn) be fet along the unine to mouted rock called Saidentaluni about 170 feet South of the read to Naturbini, thence S. 1. 4 & time I Ses'i & magn) 1892 feet to a fite of stone at Kanhiemer on West side of revine, Theree Six 18 6 stoo Sus is 6 magn) 1340 feet to a mereted work by the path at Julmali 335'7' to time I Sust to magn 1508 feet to a wiliwili tive on West land of the gulch which is the corner of the alimaile and the district of Stule . Thence Ist' 27 H. time 5 346 feet along Mula Sog 21 It true 6 59 feet along Mula Sol' St W. true gis fat along Mula to a concrete post marked with worse at the North Wat women of Natialinui and Wailette. From which the Soverment surrey station on Tun a Moha lears 838'25' to time Thence Sel' 36 W. time 1376 fatt along Kalihinai to top of a large rock called Tunstone. There Sit will true 3050.5 feet along Sushalinen to a granite post at the corner of Natialinia Hastula and Sulchanni From which the Soverment survey station on Jun Hele bean See 6 Whom Thence A 6+'s Whome 36030 feet along Tulchen mir and Waitafin to Tohattoi a marked rock a short die time It of roud to Weikapu Thence A 73'45 H. True A 15 H mayn) 1326 9 feet along It wikapu up ridge N 82'30 Il truck let 15 H magn) 1108.8 feet along Warkapor to stone port on the creek of the ridge known as Kalaparkoulis I hence along up the centre of this ridge along Waikape always following the water shed to the redge forming the head of Glowale Valley I hence following said ridge directing

418 the from Olovale Valley Thence around by the ridge forming the head of Warletin Valley to the head of the land of Waither Thence dlong the dividing ridge between the Waithite and the Warher Valleys to the head of Waithite Thence Sign of twee 3366 feet along Waither down ridge N. 20.36 to true 2161.5 feet along same to function of ridges called Nechoolera A.13:36 & time 1315 5 feet along some 10395 feet along same to black were marked the - at udge of gulch Themes A 7'21 6 time 427,7 feet along I withe along edge of gulle Alist' 6 time styl fet along sime to front near a large black stone marked -All'il the way feet along same Autil to true 9572 feet along Marcha Att 21 6 time 1029 t feet along Haicher Arg's 6 time 1025 feet along Waicher to stone marked thin _ \$ 20' 30' It time 128 feet along Haiche N 22' 15 6 time 244 feet along harehu Ari's I time 310 feet along Harehu Ass's lo time 364 fel along Haicher Sun 30 6 two 703 feet along Haicher along stone wall A p'00 6 truly feet along Naichw along stone wall to tall stone marked From which the above mentioned marked stone _ > bear Syi'2' W time 1458 & feet . Thence Still to the thop of fet crossing the Government road to stone marked - at send hells. Thence A 77.52 6 true 15.19.3 feet along Harchen across sandy hollows to stone mented - Theme Abs'45 6 true 1013 feet along Hareha to a stone marked _ at wa shore Thence along sea shore to initial point Subject to all custing leaves and benuncies and to the rights of Native tenante

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24.000 Containing

more or less; excepting and reserving to the Hawaiian Jovernment all mineral or metallic mines of every description.

To Fabe and to fold the above granted Land in Fee Simple, unto the said Claus Sprechele his Heirs and Assigns forever.

> itness Purself at Ronolulu, this 30% day of September 1882 , in the Anith year of Our Reign.

BY THE KING:

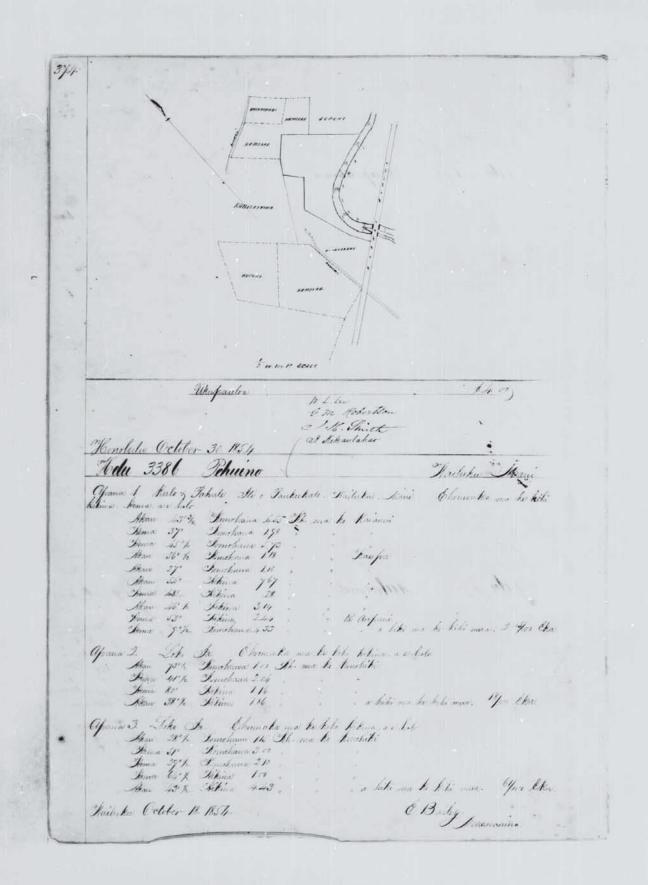
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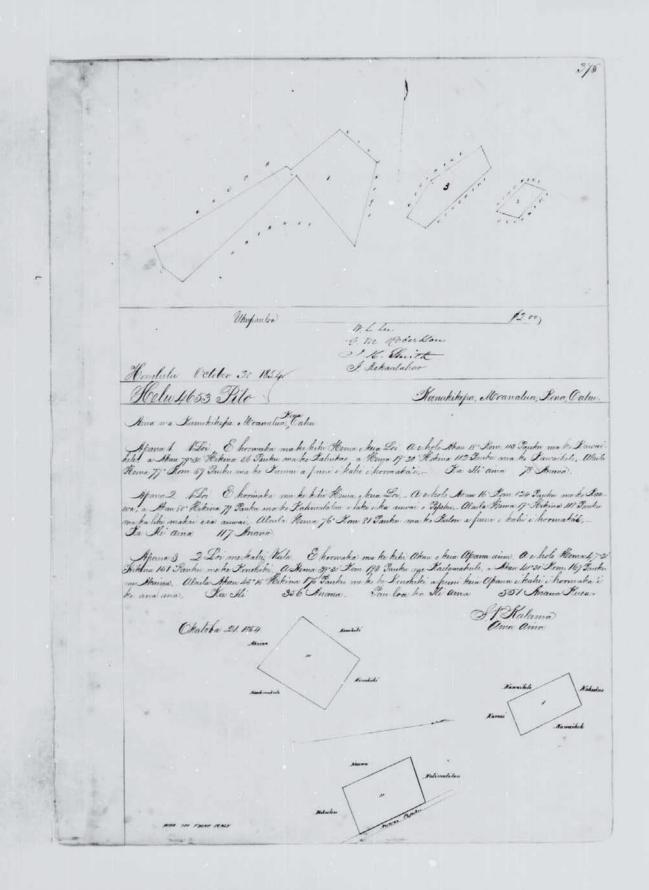
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420 Grantee District Island Issued Patent Fee Delivered. (GHANT)

(M) ROYAL PATENT. COSTS. Total, &











PARTIES CONSULTED DURING
THE 30-DAY COMMENT PERIOD
FOR THE DRAFT
ENVIRONMENTAL
ASSESSMENT; LETTERS
RECEIVED; AND RESPONSES TO
SUBSTANTIVE COMMENTS



IX. PARTIES CONSULTED DURING THE 30-DAY COMMENT PERIOD FOR THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED; AND RESPONSES TO SUBSTANTIVE COMMENTS

The Draft EA was published in the Office of Planning and Sustainable Development's The Environmental Notice on September 23, 2021. The following agencies and organizations received a copy of the Draft EA for review and comment during the 30-day comment period. Comment letters received and responses to substantive comments are included in this Chapter.

Federal Agencies

- U.S. Department of the Army Army Corps of Engineers Pacific Ocean Division Building 525, Suite 300 Fort Shafter, HI 96858-5440
- Ms. Michelle Bogardus, Island Team Leader U. S. Fish and Wildlife Service 300 Ala Moana Blvd., Rm. 3-122 Honolulu, HI 96850
- Mr. Gordon Wong, Manager
 U. S. Department of Transportation
 Federal Aviation Administration
 Honolulu Airports District Office
 Airports Western Pacific Region
 Box 50244
 Honolulu, HI 96850
- Mr. Kahana Stone, Soil Conservationist U.S. Department of Agriculture Natural Resources Conservation Service 77 Hookele Street, Suite 202 Kahului, HI 96732

State Agencies

 Mr. Curt Otaguro, Comptroller State of Hawai'i Department of Accounting and General Services 1151 Punchbowl Street, #426 Honolulu, HI 96813

- Ms. Denise Albano, Chair State of Hawai'i Department of Agriculture 1428 South King Street Honolulu, HI 96814-2512
- Mr. M. Kaeo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, HI 96809
- Keith Hayashi, Interim Superintendent State of Hawai'i Department of Education P.O. Box 2360 Honolulu, HI 96804
- Mr. William Aila, Jr., Chair State of Hawai'i Department of Hawaiian Home Lands P.O. Box 1879 Honolulu, HI 96805
- Dr. Elizabeth Char, Director State of Hawai'i Department of Health 1250 Punchbowl St., Room 325 Honolulu, HI 96813

- 11. Mr. Alec Wong, P.E., Chief State of Hawai'i Department of Health Clean Water Branch Hale Ola, Room 225 2827 Waimano Home Road Pearl City, HI 96782
- 12. State of Hawai'i Department of Health Environmental Health Administration P.O. Box 3378 Honolulu, HI 96801
- 13. Ms. Patti Kitkowski State of Hawai'i Department of Health Maui Sanitation Branch 54 South High Street, Room 300 Wailuku, HI 96793
- 14. Mr. Keith Kawaoka, Acting Director State of Hawai'i Department of Health Office of Environmental Quality Control 235 S. Beretania Street, Suite 702 Honolulu, HI 96813
- 15. Mr. Lene Ichinotsubo State of Hawai'i Department of Health Solid and Hazardous Waste Branch 2827 Waimano Road, Suite 100 Pearl City, HI 96782-1407
- 16. Ms. Suzanne Case, Chairperson State of Hawai'i Department of Land and Natural Resources P. O. Box 621 Honolulu, HI 96809
- 17. Dr. Alan Downer, Administrator
 State of Hawai'i
 Department of Land and Natural Resources
 State Historic Preservation Division
 via email: DLNR.Intake.SHPD@hawaii.gov
 cc: Susan Lebo
- 18. State of Hawai'i Department of Land and Natural Resources State Historic Preservation Division, Maui via email: <u>DLNR.Intake.SHPD@hawaii.gov</u> cc: Susan Lebo, Lehua Soares, Garnet Clark, Iolani Kauhane, and Andrew McCallister

- Mr. Jade Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, HI 96813
- 20. Ms. Denise Iseri-Matsubara, Executive Director State of Hawai'i Hawai'i Housing Finance and Development Corporation 677 Queen Street Honolulu, HI 96813
- 21. Major General Kenneth Hara, Adjutant General State of Hawai'i Department of Defense 3949 Diamond Head Road Honolulu, HI 96816
- Dr. Sylvia Hussey, Chief Executive Officer State of Hawai'i
 Office of Hawaiian Affairs
 N. Nimitz Highway, Suite 200 Honolulu, HI 96817
- 23. Ms. Mary Alice Evans, Director State of Hawai'i Office of Planning and Sustainable Development P. O. Box 2359 Honolulu, HI 96804
- 24. Mr. Dan Orodenker, Executive Officer State of Hawai'i State Land Use Commission P.O. Box 2359 Honolulu, HI 96804

Maui County Agencies

- Council Chair Alice Lee County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 26. Honorable Gabe Johnson County of Maui Maui County Council 200 South High Street Wailuku, HI 96793

- 27. Honorable Tasha Kama County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 28. Honorable Kelly King County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 29. Honorable Mike Molina County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 30. Honorable Tamara Paltin County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- Council Vice-Chair Keani Rawlins-Fernandez
 County of Maui
 Maui County Council
 200 South High Street
 Wailuku, HI 96793
- 32. Honorable Shane Sinenci County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- Honorable Yuki Lei Sugimura County of Maui Maui County Council 200 South High Street Wailuku, HI 96793
- 34. Mr. Herman Andaya, Administrator County of Maui Maui Emergency Management Agency 200 South High Street Wailuku, HI 96793
- 35. Mr. Eric Nakagawa, Director County of Maui Department of Environmental Management 2050 Main Street, Suite 2B Wailuku, HI 96793

- 36. Chief Bradford Ventura County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, HI 96732
- Ms. Lori Tsuhako, Director County of Maui Department of Housing and Human Concerns
 Main Street, Suite 546
 Wailuku, HI 96793
- 38. Ms. Karla Peters, Director County of Maui Department of Parks and Recreation 700 Halia Nakoa Street, Unit 2F Wailuku, HI 96793
- Ms. Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, HI 96793
- Chief John Pelletier
 County of Maui
 Maui Police Department
 55 Mahalani Street
 Wailuku, HI 96793
- Ms. Rowena Dagdag-Andaya, Director County of Maui Department of Public Works 200 South High Street Wailuku, HI 96793
- 42. Mr. Marc Takamori, Director County of Maui Department of Transportation David Trask Building, Suite 102 2145 Kaohu Street Wailuku, HI 96793
- Mr. Jeffrey Pearson, Director County of Maui Department of Water Supply 200 South High Street, 5th Floor Wailuku, HI 96793
- 44. Ms. JoAnn Inamasu, Director County of Maui Office of Economic Development 2200 Main Street, Suite 305 Wailuku, HI 96793

- 45. Mayor Michael Victorino County of Maui Office of the Mayor 200 South High Street Wailuku, HI 96793
- 46. County of Maui
 Department of Finance
 Real Property Division
 110 'Ala'ihi Street, Suite 110
 Kahului. Hawai'i 96732
- 47. County of Maui Department of Planning Zoning and Enforcement Division 2200 Main Street, Suite 335 Wailuku, Hawai'i 96793
- Ms. Caryl Hitchcock-Sprinzel, Chair Maui Urban Design Review Board Department of Planning 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793
- 49. Maui Planning Commission Department of Planning 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793

Other Agencies

- 50. Hawaiian Telcom 60 South Church St Wailuku, HI 96793
- Mr. Allen Baybayan, Principal Engineer Hawaiian Electric
 P.O. Box 398 Kahului, HI 96733
- 52. Spectrum 158 Ma'a Street Kahului, HI 96732
- Mr. Rogelio Aricayos, President Waiehu Terrace Community Association c/o Destination Maui, Inc. 841 Alua Street, Suite 102 Wailuku HI 96793
- 54. Mr. Roy Oliveira, President
 Waiehu Kou Phase 3 Association
 Email address:
 waiehukouphase3association@hotmail.com

- 55. Mr. Bryan Sarasin, Sr., Vice-Chairman Waihe'e Community Association Email address: bryancs@mauigateway.com
- 56. Mr. Kyle Nakanelua, Committee Member Aha Moku o Maui Email address: kyle.nakanelua@gmail.com
- 57. Mr. Kaniloa Kamaunu Aha Moku o Maui Email address: bkofmor@gmail.com



United States Department of the Interior

FISH AND WILDLIFE SERVICE Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850



In Reply Refer To: 01EPIF00-2022-TA-0002

October 12, 2021

Buddy Almeida, Housing Administrator Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793

Subject: Technical Assistance for the Draft Environmental Assessment for the Proposed

Hale Mahaolu Ke Kahua Affordable Housing Community, Waiehu, Maui

Dear Buddy Almeida:

The U.S. Fish and Wildlife Service (Service) received your request for comment on the Draft Environmental Assessment (EA) for the proposed Hale Mahaolu Ke Kahua Affordable Housing Project on September 23, 2021. This project proposes to construct a new 120 unit affordable rental housing community in Waiehu on the island of Maui. The property is identified as TMK (2)3-3-001:106 and is approximately 11.476 acres.

Thank you for your efforts to address listed species and recommended avoidance and minimization methods referenced in our December 22, 2020 letter and for conducting a biological survey. We provide the following comments for incorporation in your final Environmental Assessment and further consultation as necessary. This letter has been prepared under the authority of, and in accordance with, provisions of the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*), as amended (ESA).

Thank you for including the recommended mitigation measures into the project plans to protect the 'ōpe'ape'a or Hawaiian hoary bat (*Lasiurus cinereus semotus*) (Page 21).

Thank you for conducting an extensive plant survey (Appendix B, pages 6–8). The list you provided indicated that there are no endangered plants within the project area and no host plants for yellow-faced bees (*Hylaeus assimulans*, *Hylaeus facilis*, and *Hylaeus longiceps*) or Blackburn's sphinx moth (*Manduca blackburni*). We recommend project proponents take action to avoid attraction of Blackburn's sphinx moth to the project location and prohibit *Nicotiana glauca* (tree tobacco) from entering the site. Tree tobacco can grow greater than 3 feet tall in approximately 6 weeks. If it grows over 3 feet, the plants may become a host plant for

INTERIOR REGION 9 COLUMBIA-PACIFIC NORTHWEST INTERIOR REGION 12
PACIFIC ISLANDS

Idaho, Montana*, Oregon*, Washington

American Samoa, Guam, Hawaiʻi, Northern Mariana Islands Buddy Almeida 2

Blackburn's sphinx moth. We therefore recommend that you incorporate the following measures into your project plan:

- Remove any tree tobacco less than 3 feet tall.
- Monitor the site every 4-to-6 weeks for new tree tobacco growth before, during, and after the proposed ground-disturbing activity.
 - Monitoring for tree tobacco can be completed by any staff, such as groundskeeper or regular maintenance crew, provided with picture placards of tree tobacco at different life stages.

Thank you for incorporating lighting shielded from view above for both construction and permanent lighting and committing to avoiding night work during the seabird fledgling season (September 15 to December 15) (Page 21). We appreciate your commitment to minimizing impacts to endangered seabirds including the 'ua'u or Hawaiian petrel (*Pterodroma sandwicensis*), the 'ake'ake or Hawai'i distinct population segment of the band-rumped stormpetrel (*Oceanodroma castro*), and the 'a'o or Newell's shearwater (*Puffinus auricularis newelli*).

Thank you for your commitment to verify that no nēnē or Hawaiian Goose (*Branta* (=*Nesochen*) *sandvicensis*) are present prior to commencement of project activities (Appendix B). To avoid and minimize potential project impacts to Hawaiian geese we recommend you incorporate the following applicable measures into your project plans:

- Do not approach, feed, or disturb Hawaiian geese.
- If Hawaiian geese are observed loafing or foraging within the project area during the breeding season (September through April), have a biologist familiar with Hawaiian geese nesting behavior survey for nests in and around the project area prior to the resumption of any work. Repeat surveys after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest).
- Cease all work immediately and contact the Service for further guidance if a nest is discovered within a radius of 150 feet of proposed project, or a previously undiscovered nest is found within the 150-foot radius after work begins.
 - o In areas where Hawaiian geese are known to be present, post and implement reduced speed limits, and inform project personnel and contractors about the presence of endangered species on-site.

Additional measures for housing developments common to all listed animal species that will reduce mortality or predation include the following:

- Post and enforce low speed limits to reduce vehicle collisions with wildlife.
- Require all pets, including cats and dogs, to be on leash at all times outside.
- Require garbage cans with lids to reduce populations of rats and mongoose, which are invasive species and prey upon native and endangered species.
- Provide signage instructing residents and visitors to avoid approaching, feeding, or disturbing wildlife.

The Service recommends incorporating all applicable avoidance and minimization measures into your project design to avoid and minimize effects on protected species. If you determine the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with ESA compliance.

Buddy Almeida 3

Thank you for the opportunity to comment and for participating with us in the protection of our endangered species. If you have any questions, please contact Christina Richards at christina_richards@fws.gov or by telephone at 808-792-9450. When referring to this project, please include this reference number: 01EPIF00-2022-TA-0002.

Sincerely,

CHELSIE Digitally signed by CHELSIE JAVAR-SALAS Date: 2021.10.12 16:45:48 -10'00'

Acting Island Team Manager Maui Nui and Hawai'i Island Team

cc: Chris Sugidono, Munekiyo Hiraga



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Chelsie Javar-Salas, Acting Island Team Manager U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office Maui Nui and Hawai'i Island Team 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i (01EPIF00-2022-TA-0002)

Dear Ms. Javar-Salas:

Thank you for your comment letter dated October 12, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant appreciates the recommendation for project plans to include the removal of tree tobacco less than three (3) feet tall and the monitoring of the project site for tree tobacco in order to avoid attraction of the Blackburn's sphinx moth to the site. The Flora and Fauna survey conducted for the project did not identify signs of the Blackburn's sphinx moth or their habitats, however, the recommended avoidance measures will be incorporated into project plans, as applicable.
- 2. The Applicant appreciates the recommendation for project plans to include avoidance measures to minimize potential impacts to nēnē or Hawaiian Geese. These measures include avoidance of approaching, feeding or disturbing nēnē. The Flora and Fauna survey did not identify nēnē in the project area, however, the Service will be contacted and avoidance measures implemented should nēnē be observed in or near the project site.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Chelsie Javar-Salas, Acting Island Team Manager June 1, 2022 Page 2

3. We acknowledge receipt of the additional measures for housing developments that reduce mortatlity or predation for all listed species. These avoidance and mitigation measures will be incorporated into the project, as applicable and as feasible.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC - 35C

CEJS:Ih

cc: Grant Chun, Hale Mahaolu Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Lena Tamashiro, Design Partners Inc.

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\USFWS.res.doc

KEITH T. HAYASHI



STATE OF HAWAI'I

DEPARTMENT OF EDUCATION

P.O. BOX 2360 HONOLULU, HAWAI'I 96804

OFFICE OF FACILITIES AND OPERATIONS

October 21, 2021

Buddy Almeida, Housing Administrator County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

> Re: Draft Environmental Assessment for the Hale Mahaolu Ke Kahua Affordable Housing Community, Waiehu, Maui, Hawaii, TMK (2)3-3-001:106

Dear Mr. Almeida:

Thank you for your letter dated September 21, 2021. The Hawaii State Department of Education (Department) has the following comments on the Draft Environmental Assessment (DEA) for the proposed Hale Mahaolu Ke Kahua Affordable Housing Community Project (Project). According to the DEA, the Project will utilize the County of Maui affordable housing review process to develop 120 rental apartment units targeting residents earning 60 percent or less of the Area Median Income on approximately 11.486 acres of land located at Waiehu, Island of Maui, TMK (2)3-3-001:106.

The Department previously provided comments on the Project by letter dated December 17, 2020, and has no additional comments.

Thank you for the opportunity to comment. Should you have questions, please contact Robyn Loudermilk, School Lands and Facilities Specialist with the Facilities Development Branch, Planning Section, at (808) 784-5093 or via email at robyn.loudermilk@k12.hi.us.

Sincerely,

Roy Ikeda Interim Public Works Manager Planning Section

RI:rll

 c: Kathleen Dimino, Complex Area Superintendent, Baldwin-Kekaulike-Maui Complexes Chris Sugidono, Munekiyo Hiraga Facilities Development Branch



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Roy Ikeda, Interim Public Works Manager State of Hawai'i Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Ikeda:

Thank you for your comment letter dated October 21, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. On behalf of the Applicant, we acknowledge that the Hawai'i State Department of Education has no additional comments to offer at this time.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

a. 352

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\DOE.res.doc

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

Standard Comments for Land Use Reviews Clean Air Branch Hawaii State Department of Health

If your proposed project:

Requires an Air Pollution Control Permit

You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.

Includes construction or demolition activities that involve asbestos

You must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.

Has the potential to generate fugitive dust

You must control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near to existing residences, business, 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, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance complaints.

You should provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing airborne, visible fugitive dust from shoulders and access roads;
- e) Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling airborne, visible fugitive dust from debris being hauled away from the project site.

If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch

Clean Air Branch	Indoor Radiological Health Branch
(808) 586-4200	(808) 586-4700
cab@doh.hawaii.gov	



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: cab@doh.hawaii.gov

State of Hawai'i Clean Air Branch 2827 Waimano Home Road, #130 Pearl City, Hawai'i 96782

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Sir or Madame:

Thank you for your correspondence dated April 1, 2019, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with input for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant will coordinate with the Permitting Section of the Clean Air Branch as to whether the project needs an Air Pollution Control Permit.
- 2. The proposed project will not involve construction or demolition activities that involve asbestos.
- 3. Best Management Practices (BMPs) such such as frequent watering of exposed surfaces and regular maintenance of construction equipment, will be utilized to minimize air quality impacts associated with project construction.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 * Honolulu, Hawaii 96813 * Tel: 808.983.1233

www.munekiyohiraga.com

Sir or Madame June 1, 2022 Page 2

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

a. 2

Chris Sugidono Senior Associate

CEJS:Ih

CC: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\DOH-CAB.res.doc



ELIZABETH A. CHAR, M.D. DIRECTOR OF HEALTH

> Lorrin W. Pang, M.D., M.P.H. District Health Officer

STATE OF HAWAII DEPARTMENT OF HEALTH Maui District Health Office

Maui District Health Office 54 South High St. Rm. #301 Wailuku, HI 96793

October 6, 2021

Mr. Buddy Almeida Housing Administrator County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

Subject:

Draft Environmental Assessment for the Hale Mahaolu Ke Kahua

Affordable Housing Community, Waiehu, Maui, Hawaii

TMK: (2) 3-3-001:106

Thank you for the opportunity to review this project. We have no further 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

District Environmental Health Program Chief

c Chris Sugidono Joanna L. Seto, EMD Chief

tti Kitlonislii



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Patti Kitkowski, District Environmental Health Program Chief State of Hawai'i Department of Health Maui District Health Office 54 South High Street, Room #301 Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Kitkowski:

Thank you for your comment letter, dated October 6, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. On behalf of the Applicant, we acknowledge that the Maui District Health Office has no comments to offer at this time.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC. ST

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\DOHMaui.res.doc

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

October 25, 2021

County of Maui Department of Housing and Human Concerns Attn: Mr. Buddy Almeida 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

SUBJECT: Draft Environmental Assessment for the Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community located at Waiehu, Island of

via email: buddy.almeida@co.maui.hi.us

Maui; TMK: (2) 3-3-0001:106 on behalf of Waiehu Housing, LP

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 pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Division of Forestry & Wildlife, and (c) Land Division – Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji Land Administrator

Enclosures

cc: Central Files

Munekiyo Hiraga (w/copies, via email: planning@munekiyohiraga.com)

Attn: Mr. Chris Sugidono, Senior Associate





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

September 24, 2021

FROM	ŗ.	MEN	<u>IORAN</u>	DUM_			
	T O:	DLNR Agencies:Div. of Aquatic ResourceDiv. of Boating & Oce X Engineering Division X Div. of Forestry & WildDiv. of State Parks X Commission on WateOffice of Conservatio X Land Division – Maui	ean Reci (<u>DLNR.E</u> dlife (<u>ruk</u> r Resou n & Coa	oyrosa.t rce Mar stal Lar	.terrago@hawaii.gov) nagement (<u>DLNR.CWRM@hawaii.gov</u>) nds		
ТО:	FROM: SUBJECT:		essmen	t for the	sell Tsuji e Proposed Hale Mahaolu Ke Kahua		
	LOCATION: APPLICANT:	, , , , , , , , , , , , , , , , , , , ,					
	Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on September 23, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Contr I) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice , available at the following link:						
	http://oeqc2.doh.ha	awaii.gov/The_Environme	ental_No	tice/202	21-09-23-TEN.pdf		
	Please submit any comments by October 22, 2021. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov . Thank you.						
	BRIEF COMMENT	S:	() ()	We hav	ve no objections. ve no comments. ve no additional comments. ents are included/attached.		
			Signed	:	959		
			Print Na		Carty S. Chang, Chief Engineer		
			Division	า:	Engineering Division		
			Date:		Oct 11, 2021		

Attachments

cc: Central Files





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

September 24, 2021

MEMORANDUM

TO:	DLNR Agencies:Div. of Aquatic Resorbiv. of Boating & Occ. X Engineering Division X Div. of Forestry & WilDiv. of State Parks X Commission on WateOffice of Conservation X Land Division – Maui	ean Red (<u>DLNR.</u> dlife (<u>ru</u> er Resou on & Co	ENGR@ byrosa.t urce Mai astal Lai	. <u>terrago@hawaii.gov)</u> nagement (<u>DLNR.CWRM@hawaii.gov</u>) nds	
FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land A Draft Environmental Ass Affordable Housing Co Waiehu, Island of Maui; Munekiyo Hiraga on beh	sessme ommun TMK: (nt for the ity 2) 3-3-0	e Proposed Hale Mahaolu Ke Kahua 001:106	
matter. The DEA Program (formerly Sustainable Deve following link:	was published on Septe the Office of Environm	ember 2 ental Q bulletin,	3, 2021 uality C <u>The E</u> i	on on the above-referenced subject by the State Environmental Review ontrol) at the Office of Planning and avironmental Notice, available at the 21-09-23-TEN.pdf	
will assume your	agency has no commen	its. Sho	uld you	response is received by this date, we have any questions, please contact a@hawaii.gov. Thank you.	
BRIEF COMMENTS:		(\sqrt)	We have Commo	have no objections. have no comments. have no additional comments. nments are included/attached.	
		Signed		DAVID G.SMITH, Administrator	
		Print Name: Division:		Division of Forestry and Wildlife	
		Date:	/11	Oct 22, 2021	

Attachments

cc: Central Files





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES DIVISION OF FORESTRY AND WILDLIFE 1151 PUNCHBOWL STREET, ROOM 325 HONOLULU, HAWAII 96813

October 22, 2021

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILD LIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
LAND

Log no. 3353

MEMORANDUM

TO: Russell Y. Tsuji, Land Administrator

Land Division

FROM: DAVID G. SMITH, Administrator

Division of Forestry and Wildlife

SUBJECT: Division of Forestry and Wildlife Comments for the Draft Environmental

Assessment (DEA) for the Proposed Hale Mahaolu Ke Kahua Affordable

Housing Community

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding review of the DEA for the proposed Hale Mahaolu Ke Kahua Affordable housing Community in Waiehu on Maui, Hawaiʻi, TMK: (2) 3-3-001:106. The project consists of constructing a 120 multi-family residential units, housed in 13 2-story buildings, a non-profit building, clubhouse, landscaping and related improvements, 264 parking stalls, and two loading stalls on a total of 11.476 acres.

The State listed Blackburn's Sphinx Moth (BSM; *Manduca blackburni*) has a historic range that encompasses the project area. Larvae of BSM feed on many nonnative hostplants that include tree tobacco (*Nicotiana glauca*) which grows in disturbed soil. We recommend contacting our Maui DOFAW office at (808) 984-8100 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. To avoid harm to BSM, DOFAW recommends removing plants less than one meter in height or during the dry time of the year. If you remove tree tobacco over one meter in height or disturb the ground around or within several meters of these plants they must be checked thoroughly for the presence of eggs and larvae.

We note that artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. For illustrations and guidance related to seabird-friendly light styles that also protect the dark, starry skies of Hawai'i please visit: https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf.

The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of the project area and may roost in nearby trees. If any site clearing is required this should be timed to avoid disturbance during the bat birthing and pup rearing season

(June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW.

DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens (e.g. Rapid 'Ōhi'a Death), vertebrate and invertebrate pests (e.g. Little Fire Ants), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Maui Invasive Species Committee at (808) 573-6472 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (https://sites.google.com/site/weedriskassessment/home). We recommend that you refer to www.plantpono.org for guidance on selection and evaluation for landscaping plants.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Paul Radley, Protected Species Habitat Conservation Planning Coordinator at (808) 295-1123 or <u>paul.m.radley@hawaii.gov</u>.

Sincerely,

MGLL

DAVID G. SMITH Administrator



cc: Central Files



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAH DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

September 24, 2021

MEMORANDUM

TO:	DLNR Agencies: Div. of Aquatic ResourcesDiv. of Boating & Ocean Recreation X Engineering Division (DLNR.ENGR@hawaii.gov) X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)Div. of State Parks X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)Office of Conservation & Coastal Lands X Land Division – Maui District (daniel.l.ornellas@hawaii.gov)
FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land Administrator <i>Russell Tsuji</i> Draft Environmental Assessment for the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community Waiehu, Island of Maui; TMK: (2) 3-3-0001:106 Munekiyo Hiraga on behalf of Waiehu Housing, LP
matter. The DEA Program (formerly	our review and comment is information on the above-referenced subject was published on September 23, 2021 by the State Environmental Review the Office of Environmental Quality Control) at the Office of Planning and copment in the periodic bulletin, The Environmental Notice, available at the
http://oeqc2.doh.ha	awaii.gov/The Environmental Notice/2021-09-23-TEN.pdf
will assume your	comments by October 22, 2021. If no response is received by this date, we agency has no comments. Should you have any questions, please contact directly via email at darlene.k.nakamura@hawaii.gov . Thank you.
BRIEF COMMENT	We have no objections. We have no comments. We have no additional comments. Comments are included/attached. Signed: Print Name: Division: Date: Divisions
Attachments	



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

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

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Tsuji:

Thank you for your letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses:

ENGINEERING DIVISION

1. We acknowledge that the Engineering Division has no further comments to provide at this time.

DIVISION OF FORESTRY AND WILDLIFE

- 1. The Applicant appreciates the recommendations regarding the State listed Blackburn's Sphinx Moth. We note that a Flora and Fauna Survey was conducted to address biological resources in the project area. The survey did not identify Blackburn's sphinx moths or their habitats in the area, however, these recommendations have been shared with the project team for consideration and incorporation into the project as feasible.
- 2. Should any night work occur requiring artificial lighting for the project, such work will be avoided during the seabird fledging season from September 15 through December 15. In addition, outdoor lighting will be shielded and downward-facing to minimize impacts to seabirds.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

- 3. Construction plans for this project will include that woody plants greater than 15 feet tall will not be removed or trimmed during the Hawaiian Hoary Bat or 'Ōpe'ape'a birthing and pup rearing season from June 1 to September 15.
- 4. The Applicant appreciates the recommendation regarding the invasive pathogens, pests, and plant parts that may harm native species and ecosystems. Practices such as the cleaning of excess soil and debris from equipment, materials, and personnel will be implemented, as applicable, to minimize the risk of spreading invasive species.
- 5. The Applicant appreciates the recommendation to use native plant species for landscaping and recommendations for avoiding the use of invasive species. The use of invasive species will be avoided and native plants will be considered for use in landscaping, as feasible.

LAND DIVISION - MAUI DISTRICT

1. We acknowledge that the Land Division has no comments to provide at this time.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC - 352

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Lena Tamashiro, Design Partners Inc.
David Sereda, Chris Hart & Partners

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DAVID Y. IGE



SUZANNE D. CASE

MICHAEL G. BUCK ELIZABETH A. CHAR, M.D. NEIL J. HANNAHS AURORA KAGAWA-VIVIANI, PH.D. WAYNE K. KATAYAMA PAUL J. MEYER

M. KALEO MANUEL

REF: RFD.5781.6

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

P.O. BOX 621 HONOLULU, HAWAII 96809

October 19, 2021

TO: Chris Sugidono, Senior Associate

Munekiyo Hiraga

FROM: M. Kaleo Manuel, Deputy Director

Commission on Water Resource Management

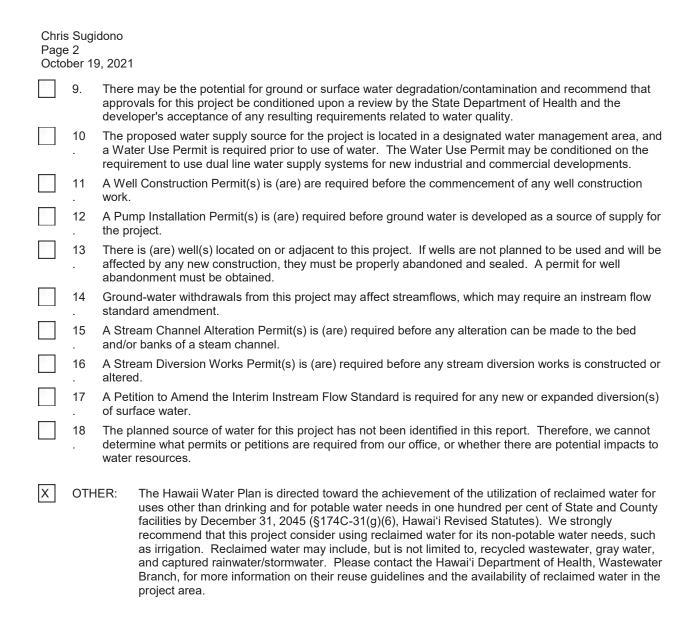
SUBJECT: Draft Environmental Assessment for the Hale Mahaolu Ke Kahua Affordable Housing Community

FILE NO.: RFD.5781.6 TMK NO.: (2) 3-3-001:106

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/cwrm.

Our comments related to water resources are checked off below.

X	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.
3)—	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.
X	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 .
X	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/
X	6.	We recommend the use of alternative water sources, wherever practicable.
(0)	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.
Χ	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.



If you have any questions, please contact Neal Fujii of the Commission staff at 587-0216.



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

M. Kaleo Manuel, Deputy Director State of Hawai'i Department of Land and Natural Resources Commission on Water Resource Management P.O. Box 621 Honolulu, Hawai'i 96809

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i (REF: RFD.5781.6)

Dear Mr. Manuel:

Thank you for your comment letter, dated October 19, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The County of Maui Department of Water Supply has provided comments on this project and has shared the Draft Maui Island Water Use and Development Plan (WUDP) strategies that have the potential to be implemented in the project. These strategies have been forwarded to the engineering and design team for consideration and incorporation into the project as applicable.
- 2. The Applicant appreciates the recommendation to install water efficient fixtures and to implement water efficient practices and will incorporate these practices into the project, as feasible.
- 3. Best Management Practices (BMPs) such as temporary drainage swales and detention basins will be implemented during construction to ensure stormwater runoff is channeled to appropriate drainage facilities onsite and will not impact downstream or adjacent properties. In addition, project related drainage improvements will be carried out to retain the increase in stormwater runoff from

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

the project onsite. Further information on stormwater management BMPs for the proposed project will be discussed in the Final EA.

- 4. The Applicant appreciates the recommendation and will consider the use of alternative water sources, wherever practicable.
- 5. The Applicant appreciates the recommendation and will consider adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawai'i, wherever practicable.
- 6. The Applicant appreciates the recommendation. The use of non-potable water features such as rainwater harvesting systems for irrigation will be evaluated and incorporated as practicable and feasible.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC: 357

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Lena Tamashiro, Design Partners Inc.
David Sereda, Chris Hart & Partners
Ashley Otomo, Otomo Engineering Inc.
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STATE OF HAWAII OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

DAVID Y. IGE **GOVERNOR**

MARY ALICE EVANS DIRECTOR

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813 Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

(808) 587-2846 Telephone: Fax: (808) 587-2824 Web: https://planning.hawaii.gov/

Coastal Zone Management Program

DTS202110221123SE

Environmental Review

Program

October 25, 2021

Land Use Commission

Land Use Division

Buddy Almeida, Housing Administrator

County of Maui

Special Plans Branch

Department of Housing and Human Concerns

2200 Main Street, Suite 546

State Transit-Oriented

Development

Wailuku, Hawaii 96793

Buddy.Almeida@co.maui.hi.us

Statewide Geographic Information System

Statewide

Sustainability Program

SUBJECT: Draft Environmental Assessment for the Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaii

Dear Mr. Almeida,

Thank you for the opportunity to review the subject Draft Environmental Assessment (DEA).

The Waiehu Housing, LP proposes to develop a 120-unit 100% affordable rental housing community in Waiehu, Maui. The units will be offered at rental prices affordable to households with 60% or less of the area median income. The project will consist of 13 two-story multi-family buildings, a 3,477-sq. ft. non-profit building, a 3,231-sq. ft. clubhouse, 264 parking stalls and two loading stalls.

The project is situated on approximately 11.476 acres of land south of the intersection of Kahekili Highway and Waiehu Beach Road and is bordered to the west by Kahekili Highway, a State roadway, and by the Waiehu Heights residential subdivision to the east. The Applicant proposes to provide access to the site through three new driveways off Kahekili Highway. A portion of the site immediately adjacent to the Waiehu Heights subdivision is within the State Land Use Urban District, but the remaining 9.798 acres are in the Agricultural District, and a State Land Use Reclassification from the Agricultural to the Urban District is required. The land in the Agricultural District is classified as "Prime" under the Agricultural Lands of Importance to the State of Hawaii system and rated "B" by the Land Study Bureau. The entire site is within the Urban Growth Boundary on the Maui Island Plan.

Mr. Buddy Almeida, October 25, 2021 Page 2

The Applicant proposes an expedited affordable housing project approval from the Maui County Council under Chapter 2.97 of the Maui County Code (MCC), including an expedited a State Land Use District Boundary Amendment for land less than 15 acres by the Maui County Council.

The Office of Planning and Sustainable Development (OPSD) offers the following specific comments:

District Boundary Amendment

OPSD provided comments on the Early Consultation Request for the DEA and our concerns have been addressed in the DEA, including the fact that the County Council will act on the DBA concurrently during its review of the Chapter 2.97, MCC affordable housing application.

Sustainability

- The proposed project aligns with the Hawaii 2050 Sustainability Plan: Charting a Course for a Decade of Action (2020-2030) Focus Areas for 2030. Specifically, the Focus Area to "Advance Equity" through "Strategy 25: Continue to improve economic and social sustainability of individuals through access to affordable housing." The Hawaii 2050 Sustainability Plan serves as the State of Hawaii's climate and sustainability strategic action plan, in accordance with Part II of the Hawaii State Planning Act, Hawaii Revised Statutes §226-65. The proposed project will be 100% affordable, providing rental housing for residents earning 60% or less of the Area Median Income, is considered by the Statewide Sustainability Program to be in alignment with UN Sustainable Development Goal 11: Sustainable Cities and Communities, to make cities and human settlements inclusive, safe, resilient, and sustainable.
- The proposed project aligns with Part III of the Hawaii State Planning Act, Hawaii Revised Statutes §226-108, the Sustainability Priority Guidelines paragraph 5 by "promoting decisions based on meeting the needs of the present without compromising the needs of future generations." Additionally, the proposed project aligns with the Land Use Commission's Hawaii Administrative Rules §15-15-50 (c) (25) (a) and (b) by including a statement and analysis pursuant to Part III of the Hawaii State Planning Act, Hawaii Revised Statutes §226-108 the Sustainability Priority Guidelines. Specifically, the proposed project notes that the project site is centrally located and promotes an interconnected, walkable, bikeable, multimodal and alternative transportation access using existing bikeways to local recreational parks and natural resource areas in the Waiehu region.
- The proposed project aligns with Part III of the Hawaii State Planning Act, Hawaii Revised Statutes §226-109, the Climate Change Adaptation Priority Guidelines paragraphs 5 and 10 by "encourag(ing) the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change," and "encourag(ing) planning and management of the natural and built environments that effectively integrate climate

Mr. Buddy Almeida, October 25, 2021 Page 3

change policy," respectively. Additionally, the proposed project aligns with the Land Use Commission's Hawaii Administrative Rules §15-15-50 (c) (24) (a), (c), and (d) by including a statement and analysis pursuant to Part III of the Hawaii State Planning Act, Hawaii Revised Statutes §226-109, the Climate Change Adaptation Priority Guidelines. Specifically, the proposed project notes that the project site will be located outside of the projected 3.2-ft. sea level rise hazard area as identified in the 2017 Hawaii Sea Level Rise Vulnerability and Adaptation Report, and the relative effects GHG emissions (CO2 EQ) during construction from earthmoving equipment and transportation of materials to and from the project site, will be short term and are not considered significant.

- The State of Hawaii has committed to a Statewide Energy Efficiency Portfolio Standard through the enactment of Hawaii Revised Statutes §269-96, requiring that 4,300 gigawatt hours (GWh) of electricity use be reduced by 2030. The Statewide Sustainability Program notes that the proposed project intends to utilize energy efficient fixtures and appliances, thereby assisting the state meet its statutory sustainability target.
- The State of Hawaii has committed to a Statewide Renewable Portfolio Standard through the enactment of Hawaii Revised Statutes §269-92, requiring a renewable portfolio standard of 40% of each electric utility's newt electricity sales by December 31, 2030 and 100% by December 31, 2045. Additionally, the State of Hawaii has committed to a Zero Emissions Clean Economy Target through the enactment of Hawaii Revised Statutes §225P-5, to sequester more atmospheric carbon and greenhouse gases than emitted within the state as quickly as practicable, but not later than 2045. The Statewide Sustainability Program notes that this proposed project "may" install photovoltaic solar panels should funding be available. The Statewide Sustainability Program strongly encourages the installation of photovoltaic solar panels to assist the state meet its clean energy statutory sustainability targets and reduce the state's overall dependence of fossil-fuel based energy.

OPSD commends this effort to provide higher density, affordable housing consistent with sustainability principles to an underserved segment of the community with incomes at less than 60% AMI and in an area adjacent to an existing Urban area with access to available infrastructure.

If you have any questions regarding this comment letter, please contact Aaron Setogawa of our Land Use Division at aaron.h.setogawa@hawaii.gov or Danielle Bass, State Sustainability Program Manager at daniell.m.bass@hawaii.gov.

Sincerely,

Mary Alice Evans

· Mary Alice Evans

Director



Karlynn K. Fukuda PRESIDENT Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

Tessa Munekiyo Ng AICP

VICE PRESIDENT

June 1, 2022

Mary Alice Evans, Director State of Hawai'i Office of Planning and Sustainable Development P.O Box 2359 Honolulu, Hawai'i 96804

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Ms. Evans:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. On behalf of the Applicant, we thank you for confirming that the Draft EA has addressed the Office of Planning and Sustainable Development's (OPSD) concerns regarding the District Boundary Amendement and we acknowledge comments regarding the project's applicability to the State's goals related to sustainability and climate change adaptation.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

W- 35C

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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DAVID Y. IGE GOVERNOR



STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

October 19, 2021

JADE T. BUTAY DIRECTOR

Deputy Directors DEREK J CHOW ROSS M HIGASHI EDWIN H SNIFFEN

DIR 0918 STP 8.3276

Ms. Lori Tsuhako Director Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Attention: Mr. Buddy Almeida, Housing Administrator

Dear Ms. Tsuhako:

Subject: Draft Environmental Assessment (EA)

Hale Mahaolu Ke Kahua Affordable Housing Community Project

Waiehu, Maui, Hawaii

Tax Map Key: (2) 3-3-001:106

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject Draft EA and understands Waiehu Housing, LP is proposing to develop a 120-unit affordable rental housing community, including a community center, non-profit building, and 285 parking stalls in Waiehu, Maui. The project will be constructed on an approximately 11.476-acre site south of the intersection of Kahekili Highway (State Route 340, County Route 330) and Waiehu Beach Road (State Route 3400).

Access to the site will be via three new driveways along Kahekili Highway. The northernmost and southernmost entrances will be right-in and right-out driveways. The central entrance will be constructed as a non-signalized full intersection.

HDOT has the following comments:

Airports Division (HDOT-A)

The Draft EA sufficiently addresses HDOT-A's prior concerns with the project and has no additional comments.

Highways Division (HDOT-HWY)

 In accordance with the HDOT guidelines, the applicant shall mitigate all transportation impacts due to the project to maintain the operating Level of Service (LOS) and delay level conditions at the "without project condition" for all horizon years. In addition, should the LOS without the project be lower than the desirable HDOT threshold of LOS D, the applicant may be required to provide mitigation improvements to improve the State facilities to LOS D or better with the project condition. If the roadway element is already operating at LOS E or F, and the delay for that location increases by 5 percent or more with the project, the applicant may also be required to provide mitigation improvements. The following elements of intersection had an increase in delay of over 5 percent:

- a. Waiehu Beach Road and Wailupe Drive/Lower Waiehu Beach road westbound left turn/though lane at A.M. and P.M. Peak. Eastbound left turn/through lane at P.M. Peak.
- b. Waiehu Beach Road and Makaala Drive eastbound right turn at A.M. Peak.
- c. Waiehu Beach Road and Eha Street southbound through at A.M. Peak.
- d. Market Street/Kahekili Highway and Mokuhau Road/Pilihana Road westbound left turn/through lane/right turn at A.M. Peak.
- e. Market Street and Vineyard Street northbound/through lane/right turn at P.M. Peak.
- 2. There are two intersections that are not included in the Future Year 2023 Analysis. The westbound leg of the intersection of Market Street/Kahekili Highway and Mokuhau Road/Pilihana Road will worsen due to the project in the A.M. peak from LOS E to LOS F. The westbound leg of the intersection of Market Street and Mill Street while already a LOS F will worsen due to the project both in the A.M. and P.M. peak. Recommend mitigation for both these intersections.
- 3. Coordination with HDOT-HWY on traffic mitigation is required.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

JADE T. BUTAY

Director of Transportation

c: Mr. Chris Sugidono, Munekiyo Hiraga



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP

June 1, 2022

Jade Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Mr. Butay:

Thank you for your comment letter dated October 19, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Airports Division (HDOT-A)

The Applicant acknowledges that HDOT-A has no comments at this time.

Highways Division (HOOT-HWY)

- 1. As described in the Traffic Impact Analysis Report (TIAR), congestion at various study intersections is existing and regional in nature. Some of the LOS E/F movements are calculated to have higher delays through HCM calculations than actual delays documented through video observations. See below for detailed discussion at the HDOT-identified intersections:
 - a. Waiehu Beach Road/Wailupe Dr/Lower Waiehu Beach Road
 - AM & PM Existing 2021 observations indicated westbound queues of only 1-3 left-turn vehicles and averaged little to no delays (5-20s). Only issue would be queue spillback from Eha which occasionally blocks LTs during heavy AM congestion periods.
 - 2. Project only adds 10-23 vehicles per direction on Waiehu Beach Road with little impacts to LOS E/F movements.
 - b. Waiehu Beach Road/Makaala Drive
 - 1. AM Existing regional AM eastbound congestion along Waiehu Beach Road can spill back beyond Makaala Drive. Therefore, eastbound right-turn

delays are more heavily impacted by this queue spillback stemming from the Eha Street intersection. Any widening or intersection modifications at this intersection is unlikely to change operations since delays are a product of queue spillback.

- c. Waiehu Beach Road/Eha Street
 - AM The TIAR states that the heavy AM southbound congestion is impacted greatly from the short southbound right-turn lane. Lengthening of this right-turn lane is constrained by the limits to the nearby bridge over Wailuku River and would require major bridge improvements.
 - 2. The Project adds 10-30 vehicles per direction along Waiehu Beach Road through this intersection, resulting in an increase on average of 1 vehicle every signal cycle.
- d. Market Street/Kahekili Highway/Mokuhau Road/Piihana Road
 - 1. AM The westbound left-turn/through/right-turn movement only increases by 4.7 seconds in the AM peak hour, resulting in a 6.5% increase. Existing regional AM southbound congestion along Market Street/Kahekili Highway can spill back beyond this intersection. Queued vehicles along Market Street typically stop to allow left-turn vehicles from Piihana Road to turn onto Market Street, reducing delays and queues. Observed existing westbound queues were typically 0-2 vehicles long.
- e. Market Street/Vineyard Street
 - 1. PM The northbound approach only increases by 3.2 seconds in the PM peak hour, resulting in a 6.2 percent increase.

The project itself only adds 1-3 vehicles per approach at this 4-legged intersection, therefore project impacts are minimal.

2. See response in d.1 above for discussion at the Market Street/Kahekili Highway/Mokuhau Road/Piihana Road intersection.

Market Street/Mill Street

AM & PM – The westbound left-turn movements are low volume 30-35 vehicles per peak and delays only increases by 4.4%. For the most part, westbound right-turners proceeded relatively freely without lengthy delays. Based on existing observations, average AM queues were 0-2 vehicles long and PM queues were 2-6 vehicles long. Average actual observed delays ranged from 5-30 seconds on average. On a couple occasions during the peak, westbound left-turns blocked right-turners and created a maximum queue of 10 vehicles, but quickly dissipated. The project only adds 5-10 peak hour vehicles per direction on Market Street, which will result in minimal impacts to the LOS E/F movements.

3. The Applicant acknowledges the comment and the development team has been in coordination with HDOT-HWY to determine its fair share of traffic mitigation.

Jade Butay, Director June 1, 2022 Page 3

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC - 352

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Substantive Comments\SDOT.res.docx

MICHAEL P. VICTORINO Mayor

HERMAN ANDAYA Administrator





County of Maui MAUI EMERGENCY MANAGEMENT AGENCY 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793

PH: (808) 270-7285 emergency.management@mauicounty.gov

October 25, 2021

Buddy Almeida County of Maui Housing Administrator Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

Mr Almeida,

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT AND MAUI COUNTY CODE 2.97 APPLICATION FOR THE HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY AT TMK (2)3-3-001:106, WAIEHU, MAUI, HAWAII

Thank you for your proposal and the opportunity for us to submit suggestions and comments on the proposed Hale Mahaolu Ke Kahua Affordable Housing Community. We have read the Draft Environmental Assessment request and have offered some comments and considerations for your convenience below.

1.) Currently Maui County Emergency Management Agency (MEMA) is recommending that an assessment be completed as a separate document or included with the draft environmental assessment to Exhibit D (Infrastructure Description). The description states that there will be (3) driveway entrances, all egress/ingress off of the Kahekili Highway. The area is known to be very prone to wildfires. The attached map, shows the area of the proposed project and the approximate numbers of fires and locations that were active in the past. Although, the fires seem to be small in regards to the acreages burnt, any fire can do damage and put life and property to risk. The map information that is included can be found at the following web address (http://gis.ctahr.hawaii.edu/WildfireHistory).





2.) The recommendation would be to construct another alternative driveway or road easement, to allow for evacuation of the Hale Mahaoluke Kahua community in case of an emergency, such as a fire. The road system from Happy Valley going north on Kahekili Hwy to and including the intersection of Waiehu Beach Road and then driving south will not be able to handle the additional traffic from the complex. This is concerning because it would make evacuation due to an emergency very difficult, resulting in risk to the individuals/residents that already live in the area

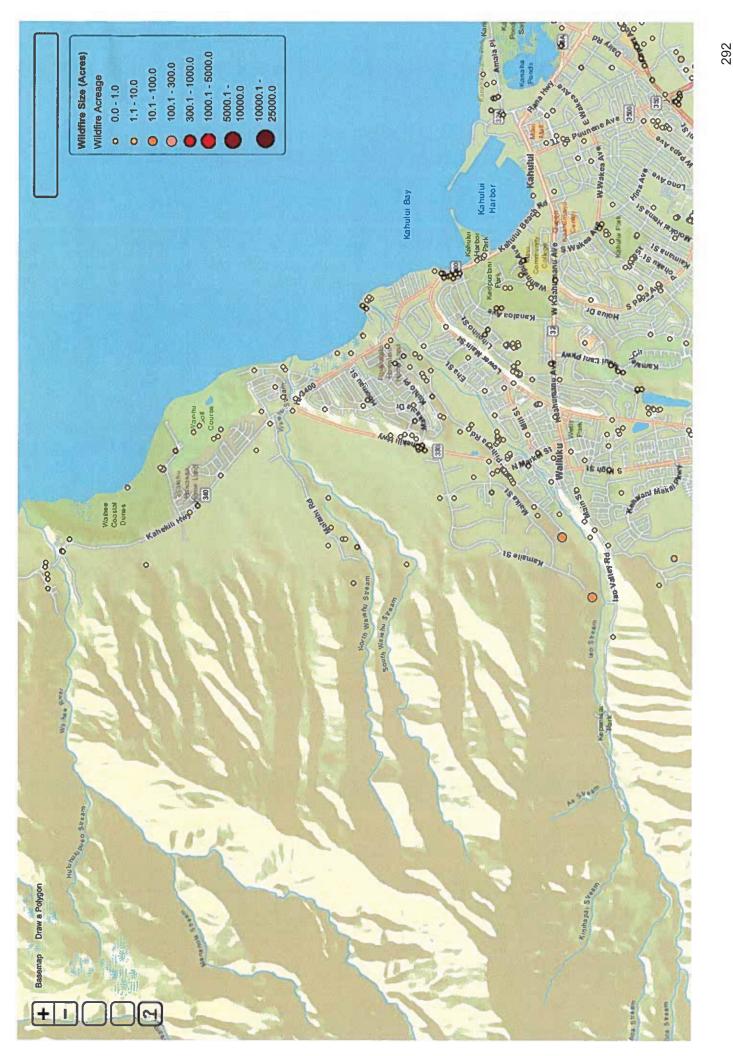
Thank you for allowing us to make our suggestions to your project. Should you have any questions please feel free to contact Gina Albanese (808) 270-7276, or via email at Herman.Andaya@co.maui.hi.us

Sincerely,



MEMA Administrator







Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP

June 1, 2022

Herman Andaya, Administrator County of Maui Maui Emergency Management Agency 200 South High Street Wailuku, HI 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Mr. Andaya:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

- 1. The Applicant acknowledges the comment regarding wildfires. The development team has been in coordination with the Hawai'i Department of Transportation (HDOT) and Department of Public Works (DPW), which deemed the three (3) proposed access points as acceptable. However, consultation with the two (2) agencies as well as the Department of Fire and Public Safety's Fire Prevention Bureau will continue to ensure adequate ingress/egress to the project site and that appropriate fire protection measures, including fire hydrants, shall be installed onsite. An updated Preliminary Engineering Report will be included in the Final EA.
- 2. We note your comment. The proposed project incorporates three (3) driveways onto Kahekili Highway that would provide access to routes for evacuation in the event of an emergency. Depending on the location of the emergency, residents could utilize the southbound or northbound stretches of Kahekili Highway or Waiehu Beach Road to gain access to other areas on Maui.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension, which would provide another route from Kahekili Highway to Eha Street and is anticipated to relieve some traffic along the Kahekili Highway/Market Street corridor through Happy Valley. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

Herman Andaya, Administrator June 1, 2022 Page 2

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC - 35

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc. Lena Tamashiro, Design Partners, Inc.

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Karlynn K. Fukuda PRESIDENT Mark Alexander Roy VICE PRESIDENT Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 21, 2021

Bradford Ventura, Chief County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, HI 96732

SUBJECT:

Draft Environmental Assessment and Maui County Code 2.97

Application for the Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Chief Ventura:

On behalf of the County of Maui, Department of Housing and Human Concerns. enclosed for your review and comment is the Draft Environmental Assessment (EA) (prepared pursuant to Chapter 343, Hawai'i Revised Statutes, and Hawai'i Administrative Rules, Title 11, Chapter 200.1) and the County of Maui, Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the Hale Mahaolu Ke Kahua Affordable Housing Community.

We would appreciate receiving any comments you may have on the Draft EA and Chapter 2.97 Application no later than October 25, 2021.

Please send your comments to the following:

Approving Agency: County of Maui

Address:

Department of Housing and Human Concerns

2200 Main Street, Suite 546 Wailuku Hawai'i 96793

Contact Person:

Buddy Almeida, Housing Administrator

Email:

Buddy.Almeida@co.maui.hi.us

Phone No.:

(808) 270-7805

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729 Oahu: 735 Bishop Street, Suite 412 * Honolulu, Hawaii 96813 * Tel: 808.983.1233

www.munekiyohiraga.com

Bradford Ventura, Chief September 21, 2021 Page 2

In addition, may we ask that a copy of your comments be sent to the following:

Consultant: Munekiyo Hiraga

Address: 305 High Street, Suite 104

Wailuku, Hawai'i 96793

Contact Person: Chris Sugidono, Senior Associate Email Address: planning@munekiyohiraga.com

Phone No.: (808) 244-2015

Thank you for your participation in the review of this project. Should you have any questions, please feel free to contact me at (808) 244-2015.

Very truly yours,

Chris Sugidono Senior Associate

OL X

CEJS:yp Enclosure

cc: Buddy Almeida, Department of Housing and Human Concerns (w/out enclosure)

Monte Heaton, Waiehu Housing, LP (w/out enclosure)

Grant Chun, Hale Mahaolu (w/out enclosure)

Debbie Cabebe, Maui Economic Opportunity, Inc. (w/out enclosure)

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County of Maui Department of Fire and Public Safety

Thank you for the opportunity to review your project. At this time Fire Prevention Bureau has no comments.

Our office does reserve the right to comment on the proposed project during the building permit review process when detailed plans for this project are routed to our office for review. At that time, fire apparatus access, water supply for the fire protection, and fire and life safety requirements associated with the subject project will be formally reviewed.

Should you have any specific fire related public safety concerns please identify those to us on this or any future projects you would like us to review.

Plans Review - Fire Prevention Bureau Fire.Prevention@mauicounty.gov



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: fire.prevention@mauicounty.gov

County of Maui Department Fire and Public Safety Attn: Plans Review – Fire Prevention Bureau 200 Dairy Road Kahului, Hawai'i 96732

SUBJECT: Draft Environmental Assessment and Maui County Code Chapter 2.97

Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Sir or Madame:

Thank for your comment letter dated October 5, 2021, regarding the Draft Environmental Assessment (EA) and (Draft) Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the subject project. On behalf of the Applicant, we acknowledge that the Fire Prevention Bureau has no comments to offer at this time. We acknowledge that during the building permit review process, fire appartatus access, water supply for fire protection, and fire and life safety requirements associated with the project will be formally reviewed.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA, as well as the Chapter 2.97 application that will go to the Maui County Council for approval. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

MICHAEL P. VICTORINO Mayor

KARLA H. PETERS
Director

MARCI M. SATO Deputy Director





DEPARTMENT OF PARKS AND RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793 Main Line (808) 270-7230 / Facsimile (808) 270-7942

MEMORANDUM

TO:

Lori Tsuhako, Director

Department of Housing and Human Concerns

FROM:

Karla H. Peters, Director

DATE:

October 4, 2021

SUBJECT:

DRAFT ENVIRONMENTAL ASSESSMENT AND MAUI COUNTY CODE 2.97 APPLICATION FOR THE HALE MAHAOLU KE KAHUA AFFORDABLE

HOUSING COMMUNITY AT TMK: (2) 3-3-001:106, WAIEHU, MAUI, HAWAII

Thank you for the opportunity to review the proposed Hale Mahaolu Ke Kahua Affordable Housing Community project. In review of the project, we note that the applicant is currently proposing to develop 120 affordable housing units and is planning to apply for Maui County Code Chapter 2.97 approval from the Maui County Council for the proposed development.

The Department of Parks and Recreation looks forward to reviewing the final application for compliance with Maui County Code 18.16.320. We have no further comments at this time.

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

c:

Buddy Almeida, Housing Administrator Samual Marvel, Chief of Planning and Development Chris Sugidono, Munekiyo Hiraga

KHP:SM:csa



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Karla H. Peters, Director County of Maui Department of Parks and Recreation 700 Hali'a Nakoa Street, Unit 2 Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment and Maui County Code Chapter 2.97

Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Peters:

Thank you for your comment letter dated October 4, 2021, regarding the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the subject project. On behalf of the Applicant, we acknowledge that the Department of Parks and Recreation has no further comments to offer at this time.

We appreciate your input and a copy of your comment letter and this response will be incorporated into the Final EA, as well as the Chapter 2.97 application that will go to the Maui County Council for approval. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC - 257

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

> JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

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

October 22, 2021

Ms. Lori Tsuhako, Director Department of Housing and Human Concerns County of Maui 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Ms. Tsuhako:

SUBJECT:

CONSOLIDATED APPLICATION FOR CHAPTER 2.97, MCC FAST-TRACKED RESIDENTIAL WORKFORCE HOUSING PROJECT APPROVAL AND DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY IN WAIEHU, MAUI, HAWAII AT TAX MAP KEY (TMK) (2) 3-3-001:106

(EAC 2021/0006)

The Department of Planning (Department) has reviewed the consolidated MCC Chapter 2.97 application document and Draft EA filed for the above-referenced project. The Department has the following comments:

- In various sections throughout the Draft EA, the existing Community Plan designation is listed incorrectly. It should be 'Wailuku-Kahului Project District 2 (Piihana).' For the Final EA, please ensure that it is listed accurately.
- 2) For the Final EA, please include more information on the nonprofit building in the project scope. Will it serve Hale Mahaolu, or other groups? Also, we are wondering if it might be possible to combine the nonprofit building and clubhouse into one two-story building to minimize impervious surfaces and aggregate massing on the site.
- In our early consultation letter, we requested that a review of the potential for installing photovoltaic panels (PV) be explored. We understand that it could be installed, pending funding availability. We strongly encourage that PV panels be installed atop rooftops for hot water, at the very least. Even though the operating cost savings are not passed on to the tenants, there will be a net environmental benefit overall.
- 4) Also, in our early consultation letter, we mentioned that it is difficult to determine if a multi-use path will be constructed in the landscaped area, connecting one end of the development to the other. For the Final EA, please clearly show the path.
- In addition, there does not appear to be a pathway between the parking lot and the units that fully extends from one site of the development to the other. There also does not seem to be mid-block raised crosswalks or speed humps within the parking lot. For the Final EA, please evaluate extending the pathway between the parking lot and units, and also adding traffic calming measures.
- 6) Please evaluate locating resident parking behind or to the side of each building to provide more spaces closer to each building and hide them from street view.

- 7) A sidewalk exemption is being sought along Kahekili Highway, but one should be added along the project frontage.
- 8) We note that two of the driveways will be limited to right-turn in, right-turn out movement. Please ensure that there are bollards or something ensuring there is a forced right-turn in and out. The north driveway is near the intersection of Kahekili Highway and Waiehu Beach Road, and there could be traffic accidents, if left turns in/out of the project area are not blocked.
- 9) We strongly suggest that you consider relocating the north driveway further south and away from the Waiehu Beach Road intersection. We further suggest you coordinate its proposed location with the Department of Public Works due to the 750-unit proposed development across the highway.
- 10) Provide a northbound turnout lane at the mid entrance along Kahekili Highway and coordinate with the Maui Department of Transportation to provide a bus stop facility at that location.
- 11) Screen the residences from Kahekili Highway with earthen berms and/or landscaping to mitigate the noise of passing traffic. Use plantings on the berms to reduce polluted air migration on to the site and to provide a visually and physical buffer to and from the highway.
- 12) Secure bike parking/storage should be provided on-site.
- For the Final EA, please ensure that the Site Plan is on 11 x 17 paper and that trash and recycling bins are all clearly shown. There is an arrow pointing to one of the trash receptacles, but the plan is small it is difficult to easily see.
- 14) The laundry facility is shown on the plans in small print; however, please call them out so that they are more visible for the Final EA.
- There is no Conceptual Landscape Plan or a Landscape Planting Plan, and this should be included in the Final EA. We encourage the use of drought tolerant native plants. Trees for shade and the pocket parks should be installed in the park area.
- 16) For the Final EA, please clearly show the pocket parks. They cannot be easily identified on the existing Site Plan. Because of the site's remote location from other recreational areas, please consider installing playgrounds and benches amidst the parks. Also, please include this information in the Recreational Resources section.
- 17) Provide space for community gardens and composting.
- 18) For site security, please ensure that there is adequate lighting throughout the development.
- The site is located in Flood Zone 'X,' an area of minimal flooding, but it is located next to a 48-inch culvert and extreme weather events are occurring more frequently. Evaluate drainage improvements built to accommodate a 100-year, one hour storm runoff. Also, the flood code requires that the applicant has an engineer certify that the proposed work will not affect the carrying capacity of the drainage facility or adversely impact adjacent and downstream properties. Please provide a letter from the project engineer along with building permit plans to the Zoning Administration and Enforcement Division.

- 20) Please consider the use of green swales or bioswales to capture storm runoff from the parking lot.
- Because the area consists primarily of sand, provide a geotechnical report in the Final EA so that it is possible to assess site stability.
- 22) For the Final EA, existing water capacity consumption and conservation methods should be evaluated.
- Please also consider the use of non-potable water for irrigation. Consider incorporating rainwater harvesting systems into each building to irrigate site landscaping where possible.
- Overhead utility lines should be placed underground as much as practicable.
- For the Final EA, please include colored renderings. It would be beneficial to envision what the development would look like once built.
- For the Final EA, please update the project financing section. It says that the award of a bond, State Rental Housing Revolving Fund and Low-Income Housing Tax Credit is anticipated in September 2021.
- The project is proposed to provide rental housing for residents earning 60 percent or less of the Area Median Income (AMI); however, there was no income group distribution provided, as per MCC 2.96.040(C). For the Final EA, please include this information.
- In the Final EA, please indicate that more recently the property was planted with dry land taro. Maui Economic Opportunity had a volunteer program that worked the land. Please indicate what will happen to this farming activity.
- 29) For the Final EA, in the Socio-Economic section, please provide housing demand numbers by income group. Also state approximately how many construction jobs will be generated to work on the project and indicate whether local construction labor will be employed.
- In the Draft EA, there is a land ownership section, but there is only the lease agreement. For the Final EA, please include a copy of the title document.
- In the lease agreement between the landowner and Applicant, under the 'Grant of Option' section, 1c., it says, "The Optionee shall use or cause the Premises to be used for the purpose of developing, construction, operating and maintaining the following: (a) a multifamily rental housing project consisting of approximately 120 number of units (including I manager's unit) known as Hale Mahaolu Ke Kahua." The Draft EA does not mention the manager's unit in the project scope, or show it on the plans. An onsite manager would be beneficial to help monitor the area for security purposes. For the Final EA, please disclose whether there will be a unit and show the location.
- Under 'Project Time Schedule and Costs,' it says that the project is estimated to be completed in 16 months. For the Final EA, please provide more detailed construction timing information, such as whether the project will be built in a single phase, around when the Applicant plans to initiate construction and by when construction will be completed.

Ms. Lori Tsuhako, Director October 22, 2021 Page 4

- For the Final EA, please add to the 'Alternatives' section. Did the landowner consider other density alternatives, such as perhaps single-family residential homes, duplexes or townhomes?
- In Appendices J-2 and J-3, some policies are listed and checked when they do not seem to be applicable. For the Final EA, please ensure the correct boxes are checked.

We look forward to future reviews of this project. Should you have any questions, please contact Staff Planner Tara Furukawa by email at tara. furukawa@mauicounty.gov or by phone at (808) 270-7520.

Sincerely,

Closk I. Yhith Romichele McLean, AICP Planning Director

xc: Clayton Yoshida, Planning Program Administrator (PDF)

Jacky Takakura, Acting Planning Program Administrator (PDF)

Pam Eaton, Planning Program Administrator, Long-Range Division (PDF)

Kathleen Aoki, Planning Program Administrator (PDF)

Tara Furukawa, Staff Planner (PDF)

Danny Dias, Supervising Planner (PDF)

Jennifer Maydan, Supervising Planner (PDF)

Grant Chun, Hale Mahaolu (PDF)

Mark Roy, Munekiyo Hiraga (PDF)

Chris Sugidono, Munekiyo Hiraga (PDF)

Project File

MCM:TKF:lak

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Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, HI 96793

SUBJECT:

Draft Environmental Assessment and Maui County Code Chapter 2.97 Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. McLean:

Thank you for your comment letter dated October 22, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

In various sections throughout the Draft EA, the existing community Plan designation is listed incorrectly. It should be 'Wailuku-Kahului Project District 2 (Piihana).' For the Final EA, please ensure that it is listed accurately.

Response:

The Applicant acknowledges the comment and will ensure the change is reflected in the Final EA.

Comment No. 2:

For the Final EA, please include more information on the nonprofit building in the project scope. Will it serve Hale Mahaolu, or other groups? Also, we are wondering if it might be possible to combine the nonprofit building and clubhouse into one two-story building to minimize impervious surfaces and aggregate massing on the site.

Response:

The nonprofit building will be operated by Maui Economic Opportunity (MEO) in its own capacity. Since this building is meant to function separately from the residential development, it would not be operationally appropriate to include both of them in the same building as the clubhouse.

Comment No. 3:

In our early consultation letter, we requested that a review of the potential for installing photovoltaic panels (PV) be explored. We understand that it could be installed, pending funding availability. We strongly encourage that PV panels be installed atop rooftops for hot water, at the very least. Even though the operating cost savings are not passed on to the tenants, there will be a net environmental benefit overall.

Response: The Applicant and development team remains open to the inclusion of solar panels to the extent that funding is available.

Comment No. 4:

Also, in our early consultation letter, we mentioned that it is difficult to determine if a multi-use path will be constructed in the landscaped area, connecting one end of the development to the other. For the Final EA, please clearly show the path..

Response: A continuous path connecting all of the buildings within the project site, which can be used for pedestrians as well as bicycles, will be included in the conceptual site plan within the Final EA.

Comment No. 5:

In addition, there does not appear to be a pathway between the parking lot and the units that fully extends from one site of the development to the other. There also does not seem to be mid-block raised crosswalks or speed humps within the parking lot. For the Final EA, please evaluate extending the pathway between the parking lot and units, and also adding traffic calming measures.

Response:

As previously mentioned, a continuous path connecting all of the buildings within the project site, which can be used for pedestrians as well as bicycles, will be included in the conceptual site plan within the Final EA. Additional opportunities for traffic calming measures will be evaluated during the construction plans preparation phase of the project.

Comment No. 6:

Please evaluate locating resident parking behind or to the side of each building to provide more spaces closer to each building and hide them from street view.

Response:

The Applicant will provide a greenway buffer along Kahekili Highway to help visually screen the property and to help with noise attenuation. The development team will make every effort to provide parking stalls as close to each unit as possible. At minimum, the project will provide at least one stall for each unit in close proximity to the assigned unit.

Comment No. 7:

A sidewalk exemption is being sought along Kahekili Highway, but one should be added along the project frontage.

Response:

The Applicant is requesting an exemption from frontage improvements, including curb, gutter, and sidewalks. There are currently no sidewalks to connect to in the vicinity of the project site along Kahekili Highway.

The Applicant notes that the costs of the frontage improvements would negatively impact feasibility of the 100 percent affordable housing community. The improvements would also infringe on the narrow project site plan and parking area.

Comment No. 8:

We note that two of the driveways will be limited to right-turn in, right-turn out movement. Please ensure that there are bollards or something ensuring there is a forced right-turn in and out. The north driveway is near the intersection of Kahekili Highway and Waiehu Beach Road, and there could be traffic accidents, if left turns in/out of the project area are not blocked.

Response:

The Applicant acknowledges the comment. The development team will work with the County Department of Public Works (DPW) to determine the appropriate measures to restrict illegal left-in and left-out movements at the right-in, right out accesses.

Comment No. 9:

We strongly suggest that you consider relocating the north driveway further south and away from the Waiehu Beach Road intersection. We further suggest you coordinate its proposed location with the Department of Public Works due to the 750-unit proposed development across the highway.

Response:

The Applicant and development team has met with County DPW on a number of occasions and DPW was acceptable to the number and location of project accesses. The development team will continue to work with DPW throughout the process to address any issues regarding the project access points.

The development mauka of Kahekili Highway is aware that their accesses will need to be coordinated with the accesses for the Hale Mahaolu Ke Kahua Affordable Housing Community.

Comment No. 10:

Provide a northbound turnout lane at the mid entrance along Kahekili Highway and coordinate with the Maui Department of Transportation to provide a bus stop facility at that location.

Response:

The Applicant and development team is coordinating with the County Department of Transportation to determine the feasibility of providing a bus stop within or near the project vicinity.

Comment No. 11:

Screen the residences from Kahekili Highway with earthen berms and/or landscaping to mitigate the noise of passing traffic. Use plantings on the berms to reduce polluted air migration on to the site and to provide a visually and physical buffer to and from the highway.

Response:

The Applicant will provide a greenway buffer along Kahekili Highway to help visually screen the property and to help with noise attenuation and air migration mitigation. The use of berms will be examined given the physical constraints of the property layout and they will be installed if practicable and feasible.

Comment No. 12:

Secure bike parking/storage should be provided on-site.

Response: The Applicant will work with the development team to provide bicycle storage within the project site.

Comment No. 13:

For the Final EA, please ensure that the Site Plan is on 11 x 17 paper and that trash and recycling bins are all clearly shown. There is an arrow pointing to one of the trash receptacles, but the plan is small it is difficult to easily see.

Response: The Applicant acknowledges the comment and will provide the conceptual site plan at 11 x 17, with the trash areas clearly labeled in the Final EA.

Comment No. 14:

The laundry facility is shown on the plans in small print; however, please call them out so that they are more visible for the Final EA.

<u>Response:</u> The Applicant acknowlldges the comment and will label the laundry facilities clearly on the conceptual site plan in the Final EA.

Comment No. 15:

There is no Conceptual Landscape Plan or a Landscape Planting Plan, and this should be included in the Final EA. We encourage the use of drought tolerant native plants. Trees for shade and the pocket parks should be installed in the park area.

Response:

A Conceptual Landscape Plan will be included in the Final EA. The plant palette will include drought-tolerant native plants. Shade canopy trees will be installed to help mitigate the 'Heat Island Effect' and provide comfort for residents.

Comment No. 16:

For the Final EA, please clearly show the pocket parks. They cannot be easily identified on the existing Site Plan. Because of the site's remote location from other recreational areas, please consider installing playgrounds and benches amidst the parks. Also, please include this information in the Recreational Resources section.

Response:

The Applicant acknowledges the comment and will label the site amenities clearly on the conceptual site plan in the Final EA.

Comment No. 17:

Provide space for community gardens and composting.

Response:

The Applicant acknowledges the comment. It is the development team's experience that community gardens and the like only work when there is buy-in and commitment on the part of the residents. While the Applicant does not oppose the inclusion of these amenities, they will need to be considered later in the project development process.

Comment No. 18:

For site security, please ensure that there is adequate lighting throughout the development.

Response:

Parking lot lighting will be provided as well as bollard lighting along the walkways to provide adequate lighting throughout the development. In addition, lighting will be provided at the building entrances and stairwells.

Comment No. 19:

The site is located in Flood Zone 'X,' an area of minimal flooding, but it is located next to a 48-inch culvert and extreme weather events are occurring more frequently. Evaluate drainage improvements built to accommodate a 100-year, one hour storm runoff. Also, the flood code requires that the applicant has an engineer certify that the proposed work will not affect the carrying capacity of the drainage facility or adversely impact adjacent and downstream properties. Please provide a letter from the project engineer along with building permit plans to the Zoning Administration and Enforcement Division.

Response:

The Applicant is aware of previous localized flooding events within the vicinity of the project site. MEO has reported to the Applicant that debris blocking the culvert to the north of the Kahekili Highway and Waiehu Beach Road intersection has caused drainage issues and flooding. The HDOT is responsible for maintaining the culvert and has cleared trash and debris from the culvert, which has mitigated the issue. Hale Mahaolu will coordinate with HDOT on ensuring the culvert is clear and operating properly during heavy rain events.

It should be noted that the proposed drainage plan will meet the requirements of Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui" and Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices". The drainage design criteria will be to minimize any alterations to the natural pattern of the existing onsite surface runoff.

A letter from the project engineer and building permit plans will be provided to the Zoning Administration and Enforcement Division as the project progresses.

Comment No. 20:

Please consider the use of green swales or bioswales to capture storm runoff from the parking Jot.

Response: The Applicant acknowledges the comment and will implement Low Impact Development (LID) measures to the greatest extent practicable.

Comment No. 21:

Because the area consists primarily of sand, provide a geotechnical report in the Final EA so that it is possible to assess site stability

Response:

The Applicant has prepared a geotechnical report for the project site and it concluded that the site may be developed for the proposed project. The Applicant also intends to utilize slope stabilization materials to the greatest extent practicable. The report will be included in the Final EA.

Comment No. 22:

For the Final EA, existing water capacity consumption and conservation methods should be evaluated.

Response:

The landscape design will utilize water-efficient drip irrigation in areas of shrub & groundcover and utilize water-efficient spray equipment in areas of lawn. Plant selection will be appropriate for the climate and many plant species will be drought-tolerant. The Applicant will also implement the use of low-flow plumbing fixtures within the project.

Additionally, the Applicant and its design team are in coordination with the Department of Water Supply regarding water infrastructure requirements for the project.

Comment No. 23:

Please also consider the use of non-potable water for irrigation. Consider incorporating rainwater harvesting systems into each building to irrigate site landscaping where possible.

Response: The use of non-potable water features such as rainwater harvesting systems for irrigation will be evaluated and incorporated as practicable and feasible.

Comment No. 24:

Overhead utility lines should be placed underground as much as practicable.

Response: The Applicant acknowledges the comment. Service to the site will be via the existing overhead utilities. Within the site, utilities will be placed underground.

Comment No. 25:

For the Final EA, please include colored renderings. It would be beneficial to envision what the development would look like once built.

Response: The Applicant will work with the development team to develop colored elevation

renderings to be included in the Final EA.

Comment No. 26:

For the Final EA, please update the project financing section. It says that the award of a bond, State Rental Housing Revolving Fund and Low-Income Housing Tax Credit is anticipated in September 2021.

Response: The Applicant will update this section to read "September 2022".

Comment No. 27:

The project is proposed to provide rental housing for residents earning 60 percent or less of the Area Median Income (AMI); however, there was no income group distribution provided, as per MCC 2.96.040(C). For the Final EA, please include this information.

Response: The Applicant acknowledges the comment and will include the income group distribution information in the Final EA.

Comment No. 28:

In the Final EA, please indicate that more recently the property was planted with dry land taro. Maui Economic Opportunity had a volunteer program that worked the land. Please indicate what will happen to this farming activity.

Response:

According to Maui Economic Opportunity, the nonprofit was planting taro and other plants when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves.

Comment No. 29:

For the Final EA, in the Socio-Economic section, please provide housing demand numbers by income group. Also state approximately how many construction jobs will be generated to work on the project and indicate whether local construction labor will be employed.

Response:

The Applicant acknowledges the comment regarding housing demand numbers and local construction labor and will incorporate this information into the Final EA, as available. It is noted, though, that 1,721 units (ownership and rental units) are needed for U.S. Housing and Urban Development (HUD) incomes of less than 30 percent, 777 are needed for 30 to 50 percent and 492 are needed for 50 to 60 percent for the island of Maui by the year 2025 (Hawai'i Housing Planning Study, 2019). Local union labor will be employed and it is estimated the project will create approximately 50 construction jobs.

Comment No. 30:

In the Draft EA, there is a land ownership section, but there is only the lease agreement. For the Final EA, please include a copy of the title document.

Response:

The land ownership section was included in the (draft) Ch. 2.97 Application submitted concurrently with the Draft EA to the Department of Planning. A copy of the title document will be included within the appropriate section of the final Ch. 2.97 Application for the Department's review.

Comment No. 31:

In the lease agreement between the landowner and Applicant, under the 'Grant of Option' section, 1 c., it says, "The Optionee shall use or cause the Premises to be used for the purpose of developing, construction, operating and maintaining the following: (a) a multifamily rental housing project consisting of approximately 120 number of units (including 1 manager's unit) known as Hale Mahaolu Ke Kahua." The Draft EA does not mention the manager's unit in the project scope, or show it on the plans. An onsite manager would be beneficial to help monitor the area for security purposes. For the Final EA, please disclose whether there will be a unit and show the location.

Response:

The Applicant and development team agree that an onsite manager will greatly enhance the resident experience at Hale Mahaolu Ke Kahua. As such, a manager's unit will be provided onsite. The exact location of this unit has not yet been selected, but is anticipated to be in a central location to serve residents most efficiently.

Comment No. 32:

Under 'Project Time Schedule and Costs,' it says that the project is estimated to be completed in 16 months. For the Final EA, please provide more detailed construction timing information, such as whether the project will be built in a single phase, around when the Applicant plans to initiate construction and by when construction will be completed.

Response: The Applicant is targeting to start construction in Q1/Q2 2023. The project will be built in a single phase, with completion targeted around Q3 2024.

Comment No. 33:

For the Final EA, please add to the 'Alternatives' section. Did the landowner consider other density alternatives, such as perhaps single-family residential homes, duplexes or townhomes?

Response:

A variety of alternative designs and uses were considered for the project site. While all the uses mentioned are needed on Maui, the site's challenging configuration quickly made it clear that no use other than multifamily rentals would be able to achieve the density needed to make a significant dent in Maui's affordable housing crisis. Multifamily rentals also allow the development team to leverage the most substantial sources of non-county resources, including tax-exempt bonds, low

> income housing tax credits (federal and state), and state Rental Housing Revolving Funds. The Final EA will include this information in the Alternatives chapter.

Comment No. 34:

In Appendices J-2 and J-3, some policies are listed and checked when they do not seem to be applicable. For the Final EA, please ensure the correct boxes are checked.

Response: The Applicant notes the comment and will revise Appendices J-2 and J-3, as appropriate.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC. 352

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc.

Lena Tamashiro, Design Partners, Inc.

Debbie Cabebe, Maui Economic Opportunity, Inc.

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MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

> JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

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

October 13, 2021

Mr. Monte Heaton Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248

Dear Mr. Heaton:

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL

ASSESSMENT FOR THE PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY,

WAIEHU, MAUI, HAWAII; TMK: (2) 3-3-001:106

(EAC 2021/0006)

At its regular meeting held on **October 5, 2021**, the Urban Design Review Board (UDRB) reviewed the plans for the document referenced above. Based upon those discussions and questions to the Applicant and its consultants, the UDRB voted to recommend approval of the project, as presented.

Overall, the UDRB agrees that this is a good project and they were unanimous in their support of the project, the scope and amenities that it will offer to the community. It supports the need of the Maui community for affordable housing, and the applicant is commended for offering it at the rates proposed, which are impressive. The project is not only aesthetically pleasing; but, there is a sensitivity to both affordability and consideration of quality of life, and they appreciated the opportunity to review the project.

The UDRB also issued design-related comments and recommendations, as stated below:

- 1) Enlarge the lanai on the two bedroom units so that it has just as large a space as the one and three-bedroom units.
- 2) Consider the use of cool roof technology, specifically the Solaris product, so that it is cooler for the residents and there is a reduction in electric costs.
- 3) Ensure that there is bicycle storage within the complex.

Mr. Monte Heaton October 13, 2021 Page 2

- 4) Landscape buffer along the highway frontage to soften the edge of the project because people are accustomed to seeing that area as farm. Also, it will help visually screen the area from residents so that they are not seeing vehicles passing by, and to help attenuate noise to the ground floor units.
- 5) Factor in offsite runoff into drainage improvements. Currently, there is a lot of storm water runoff from the south, on the other side of the highway that flows across the highway through the project site.
- 7) Consider the proximity of the driveway nearest the intersection of Kahekili Highway and Waiehu Beach Road and whether there is an adequate distance from that egress point to Waiehu Beach Road for project design. Add in the left turn storage lane into the middle driveway, where left and right turns are allowed.
- 8) Add windows to front elevations, particularly above sinks, for increased ventilation, where possible.
- 9) Work to install a bus stop for connectivity because the site is remote.
- 10) Vehicles travel along Kahekili Highway at high speeds, so increase safety along the highway by adding speed tables.
- 11) Erosion control in the back is of concern because there is sand, and we recommend that you work with your geotechnical engineers to ensure that it is addressed to prevent the undercutting of the buildings and stabilize the project site.
- We like the color palette, as it blends into the natural beauty of the surrounding environs.

Thank you for your cooperation. Should you require further clarification, please contact Staff Planner Tara Furukawa by email at tara.furukawa@mauicounty.gov or by phone at (808) 270-7520.

Sincerely,

to CARYL HITCHCOCK-SPRINZEL, Chair Maui Urban Design Review Board

Mr. Monte Heaton October 13, 2021 Page 3

Copy to: Clayton I. Yoshida, Planning Program Administrator (PDF)

Tara K. Furukawa, Staff Planner (PDF)

Lori Tsuhako, Department of Housing and Human Concerns (PDF)

Monte Heaton, Waiehu Housing, LP (PDF Moe Mohanna, Highridge Costa (PDF) Harrison Herzberg, Highridge Costa (PDF)

Mark Roy, Munekiyo Hiraga (PDF) Chris Sugidono, Munekiyo Hiraga (PDF)

Leilani Ramoran-Quemado, Secretary to Boards and Commissions (PDF)

Maui Planning Commission (PDF)

Carolyn Takayama-Corden, Secretary to Boards and Commissions (PDF)

Project File

CHS:TKF:rma

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Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Caryl Hitchcock-Sprinzel, Chair County of Maui Department of Planning Maui Urban Design Review Board 2200 Main Street, Suite 315 Wailuku, Maui, HI 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Hitchcock-Sprinzel:

Thank you for your comment letter dated October 13, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

Overall, the UDRB agrees that this is a good project and they were unanimous in their support of the project, the scope and amenities that it will offer to the community. It supports the need of the Maui community for affordable housing, and the applicant is commended for offering it at the rates proposed, which are impressive. The project is not only aesthetically pleasing; but, there is a sensitivity to both affordability and consideration of quality of life, and they appreciated the opportunity to review the project.

Response: The Applicant appreciates the UDRB's comment and unanimous support for the project.

Comment No. 2:

1) Enlarge the lanai on the two bedroom units so that it has just as large a space as the one and three-bedroom units.

Response: The Applicant acknowledges the comment and will do its best to provide equally sized lanais for each unit, as feasible.

Comment No. 3:

2) Consider the use of cool roof technology, specifically the Solaris product, so that it is cooler for the residents and there is a reduction in electric costs.

Response:

The Applicant acknowledges the comment and will work with the development team to determine what energy efficient and sustainable features will be included in the project.

Comment No. 4:

3) Ensure that there is bicycle storage within the complex.

Response:

The Applicant acknowledges the comment and will work with the development team to provide bicycle storage within the project.

Comment No. 5:

4) Landscape buffer along the highway frontage to soften the edge of the project because people are accustomed to seeing that area as farm. Also, it will help visually screen the area from residents so that they are not seeing vehicles passing by, and to help attenuate noise to the ground floor units.

Response:

The Applicant will provide a greenway buffer along Kahekili Highway to help visually screen the property and to help with noise attenuation.

Comment No. 6:

5) Factor in offsite runoff into drainage improvements. Currently, there is a lot of storm water runoff from the south, on the other side of the highway that flows across the highway through the project site.

Response:

The Applicant acknowledges the comment and will comply with the County's drainage rules. Offsite flows to the property will be further analyzed as construction-level plans are developed.

Comment No. 7:

7) Consider the proximity of the driveway nearest the intersection of Kahekili Highway and Waiehu Beach Road and whether there is an adequate distance from that egress point to Waiehu Beach Road for project design. Add in the left turn storage lane into the middle driveway, where left and right turns are allowed.

Response:

The Applicant proposes to restrict the northernmost and southernmost accesses to right-in, right-out (RIRO) only, and maintain full access at the middle intersection to allow both left and right turns entering and exiting the project. All intersections will be designed to County standards. The County Department of Public Works (DPW) was acceptable to this access plan based on previous meetings.

Comment No. 8:

8) Add windows to front elevations, particularly above sinks, for increased ventilation, where possible.

Caryl Hitchcock-Sprinzel, Chair June 1, 2022 Page 3

Response: The Applicant will add windows as appropriate to maximize ventilation within the

units.

Comment No. 9:

9) Work to install a bus stop for connectivity because the site is remote.

Response: The Applicant and development team is coordinating with County Department of Transportation to determine the feasibility of providing a bus stop within or near

the project vicinity.

Comment No. 10:

10) Vehicles travel along Kahekili Highway at high speeds, so increase safety along the highway by adding speed tables.

Response:

The Applicant and development team has been in coordination with the State of Hawai'i Department of Transportation (HDOT) and DPW to determine if traffic calming measures are appropriate in this area. In lieu of any traffic calming measures, enforcement of speeds along Kahekili Highway will encourage adherence to posted speed limit signs.

Comment No. 11:

11) Erosion control in the back is of concern because there is sand, and we recommend that you work with your geotechnical engineers to ensure that it is addressed to prevent the undercutting of the buildings and stabilize the project site.

Response: The Applicant has prepared a geotechnical report for the project site, which will be included in the Final EA. The Applicant also intends to utilize slope stabilization materials to the greatest extent practicable.

Comment No. 12:

12) We like the color palette, as it blends into the natural beauty of the surrounding environs

Response: The Applicant acknowledges and appreciates the comment.

Caryl Hitchcock-Sprinzel, Chair June 1, 2022 Page 4

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC. ST

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc.

Lena Tamashiro, Design Partners, Inc.
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MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

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

November 9, 2021

Mr. Monte Heaton Waiehu Housing, LP 330 West Victoria Street Gardena, California 90248

Dear Mr. Heaton:

SUBJECT: MAUI PLANNING COMMISSION (MPC) COMMENTS ON DRAFT

ENVIRONMENTAL ASSESSMENT (EA) PREPARED FOR THE PROPOSED HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY, LOCATED IN WAILUKU, ISLAND OF

MAUI, HAWAII; TMK: (2) 3-3-001:106 (EAC 2021/0006)

At the October 26, 2021 meeting of the Maui Planning Commission (Commission), the Commission reviewed the above-referenced project. They voted unanimously in favor of the project. After due consideration and discussion, the Commission had the following recommendations for the Final EA:

- The project looked great and we are supportive, assuming the title issues are resolved.
- 2) Find a way to call out information on maps so that it is easier to understand without having to look them up in other places.
- Discuss drainage mitigation in more detail. There is flooding in the northernmost part of the parcel, so better evaluate it because we would not want to see homes flooded.
- 4) Disclose perimeter fence locations, particularly around the swale.
- 5) We appreciated the lists of people consulted with for cultural impacts.
- 6) There is a bus route nearby and please address how people will travel to the bus stop.
- 7) Incorporate more native species into your landscape plan. Look at native plants documented as having grown in that area and incorporate that into your plants and replace the non-natives. There is good dirt back there and Hawaiian plants will have the water and the nutrients they are meant to have.
- 8) Research the history of the Piihana Project District and explain it in more detail.

- 9) Coordinate better with the project on the other side of the highway on ingress/egress.
- 10) For the clubhouse, keep in mind that more parking is needed for events for Hawaiian style celebrations.
- 11) We like the community-driven activities for residents, such as the community gardening concept.
- 12) We are concerned with the speed of traffic along Kahekili Highway and think you should consider adding a landscape buffer along the property frontage.
- We are also concerned about how busy traffic is during the work/school drop off/pick up times, so that needs to be evaluated. Even if there will be traffic impacts, we are supportive of working class people obtaining houses.
- 14) It rains in the afternoons, so extend the awnings or eaves so that the rain does not affect homes/residents.
- 15) Research and address ongoing cultural practices occurring onsite.

If you have any questions, please contact Staff Planner Tara Furukawa by email at tara.furukawa@mauicounty.gov or by phone at (808) 270-8205.

Sincerely,

Mullulu

MICHELE MCLEAN, AICP

Planning Director

xc: Clayton I. Yoshida, Planning Program Administrator (PDF)

Jacky Takakura, Acting Planning Program Administrator (PDF)

Tara K. Furukawa, Staff Planner (PDF)

Lori Tsuhako, Director, Department of Housing and Human Concerns (PDF)

Chris Sugidono, Senior Associate, Munekiyo Hiraga (PDF)

Mark Roy, Vice President, Munekiyo Hiraga (PDF)

Members of the Maui Planning Commission (PDF)

Carolyn Takayama-Corden, Secretary, Maui Planning Commission (PDF)

Project File

MCM:TKF:lp

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Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Michele Chouteau McLean, Director County of Maui Department of Planning Maui Planning Commission 2200 Main Street, Suite 315 Wailuku, HI 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Ms. McLean:

Thank you for your comment letter dated November 9, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

In At the October 26, 2021 meeting of the Maui Planning Commission (Commission), the Commission reviewed the above-referenced project. They voted unanimously in favor of the project. After due consideration and discussion, the Commission had the following recommendations for the Final EA:

Response:

The Applicant acknowledges the comment and appreciates the Maui Planning Commission's unanimous vote in favor of this project.

Comment No. 2:

The project looked great and we are supportive, assuming the title issues are resolved.

Response:

According to Maui Economic Opportunity, Inc. (MEO), the nonprofit has clear title to the land and the deeds, which is confirmed by the County of Maui's previous subdivision of the property. The persons identifying themselves as the Heirs of Pehuino have made clear that they claim interests in only Land Commission Award (LCA) No. 3386. LCA No. 3386, Apanas 1, 2, and 3 are located nearly a mile away and were never part of the MEO property. This too is confirmed by historic deeds, LCA awards, and County records.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Comment No. 3:

Find a way to call out information on maps so that it is easier to understand without having to look them up in other places.

Response: The Applicant acknowledges the comment and will update specific maps, as appropriate.

Comment No. 4:

Discuss drainage mitigation in more detail. There is flooding in the northernmost part of the parcel, so better evaluate it because we would not want to see homes flooded.

Response:

The Applicant acknowledges the comment. It is our understanding that trash and debris blocking the culvert has previously caused drainage issues at Kahekili Highway and Waiehu Beach Road. The Hawai'i Department of Transportation (HDOT) subsequently cleared the trash and debris from the culvert, which mitigated the issue. This project will be designed to meet the County's drainage rules and storm water quality rules. An updated Preliminary Engineering Report is being prepared and will be included in the Final EA for the project.

Comment No. 5:

Disclose perimeter fence locations, particularly around the swale.

Response: The Applicant acknowledges the comment

The Applicant acknowledges the comment and will label the fence locations on the conceptual site plan.

Comment No. 6:

We appreciated the lists of people consulted with for cultural impacts.

Response: The Applicant acknowledges and appreciates the comment.

Comment No. 7:

There is a bus route nearby and please address how people will travel to the bus stop.

Response:

The Applicant and development team is coordinating with the County Department of Transportation to determine the feasibility of providing a bus stop within or near the project vicinity. The Applicant will also maintain shoulder space along the project's frontage on Kahekili Highway.

Comment No. 8:

Incorporate more native species into your landscape plan. Look at native plants documented as having grown in that area and incorporate that into your plants and replace the non-natives. There is good dirt back there and Hawaiian plants will have the water and the nutrients they are meant to have.

Response: A Conceptual Landscape Plan will be included in the Final EA. The plant palette

will include drought-tolerant native plants. Native Hawaiian plant species will

include those indigenous to the habitat within the vicinity of the project.

Comment No. 9:

Research the history of the Piihana Project District and explain it in more detail.

Response: The Applicant acknowledges the comment and will provide more information on

the history of the Pi'ihana Project District in the Final EA.

Comment No. 10:

Coordinate better with the project on the other side of the highway on ingress/egress.

Response: Thank you for this comment. The development mauka of Kahekili Highway is

aware that their accesses will need to be coordinated with the accesses for the

Hale Mahaolu Ke Kahua Affordable Housing Community.

Comment No. 11:

For the clubhouse, keep in mind that more parking is needed for events for Hawaiian style celebrations.

Response:

The Applicant will work with the development team and make every effort to provide as much parking as possible and as appropriate for the project. As the property managers for the eventual housing community, Hale Mahaolu will also manage onsite parking needs between residents, the nonprofit building and clubhouse.

Comment No. 12:

We like the community-driven activities for residents, such as the community gardening concept.

Response: The Applicant acknowledges the comment and will consider implementing community-driven activities for residents, as feasible.

Comment No. 13:

We are concerned with the speed of traffic along Kahekili Highway and think you should consider adding a landscape buffer along the property frontage.

Response:

A landscape buffer planting will be installed along the frontage of the property with Kahekili Highway to help visually screen the property and to help with noise attenuation.

Comment No. 14:

We are also concerned about how busy traffic is during the work/school drop off/pick up times, so that needs to be evaluated. Even if there will be traffic impacts, we are supportive of working class people obtaining houses.

Response:

The Applicant proposes to provide 120 units of multi-family affordable housing units and a small nonprofit building, which is anticipated to generate 64(79) trips during the AM(PM) peak hour, and will account for only approximately 3-5 percent of traffic on Kahekili Highway and Waiehu Beach Road.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and the Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area based on the potential impacts that are expected to be generated by the project.

Comment No. 15:

It rains in the afternoons, so extend the awnings or eaves so that the rain does not affect homes/residents.

Response:

Roof eaves and awnings will be provided as appropriate and determined by the development team.

Comment No. 16:

Research and address ongoing cultural practices occurring onsite.

Response:

The EA process included the preparation of a Cultural Impact Assessment (CIA) that was prepared to assess the proposed project's potential effect on cultural beliefs, practices, and resources. The CIA included outreach to 73 Hawaiian organizations, agencies, and community members as well as cultural and lineal descendants in order to identify individuals with cultural expertise and/or knowledge of the project area and vicinity. Respondents included: Kumu Hōkūlani Holt-Padilla, kamaʻāina of Waiehu, Kumu Hula of Pāʻū o Hiʻiaka, and Director of Ka Hikina O Ka Lā; Kaniloa Kamaunu, kamaʻāina of Waiehu; Daniel Ornellas, kamaʻāina of Waiehu, representing Kwong Fook Tong Chinese Cemetery; and a confidential informant. No impacts to on-going cultural practices were identified within the project area during community consultation for this CIA. The project site, which is owned by Maui Economic Opportunity, Inc. (MEO), is unoccupied and there are no documented on-going cultural activities occurring on the project site.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

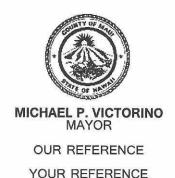
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CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Substantive Comments\MPC.res.docx



POLICE DEPARTMENT

COUNTY OF MAUI



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

CHIEF OF POLICE

DEAN M. RICKARD

DEPUTY CHIEF OF POLICE

September 28, 2021

Mr. Chris Sugidono Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Re: Draft Environmental Assessment and Maui County Code 2.97

Application for the Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK: (2) 3-3-01:106, Waiehu, Maui, Hawaii

Dear Mr. Sugidono:

This is in response to your letter dated September 21, 2021 requesting comments on the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the Hale Mahaolu Ke Kahua Affordable Housing Community.

In review of the submitted documents, we have no objections to the upcoming construction project if it meets the minimal standards set forth by county codes and state laws. If the roads will be temporarily closed for alternating traffic, we ask the project manager utilizes flag men to conduct traffic control and have proper signage posted along the routes during construction.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant John Jakubczak
for: DEAN M. RICKARD

Acting Chief of Police

Buddy Almeida, DHHC

C:



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

John Jakubczak, Assistant Chief County of Maui Police Department 55 Mahalani Street Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment and Maui County Code Chapter

2.97 Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu,

Maui, Hawai'i

Dear Assistant Chief Jakubczak:

Thank you for your comment letter dated September 28, 2021, regarding the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The proposed project will meet all minimum standards established by the Maui County Code and State laws.
- 2. Flag men and appropriate signage along construction routes will be utilized to conduct traffic control should the project result in road closures.

With the implementation of the aforementioned precaucionary measures, we acknowledge that the Maui County Police Department has no objections to the poposed project. We appreciate your input and will include a copy of your comment letter and

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

John Jakubczak, Assistant Chief June 1, 2022 Page 2

this response in the Final EA, as well as the Chapter 2.97 application that will go to the Maui County Council for approval. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC - 35

CEJS:Ih

Grant Chun, Hale Mahaolu CC:

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Police.res.doc

MICHAEL P. VICTORINO Mayor ROWENA M. DAGDAG-ANDAYA Director

> JORDAN MOLINA Deputy Director

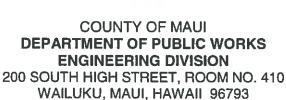
WADE SHIMABUKURO, P.E. Development Services Administration

RODRIGO "CHICO" R. RABARA, P.E. Engineering Division

JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7745 Fax: (808) 270-6267







DSA PLAN & CZM REVIEWS

DATE:

October 7, 2021

SUBJECT:

Hale Mahaolu Ke Kahua Affordable Housing Community

Wailuku, Maui

TMK: (2) 3-3-001:106

ATTACHMENTS:

Front covers (Volumes I & II) of application for Chapter 2.97.

FILEPATH:

K/DSA/Digital Files/TMK3/33001106 Hale Mahaolu....

Section	No	Yes (See notes on submittals)	Initials	Date
Survey	п	n 🖷		
Traffic	T1	N	7	11/4/2
Drainage	(1	×	W	10/19/21
Chief	X	В	In	11/5/2

MICHAEL P. VICTORINO Mayor

ROWENA M. DAGDAG-ANDAYA Director

> JORDAN MOLINA Deputy Director

WADE SHIMABUKURO, P.E. Development Services Administration

RODRIGO "CHICO" RABARA, P.E. Engineering Division

> JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7745 Fax: (808) 270-6267



Lugar



COUNTY OF MAUI DEPARTMENT OF PUBLIC WORKS ENGINEERING DIVISION

200 SOUTH HIGH STREET, ROOM 410 WAILUKU, MAUI, HAWAII 96793

Noveber 5, 2021

Project Name: Hale Mahaolu Ke Kahua Affordable Housing

TMK: (2) 3-3-001: 106

Engineering Services Comments:

- 1. Provide a roadway widening lot along frontage to accommodate an ultimate section consisting of 11' travel lanes, turn lane, bike lanes, and six foot sidewalks.
- 2. Design and construct a six foot sidewalk, bike lane, and turn lanes into the project on the adjacent half of Kahekili Highway.
- 3. We object to the request for an exemption from providing sidewalks along the Kahekili Highway frontage.

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MICHAEL P. VICTORINO Mayor

ROWENA M, DAGDAG-ANDAYA
Director

JORDAN MOLINA Deputy Director

WADE SHIMABUKURO, P.E. Development Services Administration

RODRIGO "CHICO" RABARA, P.E. Engineering Division

> JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7745 Fax: (808) 270-6267





COUNTY OF MAUI DEPARTMENT OF PUBLIC WORKS ENGINEERING DIVISION

200 SOUTH HIGH STREET, ROOM NO. 410 WAILUKU, MAUI, HAWAII 96793

October 19, 2021

CHAPTER 2.97 APPLICATION REVIEW

Project Name: HALE MAHAOLU KE KAHUA AFFORDABLE HOUSING COMMUNITY

Site Address: TMK: (2) 3-3-001:106

Design Section Review Comments:

- 1. Upon submittal of the drainage report, please ensure compliance with the following:
 - Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui"
 - Title MC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"
 - Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control"
- 2. The project drainage report should demonstrate that post-development discharge will not adversely affect downstream properties and conveyances. Provide analysis of pre-developed and post-developed conditions for discharge locations along the property line, and describe in terms of quantity, quality, and form.
- The project drainage report should discuss how offsite runoff enters the site. Please note that
 the recurrence interval is based on the drainage area and not the developed area. Review the
 drainage area contributing to the project site and select the criteria and design methodology
 accordingly.
- 4. Please provide the following information with the project drainage report:
 - Hydraulic grade lines on drainline profiles
 - · Backwater calculations, if applicable
 - Calculations for sizing of drainlines and drainage structures
 - Post development hydrology and hydraulic calculations to show adequate capacity of the existing drainageway along the eastern boundary in relation to the proposed development

If you have any questions regarding the above comments, please contact Wendy Kobashigawa at 270-7745 or wendy.kobashigawa@co.maui.hi.us.



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

County of Maui Department of Public Works Engineering Division 200 South High Street, Room 410 Wailuku, HI 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Engineering Division:

Thank you for your comment letters dated October 19, 2021 and November 5, 2021, regarding the Draft Environmental Assessment (EA) (Draft) Chapter 2.97, Maui County Code (MCC) Application for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Engineering Services

Comment No. 1:

Provide a roadway widening lot along frontage to accommodate an ultimate section consisting of 11' travel lanes, turn lane, bike lanes, and six foot sidewalks.

Response:

Due to the configuration, site constraints and geometry of the parcel, the requirement to provide a road widening lot along Kahekili Highway will significantly impact the feasibility for development of the parcel. The approximately 21 feet needed to accommodate the turn lanes, bike lanes and sidewalks would change the character of the proposed development, which will lead to a substantial reduction in affordable housing units, taller buildings, and a reduction in available parking for residents. The Applicant believes these impacts would substantially reduce the project's competitiveness for a financing award from the Hawaii Housing Finance & Development Corporation.

Comment No. 2:

Design and construct a six foot sidewalk, bike lane, and turn lanes into the project on the adjacent half of Kahekili Highway.

Response:

Northbound right-turn lanes into the Project are planned to be provided at the North and South Access points, and a southbound left-turn lane into the Project is planned to be provided at the Central Access. At the Central Access, a northbound right-turn lane, six-foot sidewalk, and bike lanes cannot all be accommodated without a redesign of the Project site plan. As mentioned above, these additions would change the

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

character of the proposed development and lead to a substantial reduction in affordable housing units, taller buildings, and a reduction in available parking for residents. The Applicant believes these impacts would render the project uncompetitive in its financing applications

Comment No. 3:

We object to the request for an exemption from providing sidewalks along the Kahekili Highway frontage.

Response:

The Applicant acknowledges the Department's comment. As the Department is aware, this affordable housing project is utilizing the Maui County Code (MCC), Chapter 2.97 "Fast track permitting" process, which allows for the exemption from constructing sidewalks. Due to the narrow constraints of the project site, this exemption allows the Applicant to avoid reducing the number of available affordable housing units and parking stalls for future residents. The exemption also ensures that the project remains financially feasible. It should be noted that there are no adjacent developments for sidewalk connection.

Design Section Review

Comment No. 1:

Upon submittal of the drainage report, please ensure compliance with the following:

- Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui"
- Title MC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"
- Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control"

Response: The Applicant acknowledges the comment and will comply with the aforement tioned County rules and regulations.

Comment No. 2:

The project drainage report should demonstrate that post-development discharge will not adversely affect downstream properties and conveyances. Provide analysis of pre-developed and post-developed conditions for discharge locations along the property line, and describe in terms of quantity, quality, and form.

Response:

The Applicant acknowledges the comment and notes that the proposed project's post-development discharge will not adversely affect downstream properties and conveyances. The Applicant will further address this comment as part of the building permit process.

Comment No. 3:

The project drainage report should discuss how offsite runoff enters the site. Please note that the recurrence interval is based on the drainage area and not the developed area. Review the drainage area contributing to the project site and select the criteria and design methodology accordingly.

Engineering Division June 1, 2022 Page 3

Response:

The Applicant acknowledges the comment and has provided a revised Preliminary Engineering Report, which addresses drainage, in the proposed project's Final Environmental Assessment. The Applicant will further address this comment as part of the building permit process.

Comment No. 4:

Please provide the following information with the project drainage report:

- Hydraulic grade lines on drainline profiles
- Backwater calculations, if applicable
- Calculations for sizing of drainlines and drainage structures
- Post development hydrology and hydraulic calculations to show adequate capacity of the existing drainageway along the eastern boundary in relation to the proposed development

Response: The Applicant and its engineer acknowledges the comment and will further address it as part of the building permit process.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC - 352

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun. Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa

Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc.

Lena Tamashiro, Design Partners, Inc.

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MICHAEL P. VICTORINO Mayor

MARC I. TAKAMORI Director







DEPARTMENT OF TRANSPORTATION

COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793

> TELEPHONE: (808) 270-7511 FAX: (808) 270-7505

> > October 28, 2021

Mr. Buddy Almeida, Housing Administrator County of Maui, Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Maui, HI 96793

Email: Buddy.Alemeida@co.maui.hi.us

Mr. Chris Sugidono Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

Email: planning@munekiyohiraga.com

SUBJECT: Draft Environmental Assessment and Maui County Code 2.97 Application for the Hale

Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu,

Maui, Hawaii

Dear Mr. Almeida,

Thank you for the opportunity to review and comment on this project. We have no comments to make at this time.

Please feel free to contact me if you have any questions.

Sincerely,

Marc Takamori Director

cc: Chris Sugidono, Munekiyo Hiraga



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

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

SUBJECT: Draft Environmental Assessment and Maui County Code Chapter 2.97

Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing

Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Mr. Takamori:

Thank you for your comment letter dated October 28, 2021, regarding the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the subject project. On behalf of the Applicant, we acknowledge that the County of Maui Department of Transportation has no comments to offer at this time.

We appreciate your input and a copy of your comment letter and this response will be incorporated into the Final EA, as well as the Chapter 2.97 application that will go to the Maui County Council for approval. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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MICHAEL P. VICTORINO Mayor

JEFFREY T. PEARSON, P.E.
Director
HELENE KAU
Deputy Director





DEPARTMENT OF WATER SUPPLY

COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI`I 96793

www.mauicounty.gov/water

October 25, 2021

Mr. Chris Sugidono, Senior Associate Munekiyo HIraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793

Re: Hale Mahaolu Ke Kahua Affordable Housing Community Draft Environmental

Assessment (DEA) TMK: (2)-3-3-001:106

Dear Mr. Sugidono:

The County of Maui Department of Water Supply's (MDWS) Water Resources and Planning Division appreciates the opportunity to comment on the proposed Hale Mahaolu Ke Kahua Affordable Housing Community Draft Environmental Assessment DEA. The MDWS Engineering Division submitted a letter on December 31, 2020 (please see attachment).

Water Source

According to the Commission on Water Resource Management, the project overlies the 'lao Aquifer, which has a sustainable yield of 20 million gallons per day (gpd).

Draft Maui Island Water Use and Development Plan (WUDP)

The table below describes how the Hale Mahaolu Ke Kahua Affordable Housing Community Project may align with various Strategies of the Draft Maui Island WUDP.

Potential Project Alignment with the Draft Maui Island WUDP

WUDP Strategy	WUDP Planning Objective	WUDP Strategy Type, Strategy #			
Reduce non-potable use of Wailuku Aquifer Sector basal and	1. Maximize water quality	Wailuku ASEA			
high level water to the extent feasible.	2. Manage water equitably	Conventional Water			

WUDP Strategy	WUDP Planning Objective	WUDP Strategy
		Type, Strategy #
	3. Maintain consistency with General	Resource Strategy,
	and Community Plans	#6
The Maui Island WUDP focuses on specific projects with a	1. Minimize adverse environmental	WUDP Addendum,
strategy to explore stormwater drainage to supplement	impacts	Wailuku ASEA,
irrigation sources in Central Maui.	2. Maximize efficiency of water use	Alternative Water
	3. Maintain sustainable resources	Source Strategy #10
Consider alternative sources of irrigation water including	1. Maintain sustainable resources	Central ASEA
wastewater reuse, recycled stormwater runoff, and brackish well	2. Protect and restore streams	Conventional Water
water in land use permitting to mitigate low-flow stream	3. Minimize adverse environmental	Resource Strategy,
conditions. Require alternative sources for irrigation when	impacts	#8
reasonably available in county discretionary land use permitting.	4. Maximize efficiency of water use	
	5. Maintain consistency with General	
	and Community Plans	

Construction Best Management Practices (BMPs) for Pollution Prevention

To protect ground and surface water resources, we recommend that in addition to required BMPs the following measures designed to minimize infiltration and runoff be implemented during construction:

- Dust Control: reclaimed water for dust control is available from the Kahului Wastewater Treatment Plant at a reasonable cost. If feasible, it should be considered as an alternative source of water for dust control during construction.
- Replanting of denuded areas should include soil amendments and temporary irrigation. Use high seeding rates to ensure rapid establishment of stands of plants.
- Maintain vehicles and equipment to prevent oil or other fluids from leaking. Concrete trucks and tools used for construction should be rinsed off-site.
- Properly install and maintain erosion control barriers such as silt fencing or straw bales.
- Keep runoff on-site.

Conservation BMPs

Indoor

- Use 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

- Use Smart Approved WaterMark irrigation products. Examples include evapotranspiration irrigation controllers, drip irrigation, and water saving spray heads.
- After plants are established, in order to avoid stimulating excessive growth, avoid fertilizing and pruning. Time watering to occur in the early morning or evening to limit evaporation. Limit the use of turf.
- Use native Hawaiian climate-adapted plants for landscaping. Native Hawaiian plants adapted to the area conserve water and protect the watershed from degradation due to

3 | Page

invasive species.

• We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawai`i.

We hope you find this information useful. Should you have any questions, please contact staff planner Alex Buttaro at (808) 463-3103 or alex.buttaro@mauicounty.gov.

Sincerely,

Jeffrey T Pearson, P.E.

Director BAB

Cc: MDWS Engineering

Attachment: December 31, 2020 MDWS Engineering Letter

File located at: S:\PLANNING\Permit_Review\Projects Review\planning review\EA-EIS\233001106 Hale Mahaolu Ke Kahua Affordable DEA



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Jeffrey T. Pearson, P.E., Director County of Maui Department of Water Supply 200 South High Street Wailuku, Hawaii 96793

SUBJECT: Draft Environmental Assessment and Maui County Code Chapter

2.97 Application for the Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu,

Maui, Hawai'i

Dear Mr. Pearson:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant acknowledges that the project site overlies the 'Īao Aquifer and has a sustainable yield of 20 million gallons per day, according to the Commission on Water Resource Management.
- The Applicant appreciates receiving the Draft Maui Island Water Use and Development Plan (WUDP) strategies that have the potential to be implemented in the project. These strategies have been shared with the engineering and design team for consideration and incorporation into the proposed project as applicable.
- 3. The Applicant acknowledges receipt of the Construction Best Management Practices (BMPs) for Pollution prevention. These BMPs have been forwarded to

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Jeffrey T. Pearson, P.E., Director June 1, 2022 Page 2

the project team for review and incorporation into the project as feasible.

4. The Applicant acknowledges receipt of the indoor and outdoor Water Conservation BMPs, which have been forwarded to the project team for review and incorporation into the project as feasible.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA, as well as the Chapter 2.97 application that will go to the Maui County Council for approval. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC. 352

Chris Sugidono Senior Associate

CEJS:Ih

Grant Chun, Hale Mahaolu CC: Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Lena Tamashiro, Design Partners Inc. Ashley Otomo, Otomo Engineering Inc.

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MICHAEL P. VICTORINO Mavor

JEFFREY T. PEARSON, P.E. Director

HELENE KAU

Deputy Director





DEPARTMENT OF WATER SUPPLY **COUNTY OF MAUI** 200 SOUTH HIGH STREET

WAILUKU, MAUI, HAWAI'I 96793

October 21, 2021

Mr. Buddy Almeida, Housing Administrator

DEPARTMENT OF HOUSING AND HUMAN CONCERNS

via email: buddy.almeida@co.maui.hi.us

Dear Mr. Almeida:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) AND MAUI COUNTY CODE 2.97

APPLICATION FOR THE HALE MAHAOLU KE KAHUA AFFORDABLE

HOUSING COMMUNITY

TMK: (2) 3-3-001:106, Waiehu, Maui, Hawaii

Thank you for the opportunity to review and comment on the subject project, which includes the construction of 120 multi-family residential affordable housing units, 3,477 square foot non-profit building, a 3,231 square foot club house, landscaping, and related improvements.

As defined in Maui County Code (MCC) 14.01.040, subdivisions are also defined as "the construction of a building or group of buildings, other than a hotel, on a single lot, parcel, or site which will contain, result, or be divided into four or more dwelling units." Since the project is proposing 120 multi-family residential affordable housing units, the project is defined as a subdivision and shall be subject to subdivision requirements as indicated in MCC 14.05 and the Department's standards to provide an adequate water system for fire protection, domestic and irrigation service. Requirements include, but are not limited to the following:

- The project shall meet the criteria for water service outlined in the Administrative Rules (Title 16, Chapter 201). The Administrative Rules clarify large quantity of water usage and the tiers for an applicant's request for new or additional water service from the Department. The 2021 Central Maui water system currently allows an applicant to request up to 5,400 gpd of new or additional water service for a parcel. Since the project is proposing a residential development project comprised of 100% residential workforce housing units, as defined in MCC 2.96.020. the project shall meet the exception to the Administrative Rules, as long as, a copy of an executed, recorded, and valid residential workforce housing agreement between the developer and the County is provided to the Department.
 - Please be advised that the proposed non-profit building and club house may not qualify for this exemption.
 - Throughout the Draft EA and Application, the water demand for the project was estimated at 67,200 gallons per day (gpd). However, this calculation only accounted for the multi-family units and did not account for the non-profit building, club house,

Mr. Buddy Almeida
Draft EA and MCC 2.97 Application
Hale Mahaolu Ke Kahua Affordable Housing Community
TMK (2) 3-3-001:106
October 21, 2021
Page 2

and landscaping, which means the required water demand is greater than stated. The Draft EA and Application also mentioned an irrigation well for landscaping within the project. If this is the case, the gpd required for the proposed project would be reduced. The demand and meter size shall be reviewed during the building permit application process.

The closest well pump to the project is the Waiehu Heights Well 2 that fills the Waiehu Kou and Waiehu Heights Tanks. Waiehu Heights Well 1 has been offline since October 2012; therefore, an increase in pumping at this location is not ideal. Source for the project shall instead originate from the North Waihee system.

- The Draft EA and Application is requesting the development and use of the property in accordance with "A-1" district zoning standards. Therefore, adequate storage tank, appurtenances, and pipelines from the tank site to the project, in accordance with MCC 14.05.020 Reservoirs/storage tanks and Fire Protection Schedule within MCC 14.05.090 Fire protection, as may be amended for "A-1" zoning shall be required.
 - MCC 14.05.020 Reservoirs/storage tanks: For "A-1" districts, storage capacity shall be determined on the basis of fire flow duration, maximum daily flow, or one thousand gallons per lot, whichever basis is greater. The fire flow duration of 1,500 gallons per minute (gpm) for 2 hours governs, requiring a 200,000-gallon tank, which the existing 1,000,000-gallon North Waihee Tank is able to provide.
 - MCC 14.05.090 Fire protection: Install approximately 2,000-feet of new 8-inch waterline along Kahekili Highway with fire hydrants spaced at 250 feet. Since the proposed main extension would result in a dead-end, install a water line interconnection between the new 8-inch waterline along Kahekili Highway and the existing 8-inch waterline within Kaena Place.
- There is no existing water meter assigned to the subject property. Therefore, provide a service lateral and box from the new water main to the project in accordance with MCC 14.05.060 Laterals, as may be amended. Install a Department approved backflow prevention device on the consumer side of the water meter. A standard detail showing the typical installation and general information may be found at https://www.mauicounty.gov/DocumentCenter/View/122949/20200805-Backflow-Preventer.
- No water service shall be approved or provided by the Department until the water system improvements have been completed and accepted by the Department, in accordance with MCC 14.05.140 Installation of water service. Payment shall be made in accordance with MCC 14.07 Water System Development Fees and the applicable fees set forth in the Department's annual budget, in effect at the time of approval of water service.
 - The project is requesting an exemption from MCC 14.07 Water System Development Fees. However, there is no process for exemption from water system development fees. Therefore, these fees will be charged upon application for water meter(s). Please be aware that approval of water service will be subject to rules, regulations, and code of the department at the time water service is applied for

Mr. Buddy Almeida
Draft EA and MCC 2.97 Application
Hale Mahaolu Ke Kahua Affordable Housing Community
TMK (2) 3-3-001:106
October 21, 2021
Page 3

- The project is requesting an exemption from MCC 14.12 Water Availability based on MCC 14.12.030 Exemptions, Paragraph E, which states that the chapter shall not apply to "residential workforce housing units developed by a qualified housing provider pursuant to chapter 2.96 of this code, and are within the service area of the department's central or west Maui water system." This shall only apply if the project submits a subdivision application with Public Works.
- Prior to commencement of construction, all water system improvements require submittal of construction plans (24"x36") stamped and signed by a licensed engineer for the Department's review and approval, in accordance with MCC 14.05.120 Construction plans and Section 112 Construction Plans of the Water System Standards 2002, as may be amended. Construction work shown on the approved plans shall be completed by a licensed contractor at the property owner's expense.
- Deliver to our Department perpetual easements for all portions of the water system improvements installed in other than publicly owned right-of-ways, in accordance with MCC 14.05.170 – Ownership of installed water system improvements.
- Water system improvements may be necessary based upon the Department of Fire and Public Safety's review of the building permit application.
- Please be aware that we will be unable to approve any building permit applications until all
 water system improvements have been completed, tested, and accepted.

If you have any questions, please contact Tammy Yeh of our Engineering Division at (808) 270-7835 or at tammy.yeh@co.maui.hi.us. Engineering Division's main number is (808) 270-7835.

Sincerely,

WENDY TAOMOTO, P.E. Engineering Program Manager

 TY

cc: Chris Sugidono, MUNEKIYO HIRAGA (<u>planning@munekiyohiraga.com</u>)
DWS Water Resources Division, (water.resources@mauicounty.gov)



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

VICE PRESIDENT

June 1, 2022

Wendy Taomoto Engineering Program Manager County of Maui Department of Water Supply 200 South High Street, 5th Floor Wailuku, HI 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Ms. Taomoto:

Thank you for your comment letter dated October 21, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

As defined in Maui County Code (MCC) 14.01.040, subdivisions are also defined as "the construction of a building or group of buildings, other than a hotel, on a single lot, parcel, or site which will contain, result, or be divided into four or more dwelling units." Since the project is proposing 120 multi-family residential affordable housing units, the project is defined as a subdivision and shall be subject to subdivision requirements as indicated in MCC 14.05 and the Department's standards to provide an adequate water system for fire protection, domestic and irrigation service. Requirements include, but are not limited to the following:

Response:

The Applicant acknowledges the comment and will comply with the applicable subdivision requirements as indicated in MCC 14.05 and with the Department's standards.

Comment No. 2:

The project shall meet the criteria for water service outlined in the Administrative Rules (Title 16, Chapter 201). The Administrative Rules clarify large quantity of water usage and the tiers for an applicant's request for new or additional water service from the Department. The 2021 Central Maui water system currently allows an applicant to request up to 5,400 gpd of new or additional water service for a

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

parcel. Since the project is proposing a residential development project comprised of 100% residential workforce housing units, as defined in MCC 2.96.020, the project shall meet the exception to the Administrative Rules, as long as, a copy of an executed, recorded, and valid residential workforce housing agreement between the developer and the County is provided to the Department.

The closest well pump to the project is the Waiehu Heights Well 2 that fills the Waiehu Kou and Waiehu Heights Tanks. Waiehu Heights Well 1 has been offline since October 2012; therefore, an increase in pumping at this location is not ideal. Source for the project shall instead originate from the North Waihee system.

Response:

The Applicant acknowledges the comment and will work with the County to establish a valid residential workforce housing agreement, which will be provided to the Department. The Applicant also acknowledges the comment regarding the water source for the project.

Comment No. 3:

Please be advised that the proposed non-profit building and club house may not qualify for this exemption.

Response: The Applicant acknowledges the comment regarding the proposed nonprofit building and clubhouse.

Comment No. 4:

Throughout the Draft EA and Application, the water demand for the project was estimated at 67,200 gallons per day (gpd). However, this calculation only accounted for the multi-family units and did not account for the non-profit building, club house, and landscaping, which means the required water demand is greater than stated. The Draft EA and Application also mentioned an irrigation well for landscaping within the project. If this is the case, the gpd required for the proposed project would be reduced. The demand and meter size shall be reviewed during the building permit application process.

Response:

Thank you for your comment. The Preliminary Engineering Report will be revised to address this additional information. The Applicant acknowledges that both demand and water meter sizing will be reviewed during the building permit application process.

Comment No. 5:

The closest well pump to the project is the Waiehu Heights Well 2 that fills the Waiehu Kou and Waiehu Heights Tanks. Waiehu Heights Well 1 has been offline since October 2012; therefore, an increase in pumping at this location is not ideal. Source for the project shall instead originate from the North Waihee system.

Response: The Applicant acknowledges the comment regarding the water source for the project.

Comment No. 6:

The Draft EA and Application is requesting the development and use of the property in accordance with "A-1" district zoning standards. Therefore, adequate storage tank, appurtenances, and pipelines from the tank site to the project, in accordance with MCC 14.05.020 – Reservoirs/storage tanks and Fire Protection Schedule within MCC 14.05.090 – Fire protection, as may be amended for "A-1" zoning shall be required.

- o MCC 14.05.020 Reservoirs/storage tanks: For "A-1" districts, storage capacity shall be determined on the basis of fire flow duration, maximum daily flow, or one thousand gallons per lot, whichever basis is greater. The fire flow duration of 1,500 gallons per minute (gpm) for 2 hours governs, requiring a 200,000-gallon tank, which the existing 1,000,000-gallon North Waihee Tank is able to provide.
- o MCC 14.05.090 Fire protection: Install approximately 2,000-feet of new 8-inch waterline along Kahekili Highway with fire hydrants spaced at 250 feet. Since the proposed main extension would result in a dead-end, install a water line interconnection between the new 8-inch waterline along Kahekili Highway and the existing 8-inch waterline within Kaena Place.

Response: The Applicant acknowledges the comments regarding the district zoning standards and has passed the information to the design team for the project.

Comment No. 7:

There is no existing water meter assigned to the subject property. Therefore, provide a service lateral and box from the new water main to the project in accordance with MCC 14.05.060 – Laterals, as may be amended. Install a Department approved backflow prevention device on the consumer side of the water meter. A standard detail showing the typical installation and general information may be found at https://www.mauicounty.gov/DocumentCenter/View/122949/20200805-Backflow-Preventer.

Response: The Applicant acknowledges the comment regarding the water meter and will install a Department-approved backflow prevention device on the consumer side of the water meter.

Comment No. 8:

No water service shall be approved or provided by the Department until the water system improvements have been completed and accepted by the Department, in accordance with MCC 14.05.140 – Installation of water service. Payment shall be made in accordance with MCC 14.07 – Water System Development Fees and the applicable fees set forth in the Department's annual budget, in effect at the time of approval of water service.

The project is requesting an exemption from MCC 14.07 – Water System Development Fees. However, there is no process for exemption from water system development fees. Therefore, these fees will be charged upon application for water meter(s).

Please be aware that approval of water service will be subject to rules, regulations, and code of the department at the time water service is applied for

Response: The Applicant notes the comment regarding the Water System Development Fees.

Comment No. 9:

The project is requesting an exemption from MCC 14.12 – Water Availability based on MCC 14.12.030 – Exemptions, Paragraph E, which states that the chapter shall not apply to "residential workforce housing units developed by a qualified housing provider pursuant to chapter 2.96 of this code, and are within the service area of the department's central or west Maui water system." This shall only apply if the project submits a subdivision application with Public Works.

Response: The Applicant acknowledges the comment and confirms its pursuit of an exemption from the requirement of Chapter 14.12, MCC.

Comment No. 10:

Prior to commencement of construction, all water system improvements require submittal of construction plans (24"x36") stamped and signed by a licensed engineer for the Department's review and approval, in accordance with MCC 14.05.120 – Construction plans and Section 112 – Construction Plans of the Water System Standards 2002, as may be amended. Construction work shown on the approved plans shall be completed by a licensed contractor at the property owner's expense.

Response: The Applicant acknowledges the comment and will prepare its construction plans in accordance with applicable requirements.

Comment No. 11:

Deliver to our Department perpetual easements for all portions of the water system improvements installed in other than publicly owned right-of-ways, in accordance with MCC 14.05.170 – Ownership of installed water system improvements.

Response: The Applicant acknowledges the comment and will comply with MCC 14.05170, as applicable.

Comment No. 12:

Water system improvements may be necessary based upon the Department of Fire and Public Safety's review of the building permit application.

Response: The Applicant acknowledges the comment and will coordinate with the Department of Fire and Public Safety during the building permit application review process.

Comment No. 13:

Please be aware that we will be unable to approve any building permit applications until all water system improvements have been completed, tested, and accepted.

Response: The Applicant acknowledges the comment regarding the Department's approval of building permit applications.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC - 357

CEJS:ab

Cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Ashley Otomo, Otomo Engineering, Inc.

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From: Kaniloa Kamaunu <bkofmor@gmail.com>
Sent: Saturday, September 25, 2021 3:22 AM

To: Lynne Hiromoto

Subject: Re: Draft EA for the Hale Mahaolu Ke Kahua Affordable Housing Community

Aloha e Lynne Hiromoto,

Thank you for your email update of the County's plan to pursue the development in Ke Kahua. We as the Aha Moku cannot support this development at this time due to a legal claim by descendants of Pehuino who has title to said property. The heirs of Pehuino have filed their claim in the Bureau of Conveyance and are occupying said area at this time. We as the Aha Moku 'O Wailuku have written a letter in support of these heirs claim to their ancestral lands. Aha Moku 'O Wailuku is oppose to any development in this area due to this issue and other issues that were previously submitted in an earlier discussion .

Mahalo Nui Kaniloa L Kamaunu Aha Moku 'O Wailuku On Thu, Sep 23, 2021 at 19:57 Lynne Hiromoto <<u>lynne@munekiyohiraga.com</u>> wrote:

To: Kaniloa Kamaumu

Aha Moku o Maui

From: Chris Sugidono, Senior Associate

Attachment:

Quantity Date Description

1 9/21/21 Letter re: review and comment of the Draft EA

Message:

The Draft EA for the Hale Mahaolu Ke Kahua Affordable Housing Community has been uploaded to the Environmental Review Program website for your review and comment. We request that you please provide any comments on the project prior to the 30-day comment period deadline of October 25. Please see attached.

Please click on the link below to view the Draft EA submittal:

http://oeqc2.doh.hawaii.gov/Doc_Library/2021-09-23-MA-DEA-Hale-Mahaolu-Ke-Kahua-Affordable-Housing-Community.pdf

Should you have any questions or are not able to open the link, please contact me at (808) 244-2015. Thank you.

Lynne Hiromoto, Administrative Assistant

Email: lynne@munekiyohiraga.com



Maui: 305 High Street, Suite 104, Wailuku, Hawaii 96793 T: 808.244.2015 F: 808.244.8729

Oahu: 735 Bishop Street, Suite 412, Honolulu, Hawaii 96813 T: 808.983.1233

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"Due to the COVID-19 pandemic, if you have a document or package for delivery to our office via FedEx, UPS, or other courier service, please reach out to a MH team member to coordinate prior to sending. We are committed to providing our clients excellent service to further project goals and objectives during these challenging times. Please take care and stay safe. Mahalo.



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: bkofmor@gmail.com

Kaniloa L Kamaunu Aha Moku 'O Wailuku

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Mr. Kamaunu:

Thank you for your comment letter dated September 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments:

We note that your organization is opposed to the proposed affordable housing project. According to MEO, the nonprofit has clear title to the land and the deeds, which is confirmed by the County of Maui's previous subdivision of the property. The persons identifying themselves as the Heirs of Pehuino have made clear that they claim interests in only Land Commission Award (LCA) No. 3386. LCA No. 3386, Apanas 1, 2, and 3 are located nearly a mile away and were never part of the MEO property. This too is confirmed by historic deeds, LCA awards, and County records.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

CC. 357

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, Maui Economic Opportunity, Inc.

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October 25, 2021

Via email:

County of Maui, Department of Housing & Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

Attention: Ms. Lori Tsuhako, Director (planning@munekiyohiraga.com)

Re: Draft Environmental Assessment

Proposed Hale Mahaolu Ke Kahua Affordable Housing Community, Wailuku, Maui, Hawai'i

Tax Map Key No. (2) 3-3-001:106

Dear Ms. Tsuhako:

Thank you for the opportunity to comment on the draft EA for the proposed Hale Mahaolu Ke Kahua Affordable Housing Community project referenced above (published September 23, 2021), specifically with respect to issues and concerns regarding light pollution.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā and Maunakea and operated by IfA and our partner institutions. Both Haleakalā and Maunakea are among the best sites in the world for astronomical facilities because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

Because of the outstanding quality and productivity of these facilities, IfA is acutely concerned about negative impacts on astronomy from increased light pollution. Our work to combat light pollution has also brought us into contact with others concerned about light pollution for other reasons, including impacts on wildlife (particularly seabirds) and on human health. While IfA's comments focus on the impacts of light pollution on astronomy, appropriate mitigation measures also help to reduce non-astronomy impacts.

With that background, we offer the following comments:

Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. All observations performed by the Pan-STARRS observatories, the ATLAS telescope, and the Faulkes telescope on Haleakalā are sky-background

County of Maui, Department of Housing & Human Concerns Ms. Lori Tsuhako Page 2

limited. This means that there is a natural sky brightness coming from airflow and zodiacal light. Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes. Some of the observations performed by the Air Force telescopes atop Haleakala are also skybackground limited, so those observations, performed for national defense purposes, will also be adversely affected.

Appropriate general steps to reduce the impact on the observatories would include:

- 1. The minimum possible amount of outdoor lighting should be used. Motion sensor activated lighting is strongly preferred.
- 2. Any outdoor lighting must follow the Maui County lighting ordinance. All lighting must be fully shielded. This means that all lighting fixtures must emit zero light above the horizontal plane.
- 3. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no circumstances should high-intensity discharge lamps such as metal halide be used; fluorescent lights also must be avoided. Both of these types of lamps use mercury and emit light at wavelengths that is very damaging to astronomy.
- 4. White light should be avoided because the blue component of white light is very damaging to astronomy. White light should always have a Correlated Color Temperature of 2700 K or below.

We appreciate the DEA's comments about minimizing lighting impacts on seabirds, which generally also tend to reduce impacts on astronomy, and would encourage similar attention to light pollution issues more generally. Finally, we note that there is a strong need for further dialog with the University regarding light pollution on Maui, and a strong need for revision of the present lighting ordinance to properly address the impacts of changes in lighting technology including LED lighting.

Thank you for your consideration of these comments and attention to IfA's concerns. If you have questions or need further detail regarding these comments, please do not hesitate to contact the undersigned or Richard Wainscoat (rjw@hawaii.edu).

Very truly yours,

Doug Simons Director

Mr. Monte Heaton, Waiehu Housing, LP (monte.heaton@housingpartners.com)

Mr. Chris Sugidono, Munekiyo Hiraga (<u>planning@munekiyohiraga.com</u>)



Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Doug Simons, Director University of Hawai'i at Mānoa Institute for Astronomy 2680 Woodlawn Drive Honolulu, Hawai'i 96822

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Simons:

Thank you for your letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as they appear in your letters:

- 1. The Applicant appreciates the recommendation to minimize outdoor lighting and will consider using motion-activated lighting.
- 2. The Applicant confirms that all outdoor lighting will be fully shielded and will follow applicable requirements set forth by Chapter 20.35 of the Maui County Code.
- 3. The Applicant appreciates the recommendation to use blue-deficient lighting and/or filtered or amber LED lights and will consider doing so, as feasible.
- 4. The Applicant appreciates the recommendation and information regarding white light and will avoid using white lights, as feasible.
- 5. The Applicant acknowledges the encouragement to place attention on general light pollution issues and has forwarded this comment to the design team for

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Doug Simons, Director June 1, 2022 Page 2

consideration and incorporation into the project as applicable.

6. The Applicant acknowledges the general need for further dialog with the University regarding overall light pollution on Maui, and encourages the University to coordinate with the County of Maui on appropriate revisions to the County's present lighting ordinance.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Cl. - 25-

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Lena Tamashiro, Design Partners Inc.

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Sherri K. Dodson

FAX (808) 242-1141

1162 Lower Main Street Wailuku, HI 96793 (808) 242-1140

County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

> Proposed Hale Mahaolu Ke Kahua Affordable Housing Re:

To Whom It May Concern,

I am writing in support of the proposed Hale Mahaolu Ke Kahua Affordable Housing project. We are in a housing crisis right now and any housing project will help alleviate that crisis.

This particular project serves the population that fall below 60% median income. This is the same clientele that Habitat serves. We see so many families who are desperate to get into homeownership but do not have the ability to save because they are paying exorbitant prices for their current housing situation. If more families had affordable rentals, then they could save for homeownership.

The project is centrally located so it would be ideal for working families. The inclusion of a nonprofit building would allow surround services to the tenants. It appears that much thought has gone into this project to assure success for the future tenants.

Please consider swift approval to this project so that we can make a dent in the housing crisis.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Sherri K. Dodson **Executive Director**

www.habitat-maui.org



Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Sherri K. Dodson, Executive Director Habitat for Humanity Maui 1162 Lower Main Street Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Dodson:

Thank you for your comment letter, dated September 29, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate your comments in support of this 100 percent affordable housing community in Waiehu.

We will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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Jud R. Cunningham

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V.FY22

October 4, 2021

County of Maui
Department of Housing and Human Concerns
Attention: Buddy Almeida
2200 Main Street, Suite 546
Wailuku, HI 96793

Aloha,

It has come to our attention that a hui comprised of Maui Economic Opportunity, Hale Mahaolu and Highridge Costa are seeking to develop a proposed "Hale Mahaolu Ke Kahua Affordable Housing Community" on 11.5 acres owned by MEO in Waiehu. We understand that the project will consist of 120 multi-family residential units that are 100 percent affordable for residents earning 60 percent or less of the area median income.

This project would appear to be a golden opportunity for Maui County to address one of our most critical needs-the lack of affordable housing options for low income families.

It is our hope, speaking on behalf of populations served by our three partner agencies, that Maui County will assist Maui Economic Opportunity and Hale Mahaolu in the process of obtaining approvals at the earliest possible time to see this project come to fruition. Maui Economic Opportunity and Hale Mahaolu are to be commended for their roles in making this resource available to the Maui community.

Sincerely,

Jud R. Cunningham, CEO



Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Jud R. Cunningham, CEO Maui Behavioral Health Resources P.O. Box 791749 Pā'ia, Hawai'i 96779

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Cunningham:

Thank you for your comment letter dated October 4, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate your comments in support of this 100 percent affordable housing community in Waiehu.

We will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CC - 35C

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Harrison Herzberg, Highridge Costa
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October 15, 2021

Mr. Buddy Almeida County of Maui Department of Housing and Human Concerns 2200 Main Street, suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida

As a social service agency, Parents And Children Together (PACT), take serving underserved populations especially those who are impoverished as an integral part of our mission. We are very happy to see that the 11.5 acres called "Ke Kahua" in Waiehu is going to be used for an affordable rental project for residents earning 60% or less of the area median income.

With housing shortages and rental prices soaring, local families often are left living in multi-family situations, homeless or in shelters, if and when they are available. With COVID-19 causing so much unemployment and instability, and with the limited financial support that is available, the outcome for our families is dismal.

We appreciate this project and hope it will come to fruition. It will give hope of having a home for some of our families. MEO has had plans and dreams for this property since 2008 and now it seems with this lease to Hale Mahaolu the "Ke Akua" project will finally be built and shared with the community, similar to the way it was initially intended.

Founded in 1968, Parents And Children Together (PACT) is one of Hawaii's not-for-profit organizations providing a wide array of innovative and educational social services to families in need. We help families identify, address and successfully resolve challenges through our various statewide programs. Among our services are: early education programs, domestic violence prevention and intervention programs, child abuse prevention and intervention programs, child and adolescent behavioral health programs, sex trafficking intervention, and community building programs.

Mahalo,

Ryan Kusumoto President and CEO

Parents And Children Together



Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: rkusumoto@pacthawaii.org

Ryan Kusumoto, President and CEO Parents And Children Together 1485 Linapuni Street, Suite 105 Honolulu, Hawai'i 96819

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Kusumoto:

Thank you for your comment letter dated October 15, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate your comments in support of this 100 percent affordable housing community in Waiehu.

We will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

a. St

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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TO: Chris Sugidono, Senior Associate

Lynne Hiromoto, Administrative Assistant 305 High Street, Suite 104, Wailuku, Hawaii 96793

T: 808.244.2015

<u>chris@munekiyohiraga.com</u> lynne@munekiyohiraga.com

FROM: Roy Oliveira, President

Waiehu Kou Phase 3 Association
Hawaiian Homelands, Maui
Federally Registered NHO (Native Hawaiian Organization)
49 Kaulana Na Pua Circle
Wailuku, Hi. 96793
waiehukouphase3association@hotmail.com



Re: Hale Mahaolu Ke Kahua Affordable Housing Community and some of the perceived concerns anticipated by our Hawaiian Homestead Community here in Waiehu, Maui.

Aloha mai ka kou,

Mahalo for the opportunity to comment on the Hale Mahaolu Ke Kahua Affordable Housing Community Environmental Assessment (EA) Draft document we received from your office. The concerns suggested by survey of our community were strong and are twofold:

- 1. **Traffic congestion,** by the mere location of said community at a choke point of access to Kahului and Wailuku, the commercial and political hubs servicing our community.
- 2. The **environmental hazard of flooding** near the site has been already established in recent years and continues to be a risk at the culvert going under Kahikili Highway where the North and South Waiehu Streams converge, across from Waiehu Beach Road.

There is little to no mitigation referenced in your EA report to alleviate any of the anxieties expressed by our community. We would appreciate a comprehensive review of these matters and a reply with your remedies to ease these potential risks.

These concerns were the ones most expressively conveyed to our Board Directors and therefore brought to your attention mindful of the comment deadline your letter imposed. Homestead members comment may still trickle into you as your email and address were included in our community comment outreach effort.

Mahalo for your consideration,

Roy K. Oliveira



Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

March 25, 2022

Via email: waiehukouphase3association@hotmail.com

Roy Oliveira, President Waiehu Kou Phase 3 Association 49 Kaulana Na Pua Circle Wailuku, Hi. 96793

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Mr. Oliveira:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project, which involves the development of 120 affordable multifamily housing units. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

Traffic congestion, by the mere location of said community at a choke point of access to Kahului and Wailuku, the commercial and political hubs servicing our community.

Response:

Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

A Traffic Impact Analysis Report (TAIR) was prepared for this project and included in the Draft EA. Section 3.3 of the TIAR discusses this existing traffic congestion along the major corridors and study intersections. The project is expected to generate a minimal increase in traffic beyond existing conditions.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

Roy Oliveira, President March 25, 2022 Page 2

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and Department of Public Works (DPW) to determine its share of roadway infrastructure improvements in the area based on the potential impacts that are expected to be generated by the project.

Comment No. 2:

The environmental hazard of flooding near the site has been already established in recent years and continues to be a risk at the culvert going under Kahikili Highway where the North and South Waiehu Streams converge, across from Waiehu Beach Road.

Response:

It is our understanding that trash and debris blocking the culvert has previously caused drainage issues at Kahekili Highway and Waiehu Beach Road. The HDOT subsequently cleared the trash and debris from the culvert, which mitigated the issue. This project will be designed to meet the County's drainage rules and storm water quality rules.

Comment No. 3:

There is little to no mitigation referenced in your EA report to alleviate any of the anxieties expressed by our community. We would appreciate a comprehensive review of these matters and a reply with your remedies to ease these potential risks. These concerns were the ones most expressively conveyed to our Board Directors and therefore brought to your attention mindful of the comment deadline your letter imposed. Homestead members comment may still trickle into you as your email and address were included in our community comment outreach effort.

Response:

The Applicant acknowledges and appreciates your comments. Additional information regarding the mitigation of traffic and flooding, as needed based on the outcome of continued agency coordination, will be included in the Final EA. Consultation with various community groups and stakeholders will also continue as the project progresses.

Roy Oliveira, President March 25, 2022 Page 3

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

06-37

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc. Lena Tamashiro, Design Partners, Inc.

Debbie Cabebe, Maui Economic Opportunity, Inc.

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From: thorne abbott < thorne abbott < thorne abbott < thorne abbott < thorneabbott@yahoo.com>
Sent: Thursday, September 23, 2021 2:25 PM

To: General eMail <<u>planning@munekiyohiraga.com</u>> **Subject:** DEA Hale Mahaolu Ke Kahua Affordable Housing

Aloha Chris Sugidono:

The area to be developed TMK (2) 3-3-001:106 may contain sandy soils that are of sufficient quality to qualify for use in beach restoration, nourishment or for use in sand bags in times of erosion crisis along Maui's shoreline. As such, I respectfully request that the developer offer any beach quality sand or clean sand encountered during site development activities to private erosion response projects that are government-approved. The cost of trucking the sand should be borne by the recipient, but as a public trust resource, the sand should be granted freely, at cost, or at for a small fee as mitigation. Thank you for your consideration.

Mahalo! Thorne Abbott

Wailuku, HI



Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: thorneabbott@yahoo.com

Thorne Abbott

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Mr. Abbott:

Thank you for your comment letter dated September 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. A portion of the proposed project is situated on Puuone Sand, part of the Pulehu-Ewa-Jaucas soils association.
- 2. The Applicant appreciates the recommendation and will consider making any beach quality sand encountered available for beach restoration or for use in sand bags for erosion control.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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On Oct 25, 2021, at 7:22 AM, MADELINE CALLAHAN <madelinecallahan@mac.com> wrote:

Aloha,

I wish to weigh in on the proposed affordable housing now being reviewed and considered for the location of Kahekili Hwy and Waieh'u Beach Rd.

There are SO MANY REASONS to REJECT THIS LOCATION!!!

The MAIN REASONS:

There is PLENTY OF ALREADY DEVELOPED EMPTY SPACE IN THE DESERTED AREAS OF KAHULUI, MAINLY-THE MAUI MARKETPLACE. This is a PERFECT resolution to the POOR decision making to just Build New and Desert the Old-Irresponsible Real Estate Developement Ventures that Have been allowed to take place and RUIN KAHULUI!!!! This area is becoming a drug infested and unstable homeless camp. This causes unnecessary stress and demands on our citizens, the few remaining businesses and our police force. It is unfathomable how these decisions and irresponsible actions are allowed to occur. These decisions are infinitely abysmal in their consideration AND implementation.

What is GOOD for the Community:

The Maui Marketplace location is a wonderful usage of space, location, infrastructure. The traffic diversion that took place on Dairy has all but become a mute point since all the new construction of box stores, etc have been moved. Developing Maui Marketplace will make that diversion reach a properly intended realization and utilization!! It will RECREATE an entirely new ENERGY for the citizens and can be designed and executed BEAUTIFULLY and EXPEDITIOUSLY since it has been cleared already. Which brings to point: that no other disruption to traffic and the current already stressed high volume of cars commuting through Wailuku, Kahului and Waieh'u will occur. NO FURTHER UNWANTED SPRAWL AND LOSS OF AG LAND AND RESIDENTIAL DISHARMONY. We have to utilize the brainwork of solid, rational planners to THINK THROUGH these needs of affordable housing. We do NOT wish ANY FURTHER knee jerk and unstable, poorly ruminated undertakings. We need to THINK BEYOND the gimmicks that have been implemented up until now. We are risking EVERYTHING we have in taking this HORRIFIC course of action to simply plow down another open space. We need to STOP trading in our land and people for short term commerce and gain to a very few already profitable companies. Short term jobs are seen now for what they are- falsehoods and fabrications. What about the LONG TERM WORKERS, whose lives commuting will be WORSENED, or

Destroyed? Road Rage is commonplace now. How is that accepted? People being pushed BEYOND their limits. What will be done when it's IRREVERSIBLE?

There ARE ways to BENEFIT ALL. Especially as we have seen WAY TOO MUCH irresponsible developement, and WAY TOO MUCH diminishing of those lives who LIVE on MAUI and WORK on MAUI. We are remiss if all we do is TAKE. Never considering for one moment-QUALITY OF LIFE, and the CARELESS REMOVAL of it. The location being considered now is DISASTROUSLY CATASTROPHIC from EVERY vantage point and is impossible to imagine. I dare say, NONE of what I'm writing is overstatement. I cannot implore you enough. Developing the abandoned buildings and areas WITHIN Kahului is a WIN - WIN in each case. You are GAINING the revitalization of this town/city by reenergizing and reusing these spaces instead of creating deserted and embarrassing eyesores. You recreate the sense of community by investing in WHAT WE HAVE, instead of letting these go to ruination as they have been treated and allowed. You recreate a sense of PRIDE. Not, FRUSTRATION. You MUST ALLOW people who LIVE on Maui to remember WHY WE LIVE HERE. The beauty. The peace.

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Thank you for your time and consideration. I will volunteer any time for community involvement, please contact me.

Kindest and Sincerest Aloha,

Madeline Callahan 455 Laulea Place Paia, Hi 96779



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Madeline Callahan 455 Laulea Place Paia, Hawai'i 96779

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Callahan:

Thank you for your comment letter, dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant acknowledges your objection to the proposed project location.
- 2. The Applicant notes your suggestion to utilize vacant retail space in Kahului, such as the Maui Marketplace.
- 3. A Traffic Impact Analysis Report (TIAR) was prepared for the project and is appended to and discussed in the Draft EA. Taking into account planned developments and roadway improvements in the area, it is predicted that there will be a 3.46 percent increase in traffic along Kaheliki Highway and Waiehu Beach Road in the year 2023. The proposed project is not anticipated to significantly alter projected traffic increases for 2023. The Applicant will continue to work with the State Department of Transportation on traffic mitigation efforts.
- 4. We note that the project's site was selected for this affordable housing project as the property is owned by Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Madeline Callahan June 1, 2022 Page 2

the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan. These affordable housing units will be rented to individuals and families earning 60 percent or less than the Area Median Income and will create more opportunities for Maui residents to live affordably and achieve economic security.

5. The proposed housing project has been carefully designed to minimize potential impacts to the project site's surrounding environment. Various studies were conducted through the environmental review process including, but not limited to, a biological resources study, Cultural Impact Assessment, and Traffic Impact Analysis Report to assess potential impacts from the project and incorporate appropriate mitigation measures.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

U. X

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.
Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.
Ashley Otomo, Otomo Engineering Inc.

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From: Matt Dillon < mattdillon567@gmail.com>
Sent: Thursday, October 28, 2021 6:32:38 PM

To: director.hhc@mauicounty.gov <director.hhc@mauicounty.gov>

Cc: <u>tasha.kama@mauicounty.us</u> < <u>tasha.kama@mauicounty.us</u>>; Monte Heaton

<monte.heaton@housingpartners.com>
Subject: Feedback on Hale Mahaolu Ke Kahua

You don't often get email from mattdillon567@gmail.com. Learn why this is important

Director Tsuhako,

I understand that this feedback is reaching you after the October 25 deadline. However I ask that the Department of Housing and Human Concerns please consider it due to the potential consequences and permanence of such a development in Waiehu. My greatest concern is that the project has been fast-tracked. I ask that the leaders of Maui County take great caution with this decision and are critical of the plan being proposed. Thank you for taking the time to read the following concerns.

The subject property is designated "Urban" and "Agricultural" by the State Land Use Commission, "Project District" and "Agriculture" designation by the Wailuku-Kahului Community Plan, and "Interim" and "Agricultural" district by Maui County Zoning. "Agriculture" is common to all of these designations, however the proposed plan is devoid of any agriculture. Loss of agricultural land is irreversible and would impact the sustainability of Maui.

Assessments made in the report appear to favor the development by misrepresenting or omitting data. With approximately 300+ residents housed in high density, such a development is likely to have a far greater negative impact on traffic than the report suggests. This impact would be felt in areas already plagued by heavy and unsafe traffic such as Happy Valley, Paukukalo, at the Kahekili Hwy-Waiehu Beach Rd intersection, and at Waihee school.

The report also omits any critique of increased noise and light pollution post-construction. Hundreds of people and cars will likely affect surrounding communities beyond what the report states. Furthermore, the report fails to accurately predict the impact on Police and Fire services. What was not considered is that Police and Fire Department call frequency to low rent housing is disproportionately greater than other neighborhoods. Coupled with its distance, the strain of the project on these services is potentially well beyond what the report states.

Additionally, the report was developed during a time of strong Covid restrictions on Maui. Besides minimizing traffic data, having the meeting be virtual greatly limited the opportunity for public response. Many of the potentially impacted neighbors were left out because they are not capable of attending. I fear that this situation is being taken advantage of with the fast-track approach.

The location of the proposed development is inappropriate for the intended residents. There is no walking access to services and/or to employment for the proposed residents. Residents that do attempt to walk will be in danger as there are no safe pedestrian routes. The location is also not particularly conducive to bicycle transportation.

A letter in the report (pg.97) from council member Tasha Kama recommended that the applicant reach out to Waiehu Heights residents, the neighborhood closest and most likely to be impacted. In their response the applicant shared that this was not done. Instead they sought input from communities miles away from the site. As a member of the Waiehu Heights neighborhood this was particularly concerning.

The need for affordable housing should not preclude sensible decision making. Thank you for taking the time to read these concerns and please contact me if needed.

Respectfully, Matt Dillon



Mark Alexander Roy AICP, LEED AP

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: mattdillon567@gmail.com

Matt Dillon

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Mr. Dillion:

Thank you for your comment letter dated October 28, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I understand that this feedback is reaching you after the October 25 deadline. However I ask that the Department of Housing and Human Concerns please consider it due to the potential consequences and permanence of such a development in Waiehu. My greatest concern is that the project has been fasttracked. I ask that the leaders of Maui County take great caution with this decision and are critical of the plan being proposed. Thank you for taking the time to read the following concerns.

Response:

Thank you for your comment. This affordable housing project is utilizing the Maui County Code (MCC), Chapter 2.97 "Fast track permitting" process, which is eligible for projects comprised of 100 percent residential workforce housing units. This permitting process is outlined in MCC, Chapter 2.97, which allows for certain exemptions and reduces the typical lengthy review/approval process in Maui County. Overall, the fast track permitting process was established to support developers in building more affordable housing, which has been identified as the greatest need in Maui County.

It should be noted that this project is undergoing a Hawaii Revised Statutes, Chapter 343 environmental review process. The Draft EA, which was published for public and agency review, evaluates potential impacts from the proposed project and sets forth mitigation measures, as appropriate, based on studies that have been completed.

Comment No. 2:

The subject property is designated "Urban" and "Agricultural" by the State Land Use Commission, "Project District" and Agriculture" designation by the Wailuku-Kahului Community Plan, and "Interim" and "Agricultural" district by Maui County Zoning.

"Agriculture" is common to all of these designations, however the proposed plan is devoid of any agriculture. Loss of agricultural land is irreversible and would impact the sustainability of Maui.

Response:

The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

The Applicant acknowledges your comment regarding agricultural uses. According to Maui Economic Opportunity, Inc. (MEO), the nonprofit was planting taro and other plants when it had operating funding for the project. When the funding was exhausted, MEO tried to maintain the property with volunteers which was unsuccessful due to the lack of supervised oversight. Additionally, the property was vandalized numerous times and over time all of the equipment was stolen, including the well pump, hoses, engine and the generator. It was at this time MEO decided to look for alternative uses of the property, which would benefit the community and the low-income families the nonprofit serves.

Comment No. 3:

Assessments made in the report appear to favor the development by misrepresenting or omitting data. With approximately 300+ residents housed in high density, such a development is likely to have a far greater negative impact on traffic than the report suggests. This impact would be felt in areas already plagued by heavy and unsafe traffic such as Happy Valley, Paukukalo, at the Kahekili Hwy-Waiehu Beach Rd intersection, and at Waihee school.

Response:

The project proposes to provide 120 units of multi-family affordable housing units, related amenities and a small nonprofit building. A Traffic Impact Analysis Report (TIAR) was prepared for this project and included in the Draft EA. Based on the findings of the TIAR, the affordable housing community is anticipated to generate 64(79) trips during the AM(PM) peak hour, and will account for approximately 3-5 percent of traffic on Kahekili Highway and Waiehu Beach Road. As such, the proposed project is expected to generate a minimal increase in traffic beyond existing conditions.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently

Matt Dillon June 1, 2022 Page 3

unknown, but would likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area based on the potential impacts expected to be generated by this project.

Comment No. 4:

The report also omits any critique of increased noise and light pollution post-construction. Hundreds of people and cars will likely affect surrounding communities beyond what the report states. Furthermore, the report fails to accurately predict the impact on Police and Fire services. What was not considered is that Police and Fire Department call frequency to low rent housing is disproportionately greater than other neighborhoods. Coupled with its distance, the strain of the project on these services is potentially well beyond what the report states.

Response:

The Applicant will provide a greenway buffer along Kahekili Highway to help visually screen the property and to help with noise attenuation and air migration mitigation. All outdoor lighting will be fully shielded and will follow applicable requirements set forth by MCC Chapter 20.35. The Applicant and development team have also been in coordination with the County police and fire departments, which had no objections to the proposed project. The departments will continue to be consulted through the building permit review process.

Comment No. 5:

Additionally, the report was developed during a time of strong Covid restrictions on Maui. Besides minimizing traffic data, having the meeting be virtual greatly limited the opportunity for public response. Many of the potentially impacted neighbors were left out because they are not capable of attending. I fear that this situation is being taken advantage of with the fast-track approach.

Response:

The TIAR provided in the Draft EA evaluated turning movement counts collected from 2016 to 2019, which was prior to the pandemic. Based on early consultation with HDOT and DPW, the use of historic counts were acceptable.

The Applicant and development team has also made strong efforts to reach out to the community to ensure awareness and input from local stakeholders. A meeting notification flier was mailed out to 92 addresses within 500 feet of the proposed project. Participants had the option of registering for the meeting to join via video or by phone.

Comment No. 6:

The location of the proposed development is inappropriate for the intended residents. There is no walking access to services and/or to employment for the proposed residents. Residents that do attempt to walk will be in danger as there are no safe pedestrian routes. The location is also not particularly conducive to bicycle transportation.

Response:

The Applicant notes your opinion regarding the location that has been selected for this project. As mentioned above, the proposed project site is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

The development team is coordinating with County Department of Transportation to determine the feasibility of providing a bus stop within or near the project vicinity. The Applicant will also maintain shoulder space along the project's frontage on Kahekili Highway, which is currently used by bicyclists in the area.

Comment No. 7:

A letter in the report (pg.97) from council member Tasha Kama recommended that the applicant reach out to Waiehu Heights residents, the neighborhood closest and most likely to be impacted. In their response the applicant shared that this was not done. Instead they sought input from communities miles away from the site. As a member of the Waiehu Heights neighborhood this was particularly concerning.

Response:

As mentioned above, the Applicant and development team has made strong efforts to reach out to the community to ensure awareness and input from local stakeholders. A meeting notification flier was mailed out to 92 addresses within 500 feet of the proposed project. These addresses were largely located within the Waiehu Heights subdivision. Participants had the option of registering for the meeting to join via video or by phone. The Applicant appreciates the questions and comments provided during the meeting and looks forward to continuing to consult with community stakeholders.

Matt Dillon June 1, 2022 Page 5

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Lena Tamashiro, Design Partners, Inc.

Debbie Cabebe, Maui Economic Opportunity, Inc.

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Begin forwarded message:

From: MADELINE CALLAHAN < <u>madelinecallahan@mac.com</u>>
Subject: Affordable Housing Weigh in Deadline Today

Date: October 25, 2021 at 7:22:03 AM HST

To: planning@munekiyohiraga.com, Director.hhc@maauicounty.gov

Aloha,

I wish to weigh in on the proposed affordable housing now being reviewed and considered for the location of Kahekili Hwy and Waieh'u Beach Rd.

There are SO MANY REASONS to REJECT THIS LOCATION!!!

The MAIN REASONS:

There is PLENTY OF ALREADY DEVELOPED EMPTY SPACE IN THE DESERTED AREAS OF KAHULUI, MAINLY- THE MAUI MARKETPLACE. This is a PERFECT resolution to the POOR decision making to just Build New and Desert the Old-Irresponsible Real Estate Developement Ventures that Have been allowed to take place and RUIN KAHULUI!!!! This area is becoming a drug infested and unstable homeless camp. This causes unnecessary stress and demands on our citizens, the few remaining businesses and our police force. It is unfathomable how these decisions and irresponsible actions are allowed to occur. These decisions are infinitely abysmal in their consideration AND implementation. What is GOOD for the Community:

The Maui Marketplace location is a wonderful usage of space, location, infrastructure. The traffic diversion that took place on Dairy has all but become a mute point since all the new construction of box stores, etc have been moved. Developing Maui Marketplace will make that diversion reach a properly intended realization and utilization!! It will RECREATE an entirely new ENERGY for the citizens and can be designed and executed BEAUTIFULLY and EXPEDITIOUSLY since it has been cleared already. Which brings to point: that no other disruption to traffic and the current already stressed high volume of cars commuting through Wailuku, Kahului and Waieh'u will occur. NO FURTHER UNWANTED SPRAWL AND LOSS OF AG LAND AND RESIDENTIAL DISHARMONY. We have to utilize the brainwork of solid, rational planners to THINK THROUGH these needs of affordable housing. We do NOT wish ANY FURTHER knee jerk and unstable, poorly ruminated undertakings. We need to THINK BEYOND the gimmicks that have been implemented up until now. We are risking EVERYTHING we have in taking this HORRIFIC course of action to simply plow down another open space. We need to STOP trading in our land and people for short term commerce and gain to a very few already profitable companies. Short term jobs are seen now for what they arefalsehoods and fabrications. What about the LONG TERM WORKERS, whose lives commuting will be WORSENED, or

Destroyed? Road Rage is commonplace now. How is that accepted? People being pushed BEYOND their limits. What will be done when it's IRREVERSIBLE?

There ARE ways to BENEFIT ALL. Especially as we have seen WAY TOO MUCH

irresponsible developement, and WAY TOO MUCH diminishing of those lives who LIVE on MAUI and WORK on MAUI. We are remiss if all we do is TAKE. Never considering for one moment-QUALITY OF LIFE, and the CARELESS REMOVAL of it. The location being considered now is DISASTROUSLY CATASTROPHIC from EVERY vantage point and is impossible to imagine. I dare say, NONE of what I'm writing is overstatement. I cannot implore you enough. Developing the abandoned buildings and areas WITHIN Kahului is a WIN - WIN in each case. You are GAINING the revitalization of this town/city by reenergizing and reusing these spaces instead of creating deserted and embarrassing eyesores. You recreate the sense of community by investing in WHAT WE HAVE, instead of letting these go to ruination as they have been treated and allowed. You recreate a sense of PRIDE. Not, FRUSTRATION. You MUST ALLOW people who LIVE on Maui to remember WHY WE LIVE HERE. The beauty. The peace. The space.

Surely, there are hundreds of ways and many beautiful & creative ways to accomplish what we need. Surely, NO ONE can feel good about denigrating our beautiful island in this proposed fashion? Maui, once the refuge for those of us wishing NEVER to experience life as on (the current) Oahu, or other poorly developed natural beauties. PLEASE I IMPLORE YOU to NOT GO THROUGH WITH THIS. Let us all explore and develop a sensible, responsible and respectful design to fit us- the people, and THE LAND and resources we have without sacrificing our souls, our day to day lives and our integrity. We NEED and DESIRE AFFORDABLE HOUSING, but it NEEDS HONORABLE, RESPONSIBLE and PRINCIPLED DESIGN, GUIDANCE, ADMINISTRATION AND HONEST LEADERSHIP. Aren't we ALL WORTH THAT????

Thank you for your time and consideration. I will volunteer any time for community involvement, please contact me.

Kindest and Sincerest Aloha,

Mille Kohl 844 Kokomo Rd. Haiku, HI 96708



Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: madelinecallahan@mac.com

Mille Kohl

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Ms. Kohl:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I wish to weigh in on the proposed affordable housing now being reviewed and considered for the location of Kahekili Hwy and Waieh'u Beach Rd.

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

to traffic and the current already stressed high volume of cars commuting through Wailuku, Kahului and Waieh'u will occur. NO FURTHER UNWANTED SPRAWL AND LOSS OF AG LAND AND RESIDENTIAL DISHARMONY. We have to utilize the brainwork of solid, rational planners to THINK THROUGH these needs of affordable housing. We do NOT wish ANY FURTHER knee jerk and unstable, poorly ruminated undertakings. We need to THINK BEYOND the gimmicks that have been implemented up until now. We are risking EVERYTHING we have in taking this HORRIFIC course of action to simply plow down another open space. We need to STOP trading in our land and people for short term commerce and gain to a very few already profitable companies. Short term jobs are seen now for what they are- falsehoods and fabrications. What about the LONG TERM WORKERS, whose lives commuting will be WORSENED, or

Destroyed? Road Rage is commonplace now. How is that accepted? People being pushed BEYOND their limits. What will be done when it's IRREVERSIBLE?

There ARE ways to BENEFIT ALL. Especially as we have seen WAY TOO MUCH irresponsible developement, and WAY TOO MUCH diminishing of those lives who LIVE on MAUI and WORK on MAUI. We are remiss if all we do is TAKE. Never considering for one moment-QUALITY OF LIFE, and the CARELESS REMOVAL of it. The location being considered now is DISASTROUSLY CATASTROPHIC from EVERY vantage point and is impossible to imagine. I dare say, NONE of what I'm writing is overstatement. I cannot implore you enough. Developing the abandoned buildings and areas WITHIN Kahului is a WIN - WIN in each case. You are GAINING the revitalization of this town/city by reenergizing and reusing these spaces instead of creating deserted and embarrassing eyesores. You recreate the sense of community by investing in WHAT WE HAVE, instead of letting these go to ruination as they have been treated and allowed. You recreate a sense of PRIDE. Not, FRUSTRATION. You MUST ALLOW people who LIVE on Maui to remember WHY WE LIVE HERE. The beauty. The peace.

Surely, there are hundreds of ways and many beautiful & creative ways to accomplish what we need. Surely, NO ONE can feel good about denigrating our beautiful island in this proposed fashion? Maui, once the refuge for those of us wishing NEVER to experience life as on (the current) Oahu, or other poorly developed natural beauties. PLEASE I IMPLORE YOU to NOT GO THROUGH WITH THIS. Let us all explore and develop a sensible, responsible and respectful design to fit us- the people, and THE LAND and resources we have without sacrificing our souls, our day to day lives and our integrity. We NEED and DESIRE AFFORDABLE HOUSING, but it NEEDS HONORABLE, RESPONSIBLE and PRINCIPLED DESIGN, GUIDANCE, ADMINISTRATION AND HONEST LEADERSHIP. Aren't we ALL WORTH THAT????

Thank you for your time and consideration. I will volunteer any time for community involvement, please contact me.

Mille Kohl June 1, 2022 Page 3

Response:

Thank you for your comment and your willingness for continued involvement in this project. While there may be other potential sites on Maui, the project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

The project's location was selected as it is owned by Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, Maui Economic Opportunity, Inc.

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From: David Hoffman [mailto:hoffmand004@hawaii.rr.com]

Sent: Monday, October 18, 2021 9:40 AM

To: Department of Housing and Human Concerns < <u>Director.hhc@mauicounty.gov</u>>

Cc: General eMail <<u>planning@munekiyohiraga.com</u>>; Chris Sugidono <<u>chris@munekiyohiraga.com</u>> **Subject:** Proposed Hale Mahaof u Ke Kahua Affordable Housing Community at TMK (2)3-3-001 :106

Regarding the Proposed Hale Mahaof u Ke Kahua Affordable Housing Community at TMK (2)3-3-001 :106

In principle I am not opposed to affordable housing. HOWEVER: As is so many times the case, surrounding infrastructure is not always thoroughly considered. Other developments have been built or proposed in the Waiehu/Waihee neighborhoods. On more than one occasion the developers either proposed or promised (to the public before dropping it, unannounced) that the Imi Kala overpass over the Iao Stream (Wailuku River) would be constructed to alleviate the chokepoints of traffic in Happy Valley and Waiehu Beach Road.

My comments today are regarding, traffic mitigation: my main concern.

Simply drive the entire length of Waiehu Beach Road on a school day between 7am and 8am as well as the reverse at 3pm. As well as other times during the day. This can include the Harbor Road. Or through Happy Valley. Traffic currently backs up the entity of Waiehu Beach Road from the Jack n the Box at Kahului Beach Road turning into Lower Main St. all the way to Kahekili Hwy. Even turning onto Waiehu Beach Road from Kahekili Hwy can back up traffic on Kahekili Hwy. The Waiehu Beach Road back up can take up to 10 minutes or more to get to Kaahumanu Ave. There just isn't any more room for any more cars!

Adding the hundreds of new residences without additional traffic mitigation endangers the safety of the population of the entire area. . If the Imi Kala overpass or another outlet is not constructed concurrently, it is irresponsible for the planning department to approve more high density in that area.

If Imi Kala overpass is in the planning and pending construction (ha ha) as the former Mayor Alan Arakawa assured me it was during his FIRST term in office, then it must include extending it all the way to Waiele St bordering St. Anthony's School even if that means a one way street or a set back of St. Anthony's playing field a few feet to meet existing set back rules.

Thank you for your consideration your job is not easy, not everyone will be happy however you rule, but you are in your positions to consider all sides, not just the developers. We may not make political contributions, but we do vote.

David Hoffman Next Step Marketing LLC P.O. Box 327 Wailuku, HI 96793

808.244.1909 office 808.283.2002 cell-text



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Via email: hoffmand004@hawaii.rr.com

David Hoffman

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Mr. Hoffman:

Thank you for your comment letter dated October 18, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

In principle I am not opposed to affordable housing. HOWEVER: As is so many times the case, surrounding infrastructure is not always thoroughly considered. Other developments have been built or proposed in the Waiehu/Waihee neighborhoods. On more than one occasion the developers either proposed or promised (to the public before dropping it, unannounced) that the Imi Kala overpass over the lao Stream (Wailuku River) would be constructed to alleviate the chokepoints of traffic in Happy Valley and Waiehu Beach Road.

My comments today are regarding, traffic mitigation: my main concern.

Simply drive the entire length of Waiehu Beach Road on a school day between 7am and 8am as well as the reverse at 3pm. As well as other times during the day. This can include the Harbor Road. Or through Happy Valley. Traffic currently backs up the entity of Waiehu Beach Road from the Jack n the Box at Kahului Beach Road turning into Lower Main St. all the way to Kahekili Hwy. Even turning onto Waiehu Beach Road from Kahekili Hwy can back up traffic on Kahekili Hwy. The Waiehu Beach Road back up can take up to 10 minutes or more to get to Kaahumanu Ave. There just isn't any more room for any more cars!

Adding the hundreds of new residences without additional traffic mitigation endangers the safety of the population of the entire area.

If the Imi Kala overpass or another outlet is not constructed concurrently, it is irresponsible for the planning department to approve more high density in that area.

David Hoffman June 1, 2022 Page 2

If Imi Kala overpass is in the planning and pending construction (ha ha) as the former Mayor Alan Arakawa assured me it was during his FIRST term in office, then it must include extending it all the way to Waiele St bordering St. Anthony's School even if that means a one way street or a set back of St. Anthony's playing field a few feet to meet existing set back rules.

Thank you for your consideration your job is not easy, not everyone will be happy however you rule, but you are in your positions to consider all sides, not just the developers. We may not make political contributions, but we do vote.

Response:

Thank you for your comment. Section 3.3 of the Traffic Impact Analysis Report (TIAR) that was included in the Draft EA, discusses the existing traffic congestion along the major corridors and study intersections. The proposed project is expected to generate a minimal increase in traffic beyond existing conditions.

As you note in your comment, the long-term regional improvement for the area identified by the County is the lmi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but will likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area based on the potential impacts associated with this project.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

U. X

CEJS:ab

Cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

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Subject: development in Waiehu

Date: Sun, 24 Oct 2021 16:14:15 -0700

Gentlemen

I was told about this development many months ago, and only now find that it is being fast-tracked, with little or no time to get input from the community. You folks knew it was on the agenda a long time ago. I thought to myself that it couldn't be true, having lived in this area for 32 years, I know the school and traffic situation and that this development didn't make sense. Schools that would accommodate the children of such a large development exceeded their capacity in the area once Hawaiian homes were built close to Waihee. Bringing more families and children into this area where schools are at their max is irresponsible. How many exits will there be to come out onto the highway? Exits are always an impediment to the smooth flow of traffic. Will you be installing signals? Another impediment to the flow of traffic.

Apparently, this is a rushed project where roads, schools, infrastructure would not be completed first. Can the roads in this area even handle that many more cars? The traffic in the AM is miles long in both directions! There will certainly be many more cars than the allotted 264 stalls. Most apartments today have 2 to 3 cars associated with them. How many people will be living in each apartment, that's close to how many cars there will be, leading to parking on the streets, just like most other developments. Harbor Lights comes to mind.

Why is it being built in this "country" "ag" area instead of over in Maui Lani, which already has the infrastucture in place, and other services needed by a community, not to mention other affordable housing and plenty of open land, and several new schools as well. Waiehu is NOT the logical place. Apparently logical is not part of the equation. I assume the landowners (and the mainland developer/investor)have connections with the county. It's always "get it built asap" before the impacted community can have time to mount multiple protests.

So many reasons NOT to build this housing in the mac nut fields, while there are so many reasons TO build it over in Maui Lani, the area that is rapidly becoming the real Central Maui and has plenty of barren land. Why desecrate the last green open space in Wailuku?

Once the "foot is in the door" on Kahekili Highway, more development and loss of green space is sure to follow. Is the land on the Mauka side next? Continue the expansion of Maui Lani with this project. That's where it belongs. Here is the County, once again shoving a build by MAINLAND developers down the throats of the local community. We are not against affordable housing, just not in "country" Waihee/Waiehu.

Thanking you in advance for your attention to our concerns.

Diana Kaaihue 1291 W. Hiahia Place Wailuku, HI 96793 808 283 12996



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

VICE PRESIDENT

June 1, 2022

Via email: dkaaihue@mauigateway.com

Diana Kaaihue

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Ms. Kaaihue:

Thank you for your comment letter dated October 24, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I was told about this development many months ago, and only now find that it is being fast-tracked, with little or no time to get input from the community. You folks knew it was on the agenda a long time ago. I thought to myself that it couldn't be true, having lived in this area for 32 years, I know the school and traffic situation and that this development didn't make sense. Schools that would accommodate the children of such a large development exceeded their capacity in the area once Hawaiian homes were built close to Waihee. Bringing more families and children into this area where schools are at their max is irresponsible.

Response:

Thank you for your comment. The Applicant and development team has made strong efforts to reach out to the community to ensure awareness and input from local stakeholders.

The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

The Applicant has also consulted with the Hawai'i Department of Education (HIDOE) and its Planning Section on the proposed affordable housing community as part of the EA preparation process. The HIDOE and its Planning Section reviews new project proposals in relation to the State school system, including Maui County. The Applicant received comments from the HIDOE, noting that the proposed project is located within the Central Maui School Impact Fee District. The

Diana Kaaihue June 1, 2022 Page 2

fee amount per unit for the district is \$2,371. As such, the Applicant will be providing a total school impact fee for this project of \$284,520.

The Applicant looks forward to complying with the school impact fee requirement which is intended to mitigate any potential impacts from the project on HIDOE's school facilities.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and Department of Public Works (DPW) to determine its share of roadway infrastructure improvements in the area based on the potential impacts that are expected to be generated by the project.

Comment No. 2:

How many exits will there be to come out onto the highway? Exits are always an impediment to the smooth flow of traffic. Will you be installing signals? Another impediment to the flow of traffic.

Response:

There are a total of three (3) unsignalized project accesses off of Kahekili Highway. The north and south accesses are restricted to right-in, right-out (RIRO) access only. The central access is proposed to be a full-access driveway with allowed left-in and left-out. A signal is not warranted and therefore, not proposed at any of the three project accesses.

Comment No. 3:

Apparently, this is a rushed project where roads, schools, infrastructure would not be completed first. Can the roads in this area even handle that many more cars? The traffic in the AM is miles long in both directions! There will certainly be many more cars than the allotted 264 stalls. Most apartments today have 2 to 3 cars associated with them. How many people will be living in each apartment, that's close to how many cars there will be, leading to parking on the streets, just like most other developments. Harbor Lights comes to mind.

Response:

A Traffic Impact Analysis Report (TAIR) was prepared for this project and included in the Draft EA. Section 3.3 of the TIAR discusses this existing traffic congestion along the major corridors and study intersections. The project is expected to generate a minimal increase in traffic beyond existing conditions. The long-term regional improvement identified for the area by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawaii Department of Transportation (HDOT) and Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area based on potential impacts associated with this project.

Diana Kaaihue June 1, 2022 Page 3

Comment No. 4:

Why is it being built in this "country" "ag" area instead of over in Maui Lani, which already has the infrastucture in place, and other services needed by a community, not to mention other affordable housing and plenty of open land, and several new schools as well. Waiehu is NOT the logical place. Apparently logical is not part of the equation. I assume the landowners (and the mainland developer/investor) have connections with the county. It's always "get it built asap" before the impacted community can have time to mount multiple protests.

So many reasons NOT to build this housing in the mac nut fields, while there are so many reasons TO build it over in Maui Lani, the area that is rapidly becoming the real Central Maui and has plenty of barren land. Why desecrate the last green open space in Wailuku? Once the "foot is in the door" on Kahekili Highway, more development and loss of green space is sure to follow. Is the land on the Mauka side next? Continue the expansion of Maui Lani with this project. That's where it belongs. Here is the County, once again shoving a build by MAINLAND developers down the throats of the local community. We are not against affordable housing, just not in "country" Waihee/Waiehu. Thanking you in advance for your attention to our concerns.

Response:

Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community. The project's location was selected as it is owned by Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

Diana Kaaihue June 1, 2022 Page 4

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc. Debbie Cabebe, Maui Economic Opportunity, Inc.

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Stephen Kealoha 2682 Akalani Loop - Pukalani, HI 96768 Ph. 808 280-0072 - Email skealoha99@gmail.com

October 1, 2021

County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

Attention Buddy Almeida

Subject: Support for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community - Regarding a Draft Environmental Assessment

I submit my support of the proposed *Hale Mahaolu Ke Kahua Affordable Housing Community* development. This proposed affordable rental housing project consisting of 120 multi-family residential units at 60% or less AMI to be located in Waiehu will provide much-needed affordable rental housing. This need has been established over many years through various studies and projections. The most recent addition of Catholic Charities Hawai'i's *Kahului Lani* Phases 1 and 2 in Kahului are examples of addressing this need. This condition continues to exist for many more affordable housing opportunities in Maui.

I further support the fast tracked affordable housing project approved by the Maui County Council in December of 2018 via Ordinance 4941. This condition is important to provide affordable development costs and to enhance the completion of the project in a timely manner.

I believe that Hale Mahaolu and Maui Economic Opportunity have proven track records of sound community engagement and assistance. I respectfully request your approval.

Respectfully Submitted,

Stephen Kealoha

Copy: Chris Sugidono - Munekiyo Hiraga

Stephen Kealoha



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: Skealoha99@gmail.com

Stephen Kealoha 2682 Akalani Loop Pukalani, Hawai'i 96768

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Kealoha:

Thank you for your comment letter dated October 1, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate your comments in support of this 100 percent affordable housing community in Waiehu.

We will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Co

Harrison Herzberg, Highridge Costa K.:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\S Kealoha.res.doc

From: Joseph Kutney < <u>josephkutney@gmail.com</u>>
Sent: Wednesday, October 13, 2021 10:58 AM

To: director.hhc@mauicounty.gov
Subject: Affordable Housing Location

Hello.

I am writing with concerns about the location of the affordable housing project that has been proposed along Kahikili and Waiehu Beach Rd. Affordable housing is in dire need for Maui, but this location will be a disservice to the community and potential residents of the housing project.

- 1. The proximity to the ocean on a windward side of the island will require astronomical maintenance costs due to the salt air. All plumbing, electrical, and structural components will need to be built with costly stainless steel or aluminum. If not, all fixtures will need to be replaced within a few years, or worse, they become safety hazards. Everything from door hinges to the nails that hold it together will rust. The buildings will require yearly painting as the rust breaks through the paint.
- 1B. All refrigerators, air conditioning units, washing machines, dryers and other appliances will need to be replaced regularly due to the salt air. All TVs, radios, tools, vehicles, silverware and other personal items of the residents will be destroyed by the salt air. I live nearby and have to continually replace the brakes(rotors, calipers and pads \$1k+) on my car because of the rust. A vehicle is a financial asset to that family and will greatly lose resale value because of the rust. If the residents require free housing, they probably do not have the means to regularly replace these things and incur added expenses.
- 2. The tenants will need to drive S/SE almost exclusively in order to commute to work, school, food, medical, and most other needs. There are only two possible roads, Kahikili and Waiehu Beach Rd. Those roads are already at a standstill during the morning rush hour. Kahikili feeds into a congested intersection in Happy Valley, and the residents of Pakukalo already have enough trouble turning left out of their homes along Waiehu Beach Rd. This housing project would be better suited for an area with more highway infrastructure like Kihei.
- 3. The schools that these residents would feed into, Baldwin High School, Iao Intermediate, and Waihee School are all at maximum capacity. Temporary portable classrooms were built years ago and even those are at max capacity. The educational infrastructure is severely lacking. Again, a Kihei location would be more accommodating since there is a brand new high school being built there and could better serve a growing population.
- 3B. By adding more project housing to the area that already contains low income housing in Happy Valley, the area schools become concentrated with a higher needs population. This will make it much harder to fill teaching positions in those schools because teachers can receive the same pay to teach at other schools with a more privileged population.
- 4. The location is not walkable and puts the residents at a great disadvantage. They must be able to afford a car or be homebound. Transportation would be required for any employment, education, medical, recreation, food and other amenities. Families would need to plan their day around the time consuming bus schedule and coordinate babysitters to run simple errands.

Maui needs affordable housing, but the location needs to be chosen sensibly and with the best interests of the residents in mind. If the salt air has not been factored into the building cost and maintenance costs, then just stop right now. Unless there are plans to build a highway or bypass heading South, then just stop these plans right now.

If the goal is to find an inexpensive area hidden from the view of tourists, then it's a good spot. If the goal is to enable high need residents to better their lives, a different location needs to be chosen.

Thank you for taking these concerns into consideration.

Sincerely, Joseph Kutney



October 20, 2021

Hello,

I am writing with concerns about the location of the affordable housing project that has been proposed along Kahikili and Waiehu Beach Rd. Affordable housing is in dire need for Maui, but this location will be a disservice to the community and potential residents of the housing project.

- 1. The proximity to the ocean on a windward side of the island will require astronomical maintenance costs due to the salt air. All plumbing, electrical, and structural components will need to be built with costly stainless steel or aluminum. If not, all fixtures will need to be replaced within a few years, or worse, they become safety hazards. Everything from door hinges to the nails that hold it together will rust. The buildings will require yearly painting as the rust breaks through the paint.
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- 2. The tenants will need to drive S/SE almost exclusively in order to commute to work, school, food, medical, and most other needs. There are only two possible roads, Kahikili and Waiehu Beach Rd. Those roads are already at a standstill during the morning rush hour. Kahikili feeds into a congested intersection in Happy Valley, and the residents of Pakukalo already have enough trouble turning left out of their homes along Waiehu Beach Rd. This housing project would be better suited for an area with more highway infrastructure like Kihei.
- 3. The schools that these residents would feed into, Baldwin High School, Iao Intermediate, and Waihee School are all at maximum capacity. Temporary portable classrooms were built years ago and even those are at max capacity. The educational infrastructure is severely lacking. Again, a Kihei location would be more accomodating since there is a brand new high school being built there and could better serve a growing population.
- 3B. By adding more project housing to the area that already contains low income housing in Happy Valley, the area schools become concentrated with a higher needs population. This will make it much harder to fill teaching positions in those schools because teachers can receive the same pay to teach at other schools with a more privileged population.

4. The location is not walkable and puts the residents at a great disadvantage. They must be able to afford a car or be homebound. Transportation would be required for any employment, education, medical, recreation, food and other amenities. Families would need to plan their day around the time consuming bus schedule and coordinate babysitters to run simple errands.

Maui needs affordable housing, but the location needs to be chosen sensibly and with the best interests of the residents in mind. If the salt air has not been factored into the building cost and maintenance costs, then just stop right now. Unless there are plans to build a highway or bypass heading South, then just stop these plans right now.

If the goal is to find an inexpensive area hidden from the view of tourists, then it's a good spot. If the goal is to enable high need residents to better their lives, a different location needs to be chosen.

Thank you for taking these concerns into consideration.

Sincerely, Joseph Kutney



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

VICE PRESIDENT

June 1, 2022

Via email: josephkutney@gmail.com

Joseph Kutney

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Mr. Kutney:

Thank you for your email dated October 13, 2021, and comment letter dated October 20, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I am writing with concerns about the location of the affordable housing project that has been proposed along Kahikili and Waiehu Beach Rd. Affordable housing is in dire need for Maui, but this location will be a disservice to the community and potential residents of the housing project.

Response: The Applicant notes your opinion regarding the location of the proposed project.

Comment No. 2:

The proximity to the ocean on a windward side of the island will require astronomical maintenance costs due to the salt air. All plumbing, electrical, and structural components will need to be built with costly stainless steel or aluminum. If not, all fixtures will need to be replaced within a few years, or worse, they become safety hazards. Everything from door hinges to the nails that hold it together will rust. The buildings will require yearly painting as the rust breaks through the paint.

All refrigerators, air conditioning units, washing machines, dryers and other appliances will need to be replaced regularly due to the salt air. All TVs, radios, tools, vehicles, silverware and other personal items of the residents will be destroyed by the salt air. I live nearby and have to continually replace the brakes (rotors, calipers and pads \$1k+) on my car because of the rust. A vehicle is a financial asset to that family and will greatly lose resale value because of the rust.

Joseph Kutney June 1, 2022 Page 2

If the residents require free housing, they probably do not have the means to regularly replace these things and incur added expenses.

Response:

The proposed affordable housing community will be at a lower elevation than other residential neighborhoods in the immediate vicinity. Notwithstanding, the development will be built with durable materials to address any life cycle and maintenance concerns that may be specific to this location. The development and property management team will also conduct routine maintenance for the project. Washers and dryers will be provided by a third-party vendor who will maintain and replace the machines, as necessary.

Comment No. 3:

The tenants will need to drive S/SE almost exclusively in order to commute to work, school, food, medical, and most other needs. There are only two possible roads, Kahikili and Waiehu Beach Rd. Those roads are already at a standstill during the morning rush hour. Kahikili feeds into a congested intersection in Happy Valley, and the residents of Pakukalo already have enough trouble turning left out of their homes along Waiehu Beach Rd. This housing project would be better suited for an area with more highway infrastructure like Kihei.

Response:

The Traffic Impact Analysis Report (TIAR) prepared for the project and included in the Draft EA discussed existing traffic conditions in the area. The proposed project is expected to generate a minimal increase in traffic beyond existing conditions.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but would likely be tied to future development and availability of County funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and the Department of Public Works (DPW) to determine its fair share of infrastructure improvements in the area.

Comment No. 4:

The schools that these residents would feed into, Baldwin High School, Iao Intermediate, and Waihee School are all at maximum capacity. Temporary portable classrooms were built years ago and even those are at max capacity. The educational infrastructure is severely lacking. Again, a Kihei location would be more accomodating since there is a brand new high school being built there and could better serve a growing population.

By adding more project housing to the area that already contains low income housing in Happy Valley, the area schools become concentrated with a higher needs population. This will make it much harder to fill teaching positions in those

Joseph Kutney June 1, 2022 Page 3

schools because teachers can receive the same pay to teach at other schools with a more privileged population.

Response:

The Applicant has also consulted with the Hawai'i Department of Education (HIDOE) and its Planning Section on the proposed affordable housing community as part of the EA preparation process. The HIDOE and its Planning Section reviews new project proposals in relation to the State school system, including Maui County. The Applicant received comments from the HIDOE, noting that the proposed project is located within the Central Maui School Impact Fee District. The fee amount per unit for the district is \$2,371.00. As such, the Applicant will be providing a total school impact fee for this project of \$284,520.

The Applicant looks forward to complying with the school impact fee requirement which is intended to mitigate any potential impacts from the project on HIDOE's school facilities.

Comment No. 5:

The location is not walkable and puts the residents at a great disadvantage. They must be able to afford a car or be homebound. Transportation would be required for any employment, education, medical, recreation, food and other amenities. Families would need to plan their day around the time consuming bus schedule and coordinate babysitters to run simple errands.

Response:

Based on observations, there was little to no pedestrian traffic along the project site frontage on Kahekili Highway during the AM and PM peak periods. Pedestrian traffic is heavier in the Happy Valley area, but posted speed limits are low at 20 miles per hour, resulting in less vehicle-pedestrian conflicts. The Applicant and development team is coordinating with County Department of Transportation to determine the feasibility of providing a bus stop within or near the project vicinity. The Applicant will also maintain shoulder space along the project's frontage on Kahekili Highway.

Comment No. 6:

Maui needs affordable housing, but the location needs to be chosen sensibly and with the best interests of the residents in mind. If the salt air has not been factored into the building cost and maintenance costs, then just stop right now. Unless there are plans to build a highway or bypass heading South, then just stop these plans right now.

Response:

The Applicant notes your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

Joseph Kutney June 1, 2022 Page 4

As noted above, the Applicant is aware of the climatic conditions in the area and has factored this in to its plans development process. Further, the Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and DPW to determine its fair share of roadway infrastructure improvements in the area.

Comment No. 7:

If the goal is to find an inexpensive area hidden from the view of tourists, then it's a good spot. If the goal is to enable high need residents to better their lives, a different location needs to be chosen.

Response:

The Applicant notes your comment. As mentioned above, the project site that has been selected for this project in consideration of its location within the Urban Growth Boundary for the region and is considered to be a suitable site for additional residential housing.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Lena Tamashiro. Design Partners. Inc.

K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Substantive Comments\JKutney.res.docx

From: Gayle Long <geegayle@gmail.com> Sent: Tuesday, October 5, 2021 9:07 AM

To: Chris Sugidono < chris@munekiyohiraga.com; Director.hhc@mauicounty.gov; General eMail < planning@munekiyohiraga.com; Gail Nagasako < beachhouse808@gmail.com; Anthony Levoy III < tony@peake-levoy.com

Subject: Hale Mahaolu Affordble housing

Dear Chris,

I have questions about how the addition of this many homes on current traffic will be addressed.

This morning again, traffic from 6: 50 am until 7:30 am is backed up from the proposed site to Kahului Beach road (Wailuku Industrial park). I was driving at those times today to and from Oceanview Estates.

Please advise how these issues are considered by your EIA. This is the only access road to Kahului and it has two lanes with narrow shoulders- utilized heavily during work hours.

Thank you, Gayle Long Oceanview Estates



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: geegayle@gmail.com

Gayle Long

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Long:

Thank you for your comment letter dated October 5, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I have questions about how the addition of this many homes on current traffic will be addressed.

This morning again, traffic from 6:50 am until 7:30 am is backed up from the proposed site to Kahului Beach road (Wailuku Industrial park). I was driving at those times today to and from Oceanview Estates.

Please advise how these issues are considered by your EIA. This is the only access road to Kahului and it has two lanes with narrow shoulders- utilized heavily during work hours.

Response:

Section 3.3 of the Traffic Impact Analysis Report (TIAR), which was included in the Draft EA, discusses the existing traffic congestion along the major corridors and study intersections. The proposed project is expected to generate a minimal increase in traffic beyond existing conditions.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with Hawai'i Department of Transportation and the Department of Public Works to determine its fair share of infrastructure improvements in the area.

Gayle Long June 1, 2022 Page 2

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.
K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\Substantive Comments\GLong.res.docx

My name is Maureen Long, and I have lived in the Waiehu Heights subdivision for over forty years. My lot overlooks the piece of property that Hale Mahaolu Ke Kahua will sit on. Even though there is no mention of the gulch anywhere on your maps or in your reports or preliminary drawings it does exist.

Over the years I have seen that gulch get deeper and deeper, and it has also been getting wider. I have witnessed the hillsides of neighbors who live along the gulch lose sand from their slopes after rain. In the rainy season I have seen that gulch raging with water from the mountain. Water should flow through a culvert under Waiehu Beach Road, but the culvert repeatedly gets blocked with tree branches, rocks and rubbish so that storm water cannot pass through it. Therefore, the water collects in a huge flooded area upstream of the culvert on the project land and sits for weeks. This has been going on for forty years. It's a very dangerous situation for people and buildings in that lower area of your project design. The applicant must understand and consider the past and reconsider this project. Past flooding and erosion in the future potential based on climate change and likely increases in storm flooding quantity and duration.

Also, the culvert on Kahekili Highway just past the back entrance to Waiehu Terrace continually gets blocked with branches, boulders, etc. and forces the water to run down Kahekili Highway like a river. This also is a risk to the health and safety of the residents who will be living on the proposed project site. The County of Maui has often closed Kahekili Highway so that heavy machinery can clear the road of flood water and debris.

Attached are photos of the flooding that happens next to the Kahekili Highway and the Waiehu Beach Road intersection. I also have a video of the flood water and debris coming down the gulch between our properties.

Parking is also and issue with this project. There is just not enough adequate parking for the residents living there. All one-bedroom apartments should have two parking stalls. Twenty-eight stalls are inadequate. Guest parking is also needed, especially for the community center. Where will everyone park? This location is inadequate to provide needed guest and resident parking and loading zone areas.

A comprehensive traffic study needs to be done, beginning with the major traffic light intersections beginning with the Kahului Beach Road and Waiehu Beach Road intersection. School morning traffic on Waiehu Beach Road is backed up all the way to Kahekili Highway and beyond. It used to take me twenty-five minutes to get to work, and I worked just five miles away from home. Traffic in the evenings is also heavy with people returning from work.

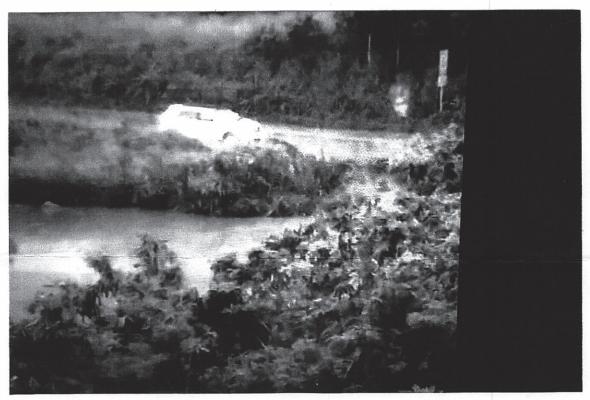
This project endangers adjacent land owners and potential residents. In my opinion it is dangerous and the wrong location for a much need project.

Haureen Long

Thank you,

mlong Kahawari, Mr. com

Manneen





Kohekili Hwy Waishin Beach Rd March 2020



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Maureen Long 816 Aukai Place Wailuku, HI 96793

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Ms. Long:

Thank you for your comment letter dated October 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

My name is Maureen Long, and I have lived in the Waiehu Heights subdivision for over forty years. My lot overlooks the piece of property that Hale Mahaolu Ke Kahua will sit on. Even though there is no mention of the gulch anywhere on your maps or in your reports or preliminary drawings it does exist.

Over the years I have seen that gulch get deeper and deeper, and it has also been getting wider. I have witnessed the hillsides of neighbors who live along the gulch-lose sand from their slopes after rain. In the rainy season I have seen that gulch raging with water from the mountain. Water should flow through a culvert under Waiehu Beach Road, but the culvert repeatedly gets blocked with tree branches, rocks and rubbish so that storm water cannot pass through it. Therefore, the water collects in a huge flooded area upstream of the culvert on the project land and sits for weeks. This has been going on for forty years. It's a very dangerous situation for people and buildings.in that lower-area of your project design. The applicant must understand and consider the past and reconsider this project. Past flooding and erosion in the future potential based on climate change and likely increases in storm flooding quantity and duration.

Also, the culvert on Kahekili Highway just past the back entrance to Waiehu Terrace continually gets blocked with branches, boulders, etc. and forces the water to run down Kahekili Highway like a river. This also is a risk to the health and safety of the residents who will be living on the proposed project site. The County of Maui has often dosed Kahekili Highway so that heavy machinery can clear the road of flood water and debris.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Maureen Long June 1, 2022 Page 2

Attached are photos of the flooding that happens next to the Kahekili Highway and the Waiehu Beach Road intersection. I also have a video of the flood water and debris coming down the gulch between our properties.

Response:

Thank you for your comment and the information provided. The development team has reviewed the property and recognizes that the existing swale conveys water to the existing culvert at the intersection. The swale will remain in its current condition and will not be modified during construction of this project. It is our understanding that trash and debris blocking the culvert has previously caused drainage issues at Kahekili Highway and Waiehu Beach Road. The Hawai'i Department of Transportation (HDOT) subsequently cleared the trash and debris from the culvert, which mitigated the issue. The proposed affordable housing community will be designed to meet the County's drainage rules and storm water quality rules.

Comment No. 2:

Parking is also and issue-with this project. There is just not enough adequate parking for the residents living there. All one-bedroom apartments should have two parking stalls. Twenty~-eight stalls are inadequate. Guest parking is also needed, especially for the community center. Where will everyone park? This location is inadequate to provide needed guest and resident parking and. loading zone areas.

Response:

The Applicant will work with the development team and make every effort to provide as much parking as possible and as appropriate for the project. As the property managers for the eventual housing community, Hale Mahaolu will also manage onsite parking needs between residents, the nonprofit building and clubhouse.

Comment No. 3:

A comprehensive traffic study needs to be done, beginning with the major traffic light intersections beginning with the Kahului Beach Road and Waiehu Beach Road intersection. School morning traffic on Waiehu Beach Road is backed up all the way to Kahekili Highway and beyond. It used to take me twenty-five minutes to get to work, and I worked just five miles away from home. Traffic in the evenings is also heavy with people returning from work.

This project endangers adjacent land owners and potential residents. In my opinion it is dangerous and the wrong location for a much need project.

Response:

Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

Maureen Long June 1, 2022 Page 3

A Traffic Impact Analysis Report (TIAR) was completed for the project and included as part of the Draft EA. Section 3.3 of the TIAR discusses this existing traffic congestion along the major corridors and study intersections. The proposed project is expected to generate a minimal increase in traffic beyond existing conditions.

The long-term regional improvement for this area identified by the County is the lmi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but will likely be tied to future development and availability of county funding.

The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and the Department of Public Works to determine its share of roadway infrastructure improvements in the area based on the potential impacts associated with this project.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc. Lena Tamashiro, Design Partners, Inc.

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----Original Message-----

From: Demetrios Maroosis < stageniner@gmail.com>

Sent: Saturday, October 23, 2021 2:40 PM

To: General eMail < planning@munekiyohiraga.com >

Subject: Housing

We are against the Hale Mahaolu Ke Kahua Affordable Housing Community.

The intersection of Kahekili Hwy. and Waiehu Bch. Rd. Is already congested mornings and evenings without adding additional vehicles. Kahekili Hwy. gets closed due to flooding between Waiehu Bch. Rd. and Happy Valley when we have heavy rain. Then what?

Charlotte and Demetrios Maroosis



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: stageniner@gmail.com

Charlotte and Demetrios Maroosis

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Charlotte and Demetrios:

Thank you for your letter dated October 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant notes your position in opposition to the proposed project. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.
- 2. A Traffic Impact Analysis Report (TIAR) was prepared for the project and is discussed in and appended to the Draft EA. Kahekili Highway, Waiehu Beach Road, and the intersection of the respective roadways were analyzed in the TIAR. Existing conditions indicate the intersection operates with some traffic congestion, but at levels appropriate for the project's location within the Urban Growth Boundary as designated by the Maui Island Plan. Taking into account planned developments and roadway improvements in the area, it is predicted that there will be a 3.46 percent increase in traffic along Kaheliki Highway and Waiehu Beach Road in the year 2024. The proposed project is not anticipated to significantly alter projected traffic increases for 2024. The Hale Mahaolu Ke

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Charlotte and Demetrios Maroosis June 1, 2022 Page 2

Kahua Affordable Housing Community development team is in coordination with HDOT and the Department of Public Works to determine its share of roadway infrastructure improvements in the area based on the potential impacts associated with this project.

3. The Applicant acknowledges concerns regarding the flooding and closure of Kahekili Highway and will work with the State Department of Transportation to mitigate disruptions in access to the highway during flood conditions. In addition, a subsurface drainage system will be constructed as part of the proposed project to accommodate increases in surface water runoff due to the project.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.
Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.
Ashley Otomo, Otomo Engineering Inc.

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From: Gary Mooers < gary@gmmaui.com > To: director hhc < director.hhc@co.maui.hi.us >

Cc: clanning@munekiyohiraga.com>, - Debbie Mooers <freestyledesignsmaui@yahoo.com</pre>

Bcc:

Date: Mon, 4 Oct 2021 13:56:44 -0500

Subject: Hale Mahaolu Ke Kapu Affordable Housing

While I am all for affordable housing to get the homeless from camping on our streets and highways, I am opposed to the project at the corner of Kahekili Highway and Waiehu Beach Rod in Waiehu.

The main reason is because I commute to work, and traffic is backed up from 7 am at the proposed intersection to the light at kahului Beach road, or at least 1 mile on week days. And Kahekili Highway is also backed up going into Happy Valley for about a mile.

The current infrastructure cannot handle the load now and will not accommodate the proposed development.

There is no mention of traffic congestion and the infrastructure even now is problematic and must be addressed.

Kahekili hwy is already insufficient and the hazards for pedestrian traffic is also a big concern not mentioned in the report.

Another issue I have is cost. Our government seems to not pay attention to how they spend taxpayer dollars. I read in the Maui News about Huliau Apartments, the 12 units that had been abandoned for years on the corner of Wahinepio and Kaahumanu Ave, and recently refurbished for affordable rental housing. According to the Maui News, that was a \$5 million project, over \$416,000 per unit to rehab the project. A private builder would have done that project for less than 20% of that cost. I rehab units of that size and do a beautiful job for 50-60k per unit, not \$400,000. That said, I believe the project would best serve the Maui community if built by private, not public, developers.

Mahalo,

Gary Mooers, RB, GRI, ABR, e-PRO, SFR

Oceanview Estates Homeowner and Resident

Mahalo.

Gary Mooers, RB, GRI, ABR, e-PRO, SFR

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Get to know me on this short video:

bit.ly/GaryMooers

Hear and watch this young family's testimonial:

https://bit.ly/Waikapu



MEO's mission is to strengthen the community while helping people in need restore their hope, reach their potential, and enrich their lives.

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PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: gary@gmmaui.com

Gary Mooers

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

<u>Hawaiʻi</u>

Dear Mr. Mooers:

Thank you for your comment letter dated October 4, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

While I am all for affordable housing to get the homeless from camping on our streets and highways, I am opposed to the project at the corner of Kahekili Highway and Waiehu Beach Rod in Waiehu.

Response:

The Applicant notes your comment in opposition of this project. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

Comment No. 2:

The main reason is because I commute to work, and traffic is backed up from 7 am at the proposed intersection to the light at kahului Beach road, or at least 1 mile on week days. And Kahekili Highway is also backed up going into Happy Valley for about a mile.

Response:

The Applicant notes your comment and concern about existing traffic conditions in the area.

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Comment No. 3:

The current infrastructure cannot handle the load now and will not accommodate the proposed development.

Response:

Based on the findings of the Traffic Impact Assessment Report (TIAR) that was included in the Draft EA, the proposed project is anticipated to generate a minimal increase in traffic beyond existing conditions. The Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the Hawai'i Department of Transportation (HDOT) and the Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area.

Comment No. 4:

There is no mention of traffic congestion and the infrastructure even now is problematic and must be addressed.

Response:

Section 3.3 of the TIAR, which was included in the Draft EA for the project, provides a comprehensive discussion on existing traffic congestion along the major corridors and study intersections.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but will likely be tied to future development and availability of County funding.

As noted above, the Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and DPW to determine its share of infrastructure improvements in the area.

Comment No. 5:

Kahekili hwy is already insufficient and the hazards for pedestrian traffic is also a big concern not mentioned in the report.

Response:

Based on observations, there was little to no pedestrian traffic along the Project frontage on Kahekili Highway during the AM and PM peak periods. Pedestrian traffic is heavier in the Happy Valley area, but posted speed limits are low at 20 miles per hour, resulting in less vehicle-pedestrian conflicts.

Comment No. 6:

Another issue I have is cost. Our government seems to not pay attention to how they spend taxpayer dollars. I read in the Maui News about Huliau Apartments, the 12 units that had been abandoned for years on the corner of Wahinepio and Kaahumanu Ave, and recently refurbished for affordable rental housing. According to the Maui News, that was a \$5 million project, over \$416,000 per unit to rehab the project. A private builder would have done that project for less than 20% of that

Gary Mooers June 1, 2022 Page 3

cost. I rehab units of that size and do a beautiful job for 50-60k per unit, not \$400,000. That said, I believe the project would best serve the Maui community if built by private, not public, developers.

Response:

This development is a new affordable housing community and is being led by Highridge Costa Development Company, a private developer. All members of the development team are also private sector entities. While this community is being funded in part by public subsidy, it has been designed from the ground up to deliver a quality affordable housing at a reasonable cost.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

U- X

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

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From: Gail Nagasako < beachhouse 808@gmail.com >

Sent: Monday, October 4, 2021 7:33 PM

To: <u>Director.hhc@mauicounty.gov</u>; General eMail <<u>planning@munekiyohiraga.com</u>>

Cc: Chris Sugidono < chris@munekiyohiraga.com>

Subject: Re: Hale Mahaolu Ke Kahua Affordable Housing Community

I am personally against it in that location. The highway from that corner up to near Happy Valley is such a nice green corridor and I feel we must preserve the few we have left. I'm surprised it isn't labeled that on the county plan. I would prefer is somewhere like on the highway towards Waihee, which is already residential. Or even on the left just before Happy Valley as there are already homes on the right side there.

Aloha, Gail Nagasako 1360 Hiahia Street Wailuku, HI 96793 (808) 281-1549



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: beachhouse808@gmail.com

Gail Nagasako

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Nagasako:

Thank you for your comment letter dated October 4, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. We acknowledge your opposition regarding the proposed project location. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.
- 2. We note that the project is situated on land zoned "Interim" and "Agriculture" by the Maui County Zoning Ordinance. However, pursuant to Chapter 2.97 of the Maui County Code (MCC), the Applicant will be seeking exemptions from MCC Title 19, Zoning, Article 1, Interim Zoning Provisions and MCC Chapter 19.30A, "Agricultural" district, to allow the use of "A-1, Apartment" district standards instead. It is also noted that the project will provide a greenway buffer along Kahekili Highway.
- 3. The project's location was selected as it is owned by Maui Economic

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Gail Nagasako June 1, 2022 Page 2

Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa Lena Tamashiro, Design Partners Inc.

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----Original Message-----

From: william Pannell pannellw@gmail.com>

Sent: Saturday, October 23, 2021 10:10 AM

To: director.hhc@mauicounty.gov

Cc: General eMail com>

Subject: Waiehu housing project

The traffic and overcrowding is already bad in this area. It also sounds like it will be an ugly housing project. Please consider other locations if possible. There are so many wide open spaces on Maui that could be great. This plan would hurt Waiehu Waihee residents and add to our existing problems. There are many empty buildings in Kahului. This seems unplanned and rushed. Will create many more problems. Gonna need sidewalks to Kahului. Maui will look like Oahu project areas soon. Please use another location.

Respectfully, William Pannell

Sent from my iPhone



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: pannellw@gmail.com

William Pannell

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Mr. Pannell:

Thank you for your comment letter, dated October 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. A Traffic Impact Analysis Report (TIAR) was prepared for the project and is appended to and discussed in the Draft EA. Taking into account planned developments and roadway improvements in the area, it is predicted that there will be a 3.46 percent increase in traffic along Kaheliki Highway and Waiehu Beach Road in the year 2024. The proposed project is not anticipated to significantly alter projected traffic increases for 2024. The Applicant will continue to work with the State Department of Transportation on traffic mitigation efforts.
- 2. The project was presented to the Maui County Urban Design Review Board on October 5, 2021, where the project's design and architectural qualities were evaluated and received unanimous support from the Board.
- 3. We acknowledge your suggestion to utilize land elsewhere or in Kahului for affordable housing. While there may be other potential sites on Maui, the project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban

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www.munekiyohiraga.com

William Pannell June 1, 2022 Page 2

Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community. note that the project's location was selected as it is owned by the Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for growth by the Maui Island Plan.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

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CEJS:lh

CC: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Lena Tamashiro, Design Partners Inc.
Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.
Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.
Ashley Otomo, Otomo Engineering Inc.

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Subject:

FW: Affordable Housing Project Proposed off Waiehu Rd.

From: Laurie Pottish <pottishl001@hawaii.rr.com>

Sent: Monday, October 25, 2021 8:18 AM

To: General eMail < planning@munekiyohiraga.com >

Subject: Affordable Housing Project Proposed off Waiehu Rd.

Aloha:

I am strongly opposed to the location of this project Not the idea of affordable housing. Why not utilize all the vacant spaces in Kahului for affordable housing such as the former "24 hour fitness" area &/or Maui Marketplace? Close to services & using already developed land seems like a much better idea than starting over.

Laurie Pottish 2892 Iwalani St. Pukalani, HI 96768



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: pottishI001@hawaii.rr.com

Laurie Pottish

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui, Hawai'i

Dear Ms. Pottish:

Thank you for your letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu.

The Applicant notes your opposition to the proposed project location and appreciates your suggestion to utilize vacant industrial or retail space in Kahului for affordable housing. While there may be other potential sites on Maui, the project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community. We note that the project's location was selected as it is owned by the Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had not previously been able to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

From: Regina Redfern < reginaredfern@gmail.com >

Sent: Saturday, October 23, 2021 1:28 PM

To: <u>Director.hhc@mauicounty.gov</u>

Cc: General eMail cplanning@munekiyohiraga.com>

Subject: Waiehue and Kahekili Hwy

The proposed building here causes more traffic problems. There is also flooding each year where that area is closed. There is no safe place to walk for children and families on the Highway.

We need affordable purchases for average working people.

Thank you

Ms. Redfern of Wailuku



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

EMAIL: reginaredfern@gmail.com

Regina Redfern

SUBJECT: Draft Environmental Assessment for the Proposed Hale Mahaolu

Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Redfern:

Thank you for your comment letter dated October 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community. A Traffic Impact Analysis Report (TIAR) was prepared for the project and is appended to and discussed in the Draft EA. Taking into account planned developments and roadway improvements in the area, it is predicted that there will be a 3.46 percent increase in traffic along Kaheliki Highway and Waiehu Beach Road in the year 2024. The proposed project is not anticipated to significantly alter projected traffic increases for 2024. The Applicant will continue to work with the State Department of Transportation on traffic mitigation efforts.
- 2. The Applicant acnowledges your concerns regarding the flooding in the area. A subsurface drainage system will be constructed as part of the proposed project and will be designed to accommodate increases in surface water runoff.

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3. The proposed affordable housing community will be accessible via three (3) driveway entrances with a greenway buffer along Kahekili Highway and is not anticipated to impact pedestrians along the highway. We note that the project will include amenities for residents such as a clubhouse, play areas, onsite laundry facilities and a maintenance room.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

Ch Sh

CEJS:lh

cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa
Lena Tamashiro, Design Partners Inc.
Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.
Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.
Ashley Otomo, Otomo Engineering Inc.

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From: kathrenbade@gmail.com <kathrenbade@gmail.com>

Sent: Sunday, October 3, 2021 4:56 PM **To:** director.hhc@mauicounty.gov

Cc: monte.heaton@housingpartners.com; General eMail clanning@munekiyohiraga.com

Subject: Opposed to: Hale Mahaolu Ke Kahua Affordable Housing Community

Dear Lori Tsuhaki,

I live in the area proposed to build this project. I am completely opposed for multiple reasons:

- 1. The area is prone to flooding from nearby streams and rivers on Kahekili highway and Waiehu beach roads, which completely shuts these two artery roads to this area down multiple times a year. Why would the county allow this to be built with annual flooding in the area?
- 2. The addition of 264 vehicles to this location only chokes the already horrific school/work traffic in the mornings and afternoons. The developer is not proposing to add infrastructure to the area: new access roads, schools, public parks, additional shopping centers.
 - a. Current parks in the area are already heavily used by local residents; there are no additional dog parks in place in this area and with the additional inhabitants proposed that means that many more people and their pets utilizing the undersized existing parks and very limited parking at these parks
 - b. There is one grocery store in the area, Sac n Save, which would not be able to adequately service the additional numbers of new residents and the add'l auto's in the minuscule parking lot at this grocery store.
 - c. There is no pharmacy near this area at all.
 - d. Schools: additional auto and school bus traffic with residents taking their children via auto to school, further adding to the congestion at peak travel times; there need to be more elementary and middle schools in the area to support this number of proposed residents to the very limited schools in Waihee.
 - e. Residential housing in this area will be hot, with all ocean breezes and winds being blocked from the Waiehu Heights and Waiehu Terrace subdivision. Future residents of this proposed development will be hot and angry and will contribute to more density in the already extremely limited beach parks and coastal zones in the area.

- 3. Access roads: traffic through Happy Valley and the Waiehu Beach Road/Kahului Beach Road/Jack in the Box junction is already terribly slow with current levels of traffic. The developer who obviously wants to eventually be granted permission to further develop the macadamia fields mauka of this project on Kahekili is not proposing additional roads to the area at their cost? The developer is obviously depending on the residential tax payers of Maui (not these rentals tenants who pay no real estate taxes) to foot the bill for that infrastructure.
- 4. The future development of the mauka lands is not even being mentioned by the developer but the fact that the developer is seeking "affordable" housing first is an obvious attempt at trying to get their foot in the door with the county for future development approval of much higher for-profit transition of additional prime agricultural lands to residential-commercial- light industrial.
- 5. The location is "Prime" agricultural land; keep it that way; keeping Hawaii green with small family farming from Wailuku country estates all the way to Kahakuloa will maintain the Hawaiian lifestyle, not urban crowded rental units and expensive future luxury housing units that local people can't afford to purchase.

I previously worked for Times Mirror Cable TV engineering in California prior to moving to Hawaii in the 1980's. When a community was designed, the infrastructure of roads, schools, parks, medical and shopping centers was built first by the developer before any permits were issued for housing. I am recommending that the county reject this plan for affordable rental housing because there are plenty of other areas within Maui with access to roads, schools, parks that are better suited right now to build affordable housing. The developer is not seeking to contribute to the local area of Waiehu and the Hawaii lifestyle but seeking future profits with the additional lands they own or seek to own and further develop.

Sincerely,

Kathy Rosales

Direct: 808-250-7077



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP

June 1, 2022

Via email: kathrenbade@gmail.com

Kathy Rosales

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawaiʻi

Dear Ms. Rosales:

Thank you for your comment letter dated October 3, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

The area is prone to flooding from nearby streams and rivers on Kahekili highway and Waiehu beach roads, which completely shuts these two artery roads to this area down multiple times a year. Why would the county allow this to be built with annual flooding in the area?

Response:

The parcel is within Flood Zone X, an area of moderate-to-low flooding risk that is located outside the 0.2 percent annual chance flood plain. It is our understanding that trash and debris blocking the culvert has previously caused drainage issues at the Kahekili Highway and Waiehu Beach Road intersection. Hawai'i Department of Transportation (HDOT) subsequently cleared the trash and debris from the culvert, which mitigated the issue. This project will be designed to meet the County's drainage rules and storm water quality rules.

Comment No. 2:

The addition of 264 vehicles to this location only chokes the already horrific school/work traffic in the mornings and afternoons. The developer is not proposing to add infrastructure to the area: new access roads, schools, public parks, additional shopping centers.

a. Current parks in the area are already heavily used by local residents; there are no additional dog parks in place in this area and with the additional inhabitants proposed that means that many more people and their pets utilizing the undersized existing parks and very limited parking at these parks

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

- b. There is one grocery store in the area, Sac n Save, which would not be able to adequately service the additional numbers of new residents and the add'l auto's in the minuscule parking lot at this grocery store.
- c. There is no pharmacy near this area at all.
- d. Schools: additional auto and school bus traffic with residents taking their children via auto to school, further adding to the congestion at peak travel times; there need to be more elementary and middle schools in the area to support this number of proposed residents to the very limited schools in Waihee.
- e. Residential housing in this area will be hot, with all ocean breezes and winds being blocked from the Waiehu Heights and Waiehu Terrace subdivision. Future residents of this proposed development will be hot and angry and will contribute to more density in the already extremely limited beach parks and coastal zones in the area.

Response:

Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.

In terms of traffic, the proposed project is anticipated to generate a minimal increase in traffic beyond current conditions and the Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with HDOT and the Department of Public Works (DPW) to determine its fair share of roadway infrastructure improvements in the area.

The Applicant has also consulted with the Hawai'i Department of Education (HIDOE) and its Planning Section on the proposed affordable housing community as part of the EA preparation process. The HIDOE and its Planning Section reviews new project proposals in relation to the State school system, including Maui County. The Applicant received comments from the HIDOE, noting that the proposed project is located within the Central Maui School Impact Fee District. The fee amount per unit for the district is \$2,371.00. As such, the Applicant will be providing a total school impact fee for this project of \$284,520.00.

The Applicant looks forward to complying with the school impact fee requirement which is intended to mitigate any potential impacts from the project on HIDOE's school facilities including Waihe'e Elementary School.

Comment No. 3:

Access roads: traffic through Happy Valley and the Waiehu Beach Road/Kahului Beach Road/Jack in the Box junction is already terribly slow with current levels of traffic. The developer who obviously wants to eventually be granted permission to

further develop the macadamia fields mauka of this project on Kahekili is not proposing additional roads to the area at their cost?

The developer is obviously depending on the residential tax payers of Maui (not these rentals tenants who pay no real estate taxes) to foot the bill for that infrastructure.

Response:

The Hale Mahaolu Ke Kahua Affordable Housing Community is a standalone 100 percent affordable housing project and the developer is not affiliated with the former Hale Mua project located mauka of Kahekili Highway.

The long-term regional improvement for the area identified by the County is the Imi Kala Street Extension. The timeline for completion of this improvement is currently unknown, but will likely be tied to future development and availability of County funding.

As mentioned above, the Hale Mahaolu Ke Kahua Affordable Housing Community development team is in coordination with the HDOT and DPW to determine its share of roadway infrastructure improvements in the area.

Comment No. 4:

The future development of the mauka lands is not even being mentioned by the developer but the fact that the developer is seeking "affordable" housing first is an obvious attempt at trying to get their foot in the door with the county for future development approval of much higher for-profit transition of additional prime agricultural lands to residential-commercial-light industrial.

Response:

As stated above, the Hale Mahaolu Ke Kahua Affordable Housing Community is a standalone 100 percent affordable housing project and the developer is not affiliated with the former Hale Mua project located mauka of Kahekili Highway.

Comment No. 5:

The location is "Prime" agricultural land; keep it that way; keeping Hawaii green with small family farming from Wailuku country estates all the way to Kahakuloa will maintain the Hawaiian lifestyle, not urban crowded rental units and expensive future luxury housing units that local people can't afford to purchase.

Response:

The Applicant notes but respectfully disagrees with your comment given that the project site is supported for future growth by the County's general planning framework. It is noted that the project will provide landscaping within the site as well as a greenway buffer along Kahekili Highway to mitigate any potential visual impacts. Further, this is a 100 percent affordable housing community and does not contain any luxury housing units.

Kathy Rosales June 1, 2022 Page 4

Comment No. 6:

I previously worked for Times Mirror Cable TV engineering in California prior to moving to Hawaii in the 1980's. When a community was designed, the infrastructure of roads, schools, parks, medical and shopping centers was built first by the developer before any permits were issued for housing. I am recommending that the county reject this plan for affordable rental housing because there are plenty of other areas within Maui with access to roads, schools, parks that are better suited right now to build affordable housing. The developer is not seeking to contribute to the local area of Waiehu and the Hawaii lifestyle but seeking future profits with the additional lands they own or seek to own and further develop.

Response:

It is known that the development will require infrastructure improvements. These improvements have been taken into account in the design and budgeting of Hale Mahaolu Ke Kahua.

This site represents a unique opportunity to build affordable housing because the land is being leased to the developer at \$1 per year by Maui Economic Opportunity, Inc. for the life of the project, enabling the project to maintain feasibility despite the fact that infrastructure improvements will be necessary to bring utilities to the site.

As previously stated, the Hale Mahaolu Ke Kahua Affordable Housing Community is a standalone 100 percent affordable housing project and the developer is not affiliated with the former Hale Mua project located mauka of Kahekili Highway.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu
Moe Mohanna, Highridge Costa
Monte Heaton, Highridge Costa
Harrison Herzberg, Highridge Costa

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

Ashley Otomo, Otomo Engineering, Inc. Lena Tamashiro, Design Partners, Inc.

Debbie Cabebe, Maui Economic Opportunity, Inc.

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From: Selina Swatek < selinaswatek@outlook.com >

Sent: Saturday, October 23, 2021 10:33 AM

To: director.hhc@mauicounty.gov

Cc: monte.heaton@housingpartners.com; General eMail clanning@munekiyohiraga.com

Subject: Comments regarding affordable rental project in Waiehu

Aloha,

I am a lifelong resident of Waiehu and currently live in the Ocean View Estates Neighborhood. Over the last 30 years, I have seen the continued development of this area and its negative effects. To put it simply, at this point in time, we do not have the infrastructure to support the population that will come with 120 units, 240 cars, and 3 entrances off of Kahekili Highway. The traffic in this area is already unmanageable. It will not work without traffic lights. There will be car accidents and road rage incidents. There should be a master plan for this area before ANY additional homes or entrances to the highway are considered. Simply dumping hundreds of residents and cars into our tiny community that is ALREADY struggling with these issues, is not responsible. We are FULL.

Especially considering that there are so many other options on Maui. So many vacant buildings in the Kahului area that could be converted to affordable rentals. Why wouldn't we maintain what we already have, in an area that can certainly handle the additional population and traffic? Why continue this ugly sprawl of buildings onto an area that has been agricultural for as long as time? I understand that MEO owns this land, and other people own the land I speak of. But, please, don't take the easy way out. Figure out a way to do it right.

Also, why rentals? Why is the focus not on affordable homes for purchase? Local families who work full time jobs cannot afford to buy a home here. Married families with children. People are leaving for the mainland every day. Let people put in roots and BUY homes. That is what creates good, healthy, successful neighborhoods. Let our locals live in what they own and build generational wealth.

Building affordable rentals over affordable housing for purchase is slapping duct tape over the problem. Just please don't do it in Waiehu. It will negatively affect our entire community and that is not fair.

Mahalo for your time and consideration.

Selina Swatek

(808) 281-3737



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP

June 1, 2022

Via email: selinaswatek@outlook.com

Selina Swatek

SUBJECT: Draft Environmental Assessment for Proposed Hale Mahaolu Ke Kahua

Affordable Housing Community at TMK (2)3-3-001:106, Waiehu, Maui,

Hawai'i

Dear Ms. Swatek:

Thank you for your comment letter dated October 23, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us comments for this 100 percent affordable housing community in Waiehu.

On behalf of the Applicant, we offer the following responses to your comments which are presented in the same order as they appear in your letter:

Comment No. 1:

I am a lifelong resident of Waiehu and currently live in the Ocean View Estates Neighborhood. Over the last 30 years, I have seen the continued development of this a rea and its negative effects. To put it simply, at this point in time, we do not have the infrastructure to support the population that will come with 120 units, 240 cars, and 3 entrances off of Kahekili Highway. The traffic in this area is already unmanageable. It will not work without traffic lights. There will be car accidents and road rage incidents. There should be a master plan for this area before ANY additional homes or entrances to the highway are considered. Simply dumping hundreds of residents and cars into our tiny community that is ALREADY struggling with these issues, is not responsible. We are FULL.

Especially considering that there are so many other options on Maui. So many vacant buildings in the Kahului area that could be converted to affordable rentals. Why wouldn't we maintain what we already have, in an area that can certainly handle the additional population and traffic? Why continue this ugly sprawl of buildings onto an area that has been agricultural for as long as time? I understand that MEO owns this land, and other people own the land I speak of. But, please, don't take the easy way out. Figure out a way to do it right.

Response:

Thank you for your comment. The project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community. The

Selina Swatek June 1, 2022 Page 2

project's location was selected as it is owned by Maui Economic Opportunity, Inc. (MEO) who intends to lease the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

Comment No. 2:

Also, why rentals? Why is the focus not on affordable homes for purchase? Local families who work full time jobs cannot afford to buy a home here. Married families with children. People are leaving for the mainland every day. Let people put in roots and BUY homes. That is what creates good, healthy, successful neighborhoods. Let our locals live in what they own and build generational wealth.

Response:

While affordable homes for purchase are important, they are only one piece of the puzzle in solving Maui's affordability crisis. Buying a home requires a substantial down payment and good credit, which many low-income residents do not have. An affordable rental allows families to save for the future so that they can one day afford home ownership.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Ch ST

Chris Sugidono Senior Associate

CEJS:ab

Cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

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Subject:

FW: Proposed Affordable housing Kahekili Hwy and Waieh'u Beach Rd

----Original Message-----

From: joannevasquez@mac.com <joannevasquez@mac.com>

Sent: Monday, October 25, 2021 9:02 AM

To: General eMail <planning@munekiyohiraga.com>

Subject: Proposed Affordable housing Kahekili Hwy and Waieh'u Beach Rd

Aloha, I object strongly to the proposed affordable housing in the area of Kahekili Hwy and Waiehu beach Rd.

Redevelop old abandoned sites around Kahului rather than engage in urban sprawl.

Get creative and put the unused or under utilized locations like Maui Marketplace in this plan.

Don't spread out into other areas.

Listen to the people not the developers.

sincerely Joanne Vasquez Haiku



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

June 1, 2022

Via email: joannevasquez@mac.com

Joanne Vasquez

SUBJECT:

Draft Environmental Assessment for Proposed Hale Mahaolu Ke

Kahua Affordable Housing Community at TMK (2)3-3-001:106,

Waiehu, Maui, Hawai'i

Dear Ms. Vasquez:

Thank you for your comment letter, dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the subject project. We appreciate you taking the time to provide us with comments for this 100 percent affordable housing community in Waiehu and offer the following responses, which are presented in the same order as your letter:

- 1. The Applicant acknowledges your objection to the proposed project location. While there may be other potential sites on Maui, the project site for the proposed project is considered to be a suitable location for residential housing as it is supported by the County's general planning framework and is located adjacent to existing residential areas and situated within the Urban Growth Boundary for the region. It is also located within easy reach of existing school facilities, recreational amenities and retail services currently available within the Wailuku-Kahului community.
- 2. We appreciate your suggestion to utilize vacant retail space in Kahului for affordable housing. We note that the project's location was selected as it is owned by Maui Economic Opportunity, Inc. (MEO) who intends to the property to the Applicant at \$1 per year for 75 years. MEO had previously been unable to develop the land on their own and has partnered with the Applicant to develop affordable housing for the community, which fulfills the nonprofit's mission to serve low-income families and residents, in a location supported for future growth by the Maui Island Plan.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

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Joanne Vasquez June 1, 2022 Page 2

We appreciate your input and will include a copy of your comment letter and this response in the Final EA. Should you have any questions or require further information regarding the proposed project, please contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

CEJS:Ih

Grant Chun, Hale Mahaolu CC:

> Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa K:\DATA\Highridge\Waiehu AH PERMITTING\Applications\Draft EA\Response Letters\J Vasquez.res.doc



December 1, 2021

MEETING MEMORANDUM

Subject: Draft Environmental Assessment Prepared for the Proposed Hale Mahaolu

Ke Kahua Affordable Housing Community

Registered

Participants: Miyo Miyasaki-Kim

Duane Kim

Colin Rodrigues
Damir Kouliev
Maureen Long
Cindy Natividad
Teri Liebmann
Darlene Endrina
Jeanie Dillon
Kehau Deutsch

Project Team: Grant Chun, Hale Mahaolu

Moe Mohanna, *Highridge Costa*Monte Heaton, *Highridge Costa*Harrison Herzberg, *Highridge Costa*

Debbie Cabebe, Maui Economic Opportunity Inc. (MEO)

Peter Horovitz, MEO

Lena Tamashiro, *Design Partners*Johnny Wu, *Design Partners*

David Sereda, *Chris Hart & Partners*Ashley Otomo, *Otomo Engineering*

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, ATA

Trevor Yucha, *Cultural Surveys Hawai'i*

Mark Roy, *Munekiyo Hiraga*Chris Sugidono, *Munekiyo Hiraga*



On October 21, 2021, the Applicant and its consultants participated in a virtual community meeting with nearby residents to provide an overview of the proposed affordable housing community and to answer questions about the project. A meeting notification flier was mailed out to 92 addresses, primarily within the Waiehu Heights subdivision. Participants had the option of registering for the meeting to join via video or by phone.

Below is a summary of the main comments that were discussed at the meeting, as well as the Applicant team's responses:

1. Comment:

Are there plans for fencing between the site and the stream behind the property?

Response: The Applicant will be installing a fence along the eastern side of the property between the adjacent homes within the Waiehu Heights subdivision. The fence provides a safety measure for children in the housing community and will include a locked entrance for staff to conduct any necessary maintenance.

2. <u>Comment:</u>

I'm concerned that your studies have underestimated the impact on local traffic and police/fire services due to the distance.

Response:

The Traffic Impact Assessment Report (TIAR) prepared by Austin, Tsutsumi & Associates, Inc. (ATA) determined that the proposed project is anticipated to generate a minimal increase in traffic over existing conditions for the region. This does not mean that there is minimal traffic on surrounding roads and intersections. Traffic in the area will continue to be heavy during peak morning and afternoon hours, with or without the proposed project.

The Applicant and its consultants have been coordinating and communicating with the Maui Police Department as well as the Department of Fire and Public Safety's Fire Prevention Bureau on the proposed affordable housing community. The agencies did not have any comments on the Draft EA, but will be consulted during the building permit review process when detailed plans are further developed. Coordination with the County Department of Public Works (DPW) and Hawai'i Department of Transportation (HDOT) on traffic mitigation measures is



also ongoing and will continue as the planning process proceeds for this project.

3. <u>Comment:</u>

The study also fails to assess noise impacts post construction.

Response:

As a 100-percent affordable housing community, noise generation would reasonably be restricted to vehicular traffic, children playing within the project's playground areas and other typical residential occurrences. The housing community will also be managed by Hale Mahaolu and an onsite manager will implement standard housing rules, such as quiet hours.

4. Comment:

What is the height of the 2-story buildings from the ground level?

Response:

The height of the 2-story housing unit buildings from the ground level to the top of the roof will be around 27 to 28.5 feet tall.

5. Comment:

Was the traffic report made during the Covid-19 pandemic? Because traffic was a lot crazier before the pandemic.

Response:

The TIAR prepared by ATA evaluated turning movement counts collected in 2016 to 2019, which was prior to the pandemic. Based on early consultation with HDOT and DPW, the use of historic counts were acceptable.

6. <u>Comment:</u>

Why was the gulch not mentioned in any reports?

Response:

The property does not appear to contain any recognized gulches, though, a swale generally occurs along the eastern edge of the property between the Waiehu Heights subdivision. The Applicant will minimize any grading of the existing swale and plans to enhance the landscape with native plants and irrigation.



Mohannad H. Mohanna, President Highridge Costa Development Company



Karlynn K. Fukuda

PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

April 11, 2022

MEETING MEMORANDUM

To: George Paresa, Jr.

Waihe'e Community Association

From: Chris Sugidono, Senior Associate

Munekiyo Hiraga

Draft Environmental Assessment Prepared for the Proposed Hale Subject:

Mahaolu Ke Kahua Affordable Housing Community

Participants: George Paresa, Jr., Waihe'e Community Association

> Brian Sarasin, Sr., Waihe'e Community Association Melvin Fukunaga, Waihe'e Community Association

Kiai Collier. Hawai'i Land Trust Grant Chun, Hale Mahaolu Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, Maui Economic Opportunity Inc. (MEO)

Peter Horovitz, MEO

Lena Tamashiro, Design Partners Johnny Wu, Design Partners

David Sereda, Chris Hart & Partners Ashley Otomo, Otomo Engineering

Tyler Fujiwara, Austin, Tsutsumi & Associates (ATA)

Kelcee Fujimoto, ATA

Trevor Yucha, Cultural Surveys Hawai'i

Mark Roy, Munekiyo Hiraga

Chris Sugidono, Munekiyo Hiraga

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Thank you very much for your time and participation in the conference call meeting that was held with the Applicant and its consultant team on October 25, 2021. We very much appreciate you taking the time to provide us with your comments and questions on the Draft Environmental Assessment (EA) for the Hale Mahaolu Ke Kahua Affordable Housing Community.

Please see below a summary of the main comments that were discussed at our meeting, as well as the Applicant team's responses:

1. Comment:

Why did the applicant not consult with Waihe'e Elementary School?

Response: The Applicant has consulted with the Hawai'i Department of Education (HIDOE) and its Planning Section on the proposed affordable housing community as part of the EA preparation process. The HIDOE and its Planning Section reviews new project proposals in relation to the State school system, including Maui County. The Applicant received comments from the HIDOE, noting that the proposed project is located within the Central Maui School Impact Fee District. The fee amount per unit for the district is \$2,371. As such, the Applicant will be providing a total school impact fee for this project of \$284,520.00.

> The Applicant looks forward to complying with the school impact fee requirement which is intended to mitigate any potential impacts from the project on HIDOE's school facilities including Waihe'e Elementary School.

2. Comment:

How many students are you expecting from the project to attend Waihe'e Elementary School?

Response: Once the project is mature and turnover stabilized, the HIDOE expects roughly 26 students would reside in the proposed housing community. This would include potential students for Waihe'e Elementary School, Iao Middle School and Baldwin High School.

3. Comment:

Sometimes during the wet season in the vicinity of this project there is an overflow of rocks and debris that goes onto the highway from the culvert at the highway intersection. Is this project doing anything to address the flooding concerns at the culvert? The culvert issue really needs to be addressed as I don't think we can rely on the State to keep it clear and maintained.

Response: The Applicant has spoken with MEO (landowner) about the offsite culvert and general flooding concerns near the project area. MEO noted that the culvert is maintained by the Hawai'i Department of Transportation (HDOT), which is responsible for cleaning and maintaining the culvert. MEO identified at least one previous flooding event caused by a lack of maintenance of the culvert, which had been clogged with debris.

> Development of the MEO property is expected to generally reduce the amount of debris in the surrounding area, which contains large trees and other vegetation. Regular landscaping and maintenance will occur once the project is completed, and include drainage system improvements to ensure that run-off from the property is not increased from existing conditions. Hale Mahaolu, which will serve as the property manager during the operational phase of the project, will additionally coordinate with HDOT to request that the culvert is regularly maintained to avoid potential future flooding events.

4. **Comment:**

Does the development have full clear title to this property?

Response: According to MEO, the nonprofit has clear title to the land and the deeds, which is confirmed by the County of Maui's previous subdivision of the property. The persons identifying themselves as the Heirs of Pehuino have made clear that they claim interests in only Land Commission Award (LCA) No. 3386. LCA No. 3386, Apanas 1, 2, and 3 are located nearly a mile away and were never part of the MEO property. This too is confirmed by historic deeds, LCA awards, and County records.

5. Comment:

Is there a stipulation on the title for this property to be used only for agriculture?

Response:

There is no stipulation on the title for the property that restricts the land to agriculture use only. This was confirmed by the Applicant and MEO.

6. Comment:

I don't agree with the findings of the traffic study and don't believe it is accurate. Are you working with the state and county agencies regarding the impacts to the highway and roadway infrastructure?

Response:

The Traffic Impact Assessment Report (TIAR) prepared by Austin, Tsutsumi & Associates, Inc. (ATA) determined that the proposed project is anticipated to generate a minimal increase in traffic over existing conditions for the region. This does not mean that there is minimal traffic on surrounding roads and intersections. Traffic in the area will continue to be heavy during peak morning and afternoon hours, with or without the proposed project. However, coordination with the County Department of Public Works and Hawai'i Department of Transportation on traffic mitigation measures is ongoing and will continue as the planning process proceeds for this project.

7. Comment:

Are native Hawaiian plants being used for this project? I really don't want to see county water being used for irrigation as it is too precious. Is this project planning on using the irrigation well that is on the site? I don't see any mention of this in the Draft EA.

Response: Since the publishing of the Draft EA, the Applicant has developed a Conceptual Landscaping Plan for the proposed housing community, which will be included in the Final EA. The plan includes a number of native plants appropriate for the area, including fruit trees. The Applicant will be working with its engineer and landscape architect to evaluate possible non-potable water sources (such as rainwater harvesting for the project's landscaped areas.

8. Comment:

What is the estimated water usage for irrigation?

Response: According to the Applicant's landscape architect, projects typically use drip irrigation and high-efficiency nozzles as water conservation measures. The project site will also include rain sensors, which limits water usage when it rains on the property. The estimated calculations for water irrigation will be developed as the project progresses, but these water conservation measures will help to reduce the project's overall water usage.

9. Comment:

Are there any upgrades that need to be done to the sewer pump station by Waiehu to accommodate the flow from this project?

Response:

The proposed project will generate approximately 30,600 gallons of wastewater daily. The onsite sewerage collection system will be designed to accommodate this flow. The nearest gravity sewer connection is located approximately 1,500 feet from the proposed site, along Waiehu Beach Road. Connection to this system will require a lift station for the project.

The wastewater generated from the project will be transported to the Wailuku-Kahului Wastewater Reclamation Facility. present time and as confirmed by the Department of Environmental Management, the reclamation facility has sufficient capacity to accommodate the additional wastewater generated from the proposed project.

10. Comment:

What are the terms of affordability for this project?

Response: An Affordable Housing Agreement will be entered into by the Applicant and the County of Maui, Department of Housing and Human Concerns for a period of 60 years for the proposed housing community.

11. Comment:

Are you working with the state and county agencies regarding the impacts to the highway and roadway infrastructure?

Response: According to the Applicant's traffic engineer, commute times in the surrounding area will generally remain the same with or without the proposed project. However, the Applicant does understand the community's concerns over any increases to the existing traffic in the area. The Applicant and ATA have engaged DPW and HDOT in discussions on fair-share mitigations that would be intended to alleviate any additional impacts from the proposed project.

12. Comment:

I drive my grandson to school each morning and observe traffic backing up past the Wailuku Country Estates driveway on our way into Happy Valley. We are at a crawl until we get to the intersection in Wailuku. This area of the highway is a bottleneck and traffic is coming from Waihe'e, Kahakuloa and Wailuku Country Estates.

Response: We note this comment. The TIAR did observe traffic in the Happy Valley area to gueue during the peak morning period before 8:00 a.m. This may partly be due to Main Street experiencing relatively slow-moving, stop-and-go traffic conditions due to on-street parking stalls, pedestrian crossing and numerous businesses and driveways in the area. The Applicant understands these concerns and will continue to work with its traffic engineer as well as DPW and HDOT to address any fair-share traffic mitigation requirements for the project.

13. Comment:

When are you proposing to break ground if this project is approved and moves forward to construction?

Response: Construction of the proposed project will commence upon the Maui County Code Chapter 2.97 approval by the Maui County Council and upon receipt of building permit approvals. This process is anticipated to take a couple of years to complete. Construction of the new affordable housing community is anticipated to be completed in 16 months.

14. Comment:

Will the developer be providing any updates to the community as it moves forward with this project?

Response: The Applicant and Hale Mahaolu will continue to provide updates to the community as project planning progresses. We recognize this meeting as the second conference call held with the association and project team (the first being held on February 2, 2021), and appreciate all of the input we have received to date. The Hale Mahaolu Ke Kahua Affordable Housing Community is envisioned to be a key part of the Waiehu-Waihe'e community and we look forward to ongoing dialogue with the surrounding community.

Thank you again for your input and review of the Draft EA for this affordable housing community. As mentioned during the meeting, this meeting memorandum will be included into the Final EA and a copy will also be sent to the Waihe'e Community Association. Should you have any questions or require further information, please feel free to contact me at (808) 244-2015, extension 221.

Very truly yours,

Chris Sugidono Senior Associate

C. X

CEJS:Ih

cc: Grant Chun, Hale Mahaolu

Moe Mohanna, Highridge Costa Monte Heaton, Highridge Costa Harrison Herzberg, Highridge Costa

Debbie Cabebe, MEO

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