
VOLUME I OF II

Draft Environmental Impact Statement

Kanahā Hotel at Kahului Airport

Kahului, Maui, Hawai'i

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Accepting Authority:

State Land Use Commission

November 2021



Kanahā Hotel

Kahului, Maui, Hawaii
TMK Nos: (2) 3-8-103:014 (portion), 015 (portion),
016, 017, and 018

Draft Environmental Impact Statement

November 2021

Prepared For
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The Draft Environmental Impact Statement and all ancillary documents were prepared my direction or supervision, and the information submitted, to the best of my knowledge, fully addresses document content requirements set forth in Hawaii Revised Statutes, Chapter 343, and Hawaii Administrative Rules 11-200.1-7, as applicable.



Brett Davis
Senior Planner
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11-1-2021

November 2021

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ABBREVIATIONS & ACRONYMS

A&B	Alexander & Baldwin, LLC
AAQS	Ambient Air Quality Standards
AAR	Airport Access Road
ACM	Asbestos-Containing Materials
ADC	Average Daily Visitor Census
AFOLU	Agriculture, Forestry, and Other Land Use
AGS	Aerobic Granular Sludge Technology
AIS	Archaeological Inventory Survey
ALISH	Agricultural Lands of Importance to the State of Hawai'i
ASTM	American Society of Testing and Materials
ATA	Austin, Tsutsumi & Associates, Inc.
BMP	Best Management Practices
BTUX	Benzene, Toluene, Ethylbenzene, and Xylene
BWS	Board of Water Supply (County of Maui)
C&D	Construction and Demolition
CCFDC	Catholic Charities Housing Development Corp
CDP	Census Designated Place
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CFS	cubic feet per second
CIA	Cultural Impact Assessment
CIZ	Change in Zoning/Change of Zoning
CML	Central Maui Landfill
CONRAC	Consolidated Rental Car Facility
COPC	Chemicals of Potential Concern
CPA	Community Plan Amendment
CPP	Countywide Policy Plan
CWRM	Commission on Water Resource Management
CY	Calendar Year
CZM	Coastal Zone Management
CZMP	Coastal Zone Management Programs
D&O	Decision and Order
DBEDT	Department of Business, Economic Development and Tourism (State of Hawai'i)
DEA	Draft Environmental Assessment
DEIS	Draft Environmental Impact Statement
DEM	Department of Environmental Management (County of Maui)

DHHC	Department of Housing and Human Concerns (County of Maui)
DLNR	Department of Land and Natural Resources (State of Hawai'i)
DMV	Division of Motor Vehicles
DNL	Day-Night Average Sound Level
DOE	Department of Education (State of Hawai'i)
DOH	Department of Health (State of Hawai'i)
DOT	Department of Transportation (State of Hawai'i)
DPW	Department of Public Works (County of Maui)
DRO	Diesel Range Organics
DU	Dwelling Units
DWS	Department of Water Supply (County of Maui)
EAL	Environmental Action Level
EISPN	Environment Impact Statement Preparation Notice
ESA	Environmental Site Assessment
EV	Electric Vehicle
FAA	Federal Aviation Administration
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GFA	Gross Floor Area
GHG	Greenhouse Gas
GPD	Gallons per day
GPM	Gallons per minute
HAR	Hawai'i Administrative Rules
HC&S	Hawai'i Commercial & Sugar Company
HDOH	State of Hawai'i Department of Health
HDOH-WQS	State of Hawai'i Department of Health Water Quality Standards
HDOT	State of Hawai'i Department of Transportation
HEER	Hazard Evaluation and Emergency Response
HRS	Hawai'i Revised Statutes
HTA	Hawai'i Tourism Authority
HVAC	Heating, Ventilation, and Air Conditioning
IPPU	Industrial Processes and Product Use
ISWMP	Integrated Solid Waste Management Plan
ITE	Institute of Transportation Engineers
KWWRF	Kahului Wastewater Reclamation Facility
LI	Light Industrial
LID	Low Impact Developments

LLP	Landowner Liability Protections
LOS	Level of Service
LSB	Land Study Bureau
LUC	Land Use Commission (State of Hawai'i)
MACC	Maui Arts & Cultural Center
MBP NPA	Maui Business Park North Project Area
MBP SPA	Maui Business Park South Project Area
MBP	Maui Business Park
MBPII	Maui Business Park Phase II
MCC	Maui County Codes
MCI	Meetings, Conventions, and Incentives
MDWS	Maui Department of Water Supply
MECO	Maui Electric Company
MEMA	Maui Emergency Management Agency
MG	Million gallons
MGD	Million gallons per day
MPC	Maui Planning Commission
MPD	Maui County Police Department
MRF	Material Recycling Facility
MSL	Mean Sea Level
MTA	Motion to Amend
MUTCD	Manual on Uniform Traffic Control Devices
NFA	No Further Action
NFIP	National Flood Insurance Program
NOAA	National Ocean and Atmospheric Administration
NPA	North Project Area
NPDES	National Pollutant Discharge Elimination System
OEQC	Office of Environmental Quality Control (State of Hawai'i)
OHA	Office of Hawaiian Affairs
PAHs	Polynuclear Aromatic Hydrocarbons
Ppm	Parts Per Million
PV	Photovoltaic
QKC	Queen Kaahumanu Center
ROW	Right-of-Way
RPZ	Runway Protection Zone
RRO	Residual Range Organics
SAIS	Supplemental Archaeological Inventory Survey
SAT MD	Saturday Mid-Day

SCS	Scientific Consultant Services, Inc.
SF	Square Feet
SHPD	State Historic Preservation Division (Hawai'i)
SLR-XA	Sea Level Rise Exposure Area
SLUC	State Land Use Commission
SMA	Special Management Area
SMERF	Social, Military, Education, Religion and Fraternal
SPA	South Project Area
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
TDM	Transportation Demand Management
TIAR	Traffic Impact Analysis Report
TMK	Tax Map Key
TNWRE	Tom Nance Water Resource Engineering
TPH	Total Petroleum Hydrocarbons
TPO	Thermoplastic polyolefin
UBC	Uniform Building Code
UDRB	Urban Design Review Board
UGB	Urban Growth Boundary
UHERO	University of Hawai'i Economic Research Organization
USCB	United States Census Bureau
USFWS	United States Fish and Wildlife Service
VOC	Volatile Organic Compound
VPI	Visitor Plant Inventory
VRF	Variable Refrigerant Flow
WCT	Waikapū Country Town
W-K WWRF	Wailuku/Kahului Wastewater Reclamation Facility
WKCP	Wailuku-Kahului Community Plan
WQS	Water Quality Standards
WRF	Water Reclamation Facility
WWPS	Wastewater Pump Station

PROJECT SUMMARY

Table 1. Project Summary	
Project Name	Kahahā Hotel at Kahului Airport
Applicant	<p>R.D. Olson Development 520 Newport Center Drive, Suite 600 Newport Beach, California 92660</p> <p>Contact: Mr. Anthony Wrzosek, Vice President Phone: 949-271-1100 Email: Anthony.wrzosek@rdodevelopment.com</p>
Summary of Proposed Action	<p>The Applicant is seeking to construct a 200-room business-oriented hotel adjacent to the Kahului Airport including on and offsite infrastructure. Implementation will require a Motion to Amend the State Land Use Commission (LUC) Decision and Order of Docket No. A03-739, Wailuku-Kahului Community Plan amendment from “LI” Light Industrial to “H” Hotel, and text amendment to the definition of Hotel, and a change in County Zoning from “LI” Light Industrial to “H-M” Hotel, and a Special Management Area Use Permit.</p>
Project Location	Kahului, Maui, Hawai‘i
Land Ownership	<p>Maui Business Park, LLC. 520 Newport Center Drive, Suite 600 Newport Beach, California 92660</p>
Tax Map Keys (TMK)	TMK Nos. (2) 3-8-103:014 (portion), 015 (portion), 016, 017 & 018
Project Size	5.2 acres
Land Use Designations	<p>State Land Use: Urban Community Plan: Light Industrial (LI) County Zoning: M-1 Light Industrial Conditional Zoning (Ordinance 3559) Project is located within the Special Management Area (SMA)</p>

Accepting Authority	<p>Hawai'i State Land Use Commission Department of Business, Economic Development & Tourism, State of Hawai'i P.O. Box 2359, Honolulu, Hawai'i 96804</p> <p>Contact: Mr. Daniel Orodener, Executive Officer Phone: 808-587-3822 Email: Daniel.e.oroedener@hawaii.org</p>
Project Planning Consultant	<p>Chris Hart & Partners, Inc. 2200 Maui Street, Suite 527 Wailuku, HI 96793</p> <p>Contact: Brett Davis, Senior Planner Phone: 808-242-1955 Email: Bdavis@chpmaui.com</p>
Chapter 343 Triggers	<p>Amendment to Wailuku-Kahului Community Plan from "LI" Light Industrial to "H" Hotel and text amendment to the definition of Hotel. Additional potential triggers, off-site infrastructure work affecting State and County rights-of-way.</p>
Determination	<p>The accepting authority, LUC has determined that an Environmental Impact Statement (EIS) is likely required for the Proposed Action. As a result, the LUC has directed the Applicant, R.D. Olson Development to prepare an EIS beginning with the preparation of an Environmental Impact Statement Preparation Notice (EISPN).</p>

Note: The comment letters and public testimony which was previously submitted by various governmental agencies, individuals, and organizations on the former Windward Hotel project, now known as Kahahā Hotel at Kahului Airport, will be included in this Kahahā Hotel Draft EIS. Appendix 3 identifies those that provided comment on the previously published Draft EA, Draft EIS, and EISPN. (See: Appendix 3)

CONTENT CHECKLIST

The Draft EIS, at a minimum shall contain the information required by Hawai'i Administrative Rules Section 11-200.1-24.

Table 2. Content Checklist			
Section	Requirement	Draft EIS Location	Notes
(d)(1)	Brief description of the Proposed Action.	Executive Summary Table 1 Chapter 1	
(d)(2)	Significant beneficial and adverse impacts.	Executive Summary Chapter 2 Section 4.6	
(d)(3)	Proposed mitigation measures.	Executive Summary Chapter 2 Section 4.6	
(d)(4)	Alternatives considered.	Executive Summary Section 1.6	
(d)(5)	Unresolved issues.	Executive Summary Section 4.5	
(d)(6)	Compatibility with land use plans and policies, and a list of permits or approvals.	Executive Summary Chapter 3 Section 3.9, Table 15	
(d)(7)	A list of relevant EAs and EISs considered in the analysis of the preparation of the EIS.	Executive Summary Chapter 6	
(e)	Table of contents.	Table of Contents	
(f)	Statement of purpose and need for the Proposed Action.	Section 1.3	
(g)(1)	Detailed map and related regional map.	Figure 1 Figure 2 Figure 5 Figures 11 to 21	
(g)(2)	Objectives of the Proposed Action.	Section 1.3	
(g)(3)	General description of the action's technical,	Chapter 2	

Table 2. Content Checklist				
Section	Requirement		Draft EIS Location	Notes
	economic, social, cultural, and environmental characteristics.			
(g)(4)	Use of state or county funds or lands for the action.		Section 3.3 (Chapter 226-9, Hawai'i State Plan)	Not Applicable. The Proposed Project is fully private funded.
(g)(5)	Phasing and timing of the action.		Section 1.5	
(g)(6)	Summary technical data, diagrams, and other information necessary to enable an evaluation of potential environmental impact by commenting agencies and the public.		Executive Summary Section 4.6	
(g)(7)	Historic perspective		Section 1.4 Subsection 2.1.9	
(h)	No action alternative		Subsection 1.6.1	
	Reasonable alternatives that could attain the objectives of the action.	Alternatives requiring actions of a significantly different nature that would provide similar benefits with different environmental impacts	Subsection 1.6.2 Subsection 1.6.4	
		Alternatives related to different designs or details of the Proposed Action that would present different environmental impacts	Subsection 1.6.5	
		Alternative locations for the Proposed Action	Subsection 1.6.3	
	Explanation and discussion of alternatives not		Subsection 1.6.6	

Table 2. Content Checklist			
Section	Requirement	Draft EIS Location	Notes
	studied.		
(i)	Description of the environmental setting, including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective.	Chapter 2	
	Environmental resources that are rare or unique to the region and the action site.	Executive Summary Chapter 2	
	Related actions, public and private, existent or planned in the region.	Section 4.3 Subsection 2.2.2 Subsection 2.4.1	
	Population and growth characteristics of the affected area	Subsection 2.2.1	
	Population and growth assumptions	Subsection 2.2.1	
	Secondary population and growth impacts resulting from the Proposed Action and its alternatives.	Section 3.1 (6)	
(j)	Description of the relationship of the Proposed Action to land use and natural or cultural resource plans, policies, and controls for the affected area.	Sections 3.1 to 3.8	
(k)	List of necessary approvals and status of each.	Section 3.9 Table 15	
(l)	Analysis of the probable impact of the Proposed Action on the environment and impacts of the natural or human environment on the action.	Executive Summary Chapter 2 Section 4.3	
	Consideration of all phases of the action.	Section 1.5	
	Consideration of all consequences on the environment, including direct and indirect effects.	Executive Summary Chapter 2 Section 4.3	
	Interrelationships and cumulative environmental impacts of the Proposed Action	Section 4.3	

Table 2. Content Checklist			
Section	Requirement	Draft EIS Location	Notes
	and other related actions.		
	Secondary effects.	Section 4.3	
	Estimated population and growth impacts.	Subsection 2.2.1	
	Direct or indirect sources of pollution.	Subsection 2.1.7 Subsection 2.1.8 Subsection 2.1.12 Subsection 2.1.13 Subsection 2.1.14	
(m)	Description of relationship between local short-term uses of humanity's environment and the maintenance and enhancement of long-term productivity.	Section 4.1	
	Trade-offs among short-term and long-term gains and losses	Subsection 4.1.1	
	Extent to which Proposed Action forecloses future options	Subsection 4.1 .2	
	Narrows the range of beneficial uses	Subsection 4.1.3	
	Poses long-terms risks to health and safety	Subsection 4.1.4	
(n)	Irreversible and irretrievable commitments of resources	Section 4.2	
	Unavoidable impacts	Section 4.4	
	Use of non-renewable resources.	Subsection 4.2.1	
	Irreversible curtailment of the range of beneficial uses of the environment.	Subsection 4.2.2	
	Possibility of environmental accidents.	Subsection 4.2.3	
(o)	Probable adverse environmental effects that cannot be avoided.	Section 4.4	
	Other public policies that offset adverse environmental effects of the Proposed Action.	Section 4.4	
	Ability of reasonable alternatives to achieve countervailing benefits to avoid adverse effects.	Section 4.4	
(p)	Description of mitigation measures in action	Chapter 2	

Table 2. Content Checklist				
Section	Requirement		Draft EIS Location	Notes
	plan to reduce significant, unavoidable, adverse impacts to insignificant levels and basis for considering these levels are acceptable.			
	Timing of each mitigation step to assuring mitigation		Section 4.6, Table 19	
(q)	How unresolved issues will be resolved prior to commencement of Proposed Action		Section 4.5	
(r)	List of all government agencies, other organizations and private individuals consulted in preparing this statement		Chapter 5	
(s)(1)	Reproductions of all written comments submitted during the consultation period.		Appendices 3.3 to 3.8	
(s)(2)	Responses to all substantive written comments made during the consultation period.		Appendices 3.3 to 3.8	
(s)(4)	Summary of any EIS public scoping meetings.	Written general summary of the oral comments made.	Sections 5.5 to 5.7	
		Representative sample of handout provided.	Appendix 3.2	
(s)(5)	List of persons or agencies consulted and had no comment.		Chapter 5	
(s)(6)	Representative sample of the consultation request letter.		Appendix 3.1	

EXECUTIVE SUMMARY

Brief Description of the Proposed Action

Proposed Action is to develop a 200-unit hotel — i.e., the Kahahā Hotel — containing 80 extended-stay guestrooms, each with a kitchenette (no oven), and 120 standard guestrooms with associated infrastructure and landscaping located adjacent to the Kahului Airport, designed to meet the needs of the business traveler. The proposed Kahahā Hotel project was previously named the Windward Hotel and comments to previous draft chapter 343 documents for the previously named Windward Hotel have been compiled with responses in this Draft EIS for the Kahahā Hotel. The current name of the hotel was changed to Kahahā in recognition of the traditional name widely used in the area.

The proposed hotel building varies from one (1), two (2), and four (4) stories in height. It will be massed toward the center of the Project Site with generous setbacks on all sides, accommodating the landscape buffer, and double-loaded parking areas. The Proposed Project includes construction of new driveways providing vehicle access from Lauo loop to the porte-cochere entry and the on-site parking lot. Grading of the site will be required and will occur during development including the foundations for the proposed hotel, the construction of the in-ground pool, and other associated infrastructure.

As discussed previously, the development of the Proposed Action is being pursued by the Applicant, R.D. Olson Development, which has experience in developing quality business traveler hotels primarily in California and Hawai'i. One of the goals of the project design is to reduce the project's energy demand through conservation and energy-efficient design. As highlighted in the Climate Change Assessment document (**See:** Appendix 26), specific green building objectives included within the Proposed Project are as follows.

- Passive solar design;
- Photovoltaic solar panels;
- Thermoplastic polyolefin (TPO) single-ply roofing membrane in a light color that reflects solar energy and heat away from the roof;
- Efficient low emissivity glazing on glass to minimize ultraviolet and infrared light that passes through;
- Water conserving plumbing fixtures and fittings;
- Irrigation with automatic controllers, sensors, and metering of outdoor water use;
- Finish material pollutant controls meeting volatile organic compound (VOC) and formaldehyde limits (adhesives, sealants, caulks, paints and coatings, aerosol paints and coatings);

- Exterior material selection for sustainability and recycled content;
- Light pollution reduction;
- Low power consumption for lighting and design and dimming systems;
- Efficient variable refrigerant flow (VRF) heating and air-conditioning system design;
- Commissioning and testing of Heating, Ventilation, and Air Conditioning (HVAC) systems;
- Insulation and sealing of the exterior building envelope; and
- Electric Vehicle (EV) charging stations.

The hotel features a lobby, lounge, dining area (providing breakfast in the morning and *pupus* during the day and evening), sundry market meeting rooms, business center, laundry, and fitness center. Additional amenities and uses include a swimming pool with spa, barbeque area, and other typical and similar incidental support services and accessory uses for the operation of a business hotel. The features and amenities are limited as the hotel is designed to accommodate the business traveler and not the leisure traveler. (See: Figure 7, “Conceptual Site Plan” and Appendix 2)

It is anticipated that the Kahahā Hotel at Kahului Airport will be constructed in a single phase — with construction projected to start in 2023. The hotel would be open for business in 2025. The project is anticipated to cost approximately \$54,000,000.00 which is fully privately funded.

Off-site Improvements in the project area to be completed by the Applicant:

It is anticipated that improvements to the A&B Triangle Square Wastewater Pump Station (WWPS) located at 417 Kele Street in Kahului, TMK No. (2) 3-8-079: 004 and Alamaha WWPS, TMK No. (2) 3-7-012:027 may be required because of the Proposed Action. Other roadways, water, and wastewater infrastructure improvements may also be required and are in the process of being defined with appropriate State and County Agencies through the Applicant’s Civil Engineer. It is important to note that per Maui County Code Section 20.28.040(A)(4), 70,000 gallons per day of the expansion capacity at the Wailuku/Kahului treatment facility is allocated to hotel use. The Proposed Project anticipates about 30,000 gpd of flow into the treatment facility, which is well below the available, allocated capacity for hotel use.

The Proposed Project will utilize potable and non-potable water from the MBPII system. However, an additional well for the A&B potable system is proposed to be developed at an appropriate distance from the system’s two existing wells. The full explanation of the existing water system and the proposed water well are discussed in Section 2.4.3 (Water) of this Draft EIS.

One possible location for the third well is shown on Figure 3 of the Memorandum by Tom Nance (See:

Appendix 18). Other locations could be evaluated, if necessary, to avoid conflicts with development plans of A&B. At the time of the preparation of this Draft EIS, the location of the new well has not been finalized.

Off-site Improvements in the project area to be completed by others:

Anticipated future offsite infrastructure improvements to be provided by the State of Hawai'i, Department of Transportation include construction of a new on-ramp to the Airport Access Road located on the eastern corner of the Project Site. Land acquisition costs relating to the on-ramp were to be charged against the A&B's documented fair share contribution, however, in January 2020 the DOT instead requested full payment of A&B's fair share contribution. Pursuant to that request A&B remitted the amount of \$4,601,026.00 to the DOT in February 2020 in full payment of its fair share contribution. The State's timing of the future on-ramp construction is unknown at this time. (See: Figure 8, "Conceptual Site Plan with future Airport Access Road on Ramp Plan" and Figure 9, "Kahului Airport Master Plan Map")

During a May 2021 meeting between the State of Hawaii, Department of Transportation, Highways Division, and the Petitioner — it was clarified that DOT does not have a timeline for the construction of the on-ramp and that DOT will approach Petitioner or future landowner at the appropriate time to purchase the necessary land area at fair market value. Section 1.5 of the DEIS provides further detail on the background of the onramp.

Land Use Approvals and Entitlements:

The hotel project will require approval of a subdivision application for the consolidation of five parcels and the re-subdivision of the consolidated parcel into two parcels. The subdivision or "lot line adjustment" will result in a 5.2-acre parcel for the hotel project and a 1.1-acre adjacent parcel to be available for future development as permitted within the MBPIL. In addition, the Project Site is located adjacent to the boundary of the Kahului Airport as shown in the Kahului Airport Master Plan Update dated December 2016, hotel use is permitted in the Kahului Airport District per County zoning, and additional hotel accommodations are desired per the WKCP. (See: Figure 9, "Kahului Airport Master Plan Map" and Figure 10, "Lot Line Adjustment Site Plan")

The proposed use achieves one of the goals of the WKCP by allowing opportunities for hotel accommodations near the Kahului Airport and is consistent with the permitted use of the adjacent Kahului Airport District. While consistent with the neighboring permitted uses, the proposed use will require an Amendment to the WKCP land use map from Light Industrial to Hotel, which pursuant to HRS Section 343-5(a)(6) is the trigger for this EIS. Any interactions with public lands or infrastructure — which may

be required for incidental infrastructure improvements — are also addressed by this HRS 343 Compliance Document.

The proposed hotel use will require a Motion to Amend the State Land Use Commission Decision & Order A03-739. On January 16, 2020, R.D. Olson filed its Motion to Amend Findings of Fact, Conclusions of Law and Decision and Order filed March 25, 2004 (“2004 D&O”) with the LUC for an order: 1) recognizing R.D. Olson’s standing to seek and obtain the relief requested; and 2) amending the 2004 D&O providing that a portion of the Petition Area, that portion being identified as Tax Map Key Nos. (2) 3-8-103:014 (portion), 015 (portion), 016, 017, and 018, comprising approximately 5.17 acres of land (“Petition Area B”) shall be subject to a new decision and order that is specific to Petition Area B and that said Petition Area B shall not be subject to the 2004 Decision and Order, for the purpose of establishing appropriate findings of fact, conclusions of law and decision and order that are specifically applicable to Petitioner’s Kahahā Hotel and limited to Petition Area B.

Additionally, the Proposed Project requires a Change in Zoning from “LI” Light Industrial to “H-M” Hotel, and Wailuku-Kahului Community Plan Amendment from “LI” Light Industrial to “H” Hotel. Additionally the Applicant is proposing to amend the WKCP definition of hotel to allow for kitchens within individual units.

After all amendments to the Land Use Designations have been obtained, a Special Management Area (SMA) Use Permit will be required to authorize the project’s development action in the SMA. The project is valued at more than \$500,000.00 therefore an SMA Major Permit is anticipated.

This Draft EIS discusses the potential impacts of the Proposed Action to the physical environment, socio-economic environment, public services, and infrastructures — along with the proposed mitigation measures. In general, the proposed Kahahā Hotel anticipates significant beneficial economic impacts to County of Maui and the development of the proposed hotel will be in compliance with the applicable governmental plans, policies, and controls. The following are the environmental topics explored with regard to the Proposed Project — which will be detailed in Chapter 2 of this Draft EIS.

Physical Environment:

Surrounding Land Uses

Topography and Soils

Natural Hazards

Climate Change Assessment

Hazardous Substances

Flora and Fauna

Air Quality

Noise Quality

Historical and Archaeological Resources

Visual Resources

Agricultural Resources

Surface Water Resources

Coastal Water Resources

Groundwater Resources

Socio-economic Environment:

Population and Housing

Economy

Cultural Resources

Public Services:

Recreational Facilities

Medical Facilities

Police and Fire Protection Facilities

Schools

Solid Waste

Emergency Management Agency

Infrastructure:

Roadways

Drainage

Water

Wastewater

Electrical

Significant Beneficial and Adverse Impacts

The proposed Kānahā Hotel will meet the intent of Objective 3 of the Wailuku-Kahului Community Plan (WKCP) Part III.C — which states, “*Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core.*” As previously discussed, the subject property is situated adjacent to Kahului Airport, sharing two common boundary lines with the Kahului Airport. The travel distance from the Project Site to the airport terminal, or vice versa, is approximately a 5-minute drive by private vehicle. Providing hotel accommodation on a property situated near the Kahului Airport will maximize the potential of the available urban land use within the established urban community. In addition, the subject property is included within a designated business park (i.e., MBPII) and improved with roadway and utility service.

The Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require the travel to Maui. An example of the said activities is the probable need for new businesses to receive technical support from businesses and consultants not located on Maui. A business traveler hotel next to the airport and near the business center of Maui, designed for these types of individuals, will serve as a support feature for the diversification of Maui’s economy. The non-resort environment with business amenities — in a location which will not require extensive travel for many businesses — will be a desired convenience for the business community on Maui. An additional benefit is that the location of the proposed Kānahā Hotel should reduce the impact that business travelers have on the already overcrowded roadways on Maui. Therefore, the Proposed Action will contribute as a necessary component for the diversification of Maui’s economy.

Furthermore, the Proposed Project will benefit the Maui community — i.e., friends and family from other islands will have a non-resort alternative when traveling to Maui. The proximity of the Kānahā Hotel to Kahului and Wailuku, where a majority of Maui’s population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui’s various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within Central Maui will appeal to inter-island travelers.

Chapter 226-108 (Sustainability) of the Priority Guidelines, Hawai’i State Plan, discusses seven (7) priority guidelines to promote sustainability in the State of Hawai’i. The Proposed Project meets the said priority guidelines by focusing future development in the State Urban District and the planned urban areas identified in the Maui Island Plan where infrastructure and services are readily available. Therefore, the

Proposed Action promotes a sustainable pattern of future development and urban growth. In addition, the Proposed Project involves a commitment to sustainability through the implementation of green building objectives for energy conservation and mitigation measures relating to climate change during the construction and operation of the Kānahā Hotel. The said green building objectives will be discussed in Section 2.1.4 of this Draft Environmental Impact Statement (DEIS).

When considering and evaluating the sum of the effects the Proposed Project will have on the quality of the environment, it is not anticipated that the proposed Kānahā Hotel will have a significant effect on the environment. This Draft EIS examines the expected impacts and the proposed mitigation measures, reviewing the Significance Criteria set forth in Hawai'i Administrative Rules (HAR) Title 11, Department of Health (DOH), Chapter 200.1 EIS Rules, Section 13. The primary issue foreseen with the proposed Kānahā Hotel is the community's concerns of over-tourism — while the hotel is designed primarily for business travelers, a small percentage of guests are anticipated to be leisure travelers.

Kānahā Hotel will not have a substantial adverse impact on the social welfare of the County of Maui — as the hotel is not expected to increase demand, it is intended to meet current, existing demand for non-leisure travel accommodations in the Kahului area. Due to its proximity to the Kahului Airport and the business center of Maui, the Kānahā Hotel could serve to improve the social welfare of the County of Maui. The proposed hotel could reduce the number of cars on Maui's roadways between the Kahului Airport and the tourist areas of South and West Maui — especially for business travelers who need to do businesses in the Central Maui area.

The demand for business traveler accommodations will not decrease as new industries develop on Maui and the business travelers will be forced to find accommodations in the existing resort areas — requiring commuting to and from Wailuku and Kahului, increasing the impact on Maui's roads. Business travelers are less likely to spend a great deal of time enjoying Maui's various attractions, not contributing as much to the overcrowding as these attractions. In addition, the location of the Kānahā Hotel will shorten the commuting time between the airport and the hotel, as well as the hotel and places to do business in Central Maui — which will appeal to business travelers.

Alternatives Considered

As discussed in the following Section 1.6 (Alternatives), various development alternatives for the Proposed Action were considered. These alternatives include No Action/No Project/No Build Alternative, Alternative Development Concepts, and an Alternative Site Alternative. These Alternatives were determined based on their ability to meet both the purpose and need as well as the goals and objectives of

the Proposed Action (the Preferred Alternative). The Alternative Actions are briefly described below:

- The No Action/No Project/No Build Alternative would retain the Project Site in its current condition. With this Alternative, the parcels at the MBPII would remain vacant and existing underground utilities and roadway services would remain underutilized.
- The Existing Land Use Designations Alternative assumes development of what would be reasonably expected to occur in the foreseeable future — if the Proposed Project were not approved — would be based on the Project Site’s current land use, zoning, and community plan designations.
- The Alternative Site Alternative assumes the development of a 200-room hotel to be located on another possible site within the Wailuku/Kahului area.
- Under the Multi-family Development Alternative, multi-family housing would be created within close proximity to urban amenities in Central Maui.
- The Reduced Intensity Alternative would propose a 3-story hotel with 175 rooms, versus the Preferred Alternative (i.e., Proposed Action), up to 4-stories with 200 rooms. This Reduced Intensity Alternative would have 1-story less than the Preferred Alternative.

Cumulative and Secondary Impacts

Cumulative impacts are defined 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.

Secondary impacts are those that have the potential to occur later in time or farther in the future, but which are reasonably foreseeable. They can be viewed as actions of others that are taken because of the presence of the project. Secondary impacts from highway projects, for example, can occur because they can induce development by removing transportation impediments to growth.

The Proposed Action, when considered in conjunction with past, present and reasonably foreseeable future actions to the environment, may result in cumulative impacts. Section 4.3 (Cumulative and Secondary Impacts) of this Draft EIS provides a summary of known conceptual and underway development within proximity of the Project Site. A review of potential cumulative and secondary impacts of the Proposed Action and other development is also provided. These developments include but not limited to the following:

- Maui Palms Hotel
- Hotel Wailuku
- Hawaiian Cement Facility Relocation at Kahului Harbor
- Waikapu Country Town Wastewater Reclamation Facility

- Greenway Project in Lieu of Vehicular Road Connection
- Hale Mahaolu

Table 3 provides, in a summary format, the discussion of the anticipated impacts of the Proposed Project and the proposed mitigation measures — which will be detailed in Chapter 2. In addition, mitigation timing and monitoring reporting program will be discussed in Section 4.6 of this Draft EIS (Mitigation and Monitoring Reporting Program).

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
Surrounding Land Uses	The proposed hotel is compatible with surrounding uses and will provide accommodations in close proximity to the Kahului Airport.	<p>No mitigation measures warranted with regards to the compatibility of the proposed use and the existing urban land uses in the vicinity of the Project Site.</p> <p>However, as previously discussed, the Proposed Project requires amendments to some land use entitlements and permitting. This requirement will be discussed in Section 2.1.1 (Surrounding Land Uses), Chapter 3 (Relationship to Governmental Plans, Policies, and Controls), and Section 4.5.1 (Project-Specific Land Use Entitlements and Permitting) of this Draft EIS.</p>
Topography and Soils	The proposed grading plan will require both excavation and embankment, with attempts to balance “cuts” and “fills”, to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or export of earthwork materials.	<ul style="list-style-type: none"> • During site preparation, storm runoff from the site will be controlled in accordance with the County’s “Soil Erosion and Sediment Control Standards”. • Minimizing the time of construction; • Retaining existing ground cover as long as possible; • Constructing drainage control features

Table 3. Summary of Impacts and Mitigation Measures

Condition	Impacts	Mitigation
	<p>Finish grades throughout the site will vary in elevation from 28 to 34 feet mean sea level (msl) and slopes will vary between 0 to 5 percent after improvements with a maximum of 2:1 grade used along the embankments.</p>	<p>early;</p> <ul style="list-style-type: none"> • Using temporary area sprinklers in non-active construction areas when ground cover is removed; • Providing a water truck on-site during the construction period to provide for immediate sprinkling as needed; • Using temporary berms and cut-off ditches, where needed, for control of erosion; • Watering graded areas when construction activity for each day has ceased; • Grassing or planting all cut and fill slopes immediately after grading work has been completed; and • Installing silt screens where appropriate. <p>Compliance with all applicable Federal, State and County regulations and rules for erosion and sediment control and SHPD rules in the event historical features or remains are discovered during ground disturbing activities.</p> <p>Implementation of LID Strategies.</p> <p>Obtain a Grading Permit — Final erosion control plan and BMPs.</p>

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
Natural Hazards	The Project Site is outside Special Flood Hazard Areas (SFHAs) and within the Tsunami Evacuation Zone.	No adverse flood hazards impacting the site or the properties in the immediate vicinity are anticipated. The Proposed Action will be constructed in accordance with the Building Code adopted by the County of Maui.
	No adverse flood hazards impacting the site or the properties in the immediate vicinity are anticipated.	However, the Proposed Project will include coordination with Maui Emergency Management Agency (MEMA) to understand procedures in the event of a tsunami evacuation.
Climate Change Assessment		
Temperature	<p>The Proposed Action is in an urban area — where temperatures are significantly warmer than surrounding rural or natural areas.</p> <p>The Proposed Project will contribute to the increase in number of impervious surfaces that reflect heat and contribute to an urban heat island effect.</p>	<p>The following mitigation measures will include but are not limited to:</p> <ul style="list-style-type: none"> • Utilizing a passive solar design; • Applying a low emissivity glazing on glass; • Insulating and sealing the exterior building envelope; and • Installing high-efficiency cooling systems, and commissioning and testing of HVAC systems. • The Proposed Project will incorporate a “cool roof” that reflects heat and solar energy away from the building using a TPO single-ply roofing membrane in a light color.
Rainfall	It is anticipated that the Proposed	No mitigation measures are warranted. The

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
	Action will not directly or indirectly result in significant impacts on rainfall patterns for the region — as Greenhouse Gas (GHG) emissions generated by the Proposed Project are anticipated to be negligible.	Proposed Action will comply with all GHG regulations outlined by the County of Maui.
Greenhouse Gas Emissions	The Proposed Action is anticipated to generate GHG emissions during both construction and operation resulting in direct, indirect, and cumulative impacts to concentrations of GHG in the atmosphere.	<p>In the long-term, the Proposed Action will incorporate green building objectives and implement Best Management Practices (BMPs) to ensure emissions are minimized. These include but not limited to the following recommendations:</p> <ul style="list-style-type: none"> • Improve fuel efficiency from construction equipment by minimizing idle time either by shutting equipment off when not in use or reducing the time of idling; • Provide clear signage that posts this requirement for workers at the entrances to the site; • Maintain all construction equipment in proper working condition according to manufacturer's specifications and prior to operation — ensure equipment is being checked by a certified mechanic; • Train equipment operators in proper use of equipment; • Use appropriately sized equipment for the job; • Use equipment with high-efficiency

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		<p>technologies (e.g., repowered engines, electric drive trains);</p> <ul style="list-style-type: none"> • Perform on-site material hauling with trucks equipped with on-road engines (if determined to be less emissive than the off-road engines); • Encourage and provide incentives for carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes; • Reduce electricity use in the construction office or trailer by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones; • Recycle or salvage non-hazardous construction and demolition debris; • Use locally sourced or recycled materials for construction materials and ensure the wood products utilized in the project should be certified through a sustainable forestry program; • Avoid road closures during peak traffic hours; • Move heavy construction equipment and workers to and from construction areas during periods of low traffic volume; • Install high-efficiency equipment or energy-saving technologies throughout the facility; • Ensure structures and facilities are properly

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		<p>maintained;</p> <ul style="list-style-type: none"> • Develop programs that encourage guests to be green and promote alternative transportation options. <p>(See: Appendix 26)</p>
Hazardous substances	<p>No impacts from hazardous substances are anticipated at the site based on the conclusions of the Phase I and II ESA reports.</p> <p>(See: Appendices 6 and 7)</p>	<p>No mitigation measures are warranted. However, it is recommended that future excavation activities should be monitored for evidence of potential buried waste materials.</p>
Flora and Fauna	<p>It is anticipated that the Proposed Action will not result in a significant impact to Flora and Fauna.</p> <p>(See: Appendices 8 to 11)</p>	<p>No mitigation measures are warranted. However, in the event that rodents are discovered on the property during the construction process it is the responsibility of the Applicant to eradicate them as to not displace them to the surrounding area.</p> <p>Despite the foregoing, the Proposed Project will follow guidelines of avoidance and minimization measures as listed in the letter from USFWS dated October 15, 2019, for the Proposed Project. In the event that any of the nine federally listed animal species — i.e., the federally threatened Newell’s shearwater (<i>Puffinus auricularis newelli</i>), and endangered</p>

Table 3. Summary of Impacts and Mitigation Measures

Condition	Impacts	Mitigation
		<p>Hawaiian hoary bat (<i>Lasiurus cinereus semotus</i>), Hawaiian petrel (<i>Pterodroma sandwichensis</i>), Band-rumped storm-petrel (<i>Oceanodroma castro</i>), Hawaiian stilt (<i>Himantopus mexicanus knudseni</i>), Hawaiian coot (<i>Fulica alai</i>), Hawaiian common gallinule (<i>Gallinula galeata sandvicensis</i>), Hawaiian duck (<i>Anas wyvilliana</i>), and Blackburn's sphinx moth (<i>Manduca blackburni</i>) — the avoidance and minimization measures recommended by USFWS will be complied with. These measures are excerpted in Section 2.1.6 of this Draft EIS.</p>
Air Quality	<p>It is anticipated that the Proposed Action will bear adverse long and short-term impacts on Air Quality.</p> <p>Short-term impacts associated with the Proposed Action include, but are not limited to, fugitive dust from vehicle movement and soil excavation activities and exhaust emissions from on-site construction equipment.</p> <p>Long-term impacts associated with the Proposed Action include but are not limited to; Carbon Monoxide emissions and other</p>	<ul style="list-style-type: none"> • Erecting a dust fence to shield the adjacent Project Sites; • Establishment of a frequent watering program to keep bare-dirt surfaces in construction areas from becoming significant sources of dust; • In dust-prone or dust-sensitive areas, measures include limiting the area that can be disturbed at any given time, applying chemical soil stabilizers, and mulching and/or using wind screens; • Open-bodied trucks to be always covered during the transportation of materials that could become airborne; • Road cleaning or tire washing as a form of dust control since the haul trucks tracking

Table 3. Summary of Impacts and Mitigation Measures

Condition	Impacts	Mitigation
	<p>contaminants via motor vehicle traffic generated from the use of the site.</p> <p>(See: Appendix 12)</p>	<p>dirt onto paved streets from unpaved areas; and</p> <ul style="list-style-type: none"> • Paving of parking areas and/or establishment of landscaping as early in the construction schedule as possible can also lower the potential for fugitive dust emissions. <p>Promote energy conservation programs and recycling programs during the operations of the Proposed Action.</p>
Noise Quality	<p>Future traffic noise levels at the Proposed Action should not exceed 61 DNL by 2025. For these reasons, traffic noise impacts resulting from project traffic are not expected — and traffic noise mitigation measures should not be required.</p> <p>However, audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. Actual length of exposure to construction noise at any receptor</p>	<ul style="list-style-type: none"> • The use of properly muffled construction equipment should be required on the job site. The incorporation of State Department of Health construction noise limits and curfew times — applicable on the island of Maui — is another noise mitigation measure which will be applied to this project. • The project will comply with State Department of Health noise regulations for construction activities. As stipulated by DOH permit requirements, noise-generating construction activities are not allowed on Sundays and holidays, during the early morning, and during the late evening and nighttime periods. <p>Acoustical treatments recommended to the exterior envelope of the building adjoining the</p>

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
	<p>location will probably be less than the total construction period for the entire project.</p> <p>(See: Appendix 13)</p>	<p>guest suites include the following:</p> <ul style="list-style-type: none"> • Using 1” laminated, insulated glass (1/4” laminated glass + 1/2” air + 3/16” glass) with STC 39 rating. • Use of a roof assembly with minimum STC 42 rating. • EFS exterior walls with minimum STC 47 rating. • Exterior glazed areas should be limited not to exceed 25 percent of the exterior wall area-unless the use of glazing with a higher STC rating is possible.
Historical Archaeological Resources	<p>It is not anticipated that the Proposed Action will have an impact on Historical Archaeological Resources.</p>	<p>Although the Proposed Action is not anticipated to generate adverse impacts, the State of Hawai'i Preservation Department has outlined the following plan to mitigate against potential impacts.</p> <ul style="list-style-type: none"> • Excavations with a maximum depth expected to be 10 feet where the sewage manhole is located — for the construction of a swimming pool, a manhole for sewage services, a fire pump room, an underground fire water tank, and two elevator pits; • Excavations with depths range between 6 to 8 feet — for the remaining construction; and • Additional seven (7) mechanically assisted test excavation units (BTs) placed in areas

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		sustaining the deepest ground disturbance during construction — to supplement the previous archaeological work.
Visual Resources	<p>It is anticipated that the Proposed Action will visually improve the Project Site without adversely impacting the view of the natural environment within the region.</p> <p>(See: Appendix 16)</p>	<p>Landscape planting will be used to screen the building where possible and to provide visual context in blending the massing of the building to the site and surrounding environs.</p> <p>All buildings within the Proposed Action will be designed in accordance with the applicable Maui County building code standards.</p>
Agricultural Resources	The Proposed Action will have no effect on the Statewide growth of diversified agriculture.	No mitigation measures warranted.
Hydrology		
Surface Water Resources	It is not anticipated that the Proposed Action will create adverse impacts to surface water resources — as there are no surface water resources located within the Project Site and the closest surface water resources is located 0.4 miles away from the Project Site.	<p>As discussed in the following Section 2.1.2 (Topography and Soils) of this Draft EIS and as documented within the Preliminary Engineering and Drainage Report (See: Appendix 5), temporary erosion control measures will be incorporated during construction to minimize soil loss and erosion hazards.</p> <p>Best management practices will include but</p>

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		<p>are not limited to:</p> <ul style="list-style-type: none"> • Temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, inlet protection, slope protection, stabilized construction entrances and truck wash-down areas. Periodic water spraying of loose soils will be implemented to minimize air-borne dirt particles from reaching adjacent properties. • Additionally, the Proposed Action will submit an application for a National Pollution Discharge Elimination System.
Coastal Water Resources	Water quality data collected downslope of the Proposed Action indicated that at the present there are no significant factors that indicates the land influencing water quality.	As a result of the conclusion made from the Baseline Assessment of Water chemistry for the Proposed Action, no mitigation measures are warranted.
Groundwater Resources	It is not anticipated that the Proposed Action will create adverse impacts to groundwater resources.	It can be concluded that with proper management practices to prevent material input to groundwater discharge by the Proposed Action, there is little or no potential for the project to provide any affects to the marine environment that differs substantially from the present condition.
Socio-Economic Environment		

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
Population and Housing	The Project Site is currently designated for Light Industrial development. The new designation would be to accommodate Hotel uses and would be anticipated to have a minimal or secondary impact on population and housing. The Proposed Action or transient accommodations are anticipated to have a similarly insignificant impact on the population.	The Proposed Action is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents. See Section 2.2.1 (Population and Housing) of this Draft EIS for more discussion about MCC 2.96 with regard to the Proposed Project.
Economy	The Proposed Action will enhance the local economy surrounding the Project Site as well as the Island of Maui in general. The Proposed Action is not anticipated to generate adverse impacts to the economy.	No mitigation measures are warranted.
Cultural Resources	The potential of the Proposed Action to have significant impacts on the Cultural resources that include flora, fauna, archaeological resources, beliefs, or practices is highly unlikely considering the long history of intensive agricultural use of the Project Site.	It is recommended that some mitigations measures are implemented such as: <ul style="list-style-type: none"> • Integrate cultural elements into the design of the hotel to support increasing awareness about Maui's cultural history among hotel guests. • Utilize patterns inspired by the Kahului cultural landscape, the nearby Kanahā pond, the lokelani rose, and other culturally inspired patterns and designs. • Incorporate a māla (traditional Hawaiian

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		<p>garden) that features native flora with accompanying identification signage.</p> <ul style="list-style-type: none"> • Water conservation measures. • Partnerships with community and cultural practitioners to develop educational interpretive materials and cultural programming. • Utilization of native flora throughout the property.
Public Services		
Recreational Facilities	It is not anticipated that impacts to recreational resources will be significant.	No mitigation measures are warranted.
Medical Facilities	The Proposed Action will not generate population like a multi-family development or residential subdivision project and therefore is not anticipated to have an adverse impact upon existing medical facilities.	No mitigation measures are warranted.
Police and Fire Protection Services	The Proposed Action will not increase the population of the immediate area and is of a moderate scale, therefore the Proposed Action is not anticipated to result in significant adverse impact upon existing police and	No mitigation measures are warranted. However, the Proposed Action will comply with any impact fee ordinances for police and fire that may be adopted.

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
	<p>fire protection services.</p> <p>The Proposed Action will generate beneficial impacts as it will increase tax revenue which provide additional funds to the County of Maui for police and for capital facility investments and service upgrades.</p>	
Schools	<p>It is not anticipated that the Proposed Action will have a direct impact on population or public education facilities. Any secondary impacts resulting from an increased population due to employment creation are anticipated to be minimal.</p>	No mitigation measures are warranted.
Solid Waste	<p>The Proposed Action is not anticipated to have an adverse impact upon existing solid waste facilities.</p>	<p>The following mitigation measures will include but are not limited to:</p> <ul style="list-style-type: none"> • Prepare a solid waste management plan • During construction, as required by County regulations, construction and demolition waste will be properly disposed. • Green waste will be mulched onsite when practicable. • On-site recycling opportunities to reduce solid waste entering the landfill.

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
Infrastructure		
Roadways	Upon full build out of the Proposed Action is not anticipated to generate adverse impacts on the roadways within the vicinity of the Project Site.	No improvements are recommended for the Future Year 2025 (completion year of project) conditions with the Project. (See: Appendix 24)
Drainage	Development of the Project Site will decrease the overall permeable surface area of the Project Site. Thus, it is anticipated that this will generate a slight increase in the volume of runoff.	ATA has prepared a drainage plan to mitigate surface runoff caused by seasonal storm events. Best management practices (BMPs) for mitigation will include but are not limited to: <ul style="list-style-type: none"> • Provide temporary sediment basins, temporary diversion berms, and swales to intercept runoff; • Install silt fences to detain sediment-laden stormwater runoff; • Install dust fences to control dust generated from construction; • Provide inlet protection to prevent sediment in stormwater runoff entering drain inlets; • Provide slope protection to help control erosion and stabilize slopes; and • Stabilize construction entrances and truck wash-down areas. (See: Appendix 5)

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
Water	It is not anticipated that the Proposed Action will generate demand that will adversely impacts the Maui County water system.	The Proposed Action proposes to use Maui Business Park's privately owned water systems for the Proposed Action's potable and non-potable water demands.
Wastewater	It is anticipated that improvements maybe required to wastewater systems due to the increase wastewater flow from the use of the Proposed Action once it is operational.	In compliance with the requirements from the County of Maui, Department of Environmental Management (DEM), the Proposed Action will involve installation of a new sewer service property manhole on the sewer lateral.
Electrical	Development of the project is not anticipated have any adverse impact upon the existing electrical or telephone systems that will serve the subject property.	<p>The Applicant is proposing the energy-saving features will be incorporated to minimize electrical demand for the Proposed Action. The following list includes but not limited to:</p> <ul style="list-style-type: none"> • Installation of Photovoltaic Solar Panels on the roof; • Use of energy efficient and/or Energy Star labeled appliances and fixtures; • Use of passive solar cooling; • Use of natural lighting; • Use of energy efficient lighting; • Use of lighting controls in storage areas, closets, stairwells, and other low use areas; • Use of window tinting film that filters glare (white light) and UV while allowing in all the "useable light";

Table 3. Summary of Impacts and Mitigation Measures		
Condition	Impacts	Mitigation
		<ul style="list-style-type: none"> • Use of variable frequency drives on pumps (pool, water features); • Use of electronically commutated motors and controls in walk in refrigeration units; • Use of low flow water fixtures; • Use of smart thermostats in units; and • Use of appropriate landscaping to shade buildings and parking lots.

Compatibility with Land Use Plans and Policies

The relationship of the Proposed Action to potentially applicable land use plans and policies was evaluated and is discussed further in Chapter 3 (Relationship to Governmental Plans, Policies, and Controls) of this Draft EIS. It was determined that the Proposed Action is supportive or consistent with numerous applicable plans and policies. The following plans were evaluated:

- The Hawai'i Revised statutes, Chapter 343, HRS
- The State Land Use Law, Chapter 205, HRS
- The Hawai'i State Plan, Chapter 226, HRS
- County of Maui General Plan (2010)
- Maui Island Plan (2012)
- Wailuku-Kahului Community Plan (2002)
- The Hawai'i Coastal Zone Management Program, Chapter 205A, HRS
- County Zoning

List of Permits and Approvals

Federal

- Federal Aviation Administration (FAA) Form 7460-1, "Notice of Proposed Construction or Alteration"

State of Hawai'i

Land Use Commission

- Amendment of decisions & Order (D&O) Docket No. A03-739
- Hawai'i Revised Statutes (HRS) Chapter 343 compliance

State Historic Preservation Division (SHPD)

- HRS Chapter 6E Compliance (Historic Preservation Review)

Department of Health

- Permit to preform work within the State Right-of-Way
- Air Pollution Control Permit

Clean Water Branch

- National Pollutant Discharge Elimination Systems (NPDES) Permit

County of Maui

Maui Planning Commission and Maui County Council

- Change in Zoning (CIZ)
- County Plan Amendment (CPA)

Maui Urban Design Review Board

- Project Design Review

Maui Planning Commission

- Special Management Area (SMA) Use Permit

Department of Works, Development of Services Administration

- Subdivision
- Grading and Grubbing Permit
- Driveway Permit
- Building Permit

Department of Environmental Management, Wastewater Reclamation Division

- Wastewater Discharge Permit

Irretrievable and Irreversible Commitment of Resources

Irreversible and irretrievable commitments of resources during construction include:

- Use of construction materials;
- Use of available space in the construction and demolition landfill;
- Expenditure of funds to finance construction;
- Construction manpower; and
- Use of energy in the form of direct consumption of fossil fuel for vehicles and equipment.

In the short-term, construction activities would require the consumption of fossil fuel and energy, as construction requires equipment that would use fuel, either gasoline or diesel, to operate. This would also include electrical construction equipment relying on fossil fuel generated electricity.

Relationship Between Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity

Short-term uses associated with construction of the Proposed Action include temporary and permanent alteration of land, energy, fuel, elevated noise levels and other resources. The impact associated with use of these resources is anticipated to be minimal.

The Proposed Action will create long term benefits to the community such as job creation and aide in economic stimulus to the surrounding areas. The Long-term use of the project will increase traffic in the immediate area, as well as add demand on public resources such as water, Police and Fire protection.

Probable Adverse Impacts that cannot be Avoided

Short-term uses associated with construction of the Proposed Action include use of water, energy, fuel, and other resources. The impact associated with use of these resources is anticipated to be minimal. Short-term uses and long-term productivity of water resources, flora and fauna, and health, safety, and well-being are summarized below.

Unavoidable short-term impacts include those related to noise and air quality, and water quality as the result of construction activities.

Noise: Construction noise will be unavoidable during project construction. Short-term increases in noise levels will result from the use of construction equipment and vehicle movements on

public roads and at the Project Site. Despite compliance with Chapter 46, Title 11, Community Noise Control, DOH, HAR, noise generated by construction activities could adversely impact nearby land uses. The use of muffled equipment, noise barriers, and restrictions on construction hours, as well as adherence to State DOH regulations on noise mitigation, will minimize construction equipment and vehicle noise. For construction work to be performed at night or on weekends and holidays, a Community Noise Variance permit from the DOH will be required if it exceeds regulatory noise levels.

Air Quality: Construction-related air quality impacts would result from airborne dust and exhaust emissions from internal combustion engines during site preparation and earth moving activities, the movement of construction vehicles on unpaved areas of the site, and from construction equipment. The construction contractor will be responsible for complying with State DOH regulations, which prohibit visible dust emissions at property boundaries. Nevertheless, open-air areas and naturally ventilated structures located in the vicinity of the Project Site could be affected by dust in spite of compliance with these regulations.

Water Quality: No significant impacts on coastal waters are anticipated as a result of constructing and operating the Proposed Action. Construction activities will involve land-disturbing activities that may result in some short-term surface runoff and soil erosion. Associated construction plans will account for erosion control measures for all work proposed. Construction controls required by NPDES permits and compliance with the City and County of Honolulu's Rules Relating to Water Quality would reduce the risk of sediment and construction-related contaminants reaching nearby surface and coastal waters. In addition, any discharges related to project construction or operation activities will be required to comply with applicable State water quality standards as specified in HAR, Chapter 11-54 "Water Quality Standards" and HAR, Chapter 11-55 "Water Pollution Control."

During construction of the Proposed Action, any soil disturbances in excess of one acre would require a National Pollutant Discharge Elimination System (NPDES) permit administered by HDOH for storm water discharges associated with construction activities. This permit requires the completion of a SWPPP that will describe BMPs for the project in order to properly manage storm water runoff.

Traffic: During construction, traffic near the Project Site will be impacted for the period of the construction activity. For example, during construction, heavy equipment and trucks will be traveling along existing roadways within the vicinity of the Project Site.

Where construction impacts may affect the traveling public along area roadways, traffic control plans will be prepared to ensure safe passage of passenger and commercial vehicles, bicycles, and pedestrians. Mitigation measures that may be considered include use of traffic control signage, temporary vehicle diversion barriers, flag persons or use of off-duty police officers.

The foregoing unavoidable effects are temporary in nature and associated with project construction. Mitigation measures may include, among others, the BMPs cited above, which are anticipated to provide the necessary environmental protections, and appropriately address public safety and welfare considerations to ensure implementation with the least amount of inconvenience, nuisance, and detriment.

As noted previously, the Proposed Action will, in the long run, serve as a source of revenue for the State and County of Maui, supporting programs that are covered as part of both governments' mandates.

Unavoidable long-term impacts resulting from development of the Proposed Action include the following:

Noise: Ambient noise levels in the vicinity will increase slightly as a result of the associated increase in vehicular traffic generated by the Proposed Action. It is acknowledged that use of the Proposed Action will generate increased noise emissions through vehicular traffic, however, even with the projected increases in future traffic noise levels along Lauo Loop — the 65 DNL contour should not extend beyond 23 feet from the centerline of Lauo Loop. Future traffic noise levels at the Proposed Action should not exceed 61 DNL by 2025. Consequently, it was concluded that the future vehicular noise emissions should not cause adverse impacts at existing noise sensitive receptors.

Topography: Although no significant adverse impacts on Project Site topography are anticipated to result from the implementation of the Proposed Action, it would nonetheless result in the unavoidable alteration of site topography. Specifically, the proposed grading plan will require both excavation and embankment, with attempts to balance “cuts” and “fills”, to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or export of earthwork materials. Nevertheless, the existing site is already heavily altered and there are no natural features that would be affected by the development of the Proposed Action.

Visual Resources: It is anticipated that the full build of the Proposed Action would result in the unavoidable transformation of the visual and esthetic character of the Project Site. All new

above-grade facilities are anticipated to be design guidelines that would emphasize aesthetic themes and landscaping compatible with the character of the natural and built-up environment and, therefore, would not be expected to substantially affect scenic vistas and view planes in the area.

Solid Waste Collection and Disposal: It is anticipated the project will generate an increase of solid waste through the construction and operation of the Proposed Action. Despite this expected increase, it is not expected that the additional waste generated will overtax the current capacity of solid waste facilities as operations of all of the proposed elements of the Proposed Action will incorporate recycling and waste management strategies into the design.

Infrastructure and Utilities: Proposed Action operations are anticipated to generate a greater demand for infrastructure and utilities with regard to electrical and wastewater service. The Proposed Action will be a modern facility that is resource efficient. It is anticipated that adverse impacts would be appropriately mitigated through adherence to State, and County of Maui regulatory requirements and the implementation of applicable BMPs.

Unresolved Issues

Unresolved issues are invariably associated with projects in the planning and conceptual design stages, as is the case for the Proposed Action in consideration under this EIS process. Consequently, the various planning processes being pursued by the Proposing Applicant, including preparation of this Draft EIS and community outreach efforts, have been conducted on the basis of best available information and expertise of those knowledgeable in the design and construction of the types of facilities associated with the Proposed Action. It is anticipated that some adjustments will be made to the design and site layout and by the Applicant. Project specific land use entitlements and permitting subject to approval may require additional design detail provided by the Applicant.

The following is a summary of identified unresolved issues which are discussed further in Section 4.5 (Unresolved Issues) of this Draft EIS.

- Project-Specific Land Use Entitlements and Permitting;
- COVID-19 Pandemic Conditions;
- Construction Time for Airport On Ramp; and
- Proposed Moratorium on New Transient Accommodations on Maui.

Consultation

Prior to the preparation of this Draft EIS, a Draft Environmental Assessment (DEA) and Draft Environmental Impact Statement (DEIS) were prepared for this project (formerly referred to as the Windward Hotel) with the Maui Planning Commission (MPC) initially identified as the Accepting Authority. Neither the DEA nor the DEIS completed the draft stage of the process. At the November 12 & 26, 2019 MPC public hearings, the Maui Planning Commission (MPC) provided comments on the DEIS, and there was discussion with regard to the determination of the appropriate Accepting Authority. Per Subsection 11-200.1-7(d) of the EIS Rules, when more than one agency has jurisdiction over an action, the agencies involved shall consult with one another to determine which agency shall act as the accepting authority. In this case the agencies involved are the Maui Planning Commission (MPC) and the State Land Use Commission (LUC). On February 5, 2020, the LUC agreed to be the Accepting Authority for this Draft EIS and any subsequent EIS documentation.

The previous DEA involved consultation with various County agencies such as the Maui County Department of Water Supply, the Maui Planning Department, the Maui Planning Commission, and the Maui County Department of Environmental Management. Similarly, various agencies, organizations, and individuals were consulted in scoping this Draft EIS, including scoping that took place prior to the preparation of the EISPN, and during the 30-day public comment period on the EISPN in the form of formal written consultation pursuant to HRS, Chapter 343 and HAR, Title 11, Chapter 200.1. Consultation also included meetings with elected officials, agencies, and community members. As there were two publications of the EISPN, two public scoping meetings were held during the 30-day comment period of each respective EISPN publication. A list of those who participated in the consultation process is provided in Chapter 5 and their testimonies are reproduced in Appendix 3. Moreover, those who submitted public comments on the published EISPN, and the corresponding responses are reproduced in Appendix 3.

List of Relevant EISs

The following Environmental Impact Statements (EIS) or Environmental Impact Reports (EIR) documents are being considered in the analysis of the preparation of the Draft EIS for the proposed Kahahā Hotel.

- Final EIS dated December 2004 for the Maui Business Park Phase II located at Kahului, Maui, Hawai'i
- Programmatic Draft EIS dated December 2020 for the New Aloha Stadium Entertainment District located at Hālawā, Oahu, Hawai'i

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1. INTRODUCTION

1.1 Property Location

The subject property is in the Wailuku-Kahului Community Plan (WKCP) Area — within the development known as Maui Business Park Phase II (MBPII) — Maui, Hawai'i; TMK Nos: (2) 3-8-103: 014 (portion), 015 (portion), 016, 017 & 018. The subject property is adjacent to the airport, sharing common boundary lines with the Kahului Airport District identified in the WKCP and strategically situated between Haleakalā Highway on the north and Lauo Loop on the west. The Airport Access Road (southbound) runs on the east of the subject property. The Project Site is currently vacant land with utility and roadway services. The Project Site is located within the Special Management Area (SMA) and located in a Tsunami Evacuation Zone (See: Figures 1 to 5, “Location Map”, “Surrounding Uses Map”, “Tax Map Key”, “Site Photographs”, and “Tsunami Evacuation Zone Map”).

1.2 Land Ownership and Project Applicant

The lands comprising the Project Site, approximately 5.2 acres, are owned in fee simple by Maui Business Park, LLC. The owner purchased the Project Site parcels from Alexander & Baldwin, LLC, Series T in 2021.

The Project Applicant is R.D. Olson Development, which has over thirty years' experience in developing and constructing quality business traveler hotels primarily in California and Hawai'i.

1.3 Purpose and Need

The primary purpose of the Proposed Action is to construct a 200-room upscale, select-service hotel within the Kahului/Wailuku area in the vicinity of the Kahului Airport that directly serves targeted business and non-leisure travel accommodation demand on the island of Maui. The proposed hotel is intended to best serve inter-island and out-of-state travelers visiting Maui for business and other corporate events as it would be optimally situated within the primary business and commercial district of Maui and close in proximity to the island's civic center and major transportation hubs.

The Proposed Action will present a convenient lodging option for business travelers, military personnel, airline crew members, distressed airline passengers who are stranded due to delayed or cancelled flights, healthcare providers, and those traveling for school and educational-related purposes. Nearby demand generators include Kahului Airport, Kahului Harbor, Maui County government offices, Maui Memorial Hospital, Maui Arts & Cultural Center, War Memorial Stadium Complex, Maui Research and Technology Park, local construction projects, and the many businesses located in the Kahului/Wailuku area.

The existing hotel inventory in Kahului and the neighboring Wailuku consists of two older, economy-tier hotels (Maui Seaside Hotel and Maui Beach Hotel) and a relatively new, upscale hotel (Courtyard by Marriott Kahului). According to interviews conducted for the Maui Lodging Market Analysis for this project, *kama'āina* corporate demand is the single largest market segment for hotels in this area comprising an estimated 32 percent of the total business (See: Appendix 22). Although lesser percentages make up other corporate and non-leisure market segments, such as inter-island and out-of-state travelers visiting Maui to attend corporate meetings, conduct government business, attend group events, and visit friends and family, these market segments are estimated to make up about 43 percent of the market share when combined. The remaining 25 percent of demand comes from the leisure market segment consisting of both out-of-state and inter-island visitors. By contrast, the business/other market segment accounted for only 10 percent of the island-wide demand while the leisure market segment accounted for 90 percent.

Together, the three hotels represent less than 3 percent of the lodging inventory for Maui (including vacation rentals and timeshares) (HTA, 2020). Most of the hotel accommodations on Maui are located in resort areas outside of Kahului/Wailuku and skew towards the high end of the scale with approximately 55 percent of units priced at \$500 or more per night. The pricing and distance from the primary business and commercial district make these higher-end accommodations less desirable for business travelers and others in the non-leisure market segment. Likewise, there is an insufficient number of hotel accommodations available in the mid-level price range (between \$251 to \$500 per night) that serve the leisure market segment. Approximately 60.7 percent of the vacation rentals on Maui are priced between \$251 to \$500 per night, whereas the overall supply of visitor accommodations on the island within this price range is only 25.2 percent.

With very few options for hotel accommodations in a central location and within a lower to mid-level price range, it is evident that Kahului/Wailuku is currently underserved by hotels that cater

to business-oriented and non-leisure travelers. The opening of the Courtyard by Marriott Kahului in 2012 and its rapid capture of non-leisure related lodging demand underscores the extent of unsatisfied business demand present in the area (CBRE, 2021). Additionally, it is anticipated that hotel accommodations specifically catered to the needs of business travelers near Maui's urban core will be in high demand as Maui continues to look at ways to rejuvenate and diversify its economy in the wake of ongoing pandemic conditions. Therefore, this project intends to satisfy market demands by providing upscale, select-service hotel facilities in an area that is currently underserved.

In addition, the Proposed Action will serve the long-term economic and sustainability goals of Maui. Between 2014 and 2017, the supply of vacation rentals on Maui grew at an average rate of 15% per year while the supply of hotel and condo hotel rooms remained flat (Kloninger, 2021). During that same period, the island saw a similar growth rate in the volume of visitor arrivals making it apparent that the growing supply of vacation rentals has driven Maui's tourism growth in recent years thereby adding to concerns of "overtourism" on Maui. There have been calls for the diversification of Maui's economy and these calls have grown louder as a result of the COVID-19 pandemic. While the project itself will not directly create a new industry on Maui, it will serve as an integral component for the diversification of Maui's economy as business traveler accommodations will be needed to support new business and commercial activities that generate demand through visiting investors/partners, employees, vendors, and consultants. Increasing the supply of legal accommodations priced well below the average price range for Maui hotels is also anticipated to have positive impacts on local residential communities by displacing demand currently accommodated by unlicensed vacation rentals.

From a sustainability perspective, providing hotel accommodations in a central location within the mid-level price range would serve to mitigate the sprawling impacts of essential business travel on the island as a whole by keeping business travelers in close proximity to major commercial and civic center destinations. The project would also support long-term sustainability goals by incorporating low-impact development design strategies and standard green building objectives that will emphasize high performance and energy-efficient design and construction methods.

In consideration of the purpose and need of the Proposed Action, as outlined above, the following project objectives have been identified and will be used to evaluate a range of reasonable alternatives for the project:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation

- demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
 3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.
 4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
 5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3 states "Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core."
 6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3- Action 3: "Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding."

1.4 Existing and Previous Land Use

The existing land use of the subject property is vacant land with utility and roadway service.

The previous land use of the subject property was sugar cane fields operated by Hawai'i Commercial & Sugar Company (HC&S). The subject property is part of the Maui Business Park Phase II (MBPII), which was intended to be a business park that allows business and light industrial uses, per the Maui County zoning ordinances. Land in MBPII is currently for sale and several subdivided parcels are sold and/or are under construction. (See: Figure 6, "Maui Business Park II Land Use Plan")

The Project Site is located in the State Land Use Urban District, County-Zoned M-1 Light Industrial Conditional Zoning (Ordinance 3559), designated as Light Industrial (LI) in the Wailuku-Kahului Community Plan and located within the Urban Growth Boundary of the Maui Island Plan. It is important to note that the Project Site shares two common borders with the Airport District, which permits hotel use, and where additional hotel accommodations are desired per the WKCP. The Project Site is also located within the Special Management Area (SMA) (See: Figures 11 to 14, "State Land Use Map", "Maui County Zoning Map", "Wailuku-Kahului Community Plan Map", and "Maui Island Plan – Speckelsville/Paia").

The Project Site is subject to a March 25, 2004, Findings of Fact, Conclusions of Law, and Decision and Order (D&O) identified as Docket No. A03-739 for the development of a Light Industrial development, Maui Business Park Phase II. At the request of the Maui County Planning Department as part of the early consultation process, the Draft Environmental Impact Statement (DEIS) includes an analysis of the conditions of the Docket No. A03-739 D&O in Chapter 3. Additionally, a copy of the D&O is included in the DEIS. (See: Appendix 1)

1.5 Proposed Action (Preferred Alternative)

Proposed Action is to develop a 200-unit hotel — i.e., the Kahahā Hotel — containing 80 extended-stay guestrooms, each with a kitchenette (no oven), and 120 standard guestrooms with associated infrastructure and landscaping located adjacent to the Kahului Airport, designed to meet the needs of the business traveler. The proposed Kahahā Hotel project was previously named the Windward Hotel and comments to previous draft chapter 343 documents for the previously named Windward Hotel have been compiled with responses in this Draft EIS for the Kahahā Hotel. The current name of the hotel was changed to Kahahā in recognition of the traditional name widely used in the area.

The proposed hotel building varies from one (1), two (2), and four (4) stories in height. It will be massed toward the center of the Project Site with generous setbacks on all sides, accommodating the landscape buffer, and double-loaded parking areas. The Proposed Project includes construction of new driveways providing vehicle access from Lauo loop to the porte-cochere entry and the on-site parking lot. Grading of the site will be required and will occur during development including the foundations for the proposed hotel, the construction of the in-ground pool, and other associated infrastructure.

As discussed previously, the development of the Proposed Action is being pursued by the Applicant, R.D. Olson Development, which has experience in developing quality business traveler hotels primarily in California and Hawai'i. One of the goals of the project design is to reduce the project's energy demand through conservation and energy-efficient design. As highlighted in the Climate Change Assessment document (See: Appendix 26), specific green building objectives included within the Proposed Project are as follows.

- Passive solar design;
- Photovoltaic solar panels;
- Thermoplastic polyolefin (TPO) single-ply roofing membrane in a light color that reflects

- solar energy and heat away from the roof;
- Efficient low emissivity glazing on glass to minimize ultraviolet and infrared light that passes through;
- Water conserving plumbing fixtures and fittings;
- Irrigation with automatic controllers, sensors, and metering of outdoor water use;
- Finish material pollutant controls meeting volatile organic compound (VOC) and formaldehyde limits (adhesives, sealants, caulks, paints and coatings, aerosol paints and coatings);
- Exterior material selection for sustainability and recycled content;
- Light pollution reduction;
- Low power consumption for lighting and design and dimming systems;
- Efficient variable refrigerant flow (VRF) heating and air-conditioning system design;
- Commissioning and testing of Heating, Ventilation, and Air Conditioning (HVAC) systems;
- Insulation and sealing of the exterior building envelope; and
- Electric Vehicle (EV) charging stations.

The hotel features a lobby, lounge, dining area (providing breakfast in the morning and *pupus* during the day and evening), sundry market meeting rooms, business center, laundry, and fitness center. Additional amenities and uses include a swimming pool with spa, barbeque area, and other typical and similar incidental support services and accessory uses for the operation of a business hotel. The features and amenities are limited as the hotel is designed to accommodate the business traveler and not the leisure traveler. (See: Figure 7, “Conceptual Site Plan” and Appendix 2)

It is anticipated that the Kanahe Hotel at Kahului Airport will be constructed in a single phase — with construction projected to start in 2023. The hotel would be open for business in 2025. The project is anticipated to cost approximately \$54,000,000.00 which is fully privately funded.

Off-site Improvements in the project area to be completed by the Applicant:

It is anticipated that improvements to the A&B Triangle Square Wastewater Pump Station (WWPS) located at 417 Kele Street in Kahului, TMK No. (2) 3-8-079: 004 and Alamaha WWPS, TMK No. (2) 3-7-012:027 may be required because of the Proposed Action. Other roadways, water, and wastewater infrastructure improvements may also be required and are in the process of being defined with appropriate State and County Agencies through the Applicant’s Civil Engineer. It is important to note that per Maui County Code Section 20.28.040(A)(4), 70,000 gallons per day of the expansion capacity at the Wailuku/Kahului treatment facility is allocated to

hotel use. The Proposed Project anticipates about 30,000 gpd of flow into the treatment facility, which is well below the available, allocated capacity for hotel use.

The Proposed Project will utilize potable and non-potable water from the MBP II system. However, an additional well for the A&B potable system is proposed to be developed at an appropriate distance from the system's two existing wells. The full explanation of the existing water system and the proposed water well are discussed in Section 2.4.3 (Water) of this Draft EIS.

One possible location for the third well is shown on Figure 3 of the Memorandum by Tom Nance (See: Appendix 18). Other locations could be evaluated, if necessary, to avoid conflicts with development plans of A&B. At the time of the preparation of this Draft EIS, the location of the new well has not been finalized.

Off-site Improvements in the project area to be completed by others:

Anticipated future offsite infrastructure improvements to be provided by the State of Hawai'i, Department of Transportation include construction of a new on-ramp to the Airport Access Road located on the eastern corner of the Project Site. Land acquisition costs relating to the on-ramp were to be charged against the A&B's documented fair share contribution, however, in January 2020 the DOT instead requested full payment of A&B's fair share contribution. Pursuant to that request A&B remitted the amount of \$4,601,026.00 to the DOT in February 2020 in full payment of its fair share contribution. The State's timing of the future on-ramp construction is unknown at this time. (See: Figure 8, "Conceptual Site Plan with future Airport Access Road on Ramp Plan" and Figure 9, "Kahului Airport Master Plan Map")

During a May 2021 meeting between the State of Hawaii, Department of Transportation, Highways Division, and the Petitioner — it was clarified that DOT does not have a timeline for the construction of the on-ramp and that DOT will approach Petitioner or future landowner at the appropriate time to purchase the necessary land area at fair market value. Section 1.5 of the DEIS provides further detail on the background of the onramp.

Land Use Approvals and Entitlements:

The hotel project will require approval of a subdivision application for the consolidation of five parcels and the re-subdivision of the consolidated parcel into two parcels. The subdivision or "lot line adjustment" will result in a 5.2-acre parcel for the hotel project and a 1.1-acre adjacent parcel to be available for future development as permitted within the MBP II. In addition, the Project Site is located adjacent to the boundary of the Kahului Airport as shown in the Kahului Airport Master

Plan Update dated December 2016, hotel use is permitted in the Kahului Airport District per County zoning, and additional hotel accommodations are desired per the WKCP. (See: Figure 9, “Kahului Airport Master Plan Map” and Figure 10, “Lot Line Adjustment Site Plan”)

The proposed use achieves one of the goals of the WKCP by allowing opportunities for hotel accommodations near the Kahului Airport and is consistent with the permitted use of the adjacent Kahului Airport District. While consistent with the neighboring permitted uses, the proposed use will require an Amendment to the WKCP land use map from Light Industrial to Hotel, which pursuant to HRS Section 343-5(a)(6) is the trigger for this EIS. Any interactions with public lands or infrastructure — which may be required for incidental infrastructure improvements — are also addressed by this HRS 343 Compliance Document.

The proposed hotel use will require a Motion to Amend the State Land Use Commission Decision & Order A03-739. On January 16, 2020, R.D. Olson filed its Motion to Amend Findings of Fact, Conclusions of Law and Decision and Order filed March 25, 2004 (“2004 D&O”) with the LUC for an order: 1) recognizing R.D. Olson’s standing to seek and obtain the relief requested; and 2) amending the 2004 D&O providing that a portion of the Petition Area, that portion being identified as Tax Map Key Nos. (2) 3-8-103:014 (portion), 015 (portion), 016, 017, and 018, comprising approximately 5.17 acres of land (“Petition Area B”) shall be subject to a new decision and order that is specific to Petition Area B and that said Petition Area B shall not be subject to the 2004 Decision and Order, for the purpose of establishing appropriate findings of fact, conclusions of law and decision and order that are specifically applicable to Petitioner’s Kahahā Hotel and limited to Petition Area B.

Additionally, the Proposed Project requires a Change in Zoning from “LI” Light Industrial to “H-M” Hotel, and Wailuku-Kahului Community Plan Amendment from “LI” Light Industrial to “H” Hotel. Additionally the Applicant is proposing to amend the WKCP definition of hotel to allow for kitchens within individual units.

After all amendments to the Land Use Designations have been obtained, a Special Management Area (SMA) Use Permit will be required to authorize the project’s development action in the SMA. The project is valued at more than \$500,000.00 therefore an SMA Major Permit is anticipated.

This Draft EIS discusses the potential impacts of the Proposed Action to the physical environment, socio-economic environment, public services, and infrastructures — along with the

proposed mitigation measures. In general, the proposed Kahahā Hotel anticipates significant beneficial economic impacts to County of Maui and the development of the proposed hotel will be in compliance with the applicable governmental plans, policies, and controls. The following are the environmental topics explored with regard to the Proposed Project — which will be detailed in Chapter 2 of this Draft EIS.

- Physical Environment:
 - Surrounding Land Uses
 - Topography and Soils
 - Natural Hazards
 - Climate Change Assessment
 - Hazardous Substances
 - Flora and Fauna
 - Air Quality
 - Noise Quality
 - Historical and Archaeological Resources
 - Visual Resources
 - Agricultural Resources
 - Surface Water Resources
 - Coastal Water Resources
 - Groundwater Resources
- Socio-economic Environment:
 - Population and Housing
 - Economy
 - Cultural Resources
- Public Services:
 - Recreational Facilities
 - Medical Facilities
 - Police and Fire Protection Facilities
 - Schools
 - Solid Waste
 - Emergency Management Agency

- Infrastructure:
 - Roadways
 - Drainage
 - Water
 - Wastewater
 - Electrical

1.6 Alternatives

The Hawai'i Administrative Rules (HAR) Title 11, Department of Health (DOH), Chapter 200.1 EIS Rules set forth the content requirements for a draft EIS. Section 11-200.1-24(h) of the EIS Rules state that:

The draft EIS shall describe in a separate and distinct section discussion of the alternative of no action as well as reasonable alternatives that could attain the objectives of the action. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all the adverse environmental effects, costs, and risks of the action.

Alternatives to the Preferred Alternative (i.e., Proposed Kahahā Hotel) include:

- No Action/No Project/No Build Alternative
- Existing Land Use Designations Alternative
- Alternative Site Alternative
- Multi-family Development Alternative
- Reduced Intensity Alternative

Each alternative is considered and discussed below — with regards to the potential impacts and mitigation measures detailed in Chapter 2 of this Draft EIS.

1.6.1. No Action/No Project/No Build Alternative

DESCRIPTION OF ALTERNATIVE

The 5.2-acre Project Site is located at the southeast corner of the intersection of Haleakalā Highway and Lauo Loop in Kahului the economic hub of the Island. The Project Site is adjacent to the Airport Access Road, the primary vehicular connection

between the Airport, Kahului, and the rest of the island of Maui. The Project Site is situated within the Maui Business Park Phase II (MBPII). The Project Site is currently vacant land with existing roadways, lighting, curbs, gutters, and sidewalks as well as installed underground electrical, wastewater, and water utilities.

The No Action/No Project/No Build Alternative would retain the Project Site in its current condition. With this Alternative, the parcels at the MBPII would remain vacant and existing underground utilities and roadway services would remain unutilized.

This Alternative would leave the Project Site with the existing conditions and nothing would change. The existing utilities and improvements prepared for the Project Site would remain unutilized. The existing Project Site would remain vacant and possibly overgrown due to no development nor uses on the site.

Under the No Action/No Project/No Build Alternative, the current State Land Use Commission (LUC) Decision and Order of Docket No. A03-739, Wailuku-Kahului Community Plan designation, and Maui County Zoning designation would not be amended.

The following discussion evaluates the potential environmental impacts associated with the No Action/No Project/No Build Alternative, as compared to impacts from the Proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the No Action/No Project/No Build Alternative, no development would occur within the Special Management Area (SMA); therefore, no SMA Use Permit is required. With the No Action/No Project/No Build Alternative, current State Land Use Commission (LUC) Decision and Order of Docket No. A03-739, Wailuku-Kahului Community Plan designation, and Maui County Zoning would not be amended. Triggers to Chapter 343 including but not limited to the amendment of the Wailuku-Kahului Community Plan designation of the Project Site would no longer be applicable. Therefore, all the project's proposed amendments would not be implemented. Additionally, the construction of the 200-unit hotel would not be implemented. New land use approvals and permits would not be required.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project because no physical change to the environment would occur. Additionally, this alternative would result in no land use entitlement changes since no amendments of relevant land use planning policy documents, or the zoning code would be required.

Topography and Soils

The Project Site consists of vacant land with utilities and roadway services. The Project Site sits at approximately 28 to 34 feet above mean sea level and is relatively flat. Soils within the Project Site are generally characterized by slow to medium runoff and slight to moderate erosion hazards. Past uses within the Project Site included sugar cane cultivation between 1974 to the 1990s. Former use also included a seed treatment plant on a portion of the site. Based on a geotechnical investigation prepared by Hawai'i Geotechnical Consulting: *Geotechnical Investigation Report*, the proposed hotel development is believed to be feasible at the Project Site. (See: Appendix 4)

Soil erosion from grading and excavation as well as dust generation from the associated earthwork operations would not occur with the No Action/No Project/No Build Alternative because site development would not occur.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding topography and soils, because no new impervious surfaces would be constructed and impacts from the urban heat island effect and additional stormwater runoff would not occur.

Natural Hazards

As part of the Hawaiian Archipelago, natural hazards that may impact the Island of Maui include hurricanes, tsunamis, volcanic eruptions, earthquakes, and flooding. Seismic hazards are related to ground shaking such as landslides, ground cracks, rock falls, and tsunamis. The UBC seismic provisions classify six seismic zone — zone 0, 1, 2A, 2B, 3, and 4 — with 0 indicating the weakest earthquake ground shaking and 4 indicating the strongest. The County of Maui is in Zone 2B which means the chance of severe ground shaking falls within the middle of the six seismic zones. The Project Site is located within the Civil Defense Agency's Tsunami Evacuation Zone. Volcanic hazards are not a concern in the Central Maui area due to the dormant status of Haleakalā.

Based on the foregoing, the Project Site is susceptible to seismic and tsunami hazards. Future development of the Project Site will require coordination with the Maui Emergency Management Agency to understand procedures in the event of a tsunami evacuation. Implementation of the No Action/No Project/No Build Alternative would not expose additional people or structures to potential adverse effects associated with seismic and tsunami hazards since no new land uses would be developed on the Project Site.

The No Action/No Project/No Build Alternative would not be environmentally superior nor inferior to the Proposed Project regarding natural hazards, given that the existing site would remain susceptible to the same seismic and tsunami hazards. The only difference this Alternative would offer compared to the Proposed Project is leaving the Project Site vacant. Therefore, during the event of natural hazards, emergency evacuation procedures would not need to be conducted on the Project Site.

Climate Change

The Proposed Project will include climate change mitigation efforts as part of the development, both during construction in the short term and operationally in the long term. A minimum of fourteen (14) standard green building objectives will be incorporated into the design of the Proposed Project with the intent to emphasize high performance and energy-efficient design and construction methods. A Climate Change Assessment report was conducted by Wilson Okamoto Corporation: *Climate Change Assessment: Kānāhā Hotel at Kahului Airport* to assess the impacts of climate change on the Proposed Project as well as the potential impact of the Proposed Project on climate change. (See: Appendix 26)

Climate change impacts that were assessed for their potential to affect the Proposed Project include a rise in air temperatures, variations in rainfall patterns, flooding, sea level rise, and coastal erosion. Sea level rise and coastal erosion will not have any adverse impacts on the Proposed Project due to the inland location of the Project Site and onsite elevations. Similarly, the Proposed Project will not be affected by flooding as the Project Site is outside of the 0.2 percent annual chance floodplain. A rise in air temperatures attributed to climate change and urban heat island effect from the increase of impervious surfaces at the Project Site may indirectly increase GHG emissions in the long term from the consequential increase in energy demands as cooling systems are required to be operated more frequently or for longer durations. These indirect impacts are anticipated to be less than significant as the Proposed Project will utilize photovoltaic

solar panels to minimize and off-set the long-term demand on electrical utilities, passive cooling strategies, landscaping that will absorb heat and provide shade to cool the surrounding landscape, and high-efficiency cooling systems that will be maintained for optimal performance. Variations in rainfall patterns are also anticipated to have less than significant impacts on the Proposed Project as the proposed onsite drainage system improvements will collect and convey runoff to other areas within the MBP development for retention. Anticipated increases in runoff at the Project Site have been accounted for in the master plan development of MBP, which were calculated based on larger than average storm events. Therefore, the Proposed Project is not anticipated to exacerbate flooding impacts from climate change. Overall, the impacts of climate change on the Proposed Project are anticipated to be less than significant.

The potential of the Proposed Project to affect climate change was assessed in terms of the Proposed Project's contribution to anticipated levels of Greenhouse Gas Emissions (GHG). The Proposed Project is anticipated to produce GHG emissions during construction and operation. During construction, GHG emissions will come primarily from exhaust emissions from the operation of construction equipment onsite. GHG emissions are also expected to come from exhaust emissions from the vehicles used by construction workers to commute to the site, temporary increases in traffic from roadway lane closures, and from "upstream" activities associated with extraction or production of materials to build the project. During operations, GHG emissions are anticipated to come from the burning of fossil fuels to generate energy for the hotel, exhaust emissions from vehicles transporting to and from the hotel, and exhaust emissions from vehicles servicing the hotel. Long-term maintenance of the hotel would also generate GHG emissions.

Project implementation, individually, would not result in a significant impact on existing GHG concentrations in the atmosphere. Cumulatively, the project will contribute to the overall concentration of GHG in the atmosphere. Total emissions for the State are projected to decrease by 2025 even with projected increases in the commercial sector. It can be expected that an increase in emissions from the commercial sector will be offset by even greater reductions in emissions produced by the energy industries due to gained efficiencies in energy production. Thus, less than significant short-term and operational GHG emission impacts – with mitigation incorporated – would occur with the Proposed Project. (See: Appendix 26)

Development of the Project Site would not occur with the No Action/No Project/ No Build alternative. No new impervious surfaces would be constructed and impacts from the urban heat island effect and additional runoff would not occur. GHG emissions resulting from construction and operational activities would also not occur with the No Action/No Project/No Build Alternative.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding climate change and particularly GHG emissions, since no development and no GHG emissions would occur.

Hazardous Substances

Phase I and II Environmental Site Assessments (ESA) have been conducted on the project parcels. The Phase I and II ESA reports prepared for the Proposed Project found no presence of any fertilizers, herbicides, pesticides, or other types of agricultural products which may have been used on the site or the presence of any hazardous substance or petroleum products on the property. Therefore, the ESAs, prepared by Ford Cauty & Associates, Inc., show no evidence of recognized hazardous environmental conditions in connection with the property. Soil surfaces at the Project Site do not appear to be impacted with chemicals of potential concern (COPC). Thus, no impacts from hazardous substances are anticipated at the site, based on the conclusions of Phase I and II ESA reports. However, the ESA reports recommend future excavation activities to be monitored for potential buried waste materials. Less than significant impacts would occur with the Proposed Project — mitigation would be incorporated to minimize impact of excavation activities on the site. (See: Appendices 6 & 7)

The No Action/No Project/No Build Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding hazardous substances because the existing site conditions are not impacted with COPC.

Flora and Fauna

The Project Site was previously disturbed for intensive sugar cane cultivation for several decades. The Project Site contains three indigenous native plants; however, none of these species were found to be of environmental concern, and all are common in Hawai'i. The Project Site has no characteristics of an attractive area for Nēnē to land, spend time, or live. Thus, the Project Site is not the preferred habitat of Nēnē. No Federally listed Threatened or Endangered species (USFWS, 2017) were found on the property nor were

any found that are candidates for such status. Additionally, no special habitats were found on the property either. (See: Appendices 8, 9, 10, and 11)

Based on the foregoing, project implementation would result in less than significant impact — with mitigation incorporated and management of construction activities during the appearance of any fauna species that may enter the Project Site.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding flora and fauna, given it would not change the site and the existing land would remain undeveloped.

Air Quality

Air quality impacts attributed to the Proposed Project could include dust generated by construction-related activities. Site work, such as demolition, grubbing, grading, and building construction, could generate airborne particulate. Adequate dust control measures that comply with the provisions of Hawai'i Administrative Rules — Chapter 11-60.1, "Air Pollution Control," Section 11-60.1-33, Fugitive Dust — will be implemented during all phases of construction. (See: Appendix 12)

Short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phases. Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with the development's electrical power and solid waste disposal requirements. Mitigation efforts, management of construction operations, and use of renewable energy sources would result in a less than significant impact to air quality due to the Proposed Project. (See: Appendix 12)

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding air quality because there would be no short- or long-term air quality impacts related to construction or operation of the hotel.

Noise Quality

At the Project Site existing noise is primarily generated by vehicular traffic, air travel from Kahului Airport, heavy machinery, and construction activities. The ramifications of various activities and their corresponding sound levels may impact health conditions and

the physical or sensory appeal of an area.

According to the Acoustic Study conducted for the Proposed Project, the existing traffic noise levels at ground level along the perimeter of the proposed hotel building vary from levels of approximately 55 DNL at the southwest corner to 57 to 58 DNL along the north sides. (See: Appendix 13)

The loudest aircraft noise events were overhead tour helicopters landing at their facility northeast of the Project Site. Their measured noise levels were like those expected during commercial and private jet aircraft departures toward the south during Kona wind conditions. The noisier military jet aircraft can produce higher noise levels, but they number less than two (2) percent of all aircraft noise events. The Acoustic Consultant estimates that current, CY 2019 aircraft noise levels on the Project Site range between 60 and 65 DNL. (See: Appendix 13)

Aircraft noise would be mitigated, such as the special noise attenuation measures, with regards to interior and exterior noise levels for the Proposed Project. Audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. The actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project. Therefore, construction noise associated with the Proposed Project would result in less than significant impacts — with mitigation incorporated. Construction activities would cause a less than significant increase in mobile noise along access routes to and from the site due to the movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. (See: Appendix 13)

Under the No Action/No Project/No Build Alternative, project construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would not occur.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding noise since it would result in no short-term construction-related, or long-term operational mobile or stationary source noise impacts.

Historical and Archaeological Resources

The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

The Archaeological Inventory Survey (AIS) of the project area was conducted by SCS with subsurface testing at the project site. The study did not identify historically significant sites within the project parcel and was therefore submitted as an Archaeological Assessment to SHPD for review. (See: Appendices 14.1 and 14.2)

In response to comments on the Archaeological Inventory Survey (AIS) from the SHPD, the Applicant retained Āina Archaeology to conduct a Supplemental Archaeological Inventory Survey (SAIS). An SAIS report dated April 29, 2021, was prepared for the Proposed Project. (See: Appendix 15.1)

Based on the results of the SAIS, no further archaeological work for the project is recommended. In addition, SHPD has determined that no historic properties affected for the current project permits.

Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding the historical and archaeological resources since no construction and modern ground-disturbing activities would be conducted.

Visual Resources

Scenic resources include view corridors over the Project Site to Haleakalā and the West Maui Mountains from different roadway locations abutting the Project Site. The short-term visual impacts associated with construction activities would occur with the proposed Hotel project but would not occur with the No Action/No Project/No Build Alternative. Therefore, the project's construction-related impacts to the visual character/quality of the

Project Site and its surroundings would be avoided.

The Project Site's long-term visual character would be altered with the Proposed Project because the existing vacant land would be replaced with a new 200-unit hotel development. Project implementation would alter the visual character of the site and its surroundings; however, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity. (See: Appendix 16)

The project will set forth building height limits and setbacks to help maintain views toward the summit of Haleakalā. In addition, the open space areas incorporated into the Kahahā Hotel site plan will provide view corridors toward Haleakalā. (See: Appendix 16)

With respect to design, the Proposed Project will complement the high-quality architectural character of other developed properties in the vicinity. The Kahahā Hotel will be designed in accordance with applicable Maui County building code standards as well as applicable Maui Business Park Design Guidelines to complement the surrounding MBP II developments.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project regarding aesthetics/light and glare because the site would not be further disturbed and no construction activities would occur, and the Project Site would remain in its current vacant condition.

Agricultural Resources

Although previously used for sugar cane cultivation, the Project Site is in an urban subdivision where the lots have been graded and improved with roadways, water meters, and underground utilities as part of the planned MBP II development. The property is in the State Urban District, the County's M-1, Light Industrial Zoning District, and is designated for Light Industrial (LI) use by the Wailuku-Kahului Community Plan.

The Land Study Bureau (LSB) and Agricultural Lands of Importance to the State of Hawai'i (ALISH) classification systems indicate that the lands underlying the Project Site possess soil ratings for productive agricultural uses — land classified as "A" and "Prime", respectively. As noted, the Project Site has previously been graded and improved with water meters, underground utilities, and roadways.

As noted in the accepted MBP II FEIS document, dated December 2004:

“...given the large supply of land in other areas on Maui available for agriculture due to the decline of plantation agriculture, use of 179 acres for MBP II will not affect the statewide growth of diversified agriculture.”

While the previously approved MBP II project resulted in the loss of 179 acres of high-quality agricultural land, there is a large supply of productive farmland in Maui County. As such, the proposed 5.2-acre hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project because the lands within the Project Site would remain undisturbed and unutilized for hotel development. It should be noted that the Project Site would remain part of the MBP II, which has been improved with the necessary utilities and roadway infrastructure for future development. The immediate environment of the Project Site would remain characterized by modern structures and land uses as permitted in the urban district.

Hydrology and Water Quality

A&B developed two private water systems to supply the MBP II, one for potable consumption and the other for irrigation and other non-potable uses. The potable system is supplied by two offsite wells which draw water from the Kahului Aquifer (State Nos. 5129-004 and -005). The Proposed Project involved two consultants to assess existing conditions of the water resources and the potential impacts of the Proposed Project to the water quality.

The first consultant, Marine Research Consultants, Inc. prepared the report; *Baseline Assessment of Marine Water Chemistry Kahahā Hotel*. The purpose of the report is to assess potential impacts to water quality within the downslope ecosystem of the Proposed Project. Water quality testing was conducted from the shoreline to the offshore open ocean. (See: Appendix 19)

Results of the baseline study reveal that the marine habitat offshore of the region downslope from the hotel site consists of a shallow reef platform, primarily covered with a mix of sand and rubble interspersed with coral reef communities. Results of the water

quality survey indicate some detectable differences between the three transect sites, although the exact cause of these differences is not clear. Sources of groundwater input from the area immediately adjacent to the Wailuku-Kahului Wastewater Reclamation Facility (WWRF) contains different groundwater signatures than the other two survey areas that were located to the west. (See: Appendix 19)

However, all the results of the present survey indicate that water quality within the survey area downslope from the Kahahā Hotel Project Site is near, or within the appropriate levels established by the Department of Health Water Quality Standards, indicating that at present there are no significant factors from land uses influencing water quality. The small amount of groundwater input at the shoreline is rapidly mixed to background coastal oceanic values through wave action and other physical processes. (See: Appendix 19)

Based on the results of the survey, project implementation would have a less than significant impact to water resources with proper management practices to prevent material input to groundwater or stream discharged by the proposed Kahahā Hotel. Project implementation would not anticipate any impacts to marine water to occur since the Project Site is not situated on the shoreline. (See: Appendix 19)

The second consultant, Tom Nance Water Resource Engineering (TNWRE), prepared the report; *Potential Impact on Water Resources of the Proposed Kahahā Hotel*. The report focuses on the use of groundwater and the potential impact to the groundwater body — since no streams or other inland water bodies would be impacted by the project. (See: Appendix 17)

The TNWRE report concludes that the impact to the Kahului Aquifer of supplying water for the proposed hotel project is not considered to be significant. Analysis of the amounts of groundwater use — reflected by the comparison of the current pumping in the Aquifer and the additional pumping to supply the proposed hotel project — showed that the increase of groundwater use will be less than one (1) percent of the ongoing total pumping within the Aquifer. Furthermore, nutrients removed from the Aquifer by the wells would be greater than the nutrients returned to the aquifer from the irrigated landscaping — but the amounts are exceedingly small and of no significant environmental consequence. (See: Appendix 17)

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project because no new water well development would occur and no additional potential impacts to water resources would occur. It should be noted that the existing site would still be available for future development and the available utilities and roadways would remain ready for any uses on the existing site.

Population and Housing

The Project Site is currently designated for Light Industrial development. The change in zoning designation would accommodate Hotel uses and would be anticipated to have a minimal to no secondary impact on population and housing. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates, Inc.: *Kahahā Hotel Economic Effects*. The report projects that the average daily number of hotel guests at the Kahahā Hotel will be 295 people after project completion and stabilization. (See: Appendix 20)

The No Action/No Project/No Build Alternative would neither be environmentally superior nor inferior to the Proposed Project regarding population and housing because the Project Site would remain vacant and unutilized. In addition, the Proposed Project is not anticipated to generate population. However, compared to this Alternative, the Proposed Project is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents. The No Action/No Project/No Build Alternative would cancel the fulfillment of the said requirement, hence no project-related contribution to the workforce homes in Maui.

Economy

Maui's employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collectively comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at 12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved

in terms of hotel facilities. (See: Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% or greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kānehā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (See: Appendix 22). The following is a summary of the findings of the said study.

- Maui arrivals and ADC have increased in recent years, driven by growth in the supply of vacation rentals.
- In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kānehā Hotel would be built, the estimated visitor ratio is below 10%.
- The proposed Kānehā Hotel is expected to primarily serve the *kama'āina* market, with only a marginal contribution to the island's average daily census of visitors.
- Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-Term Rental Homes and Bed & Breakfasts (collectively referred to as "vacation rentals" in this report) providing an alternative to Maui's high-priced hotel rooms.
- Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.
- The proposed Kānehā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20)

On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three (3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai'i over a twelve (12) year period. (See: Appendix 20)

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui.

The proximity of the Kahahā Hotel to Kahului and Wailuku, where a majority of Maui's population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui's various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama'āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui.

In the context of the economy, the No Action/No Project/No Build Alternative would deprive the State and County of economic benefits of property taxes and transient accommodation taxes that a proposed hotel would generate. In addition, this alternative does not achieve the economic objectives of the Kahahā Hotel project.

Cultural Resources

A Cultural Impact Assessment (CIA) Report was completed for the Project Site by Honua Consulting; *Cultural Impact Assessment Report for the Kahahā Hotel at Kahului Airport*. Prior to the production of the CIA report, interviews with individuals and cultural practitioners knowledgeable about the lands, history, traditional practices, customs, and cultural resources of the Wailuku ahupua'a were conducted in 2018 and 2019. In addition, archival research was also conducted to research the existence of cultural resources within the Project Site or in its immediate vicinity. (See Appendix 23)

The CIA concludes that the potential of the Proposed Project to have significant effects to cultural resources, beliefs, or practices is highly unlikely considering the long use of the project area for industrial uses, including plantation activities extending back to the 19th century. Based on extensive research in both Hawaiian and English language resources conducted for the CIA and the archaeological investigation conducted for the AIS, the subject property bears no apparent signs of cultural practices or gatherings currently taking place. The oral history interviews did not reveal any known contemporaneously gathering places on the subject property or any access concerns because of the Proposed Project. (See: Appendix 23)

Therefore, it can be reasonably concluded that the development of the site would have a less than significant impact to cultural resources on the property or within its immediate vicinity. (See: Appendix 23)

The No Action/No Project/No Build Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding cultural resources because the property has not been identified as a historically or culturally significant place.

Public Services and Utilities

Implementation of the Proposed Project would place increased demands upon public services (i.e., recreational facilities, medical facilities, police and fire protection services, schools), traffic, and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, telephone). However, project implementation would have a less than significant impact because the Proposed Project is not a new population generator such as a residential subdivision. The project is proposing to use private water for the project and the supporting infrastructure has been installed at the MBPPII property.

The No Action/No Project/No Build Alternative would be environmentally superior to the Proposed Project because no development impacts would occur associated with increased demand upon public services and utilities

ATTAINMENT OF PROJECT OBJECTIVES

The No Action/No Project/No Build Alternative fails to meet the six (6) objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need.

The objectives of the Kahahā Hotel project are:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.
4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3 states "Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core."
6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3: "Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding."

1.6.2. Existing Land Use Designations Alternative

DESCRIPTION OF ALTERNATIVE

The Existing Land Use Designations Alternative proposes the development of what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on the Project Site's current land use, zoning, and community plan designations — i.e., the State Urban District, the County-zoned M-1 Light Industrial Zoning District, and Community Plan Light Industrial (LI).

The State Urban District allows any urban-like uses. Maui County Code (MCC) Chapter 19.24 states the intention of M-1 Light Industrial District as follows:

“The M-1 light industrial district is designed to contain mostly warehousing and distribution types of activity, and permits most compounding, assembly, or treatment of articles or materials with the exception of heavy manufacturing and processing of raw materials. Residential uses are excluded except for dwelling units located in the same building as any non-dwelling permitted use.”

The Wailuku-Kahului Community Plan describes Light Industrial (LI) uses as including warehousing, light assembly, service, and craft-type industrial operations.

Both the County Zoning and the Community Plan designation have identified uses specifically for non-residential development. This Alternative will assume development of the property under the existing land use designations that would allow for Light Industrial uses including business or commercial uses, following SMA review and approval. It should be noted that the Decision and Order Docket No. A03-739 prohibits residential use within the MBP II boundaries.

The following discussion evaluates the potential environmental impacts associated with the Existing Land Use Designations Alternative, as compared to impacts from the Proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the Existing Land Use Designations Alternative, new development would occur within the Special Management Area (SMA); therefore, an SMA Use Permit approved by the Maui Planning Commission would still be required under this Alternative. With the Existing Land Use Designations Alternative, current State Land Use Commission (LUC) Decision and Order of Docket No. A03-739, Wailuku-Kahului Community Plan designation, and Maui County Zoning would not be amended. Triggers to Chapter 343 including but not limited to the amendment of the Wailuku-Kahului Community Plan designation of the Project Site would no longer be applicable. Therefore, any amendments to the existing land use designations would not be implemented. However,

an SMA Use Permit would still be required.

The Existing Land Use Designations Alternative would require the Applicant to develop the property as permitted a light industrial use. Impacts could either be significant or less than significant compared to the Proposed Project depending on the type and size of the light industrial development. However, this Alternative, in general from a land use perspective, would be environmentally superior to the Proposed Project because this Alternative will follow the existing land use designations without requiring the amendments of three (3) designations that the Proposed Project requires.

Topography and Soils

The Project Site consists of vacant land with utilities and roadway services. The Project Site sits at approximately 28 to 34 feet above mean sea level and is relatively flat. Soils within the Project Site generally characterized by slow to medium runoff and slight to moderate erosion hazards. Past uses within the Project Site included sugar cane cultivation between 1974 to the 1990s. Former use also included a seed treatment plant on a portion of the site. Based on a geotechnical investigation prepared by Hawai'i Geotechnical Consulting: *Geotechnical Investigation Report*, the proposed hotel development is believed to be feasible at the Project Site. (See: Appendix 4)

Soil erosion from grading and excavation as well as dust generation from the associated earthwork operations that would occur with the Proposed Project would similarly occur with the Existing Land Use Designations Alternative. Construction-related impacts to the topography and soils would either be significant or less than significant compared to the Proposed Project depending on the type and size of the light industrial development. However, this Alternative would result in less than significant impacts with the implementation of appropriate mitigation measures.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding topography and soils because new impervious surfaces would be constructed and impacts from the urban heat island effect and additional stormwater runoff would occur.

Natural Hazards

As previously discussed, the Project Site is susceptible to seismic and tsunami hazards. Implementation of the Existing Land Use Designations Alternative would expose

additional people or structures to potential adverse effects associated with seismic and tsunami hazards since new land uses relating to Light Industrial would be developed on the Project Site that is currently vacant.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding natural hazards given that the existing site would remain susceptible to the same seismic and tsunami hazards. However, emergency evacuation procedures during the event of natural hazards will be incorporated to any development occurring on the Project Site.

Climate Change

The Proposed Project will include climate change mitigation efforts as part of the development, both during construction in the short-term and operationally in the long-term. A minimum of fourteen (14) standard green building objectives will be incorporated into the design of the Proposed Project with the intent to emphasize high performance and energy efficient design and construction methods. A Climate Change Assessment report was conducted by Wilson Okamoto Corporation: *Climate Change Assessment: Kahahā Hotel at Kahului Airport* to assess the impacts of climate change on the Proposed Project as well as the potential impact of the Proposed Project on climate change. (See: Appendix 26)

Climate change impacts that were assessed for their potential to affect the Proposed Project include a rise in air temperatures, variations in rainfall patterns, flooding, sea level rise, and coastal erosion. Sea level rise and coastal erosion will not have any adverse impacts on the Proposed Project due to the inland location of the Project Site and onsite elevations. Similarly, the Proposed Project will not be affected by flooding as the Project Site is outside of the 0.2 percent annual chance floodplain. A rise in air temperatures attributed to climate change and urban heat island effect from the increase of impervious surfaces at the Project Site may indirectly increase GHG emissions in the long-term from the consequential increase in energy demands as cooling systems are required to be operated more frequently or for longer durations. These indirect impacts are anticipated to be less than significant as the Proposed Project will utilize photovoltaic solar panels to minimize and off-set the long-term demand on electrical utilities, passive cooling strategies, landscaping that will absorb heat and provide shade to cool the surrounding landscape, and high-efficiency cooling systems that will be maintained for optimal performance. Variations in rainfall patterns are also anticipated to have less than

significant impacts on the Proposed Project as the proposed onsite drainage system improvements will collect and convey runoff to other areas within the MBP development for retention. Anticipated increases in runoff at the Project Site have been accounted for in the master plan development of MBP, which were calculated based on larger than average storm events. Therefore, the Proposed Project is not anticipated to exacerbate flooding impacts from climate change. Overall, the impacts of climate change on the Proposed Project are anticipated to be less than significant.

The potential of the Proposed Project to affect climate change was assessed in terms of the Proposed Project's contribution to anticipated levels of Greenhouse Gas Emissions (GHG). The Proposed Project is anticipated to produce GHG emissions during construction and operation. During construction, GHG emissions will come primarily from exhaust emissions from the operation of construction equipment onsite. GHG emissions are also expected to come from exhaust emissions from the vehicles used by construction workers to commute to the site, temporary increases in traffic from roadway lane closures, and from "upstream" activities associated with extraction or production of materials to build the project. During operations, GHG emissions are anticipated to come from the burning of fossil fuels to generate energy for the hotel, exhaust emissions from vehicles transporting to and from the hotel, and exhaust emissions from vehicles servicing the hotel. Long-term maintenance of the hotel would also generate GHG emissions.

Project implementation, individually, would not result in a significant impact on existing GHG concentrations in the atmosphere. Cumulatively, the project will contribute to the overall concentration of GHG in the atmosphere. Total emissions for the State are projected to decrease by 2025 even with projected increases in the commercial sector. It can be expected that an increase in emissions from the commercial sector will be offset by even greater reductions in emissions produced by the energy industries due to gained efficiencies in energy production. Thus, less than significant short-term and operational GHG emission impacts – with mitigation incorporated – would occur with the Proposed Project. (See: Appendix 26)

Under the Existing Land Use Designations Alternative, the Project Site would be developed for light industrial uses including business or commercial uses. Construction of impervious surfaces would result in impacts related to the urban heat island effect and additional runoff generated at the Project Site, similar to the Proposed Project.

GHG emissions resulting from construction and operational activities would similarly occur with the Existing Land Use Designations Alternative. This alternative would be neither environmentally superior nor inferior to the Proposed Project as both would result in development in the site and differences in total emissions would be dependent upon several factors including the site plan, the anticipated energy demands of the light industrial uses, and the traffic demands generated by the light industrial uses.

Hazardous Substances

As previously stated, ESAs were conducted on the project parcels and show no evidence of recognized hazardous environmental conditions in connection with the property. (See: Appendices 6 & 7)

Less than significant impact would occur with the Proposed Project — mitigation would be incorporated to minimize the impact of excavation activities on the site. The Proposed Project does not include activities or operations that would result in the production of hazardous substances on the site or to the surroundings.

Comparatively, the implementation of the Existing Land Use Designations Alternative would result in the potential for accidental release of hazardous substances consistent with the construction of a light industrial development (i.e., manufacturing plants, harbor facilities, laboratories, treatment facilities of non-raw materials, utility facilities, warehouse, etc.).

The Existing Land Use Designations Alternative could be environmentally inferior to the Proposed Project regarding hazardous substances due to the characteristics of light industrial development. Storage and warehousing are permitted in the Light Industrial district which could include storing hazardous substances such as gasoline, chemicals, propane and other substances.

Flora and Fauna

Project implementation, with mitigation incorporated, would result in a less than significant impact as the Project Site was previously disturbed for intensive sugar cane cultivation for several decades. As previously stated, findings on the Project Site include all common species in Hawai'i and do not contain any species that would be of environmental concern. (See: Appendices 8, 9, 10 & 11)

Under the Existing Land Use Designations Alternative, construction activities would occur over a similar development footprint compared to the Proposed Project depending on the type of the light industrial development.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding flora and fauna — because new structures or facilities and impervious surfaces would be constructed with either the Proposed Action or light industrial development and impacts from the development would likely be similar with the Proposed Project, which does not warrant mitigation measures for flora and fauna.

Air Quality

Air quality impacts attributed to the Proposed Project could include dust generated by construction-related activities. Site work, such as demolition, grubbing, grading, and building construction, could generate airborne particulate. Adequate dust control measures that comply with the provisions of Hawai'i Administrative Rules — Chapter 11-60.1, “Air Pollution Control,” Section 11-60.1-33, Fugitive Dust — will be implemented during all phases of construction.

Short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phases. Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with the development's electrical power and solid waste disposal requirements. Mitigation efforts, management of construction operations, and use of renewable energy sources would result in a less than significant impact to air quality due to the Proposed Project.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding air quality because it would result in similar impacts as the project. It should be noted; however, depending on the type of the light industrial development, air quality impacts of certain manufacturing plants or facilities may result in greater impacts than a hotel.

Noise Quality

At the Project Site existing noise is primarily generated by vehicular traffic, air travel from Kahului Airport, heavy machinery, and construction activities. The ramifications of various activities and their corresponding sound levels may impact health conditions and the physical or sensory appeal of an area.

According to the Acoustic Study conducted for the Proposed Project, the existing traffic noise levels at ground level along the perimeter of the proposed hotel building vary from levels of approximately 55 DNL at the southwest corner to 57 to 58 DNL along the north sides. (See: Appendix 13)

The loudest aircraft noise events were overhead tour helicopters landing at their facility northeast of the Project Site. Their measured noise levels were like those expected during commercial and private jet aircraft departures toward the south during Kona wind conditions. The noisier military jet aircraft can produce higher noise levels, but they number less than two (2) percent of all aircraft noise events. The Acoustic Consultant estimates that current, CY 2019 aircraft noise levels on the Project Site range between 60 and 65 DNL. (See: Appendix 13)

Aircraft noise would be mitigated, such as the special noise attenuation measures, with regards to interior and exterior noise levels for the Proposed Project. Audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. The actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project. Therefore, construction noise associated with the Proposed Project would result in a less than significant impacts with mitigation incorporated. Construction activities would cause less than significant increase in mobile noise along access routes to and from the site due to the movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant.

Under the Existing Land Use Designations Alternative, construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would occur like the Proposed Project. Long-term noise impacts from the operations of light industrial development would be similar or greater than the Proposed Project depending on the type of operations and facilities.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding noise quality because it would result in similar impacts as the project. It should be noted; however, depending on the type of light industrial development, noise quality impacts of certain manufacturing plants or facilities may result in a greater noise impact than a hotel.

Historical and Archaeological Resources

The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

The Archaeological Inventory Survey (AIS) of the project area was conducted by SCS with subsurface testing at the project site. The study did not identify historically significant sites within the project parcel and was therefore submitted as an Archaeological Assessment to SHPD for review. (See: Appendices 14.1 and 14.2)

In response to comments on the Archaeological Inventory Survey (AIS) from the SHPD, the Applicant retained 'Āina Archaeology to conduct a Supplemental Archaeological Inventory Survey (SAIS). An SAIS report dated April 29, 2021, was prepared for the Proposed Project. (See: Appendix 15.1)

Based on the results of the SAIS, no further archaeological work for the project is recommended. In addition, SHPD has determined that no historic properties affected for the current project permits.

Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding historical and archaeological resources because it would result in similar impacts as the project. This Draft EIS

includes Cultural and Archaeological studies that have concluded historical and cultural resources are not present at the property.

Visual Resources

Scenic resources include view corridors over the Project Site to Haleakalā and the West Maui Mountains from different roadway locations abutting the Project Site. The short-term visual impacts associated with grading and construction activities would occur with a light industrial project

The Project Site's long-term visual character would be altered with the Proposed Project because the existing vacant land would be replaced with a new 200-unit hotel development. Project implementation would alter the visual character of the site and its surroundings; however, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity. (See: Appendix 16)

With respect to design, the light industrial development alternative would need to be designed in accordance with applicable Maui County building code standards as well as applicable Maui Business Park Design Guidelines to complement the surrounding MBP II development.

The long-term visual character of the Project Site would be altered with the Existing Land Use Designations Alternative depending on the type of light industrial development. The impact to the area's visual character/quality and light/glare would occur with the Existing Land Use Designations Alternative.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding visual resources because it would result in construction of a light industrial scale building(s) that could have greater or similar impacts as the proposed hotel project.

Agricultural Resources

The Land Study Bureau (LSB) and Agricultural Lands of Importance to the State of Hawai'i (ALISH) classification systems indicate that the lands underlying the Project Site possess soil ratings for productive agricultural uses land classified as "A" and "Prime", respectively. As noted, the Project Site has previously been graded and improved with water meters, underground utilities, and roadways.

As noted in the accepted MBPFI FEIS document, dated December 2004 states:

“...given the large supply of land in other areas on Maui available for agriculture due to the decline of plantation agriculture, use of 179 acres for MBPFI will not affect the statewide growth of diversified agriculture.”

While the previously approved MBPFI project resulted in the loss of 179 acres of high-quality agricultural land, there is a large supply of productive farmland in Maui County. As such, the proposed 5.2-acre hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

Under the Existing Land Use Designations Alternative, impacts to the agricultural resources within the Project Site would be similar as the development would still occur.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding agricultural resources because it would result in similar urban development as the Proposed Project. In addition, the Project Site would remain a part of the MBPFI planned for development and has been improved with the necessary utilities and roadway infrastructure. The immediate environment of the Project Site would also remain characterized by modern structures and land uses as permitted in the urban district.

Hydrology and Water Quality

A&B developed two private water systems to supply the MBPFI, one for potable consumption and the other for irrigation and other non-potable uses. The potable system is supplied by two offsite wells which draw water from the Kahului Aquifer (State Nos. 5129-004 and -005). Under the Existing Land Uses Designations Alternative, less than significant impacts to the water quality would occur similar to the Proposed Project.

The Existing Land Use Designations Alternative would be environmentally superior to the Proposed Project regarding groundwater resources because a new water well would not be required to withdraw additional water from the Kahului Aquifer, therefore more water would naturally remain in the aquifer. The property has an existing adequate private water source for future light industrial development.

Population and Housing

The Project Site is currently designated for Light Industrial development. The new designation would be to accommodate Hotel uses and would be anticipated to have a minimal to no secondary impact on population and housing. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates. The report projects that the average daily number of hotel guests at the Kahahā Hotel will be 295 people after project completion and stabilization. (See: Appendix 20)

The Proposed Project is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents. Under the Existing Land Use Designations Alternative, impacts to population and housing would not be anticipated because this Alternative would not generate population. However, this Alternative may not be subject to the same MCC workforce housing policy.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding population and housing because it would result in similar impacts as the project. It should be noted that the Decision and Order Docket No. A03-739 prohibits residential use within the MBP II boundaries.

Economy

Maui's employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collectively comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at 12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (See: Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has

experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% of greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kahahā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (See: Appendix 22). The following is a summary of the findings of the said study.

- Maui arrivals and ADC have increased in recent years, driven by growth in the supply of vacation rentals.
- In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kahahā Hotel would be built, the estimated visitor ratio is below 10%.
- The proposed Kahahā Hotel is expected to primarily serve the *kama'āina* market, with only a marginal contribution to the island's average daily census of visitors.
- Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-Term Rental Homes and Bed & Breakfasts (collectively referred to as "vacation rentals" in this report) providing an alternative to Maui's high-priced hotel rooms.
- Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.
- The proposed Kahahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20)

On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three

(3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai'i over a twelve (12) year period. (See: Appendix 20)

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui.

The proximity of the Kānaha Hotel to Kahului and Wailuku, where a majority of Maui's population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui's various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama'āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui.

Under the Existing Land Use Designations Alternative, short-term impacts to the economy would be similar to the Proposed Project due to the construction activities. However, apart from property tax generation and contribution through commercial transactions, long-term impacts would generate slightly different results depending on the type and size of the light industrial development under this Alternative.

The Existing Land Use Designations Alternative would be neither inferior nor superior to the Proposed Project regarding economy. Development of the property as light industrial or commercial would contribute to the economy with property taxes for the State and County.

Cultural Resources

A Cultural Impact Assessment (CIA) Report was completed for the Project Site by Honua Consulting; *Cultural Impact Assessment Report for the Kahahā Hotel at Kahului Airport*. Prior to the production of the CIA report, interviews with individuals and cultural practitioners knowledgeable about the lands, history, traditional practices, customs, and cultural resources of the Wailuku ahupua'a were conducted in 2018 and 2019. In addition, archival research was also conducted to research the existence of cultural resources within the Project Site or in its immediate vicinity. (See: Appendix 23)

The CIA concludes that the potential of the Proposed Project to have significant effects to cultural resources, beliefs, or practices is highly unlikely considering the long use of the project area for industrial uses, including plantation activities extending back to the 19th century. Based on extensive research in both Hawaiian and English language resources conducted for the CIA and the archaeological investigation conducted for the AIS, the subject property bears no apparent signs of cultural practices or gatherings currently taking place. The oral history interviews did not reveal any known contemporaneously gathering places on the subject property or any access concerns because of the Proposed Project. (See: Appendix 23)

Therefore, it can be reasonably concluded that the development of the site would have a less than significant impact to cultural resources on the property or within its immediate vicinity. Like the Proposed Project, under the Existing Land Use Designations Alternative, impacts to cultural resources would be less than significant.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding cultural resources, given it would involve similar ground-disturbing activities.

Public Services and Utilities

Implementation of the Proposed Project would place increased demands upon public services (i.e., recreational facilities, medical facilities, police and fire protection services, schools), traffic, and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, telephone).

The Existing Land Use Designations Alternative would result in similar impacts associated with increased demands upon public services, and utilities and service systems

because new land uses would be developed. The less than significant increased demands upon public services, and utilities and service systems that would occur with the Proposed Project would occur also with this Alternative.

The Existing Land Use Designations Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding impacts to public services and utilities.

ATTAINMENT OF PROJECT OBJECTIVES

The Existing Land Use Designations Alternative fails to meet the six (6) objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need, as well as the stated goals and objectives of the Proposed Action.

The Existing Land Use Designations Alternative would not attain the project's fundamental objective to provide accommodations for business travelers, residents, and visitors would be most suitable and where lodging inventory is significantly lower compared to other locations on the Island such as the Wailea-Kihei area and the Lāhainā-Ka'anapali-Nāpili-Kapalua areas. The Existing Land Use Designations Alternative would also eliminate the State and County economic benefits associated with a hotel.

The objectives of the Kahahā Hotel project are:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.
4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3 states "Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core."
6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3: "Study the feasibility of developing an Airport District for Kahului

Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding.”

1.6.3. Alternative Site Alternative

DESCRIPTION OF ALTERNATIVE

Under the Alternative Site Alternative, the owner/Applicant would have to find and develop another property of comparable size and appropriate location. In the context of the purpose and intent of the Proposed Action, the Proposed Project site is the most feasible location due to the availability of vacant land, potable water, installed infrastructure, and adjacent to the Kahului Airport as the primary airport for passenger arrivals to the island of Maui.

This Alternative will assume the development of a 200-room hotel to be located on another possible site within the Wailuku/Kahului area. The following discussion evaluates the potential environmental impacts associated with the Alternative Site Alternative, as compared to impacts from the Proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the Alternative Site Alternative, new development would occur in another location on Maui. With this Alternative, the State Land Use Commission (LUC) Decision and Order of Docket No. A03-739, Wailuku-Kahului Community Plan designation, and Maui County Zoning specifically applied to the current Project Site would not be amended. Therefore, any amendments to the existing land use designations would not be implemented. However, other land use and development permits would still be required depending on the location of the alternative site.

Currently, there are not many possible alternative sites in the Wailuku/Kahului area for the development of a 200-room hotel. The Wailuku/Kahului Community Plan, Part II Section B.2.c about Wailuku Town Redevelopment, stated that *“The development of a hotel to accommodate business traveler is also viewed a potential opportunity for the town.”* However, Wailuku has also been known as an old town with distinctive architectural characters and low-density development compared to Kahului and the other areas on Maui that are known for hotel/resort development. With the Alternative Site

Alternative, the 200-room hotel would not be the appropriate scale of development for Wailuku Town.

The current Maui Island Plan, about Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3, stated that: *“Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding.”* The Action supports the opportunity to develop a hotel for business travelers. Project Implementation would be in support of the Maui Island Plan.

Project implementation of mitigation measures and BMPs would result in less than significant impacts for the current Project Site. Comparatively, with the Alternative Site Alternative, the 200-room hotel would not be located at the most feasible location. This Alternative would leave the current Project Site unexplored despite the goal to provide opportunities for hotel development in close proximity to the airport and compatible with the surrounding urban land uses.

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding land use and relevant planning due to the lack of available hotel-designated land within Wailuku-Kahului area that is comparable to the current Project Site to accommodate the proposed 200-room hotel.

Topography and Soils

Soil erosion from grading and excavation as well as dust generation from the associated earthwork operations that would occur with the Proposed Project would similarly occur with the Alternative Site Alternative. Construction-related impacts to the topography and soils would be similar to the Proposed Project following the Best Management Practices (BMPs) and mitigation measures.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding topography and soils because new impervious surfaces would be constructed and impacts from additional stormwater runoff would occur from any development regardless of location.

Natural Hazards

As previously discussed, the Project Site is susceptible to seismic and tsunami hazards.

Implementation of the Alternative Site Alternative would expose additional people or structures to potential adverse effects associated with seismic and tsunami hazards since new land use would be developed on another site or location on Maui.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding natural hazards because it would result in similar impacts as the Proposed Project and emergency evacuation procedures would be adhered to.

Climate Change

The Proposed Project will include climate change mitigation efforts as part of the development, both during construction in the short-term and operationally in the long-term. A minimum of fourteen (14) standard green building objectives will be incorporated into the design of the Proposed Project with the intent to emphasize high performance and energy efficient design and construction methods. A Climate Change Assessment report was conducted by Wilson Okamoto Corporation: *Climate Change Assessment: Kānāhā Hotel at Kahului Airport* to assess the impacts of climate change on the Proposed Project as well as the potential impact of the Proposed Project on climate change. (See: Appendix 26)

Climate change impacts that were assessed for their potential to affect the Proposed Project include a rise in air temperatures, variations in rainfall patterns, flooding, sea level rise, and coastal erosion. Sea level rise and coastal erosion will not have any adverse impacts on the Proposed Project due to the inland location of the Project Site and onsite elevations. Similarly, the Proposed Project will not be affected by flooding as the Project Site is outside of the 0.2 percent annual chance floodplain. A rise in air temperatures attributed to climate change and urban heat island effect from the increase of impervious surfaces at the Project Site may indirectly increase GHG emissions in the long-term from the consequential increase in energy demands as cooling systems are required to be operated more frequently or for longer durations. These indirect impacts are anticipated to be less than significant as the Proposed Project will utilize photovoltaic solar panels to minimize and off-set the long-term demand on electrical utilities, passive cooling strategies, landscaping that will absorb heat and provide shade to cool the surrounding landscape, and high-efficiency cooling systems that will be maintained for optimal performance. Variations in rainfall patterns are also anticipated to have less than significant impacts on the Proposed Project as the proposed onsite drainage system improvements will collect and convey runoff to other areas within the MBP development

for retention. Anticipated increases in runoff at the Project Site have been accounted for in the master plan development of MBP, which were calculated based on larger than average storm events. Therefore, the Proposed Project is not anticipated to exacerbate flooding impacts from climate change. Overall, the impacts of climate change on the Proposed Project are anticipated to be less than significant.

The potential of the Proposed Project to affect climate change was assessed in terms of the Proposed Project's contribution to anticipated levels of Greenhouse Gas Emissions (GHG). The Proposed Project is anticipated to produce GHG emissions during construction and operation. During construction, GHG emissions will come primarily from exhaust emissions from the operation of construction equipment onsite. GHG emissions are also expected to come from exhaust emissions from the vehicles used by construction workers to commute to the site, temporary increases in traffic from roadway lane closures, and from "upstream" activities associated with extraction or production of materials to build the project. During operations, GHG emissions are anticipated to come from the burning of fossil fuels to generate energy for the hotel, exhaust emissions from vehicles transporting to and from the hotel, and exhaust emissions from vehicles servicing the hotel. Long-term maintenance of the hotel would also generate GHG emissions.

Project implementation, individually, would not result in a significant impact on existing GHG concentrations in the atmosphere. Cumulatively, the project will contribute to the overall concentration of GHG in the atmosphere. Total emissions for the State are projected to decrease by 2025 even with projected increases in the commercial sector. It can be expected that an increase in emissions from the commercial sector will be offset by even greater reductions in emissions produced by the energy industries due to gained efficiencies in energy production. Thus, less than significant short-term and operational GHG emission impacts – with mitigation incorporated – would occur with the Proposed Project. (See: Appendix 26)

Under the Alternative Site Alternative, a 200-room hotel would be located in another suitable location within the Wailuku/Kahului area. Depending on the alternative site selected, this alternative could be more susceptible to sea level rise, shoreline erosion, and flooding and could be more vulnerable to climate change impacts. GHG emissions from construction and operational activities would similarly occur with the Alternative Site Alternative. Differences in total emissions would be dependent upon several factors

including the physical characteristics of the site and the need for additional offsite infrastructure improvements.

Assuming the alternative site is situated away from sensitive coastal areas and outside of flood hazard zones, the Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding climate change because it would result in similar impacts as the Proposed Project.

Hazardous Substances

As previously discussed, less than significant impact would occur with the Proposed Project. Mitigation would be incorporated to minimize any impact of excavation activities on the site. The Proposed Project does not include activities or operations that would result in the production of hazardous substances on the site or to the surroundings. (See Appendices 6 & 7)

Under the Alternative Site Alternative, hazardous substances would not be known until a new survey would be conducted on the alternative location for the 200-room hotel. This unknown factor would delay the development of the hotel.

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding hazardous substances at this time, given the current Project Site has been thoroughly surveyed and prepared for the proposed hotel development.

Flora and Fauna

As previously discussed, the project implementation with incorporated mitigation would result in less than significant impact as the Project Site was previously disturbed. Findings on the Project Site include all common species in Hawai'i and do not contain any species that would be of environmental concern. (See: Appendices 8, 9, 10, & 11)

Under the Alternative Site Alternative, construction activities would occur over a similar development footprint to accommodate the 200-room hotel. Therefore, as with the Proposed Project, this Alternative generally would result in less than significant impacts to flora and fauna, given the alternative site would have been thoroughly surveyed.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding flora and fauna because it would result in similar impacts

as the project. It should be noted that the alternative site would be treated the same process of research, survey, and assessment prior to development. However, this Alternative would significantly delay the proposed hotel development.

Air Quality

As previously discussed, short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phases. Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal requirements. Mitigation efforts, management of construction operations, and use of renewable energy sources would reduce a less than significant impact to air quality due to the Proposed Project. (See: Appendix 12)

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding air quality because it would result in similar impacts as the project; however, in different location.

Noise Quality

As previously discussed, project implementation would include mitigation measures to Aircraft noise, such as the special noise attenuation measures, with regards to interior and exterior noise levels for the Proposed Project. Audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. Actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project. Therefore, construction noise associated with the Proposed Project would result in less than significant impacts with mitigation incorporated. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. (See: Appendix 13)

Under the Alternative Site Alternative, construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would occur similar to the Proposed Project. Long-term noise impacts from the operations of hotel development would be similar to the Proposed Project. However, depending on the location of the alternative

site, mitigation effort to reduce aircraft noise would not be necessary.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding noise quality because it would result in similar impacts as the project.

Historical and Archaeological Resources

The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

The Archaeological Inventory Survey (AIS) of the project area was conducted by SCS with subsurface testing at the project site. The study did not identify historically significant sites within the project parcel and was therefore submitted as an Archaeological Assessment to SHPD for review. (See: Appendices 14.1 and 14.2)

In response to comments on the Archaeological Inventory Survey (AIS) from the SHPD, the Applicant retained ‘Āina Archaeology to conduct a Supplemental Archaeological Inventory Survey (SAIS). An SAIS report dated April 29, 2021, was prepared for the Proposed Project. (See: Appendix 15.1)

Based on the results of the SAIS, no further archaeological work for the project is recommended. In addition, SHPD has determined that no historic properties affected for the current project permits.

Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD’s written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, “SHPD Letter dated October 12, 2021).

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding historical and archaeological resources because the alternative site has not been thoroughly surveyed and assessed. This Alternative would result in further delay of the proposed hotel development, postponing anticipated benefits.

Visual Resources

As previously discussed, the short-term visual impacts associated with grading and construction activities that would occur with the Proposed Project would also occur with the Alternative Site Alternative. Therefore, the project's construction-related impacts to the visual character/quality of the Project Site and its surroundings would not be avoided. However, depending on the location of the alternative site, visual resources may appear different and must be re-assessed. (See: Appendix 16)

The Project Site's long-term visual character would be altered with the Proposed Project because the existing vacant land would be replaced with a new 200-unit hotel development. Project implementation would alter the visual character of the site and its surroundings; however, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity. (See: Appendix 16)

Generally, the long-term visual character of the alternative site would still be altered. The project's less than significant impact to the area's visual character/quality and light/glare could also occur with the Alternative Site Alternative.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding visual resources because it would result in similar impacts as the project.

Agricultural Resources

As previously discussed, the proposed hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

Under the Alternative Site Alternative, impacts to the agricultural resources within the alternative site would be unknown until site feasibility is conducted to identify land use designations and history relating to previous uses on the alternative site.

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding agricultural resources, given the current Project Site has been planned and substantially improved for development.

Hydrology and Water Quality

As previously summarized, with proper management practices to prevent material input to groundwater or stream discharged by the proposed Kahahā Hotel, implementation would not anticipate any impacts to marine water to occur since the Project Site is not situated on the shoreline. Depending on the alternative location, impacts of this Alternative to the marine water quality would be similar to the Proposed Project given the same BMPs and mitigation measures.

The impact to the Kahului Aquifer of supplying water for the proposed hotel project is not considered to be significant. Analysis of the amounts of groundwater use — reflected by the comparison of the current pumping in the Aquifer and the additional pumping to supply the proposed hotel project — showed that the increase of groundwater use will be less than one (1) percent of the ongoing total pumping within the Aquifer. Furthermore, nutrients removed from the Aquifer by the wells would be greater than the nutrients returned to the aquifer from the irrigated landscaping — but the amounts are exceedingly small and of no significant environmental consequence. (See: Appendices 17 & 19)

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding groundwater resource because an alternative site has not gone through the proper environmental assessment when compared to the current Project Site.

Population and Housing

Project implementation to accommodate Hotel uses is anticipated to have a minimal to no secondary impact on population and housing. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates. The report projects that the average daily number of hotel guest at the Kahahā Hotel will be 295 people after project completion and stabilization. (See: Appendix 20)

The Proposed Project is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC. Under the Alternative Site Alternative, impact to population and housing would also not be anticipated because the project would be the same; however, the project would be situated in a location other than the current Project Site.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding population and housing because it would result in similar

impacts as the Proposed Project.

Economy

Maui's employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collectively comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at 12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (**See:** Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% of greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kānāhā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (**See:** Appendix 22). The following is a summary of the findings of the said study.

- Maui arrivals and ADC have increased in recent years, driven by growth in the supply of vacation rentals.
- In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kānāhā Hotel would be built, the estimated visitor ratio is below 10%.
- The proposed Kānāhā Hotel is expected to primarily serve the *kama'āina* market, with only a marginal contribution to the island's average daily census of visitors.
- Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-

Term Rental Homes and Bed & Breakfasts (collectively referred to as “vacation rentals” in this report) providing an alternative to Maui’s high-priced hotel rooms.

- Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.
- The proposed Kahahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20)

On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three (3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai’i over a twelve (12) year period. (See: Appendix 20)

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui.

The proximity of the Kahahā Hotel to Kahului and Wailuku, where a majority of Maui’s population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui’s various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama’āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and

supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui.

Under the Alternative Site Alternative, short-term and long-term impacts to the economy would be similar to the Proposed Project, given the proposed 200-room hotel would be developed on the other location.

The Alternative Site Alternative would be neither superior nor inferior to the Proposed Project regarding economy because it would result in similar impacts as the project. It should be noted; however, this Alternative would leave the current Project Site vacant despite being adjacent to the Kahului Airport.

Cultural Resources

A Cultural Impact Assessment (CIA) Report was completed for the Project Site by Honua Consulting; *Cultural Impact Assessment Report for the Kahahā Hotel at Kahului Airport*. Prior to the production of the CIA report, interviews with individuals and cultural practitioners knowledgeable about the lands, history, traditional practices, customs, and cultural resources of the Wailuku ahupua'a were conducted in 2018 and 2019. In addition, archival research was also conducted to research the existence of cultural resources within the Project Site or in its immediate vicinity. (See: Appendix 23)

The CIA concludes that the potential of the Proposed Project to have significant effects to cultural resources, beliefs, or practices is highly unlikely considering the long use of the project area for industrial uses, including plantation activities extending back to the 19th century. Based on extensive research in both Hawaiian and English language resources conducted for the CIA and the archaeological investigation conducted for the AIS, the subject property bears no apparent signs of cultural practices or gatherings currently taking place. The oral history interviews did not reveal any known contemporaneously gathering places on the subject property or any access concerns because of the Proposed Project. (See: Appendix 23)

Under the Alternative Site Alternative, impacts to cultural resources would be unknown until thorough assessment is conducted.

The Alternative Site Alternative would be environmentally inferior to the Proposed Project regarding cultural resources, given the alternative site is not yet thoroughly assessed. In addition, this Alternative would further delay the proposed hotel development.

Public Services and Utilities

Implementation of the Proposed Project would place increased demands upon public services (i.e., recreational facilities, medical facilities, police and fire protection services, and schools), traffic, and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). The Alternative Site Alternative would result in similar impacts associated with increased demands upon public services, and utilities and service systems — because new land use would still be developed on another location. The less than significant increased demands upon public services, and utilities and service systems that would occur with the Proposed Project would occur also with this Alternative.

The Alternative Site Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding impacts to public services and utilities.

ATTAINMENT OF PROJECT OBJECTIVES

The Alternative Site Alternative meets some of the project objectives, but not to the same degree as the Proposed Project. Therefore, it fails to meet all of the six (6) objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need, as well as the stated goals and objectives of the Proposed Action.

The Alternative Site Alternative would not attain the project's fundamental objective to optimize use of vacant land situated adjacent to the Kahului Airport where accommodations for business travelers and the residents would be most suitable than other site locations. The Alternative Site Alternative would not meet the economic objectives of Wailuku-Kahului Community Plan that encourages development of hotels near the Kahului Airport.

The Alternative Site Alternative fails to meet some of the objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need. The objectives of the Kahahā Hotel project are:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.
4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3 states "Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core."
6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3: "Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding."

1.6.4. Multi-family Development Alternative

DESCRIPTION OF THE ALTERNATIVE

Under the Multi-family Development Alternative, multi-family housing would be created within close proximity to urban amenities in Central Maui.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the Multi-family Development Alternative, a new development would occur within the Special Management Area (SMA); therefore, an SMA Use Permit from the Maui Planning Commission would be required under this Alternative. The Maui Business Park Phase II project required a Change in Zoning adopted by Ordinance 3559 that included conditions of approval. Specifically condition seventeen (17) states "*that no residential use, including single-family dwellings and apartments, shall be permitted within the project.*" With this Alternative, amendments to Ordinance 3559 could be

sought for long term residential use at the Project Site. This Alternative would require a deletion of condition 17 from Ordinance 3559. (See: Appendix 1)

The Multi-family Development Alternative would be neither environmentally superior or inferior to the Proposed Project regarding land use and relevant planning due to similar need to amend the relevant planning policy documents.

Topography and Soils

Soil erosion from grading and excavation as well as dust generation from the associated earthwork operations that would occur with the Proposed Project would similarly occur with the Multi-family Development Alternative. Construction-related impacts to the topography and soils would be similar to the Proposed Project.

The Multi-family Development Alternative would be neither environmentally superior or inferior to the Proposed Project regarding topography and soils because it would result in similar impacts as the project. New impervious surfaces would be constructed and impacts from the urban heat island effect and additional stormwater runoff would occur.

Natural Hazards

As previously discussed, the Project Site is susceptible to seismic and tsunami hazards. Implementation of the Multi-family Development Alternative would expose additional people or structures to potential adverse effects associated with seismic hazards since new land use relating to Multi-family Development would be developed on the Project Site that is currently vacant. Nonetheless, emergency evacuation procedures would be adhered to during the event of natural hazards.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding natural hazards given that the existing site would remain susceptible to the same seismic and tsunami hazards.

Climate Change

The Proposed Project provides will include climate change mitigation efforts as part of the development, both during construction in the short-term and operationally in the long-term. A minimum of fourteen (14) standard green building objectives will be incorporated into the design of the Proposed Project with the intent to emphasize high performance and energy efficient design and construction methods. A Climate Change

Assessment report was conducted by Wilson Okamoto Corporation: Climate Change Assessment: Kahahā Hotel at Kahului Airport. to assess the impacts of climate change on the Proposed Project as well as the potential impact of the Proposed Project on climate change. (See: Appendix 26)

Climate change components impacts that were assessed for their potential to affect the Proposed Project include average global rise in air temperatures, seasonal rain variations in rainfall patterns, flooding, sea level rise, and coastal erosion, and Sea level rise and coastal erosion will not have any adverse impacts on the Proposed Project due to the inland location of the Project Site and onsite elevations. Similarly, the Proposed Project will not be affected by flooding as the Project Site is outside of the 0.2 percent annual chance floodplain. A rise in air temperatures attributed to climate change and urban heat island effect from the increase of impervious surfaces at the Project Site may indirectly increase GHG emissions in the long-term from the consequential increase in energy demands as cooling systems are required to be operated more frequently or for longer durations. These indirect impacts are anticipated to be less than significant as the Proposed Project will utilize photovoltaic solar panels to minimize and off-set the long-term demand on electrical utilities, passive cooling strategies, landscaping that will absorb heat and provide shade to cool the surrounding landscape, and high-efficiency cooling systems that will be maintained for optimal performance. Variations in rainfall patterns are also anticipated to have less than significant impacts on the Proposed Project as the proposed onsite drainage system improvements will collect and convey runoff to other areas within the MBP development for retention. Anticipated increases in runoff at the Project Site have been accounted for in the master plan development of MBP, which were calculated based on larger than average storm events. Therefore, the Proposed Project is not anticipated to exacerbate flooding impacts from climate change. Overall, the impacts of climate change on the Proposed Project are anticipated to be less than significant.

The potential of the Proposed Project to affect climate change was assessed in terms of the Proposed Project's contribution to anticipated levels of Greenhouse Gas Emissions (GHG). (See: Appendix 26) The Proposed Project is anticipated to produce GHG emissions during construction and operation. During construction, GHG emissions will come primarily from exhaust emissions from the operation of construction equipment onsite. GHG emissions are also expected to come from exhaust emissions from the vehicles used by construction workers to commute to the site, temporary increases in

traffic from roadway lane closures, and from “upstream” activities associated with extraction or production of materials to build the project. During operations, GHG emissions are anticipated to come from the burning of fossil fuels to generate energy for the hotel, exhaust emissions from vehicles transporting to and from the hotel, and exhaust emissions from vehicles servicing the hotel. Long-term maintenance of the hotel would also generate GHG emissions.

Project implementation, individually, would not result in a significant impact on average global temperatures, variation of seasonal rain patterns, flooding, sea level rise, coastal erosion, or existing GHG concentrations in the atmosphere. Cumulatively, the project will contribute to the total GHG emissions for the State’s overall concentration of GHG in the atmosphere. Total emissions for the State are projected to decrease by 2025 even with projected increases in the commercial sector. have already been anticipated in emission inventories for the state – and it can be expected that an increase in emissions from the commercial sector will to be offset by even greater reductions in emissions produced by the energy industries due to gained efficiencies in energy production. Thus, less than significant short-term and operational GHG emission impacts – with mitigation incorporated – would occur with the Proposed Project. (See: Appendix 26)

Under the Multi-family Development Alternative, a new multi-family development would be constructed at the Project Site. Construction of impervious surfaces would result in impacts related to the urban heat island effect and additional runoff generated at the Project Site, similar to the Proposed Project.

GHG emissions resulting from construction and occupancy of the multi-family structures would similarly occur with the Multi-family Development Alternative. Differences in total emissions would be dependent upon several factors including the site plan, the anticipated energy demands of the light industrial uses, and the traffic demands generated by the light industrial uses.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding climate change because it would result in similar impacts as the project.

Hazardous Substances

As previously discussed, less than significant impact would occur with the Proposed

Project mitigation would be incorporated to minimize impact of excavation activities on the site. The Proposed Project does not include activities or operations that would result in the production of hazardous substances on the site or to the surroundings. The implementation of Multi-family Development Alternative would result in less than significant impact to the hazardous substances on the Project Site, similar to the Proposed Project.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding hazardous substances, given the same Project Site is proposed.

Flora and Fauna

As previously discussed, project implementation with mitigation incorporated would result in less than significant impact as the Project Site was previously disturbed for intensive sugar cane cultivation for several decades. Findings on the Project Site include all common species in Hawai'i and do not contain any species that would be of environmental concern.

Under Multi-family Development Alternative, construction activities would occur over a similar development footprint to accommodate multi-family structures. Therefore, as with the Proposed Project, this Alternative generally would result in less than significant impacts to flora and fauna.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding flora and fauna because with either the Proposed Action or the Multi-family Development Alternative, new structures, amenities, and impervious surfaces would be constructed and impacts from the development would likely be similar with the Proposed Project — that does not warrant mitigation measures for flora and fauna

Air Quality

As previously discussed, short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phases. Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal

requirements. Mitigation efforts, management of construction operations, and use of renewable energy sources would reduce a less than significant impact to air quality due to the Proposed Project. Under the Multi-family Development Alternative, less than significant impact to air quality would be anticipated, as with the Proposed Project.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding air quality because it would result in similar impacts as the project.

Noise Quality

At the Project Site existing noise is primarily generated by vehicular traffic, air travel from Kahului Airport, heavy machinery, construction activities, and heating and cooling systems. The ramifications of various activities and their corresponding sound levels may impact health conditions and the physical or sensory appeal of an area.

According to the Acoustic Study conducted for the Proposed Project, the existing traffic noise levels at ground level along the perimeter of the proposed hotel building vary from levels of approximately 55 DNL at the southwest corner, to 57 to 58 DNL along the north sides. (See: Appendix 13)

The loudest aircraft noise events were overhead tour helicopters landing at their facility northeast of the Project Site. Their measured noise levels were similar to those expected during commercial and private jet aircraft departures toward the south during Kona wind conditions. The noisier military jet aircraft can produce higher noise levels, but they number less than two (2) percent of all aircraft noise events. The Acoustic Consultant estimates that current, CY 2019 aircraft noise levels on the Project Site ranges between 60 and 65 DNL.

Aircraft noise would be mitigated, such as the special noise attenuation measures, with regards to interior and exterior noise levels for the Proposed Project. Audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. Actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project. Therefore, construction noise associated with the Proposed Project would result in less than significant impacts with mitigation incorporated. Construction activities

would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant.

Under the Multi-family Development Alternative, construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would occur similar to the Proposed Project. Long-term noise impacts from the occupancy of the multi-family units would be similar with the Proposed Project.

While the Project Site may be ideal for overnight accommodations for individuals making use of the Kahului Airport, it is not anticipated that the surrounding land uses would be ideal for long term residential uses which would be anticipated to include at least partial time open air ventilation which would not achieve sound attenuation recommendations provided in Appendix 13, Acoustic Study.

The Multi-family Development Alternative would be neither environmentally superior or inferior to the Proposed Project regarding short-term and long-term noise quality — due to the construction activity during the development of the multi-family structures and the use of the multi-family structures once developed. Therefore, this Alternative could have greater or similar impacts on noise quality as the proposed hotel project.

However, the Multi-family Development Alternative would be environmentally inferior to the Proposed Project because the Project Site may not be the most suitable location for multi-family occupancies. This is due to the characteristics and uses of the immediate environs of the Project Site — that may adversely impact the noise quality for the multi-family occupants.

Historical and Archaeological Resources

The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

The Archaeological Inventory Survey (AIS) of the project area was conducted by SCS with subsurface testing at the project site. The study did not identify historically significant sites within the project parcel and was therefore submitted as an

Archaeological Assessment to SHPD for review. (See: Appendices 14.1 and 14.2)

In response to comments on the Archaeological Inventory Survey (AIS) from the SHPD, the Applicant retained ‘Āina Archaeology to conduct a Supplemental Archaeological Inventory Survey (SAIS). An SAIS report dated April 29, 2021, was prepared for the Proposed Project. (See: Appendix 15.1)

Based on the results of the SAIS, no further archaeological work for the project is recommended. In addition, SHPD has determined that no historic properties affected for the current project permits.

Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD’s written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, “SHPD Letter dated October 12, 2021).

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding historical and archaeological resources because it would result in similar impacts as the project. This Draft EIS includes Cultural and Archaeological studies that have concluded historical and cultural resources are not present at the property. (See: Appendices 14 & 23)

Visual Resources

As previously discussed, the short-term visual impacts associated with grading and construction activities that would occur with the Proposed Project would also occur with the Alternative Site Alternative. Therefore, the project’s construction-related impacts to the visual character/quality of the Project Site and its surroundings would not be avoided. However, depending on the location of the alternative site, visual resources may appear different and must be re-assessed. (See: Appendix 16)

The Project Site’s long-term visual character would be altered with the Proposed Project because the existing vacant land would be replaced with a new 200-unit hotel development. Project implementation would alter the visual character of the site and its surroundings; however, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity. (See: Appendix 16)

With respect to design, the Multi-family Development Alternative would need to be designed in accordance with applicable Maui County Building Code standards as well as applicable Maui Business Park Design Guidelines.

The long-term visual character of the Project Site would still be altered with the Multi-family Development Alternative. The project's less than significant impact to the area's visual character/quality and light/glare would also occur with the Multi-family Development Alternative.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding visual resources because it would result in construction of multi-family scale building(s) that could have greater or similar impacts as the proposed hotel project.

Agricultural Resources

As previously discussed, the proposed hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding agricultural resources because it would result in similar urban development as the Proposed Project. In addition, the Project Site would remain a part of the MBP II planned for development and has been improved with the necessary utilities and roadway infrastructure. The immediate environment of the Project Site would also remain characterized by modern structures and land uses as permitted in the urban district.

Hydrology and Water Quality

As previously summarized, with proper management practices to prevent material input to groundwater or stream discharged by the proposed Kahahā Hotel, implementation would not anticipate any impacts to marine water to occur since the Project Site is not situated on the shoreline. The impact to the Kahului Aquifer of supplying water for the proposed hotel project is not considered to be significant. Analysis of the amounts of groundwater use — reflected by the comparison of the current pumping in the Aquifer and the additional pumping to supply the proposed hotel project — showed that the increase of groundwater use will be less than one (1) percent of the ongoing total

pumping within the Aquifer. Furthermore, nutrients removed from the Aquifer by the wells would be greater than the nutrients returned to the aquifer from the irrigated landscaping — but the amounts are exceedingly small and of no significant environmental consequence. (See: Appendices 17 & 19)

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding groundwater resource because it would result in greater or similar impacts on water demand as the proposed hotel project. A new water well would still be required to withdraw additional water from the Kahului Aquifer to accommodate multi-family development which commonly involves long-term occupancy, and to ensure more water would naturally remain in the aquifer.

Population and Housing

The Project Site is currently designated for Light Industrial development. The new designation would be to accommodate Hotel uses and would be anticipated to have a minimal or secondary impact on population and housing. The proposed Hotel or transient accommodations are anticipated to have a similarly insignificant impact on population. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates. The report projects that the average daily number of hotel guest at the Kānāhā Hotel will be 295 people after project completion and stabilization. (See: Appendix 20)

The Proposed Project is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents. Under the Multi-family Development Alternative, significant positive impact to population and housing would be anticipated due to the additional supply of multi-family units. This Alternative would also be subject to the same Residential Workforce Housing Policy.

The Multi-family Development Alternative would be environmentally inferior to the Proposed Project regarding population and housing because it would result in significant impacts to schools, roads, parks and other public facilities and services compared to hotel use for short-term and temporary occupancies. However, it should be noted that the Decision and Order Docket No. A03-739 prohibits residential use within the MBPII boundaries.

Economy

Maui's employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collective comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at 12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (See: Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% of greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kahahā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (See: Appendix 22). The following is a summary of the findings of the said study.

- Maui arrivals and ADC have increased in recent years, driven by growth in the supply of vacation rentals.
- In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kahahā Hotel would be built, the estimated visitor ratio is below 10%.
- The proposed Kahahā Hotel is expected to primarily serve the *kama'āina* market, with only a marginal contribution to the island's average daily census of visitors.
- Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-Term Rental Homes and Bed & Breakfasts (collectively referred to as "vacation rentals" in this report) providing an alternative to Maui's high-priced hotel rooms.

- Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.
- The proposed Kahahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20). This short-term economic benefit from employment would be similar to impacts of employment to the economy of a Multi-Family Alternative since construction-related employment would similarly occur in the Proposed Project and the Multi-Family Alternative.

On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three (3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai'i over a twelve (12) year period. (See: Appendix 20).

In the long-term, economic benefits of a Multi-family Alternative would be inferior to the Proposed Project due to its lack of long-term employment creation opportunities and its lower contributions to the economy in the form of taxes and commercial transactions.

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui.

The proximity of the Kahahā Hotel to Kahului and Wailuku, where a majority of Maui's population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui's various sports

fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama'āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui. The Proposed Project would be superior to a Multi-family Alternative in terms of economic benefits from more sales tax and TAT revenue for local and State governments.

Both the Multi-Family Alternative and the Proposed Project would be generally similar in terms of real estate tax revenue for the government.

The Multi-family Development Alternative would be inferior to the Proposed Project regarding economy due to its lower contribution to long-term employment and tax revenue. It should be noted that this Alternative would not achieve the objectives of providing hotel accommodations adjacent to the Kahului Airport.

Cultural Resources

Given the previously discussed CIA report, it can be reasonably concluded that development of the site would have less than significant impact to cultural resources on the property or within its immediate vicinity.

Similar to the Proposed Project, under the Multi-family Development Alternative, impacts to cultural resources would also be less than significant.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding cultural resources, given it would involve similar ground-disturbing activities and utilization of the vacant land.

Public Services and Utilities

Implementation of the Proposed Project would place increased demands upon public services (i.e., recreational facilities, medical facilities, police and fire protection services,

and schools), traffic, and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone).

The Multi-family Development Alternative would result in significant impacts associated with increased demands upon public services, and utilities and service systems because multi-family residential uses generally include long-term occupancies. The less than significant increased demands upon public services, and utilities and service systems that would occur with the Proposed Project would not occur with this Alternative.

The Multi-family Development Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding impacts to public services, utilities, and the characteristics of multi-family land use.

ATTAINMENT OF PROJECT OBJECTIVES

The Multi-family Development Alternative fails to meet all the six (6) objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need, as well as the stated goals and objectives of the Proposed Action.

The Multi-family Development Alternative would not attain the project's fundamental objective to provide accommodations for business travelers, local residents and visitors. The Project Site is more suitable for a new hotel development where lodging inventory is significantly lower compared to areas such as Wailea-Kīhei and Lāhainā-Ka'anapali-Nāpili-Kapalua. The Multi-family Development Alternative would not be ideal on the Project Site due to the surrounding land uses and the noise quality for long-term residential uses.

The Multi-family Development Alternative fails to meet all of the objectives of the Proposed Action and consequently, is rejected as a feasible alternative to meeting the purpose and need. The objectives of the Kānāhā Hotel project are:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.

4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3 states “Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core.”
6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3: “Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding.”

1.6.5. Reduced Intensity Alternative

DESCRIPTION OF THE ALTERNATIVE

A Reduced Intensity Alternative is proposed as a reasonable alternative to the preferred option that meets the objectives of the action, if financially feasible. The Reduced Intensity Alternative would propose a 3-story hotel with 175 rooms, versus the Preferred Alternative (i.e., Proposed Action), up to 4-storys with 200 rooms. This Reduced Intensity Alternative would have 1-story less than the Preferred Alternative but would include an expanded footprint to accommodate rooms at a 3-story level. This expanded area of the 3-story hotel would be located within an area occupied by parking in the Preferred Alternative. Under the Reduced Intensity Alternative, the need for a hotel within proximity to urban amenities in Central Maui would still be satisfied.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

In order to develop the proposed hotel, the Applicant will be required to request a Change of Zoning (CIZ) from “LI” Light Industrial to “H-M” Hotel zoning and an amendment to the Wailuku-Kahului Community Plan from “LI” Light Industrial to “H” Hotel. Prior to the processing of the CIZ and CPA, the Applicant is required to make a Motion to Amend the State Land Use Commission (LUC) Decision and Order of Docket No. A03-739 to allow the proposed hotel use within the Project Site.

After all amendments to the Land Use Designations have been obtained, a Special Management Area (SMA) Use Permit will be required to authorize the project's development action in the SMA. The project is valued at more than \$500,000.00 therefore an SMA Major Permit is anticipated.

The Reduced Intensity Alternative would have to comply with all the same Land Use requirements as listed above for the Preferred Alternative.

The Reduced Intensity Alternative would be neither environmentally superior or inferior to the Proposed Project regarding land use. Overall, land use impacts of the Reduced Intensity Alternative would be similar to the Preferred Alternative.

Topography and Soils

Soil erosion from grading and excavation as well as dust generation from the associated earthwork operations that would occur with the Proposed Project would similarly occur with the Reduced Intensity Alternative. Construction-related impacts to the topography and soils would be similar to the Proposed Project. The Reduced Intensity Alternative would be required to implement the same mitigation measures as the Proposed Project.

The same Best Management Practices will be implemented during the construction phase of the Reduced Intensity Alternative as the Preferred Alternative, as discussed further in Section 2.4.2 (Drainage) of this Draft EIS. Same as the Preferred Alternative, a National Pollution Discharge Elimination System (NPDES) Permit will be obtained for the Reduced Intensity Alternative and if required, a Noise Permit will be obtained for construction activities. (See: Appendix 5).

Similar to the Preferred Alternative, during site preparation, storm runoff from the site will be controlled in accordance with the County's "Soil Erosion and Sediment Control Standards". Typical mitigation measures include appropriately stockpiling materials on the site to prevent runoff and commencing building construction and/or establishing landscaping as early as possible — to minimize the length of exposure of disturbed soils. Less than significant impacts — with mitigation efforts incorporated — to the land include the soil erosion and the generation of dust during construction. Clearing and grubbing activities will temporarily disturb the soil retention values of the existing vegetation and expose soils to erosion forces. Some wind erosion of soils could occur without a proper watering and re-vegetation program.

Measures taken to control erosion during the site development period may include, but are not limited to:

- Minimizing the time of construction;
- Retaining existing ground cover as long as possible;
- Constructing drainage control features early;
- Using temporary area sprinklers in non-active construction areas when ground cover is removed;
- Providing a water truck on-site during the construction period to provide for immediate sprinkling as needed;
- Using temporary berms and cut-off ditches, where needed, for control of erosion;
- Watering graded areas when construction activity for each day has ceased;
- Grassing or planting all cut and fill slopes immediately after grading work has been completed; and
- Installing silt screens where appropriate.

Construction activities on the property will comply with all applicable Federal, State, and County regulations and rules for erosion and sediment control. Prior to the issuance of a grading permit, a final erosion control plan including best management practices will be submitted to the County of Maui for review and approval. All construction activities will comply with the provisions of Chapter 11-60.1, Hawai'i Administrative Rules (HAR), Section 11-60.1-33, pertaining to Fugitive Dust. Same as the Preferred Alternative, after construction of the Reduced Intensity Alternative, the establishment of permanent landscaping will provide additional long-term erosion control.

The National Ocean and Atmospheric Association (NOAA) Coastal Zone Management Program developed a Practitioners Guide in 2006 for Low Impact Developments (LID) strategies. The Applicant will implement the following strategies for the Proposed Project and these same measures would be implemented for the Reduced Intensity Alternative:

1. Parking reduction (minimum amount of parking allowed per code to increase total landscaping);
2. Sidewalk Reduction (Limiting the path to the Right of Way to a single location on Lauo Loop to increase total landscaping); and
3. Tree planting (The Landscape Plan will exceed the number of trees required and incorporate native plants).

The Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Preferred Alternative regarding topography and soils because it would result in similar impacts as the proposed project. However, the increased footprint of the building would result in more impacts to soil disturbance, dust and air quality.

Natural Hazards

As previously discussed, the Project Site is susceptible to seismic and tsunami hazards. Implementation of the Reduced Intensity Alternative would expose additional people or structures to potential adverse effects associated with seismic hazards since new land use relating to Reduced Intensity Alternative would be developed on the Project Site that is currently vacant. The less than significant impact with mitigation incorporated prior to the predicted natural hazards would similarly occur with the Proposed Project.

The Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding natural hazards given that the existing site would remain susceptible to the same seismic and tsunami hazards regardless of whether a building is constructed or not.

Climate Change

The Proposed Alternative will include climate change mitigation efforts as part of the development, both during construction in the short-term and operationally in the long-term. A minimum of fourteen (14) standard green building objectives will be incorporated into the design of the Proposed Project with the intent to emphasize high performance and energy efficient design and construction methods. A Climate Change Assessment report was conducted by Wilson Okamoto Corporation: Climate Change Assessment: Kahahā Hotel at Kahului Airport. to assess the impacts of climate change on the Proposed Project as well as the potential impact of the Proposed Project on climate change. (See: Appendix 26)

Climate change component impacts that were assessed for their potential to affect the Proposed Project include average global rise in air temperatures, seasonal rain variations in rainfall patterns, flooding, sea level rise, and coastal erosion. Sea level rise and coastal erosion will not have any adverse impacts on the Proposed Project or a Reduced Intensity Alternative due to the inland location of the Project Site and onsite elevations. Similarly, neither the Proposed Project or a Reduced Intensity Alternative would be affected by flooding as the Project Site is outside of the 0.2 percent annual chance

floodplain. A rise in air temperatures attributed to climate change and urban heat island effect from the increase of impervious surfaces at the Project Site may indirectly increase GHG emissions in the long-term from the consequential increase in energy demands as cooling systems are required to be operated more frequently or for longer durations. These indirect impacts are anticipated to be less than significant and both alternatives would utilize photovoltaic solar panels to minimize and off-set the long-term demand on electrical utilities, passive cooling strategies, landscaping that will absorb heat and provide shade to cool the surrounding landscape, and high-efficiency cooling systems that would be maintained for optimal performance.

Variations in rainfall patterns are also anticipated to have less than significant impacts on the Proposed Project as the proposed onsite drainage system improvements will collect and convey runoff to other areas within the MBP development for retention. Anticipated increases in runoff at the Project Site or a Reduced Intensity Alternative have been accounted for in the master plan development of MBP, which were calculated based on larger than average storm events. Therefore, the Proposed Project or a Reduced Intensity Alternative are not anticipated to exacerbate flooding impacts from climate change. Overall, the impacts of climate change from both alternatives are anticipated to be less than significant.

The potential of the Preferred Alternative to affect climate change was assessed in terms of the Proposed Project's contribution to anticipated levels of Greenhouse Gas Emissions (GHG). (See: Appendix 26) The Proposed Project is anticipated to produce GHG emissions during construction and operation. During construction, GHG emissions will come primarily from exhaust emissions from the operation of construction equipment onsite. GHG emissions are also expected to come from exhaust emissions from the vehicles used by construction workers to commute to the site, temporary increases in traffic from roadway lane closures, and from "upstream" activities associated with extraction or production of materials to build the project. During operations, GHG emissions are anticipated to come from the burning of fossil fuels to generate energy for the hotel, exhaust emissions from vehicles transporting to and from the hotel, and exhaust emissions from vehicles servicing the hotel. Long-term maintenance of the hotel would also generate GHG emissions.

Project implementation, individually, would not result in a significant impact on average global temperatures, variation of seasonal rain patterns, flooding, sea level rise, coastal

erosion, or existing GHG concentrations in the atmosphere. Cumulatively, the project will contribute to the total GHG emissions for the State's overall concentration of GHG in the atmosphere. Total emissions for the State are projected to decrease by 2025 even with projected increases in the commercial sector. It can be expected that an increase in emissions from the commercial sector will be offset by even greater reductions in emissions produced by the energy industries due to gained efficiencies in energy production. Thus, less than significant short-term and operational GHG emission impacts – with mitigation incorporated – would occur with the Proposed Project and the Reduced Intensity Alternative. (See: Appendix 26)

GHG emissions resulting from construction and occupancy of the Preferred Alternative would similarly occur with the Reduced Intensity Alternative. Differences in total emissions would be dependent upon several factors including anticipated energy demands and traffic demands of the Reduced Intensity Alternative. However, it is assumed GHG emission impacts would be less than the Preferred Alternative due to the less intensity of use due to fewer occupants and associated energy consuming inputs.

The Reduced Intensity Alternative would develop the Project Site with hotel uses at a reduced intensity compared to the Preferred Alternative. An increased grading footprint, but less building construction would be required for the Reduced Intensity Alternative compared to the Proposed Project. Thus, GHG emissions during construction would be less than the Proposed Project. The Reduced Intensity Alternative includes less development and would generate fewer vehicle trips overall than the Proposed Project. GHG emissions during operation would also be less than the Proposed Project.

Overall, greenhouse gas emission impacts for this alternative would be less than the Proposed Project. However, similar to the Proposed Project, GHG emission impacts of the Reduced Intensity Alternative would be less than significant.

Hazardous Substances

As previously discussed, less than significant impact would occur with the Preferred Alternative and mitigation would be incorporated to minimize the impact of excavation activities on the site. The Preferred Alternative would not include activities or operations resulting in the production of hazardous substances on the site or to the surroundings. Similarly, the implementation of a Reduced Intensity Alternative would not include activities or operations resulting in the production of hazardous substances on the site or

to the surroundings. It would also include mitigation measures and result in less than significant impacts from hazardous substances on the Project Site due to excavation activities.

The Reduced Intensity Alternative would have similar impacts regarding Hazardous Materials as the Preferred Alternative and would be neither environmentally superior nor inferior to the Preferred Alternative. Both Alternatives would have the same Project Site and Hotel footprint.

Flora and Fauna

As previously discussed, project implementation with mitigation incorporated would result in less than significant impact as the Project Site was previously disturbed for intensive sugar cane cultivation for several decades. Findings on the Project Site include all common species in Hawai'i and do not contain any species that would be of environmental concern (**See:** Appendix 8).

Under the Reduced Intensity Alternative, construction activities would occur over a very similar, if not identical, development footprint to the Preferred Alternative. Therefore, as with the Proposed Project, this Alternative generally would result in less than significant impacts to flora and fauna. Both developments would result in the same quantity of native Hawai'ian plant species introduced to the Project Site.

The Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Preferred Alternative regarding flora and fauna because with either the Proposed Action or Reduced Intensity development, similar areas of impervious surfaces would be constructed.

Air Quality

As previously discussed, short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phases. Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal requirements. Mitigation efforts, management of construction operations, and use of renewable energy sources would reduce a less than significant impact to air quality caused by the Proposed Project.

Under the Reduced Intensity Alternative, the Project Site would be developed with a reduced intensity compared to the Proposed Project. An increased grading footprint but less building construction would be required for the Reduced Intensity Alternative compared to the Proposed Project because there would be less building construction; therefore, construction emissions would be less than the Proposed Project and remain less than significant. Operational activities affecting air quality would be less than the Preferred Alternative because the fewer occupants and possibly less employees would be generating less average daily trips and less vehicle miles travelled. Similarly, air emissions caused by HVAC systems, appliances and lighting would be less due to a reduced floor area with the Reduced Intensity Alternative.

The Reduced Intensity Alternative would be environmentally superior the Preferred Alternative regarding air quality because it would result in less impact.

Noise Quality

At the Project Site existing noise is primarily generated by vehicular traffic, air travel from Kahului Airport, heavy machinery, construction activities, and heating and cooling systems. The ramifications of various activities and their corresponding sound levels may impact health conditions and the physical or sensory appeal of an area.

According to the Acoustic Study conducted for the Proposed Project, the existing traffic noise levels at ground level along the perimeter of the proposed hotel building vary from levels of approximately 55 DNL at the southwest corner, to 57 to 58 DNL along the north sides. (See: Appendix 13)

The loudest aircraft noise events were overhead tour helicopters landing at their facility northeast of the Project Site. Their measured noise levels were similar to those expected during commercial and private jet aircraft departures toward the south during Kona wind conditions. The noisier military jet aircraft can produce higher noise levels, but they number less than two (2) percent of all aircraft noise events. The Acoustic Consultant estimates that current, CY 2019 aircraft noise levels on the Project Site ranges between 60 and 65 DNL.

Aircraft noise would be mitigated, such as the special noise attenuation measures, with regards to interior and exterior noise levels for the Proposed Project. Audible construction

noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. Actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project. Therefore, construction noise associated with the Proposed Project would result in less than significant impacts with mitigation incorporated. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant.

The Reduced Intensity Alternative would have very similar construction-related activities to the Preferred Alternative. This alternative would result in similar construction noise impacts associated with grading and construction activities as the Preferred Alternative. The construction period and associated noise may be shorter due to the decreased floor area associated with elimination of one floor of the Hotel. Overall, similar to the Preferred Alternative, construction noise impacts would be less than significant with mitigation, and overall less than the Preferred Alternative.

Similar to the Preferred Alternative, operational noise would include vehicular noise associated with traffic during operation of the hotel uses. However, because fewer hotel rooms would be constructed under the Reduced Intensity Alternative, the associated vehicular operational noise levels are expected to be reduced.

The Reduced Intensity Alternative would be environmentally superior to the Proposed Project regarding long term noise quality because it is expected that less hotel rooms and associated vehicles will generate less noise during construction and during operation. Overall, the impacts of noise from both alternatives are anticipated to be less than significant.

Historical and Archaeological Resources

The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

The Archaeological Inventory Survey (AIS) of the project area was conducted by SCS with subsurface testing at the project site. The study did not identify historically significant sites within the project parcel and was therefore submitted as an Archaeological Assessment to SHPD for review. (See: Appendices 14.1 and 14.2)

In response to comments on the Archaeological Inventory Survey (AIS) from the SHPD, the Applicant retained ‘Āina Archaeology to conduct a Supplemental Archaeological Inventory Survey (SAIS). An SAIS report dated April 29, 2021, was prepared for the Proposed Project. (See: Appendix 15.1)

Based on the results of the SAIS, no further archaeological work for the project is recommended. In addition, SHPD has determined that no historic properties affected for the current project permits.

Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD’s written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2).

The Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Preferred Alternative regarding historical and archaeological resources because it would result in similar impacts. This Draft EIS includes Cultural and Archaeological studies that have concluded historical and cultural resources are not present at the property.

Visual Resources

At the request of the Maui County Planning Department a view analysis was prepared (See: Appendix 16). While the proposed development will have an impact on views across the site, in the context of its undeveloped condition, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity.

The project will set forth building height limits and setbacks to help maintain views towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kānāhā Hotel will provide view corridors in between buildings toward Haleakalā.

The short-term visual impacts associated with grading and construction activities that would occur with the Proposed Project and would similarly occur with the Reduced Intensity Alternative. The construction-related impacts to the visual character/quality of the Project Site and its surroundings would not be avoided but would be short-term. The Project Site's long-term visual character would be altered with the Proposed Project because the existing vacant land would be replaced with a new 4-story 200-unit hotel development or in the case of a Reduced Intensity Alternative, a 175-room hotel of up to 3 stories. Project implementation would alter the visual character of the site and its surroundings; however, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity. (See: Appendix 16)

Regarding design, the Proposed Project will complement the high-quality architectural character as other developed properties in the area. The Kahahā Hotel is being designed to control the density, architectural design, and variation of all buildings in the project without sacrificing views or the aesthetic character of the Proposed Project.

As noted, portions of the Preferred Alternative are one-story, two-story, and four-story and will be setback from Haleakalā Highway to maintain public views toward the summit of Haleakalā from Haleakalā Highway and views of the West Maui Mountains from the Airport Access Road and Haleakalā Highway. Overall urban design of the project will position buildings fronting landscaped roadways to screen the building mass.

With a Reduced Intensity Alternative, the building height and mass would be less than the Proposed Project. Being one story lower than the Preferred Alternative would allow the Reduced Intensity Alternative to have less visual impact.

The Reduced Intensity Alternative would be environmentally superior to the Preferred Alternative because the building mass of the hotel would be reduced and less visually impactful.

Agricultural Resources

As previously discussed, the proposed hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

Under both the Preferred Alternative and a Reduced Intensity Alternative the Project Site would remain a part of the MBP II planned for development and has been improved with

the necessary utilities and roadway infrastructure. The immediate environment of the Project Site would also remain characterized by modern structures and land uses as permitted in the urban district. The Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding agricultural resources because it would result in the same urban development as the Proposed Project.

Hydrology and Water Quality

As previously summarized, with proper management practices to prevent material input to groundwater or stream discharged by the proposed Kahahā Hotel, implementation would not anticipate any impacts to marine water to occur since the Project Site is not situated on the shoreline. The impact to the Kahului Aquifer of supplying water for the proposed hotel project is not considered to be significant. Analysis of the amounts of groundwater use — reflected by the comparison of the current pumping in the Aquifer and the additional pumping to supply the proposed hotel project — showed that the increase of groundwater use will be less than one (1) percent of the ongoing total pumping within the Aquifer. Furthermore, nutrients removed from the Aquifer by the wells would be greater than the nutrients returned to the aquifer from the irrigated landscaping — but the amounts are exceedingly small and of no significant environmental consequence. (See: Appendices 17 & 19)

The Reduced Intensity Alternative would be environmentally superior to the Proposed Project regarding groundwater resources because it would result in less impacts on water demand versus the Preferred Alternative. A new water well would still be required to withdraw additional water from the Kahului Aquifer to accommodate a Reduced Intensity Alternative, however a reduction in the number of Hotel occupants compared to the Proposed Project would result in less water consumption.

Population and Housing

The Project Site is currently designated for Light Industrial development. The new designation would accommodate Hotel uses and would be anticipated to have a minimal or secondary impact on population and housing. The proposed Hotel or transient accommodations are anticipated to have a similarly insignificant impact on population. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates. The report projects that the average daily number of hotel guests at the Kahahā Hotel will be 295 people after project completion and stabilization. (See: Appendix 20)

The Proposed Project is subject to Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents. A Reduced Intensity Alternative would also be subject to the same Residential Workforce Housing Policy.

The Reduced Intensity Alternative would be neither environmentally inferior or superior to the Proposed Project regarding population and housing because it would result in similar impacts.

Economy

Maui's employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collectively comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at 12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (**See:** Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% of greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kahahā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (**See:** Appendix 22). The following is a summary of the findings of the said study.

- Finding #1: Maui Arrivals and ADC (Average Daily Visitor Census) have increased

in recent years, driven by growth in the supply of vacation rentals. The supply of hotel rooms has decreased, in response to market conditions.

- Finding #2: In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kahahā Hotel would be built, the estimated visitor ratio is below 10%.
- Finding #3: Some of the popularity of vacation rentals on Maui is likely value-driven, providing an alternative to Maui's high-priced hotel rooms.
- Finding #4: Hotels in the Kahului area primarily serve the interisland market and area nonleisure demand generators.
- Finding #5: The proposed Kahahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of hotel rooms in an under-served segment of the market.

On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20)

On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three (3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai'i over a twelve (12) year period. (See: Appendix 20)

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui.

The proximity of the Kahahā Hotel to Kahului and Wailuku, where a majority of Maui's population resides, is ideal for visiting family or friends. Visiting youth sports teams may

also benefit from additional available accommodations near Central Maui's various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama'āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui.

The Reduced Intensity Alternative would be inferior to the Proposed Project regarding economy because it would result in less economic benefits as the proposed project.

Cultural Resources

Given the previously discussed CIA report, it can be reasonably concluded that development of the site would have less than significant impact to cultural resources on the property or within its immediate vicinity.

Similar to the Proposed Project, under the Reduced Intensity Alternative, impacts to cultural resources would also be less than significant.

Reduced Intensity Alternative would be neither environmentally superior nor inferior to the Proposed Project regarding cultural resources, given it would involve similar ground-disturbing activities and utilization of the vacant land.

Public Services and Utilities

Implementation of the Proposed Project would place increased demands upon public services (i.e., recreational facilities, medical facilities, police and fire protection services, and schools) in addition to impacts upon traffic and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). As discussed in the following Section 2.1.14 (Groundwater Resources) of this Draft EIS, it should be noted that the Proposed Project does not intend to use a public utility source for water.

The Reduced Intensity Alternative would result in slightly less demand for electricity, natural gas, water and telecommunications because of the reduced number of Hotel occupants. Similarly, less wastewater and solid waste would generate with a Reduced Intensity Alternative.

Therefore, a Reduced Intensity Alternative would be environmentally superior to the Preferred Alternative regarding impacts to public services and utilities. However, similar to the Proposed Project, the Reduced Intensity Alternative would have less than significant impacts on public services and utilities.

ATTAINMENT OF PROJECT OBJECTIVES

The Reduced Intensity Alternative would develop the Project Site with a hotel development similar to the Preferred Alternative, but with a reduced intensity. A Reduced Intensity Alternative is proposed as a reasonable alternative to the preferred option that meets the objectives of the action, if financially feasible. The Reduced Intensity Alternative would propose a 3-story hotel with 175 rooms, versus the Preferred Alternative, up to 4-storys with 200 rooms. Under the Reduced Intensity Alternative, the need for a hotel within proximity to urban amenities in Central Maui would still be satisfied.

The Reduced Intensity Alternative would attain the project's fundamental objective to provide accommodations for business travelers, local residents and visitors. However, the objective to provide such accommodation would be met to a lesser degree when compared to the Preferred Alternative.

The existing hotel inventory in Kahului and the neighboring Wailuku consists of two older, economy-tier hotels (Maui Seaside Hotel and Maui Beach Hotel) and a relatively new, upscale hotel (Courtyard by Marriott Kahului). According to interviews conducted for the Maui Lodging Market Analysis for this project, *kama'āina* corporate demand is the single largest market segment for hotels in this area comprising an estimated 32 percent of the total business (See: Appendix 22). Although lesser percentages make up other corporate and non-leisure market segments, such as inter-island and out-of-state travelers visiting Maui to attend corporate meetings, conduct government business, attend group events, and visit friends and family, these market segments are estimated to make up about 43 percent of the market share when combined. The remaining 25 percent of demand comes from the leisure market segment consisting of both out-of-state and inter-

island visitors. By contrast, the business/other market segment accounted for only 10 percent of the island-wide demand while the leisure market segment accounted for 90 percent.

Together, the three hotels represent less than 3 percent of the lodging inventory for Maui (including vacation rentals and timeshares) (HTA, 2020). Most of the hotel accommodations on Maui are located in resort areas outside of Kahului/Wailuku and skew towards the high end of the scale with approximately 55 percent of units priced at \$500 or more per night. The pricing and distance from the primary business and commercial district make these higher-end accommodations less desirable for business travelers and others in the non-leisure market segment. Likewise, there is an insufficient number of hotel accommodations available in the mid-level price range (between \$251 to \$500 per night) that serve the leisure market segment. Approximately 60.7 percent of the vacation rentals on Maui are priced between \$251 to \$500 per night, whereas the overall supply of visitor accommodations on the island within this price range is only 25.2 percent.

With very few options for hotel accommodations in a central location and within a lower to mid-level price range, it is evident that Kahului/Wailuku is currently underserved by hotels that cater to business-oriented and non-leisure travelers. The opening of the Courtyard by Marriott Kahului in 2012 and its rapid capture of non-leisure related lodging demand underscores the extent of unsatisfied business demand present in the area (CBRE, 2021). Additionally, it is anticipated that hotel accommodations specifically catered to the needs of business travelers near Maui's urban core will be in high demand as Maui continues to look at ways to rejuvenate and diversify its economy in the wake of ongoing pandemic conditions. Therefore, this project intends to satisfy market demands by providing upscale, select-service hotel facilities in an area that is currently underserved.

Further, the reduced intensity alternative would create less public revenue via the State and County of Maui Transient Accommodation Tax (TAT). The Project Site is suitable for a new hotel development where lodging inventory is significantly lower compared to areas such as Wailea-Kīhei and Lāhainā-Ka'anapali-Nāpili-Kapalua. Therefore, provided it is financially viable, the Reduced Intensity Alternative would be consistent with all the objectives, but to a lesser degree than the Preferred Alternative (i.e., the Proposed Action).

The objectives of the Kahahā Hotel project that are met by a Reduced Intensity Alternative are:

1. Provide a hotel designed to meet corporate business and non-leisure travel accommodation demand in the vicinity of Kahului Airport.
2. Offset demand for unlicensed vacation rentals and reduce the negative impacts of overtourism by providing upscale, select-service hotel facilities in the underserved area of Kahului/Wailuku.
3. Contribute to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities.
4. Support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.
5. Achieve one of the economic goals of the WKCP. In the WKCP, Part III C. Economic Activity, Objective 3. States *"Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core."*
6. Satisfy Maui Island Plan, Infrastructure and Public Facilities, Implementing Actions 6.11.3-Action 3: *"Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as a business hotel(s), gas stations, parcel delivery services, and freight forwarding."*

The National Ocean and Atmospheric Association (NOAA) Coastal Zone Management Program developed a Practitioners Guide in 2006 for Low Impact Developments (LID) strategies. The Applicant will implement the following strategies for the Proposed Project and these same measures would be implemented for the Reduced Intensity Alternative:

1. Parking reduction (minimum amount of parking allowed per code to increase total landscaping);
2. Sidewalk Reduction (Limiting the path to the Right of Way to a single location on Lauo Loop to increase total landscaping); and
3. Tree planting (The Landscape Plan will exceed the number of trees required and incorporate native plants).

The Proposed Project is in support of climate change mitigation efforts. As highlighted in the Climate Change Assessment document, specific green building objectives included within the Proposed Project and the Reduced Intensity Alternative are as follows:

- Passive solar design;

- Photovoltaic solar panels;
- Thermoplastic polyolefin (TPO) single-ply roofing membrane in a light color that reflects solar energy and heat away from the roof;
- Efficient low emissivity glazing on glass to minimize ultraviolet and infrared light that passes through;
- Water conserving plumbing fixtures and fittings;
- Irrigation with automatic controllers, sensors, and metering of outdoor water use;
- Finish material pollutant controls meeting volatile organic compound (VOC) and formaldehyde limits;
- Exterior material selection for sustainability and recycled content;
- Light pollution reduction;
- Low power consumption for lighting and design and dimming systems;
- Efficient variable refrigerant flow (VRF) heating and air-conditioning system design;
- Commissioning and testing of Heating, Ventilation, and Air Conditioning (HVAC) systems;
- Insulation and sealing of the exterior building envelope; and
- Electric Vehicle (EV) charging stations.

1.6.6. Alternatives Not Studied

For alternatives that were eliminated from detailed study, Hawai'i Administrative Rules requires that the appropriate section contains a brief discussion of the reasons for not studying those alternatives in detail (HAR 11-200.1-24(h)).

An alternative location was studied for the Hotel site in Wailuku and that discussion is contained in the previous Section 1.6.3 (Alternative Site Alternative). The reasons for other locations considered and not studied are primarily due to issues and impacts related to proximity to Kahului Airport. Locating the Proposed Project on another site on the Island of Maui may achieve some of the stated project objectives of developing a 200-unit hotel (80 extended-stay guestrooms and 120 standard guestrooms) with associated infrastructure and landscaping. However, only two objectives would be met for certain; (1) contribution to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities; and (2) support long-term sustainability goals through low-impact development and environmentally sensitive design strategies.

Locating the proposed hotel outside the geographic vicinity of Kahului and/or Wailuku and away from Kahului Airport would not meet the other stated objectives of the Proposed Action, namely, meeting accommodation demand for the business traveler in an underserved area. Nor would it satisfy the stated objectives regarding the Maui Island Plan Implementing Action 6.11.3-Action 3 or the Wailuku Kahului Community Plan Part III C, Economic Activity Objective 3. In addition, certain adverse impacts would be increased, such as those impacts caused by generating more average daily vehicle trips and more vehicle miles travelled, since the location would no longer be in the vicinity of Kahului Airport.

1.6.7. Identification of Environmentally Superior Alternative

The No Action/No Project/No Build Alternative has the least impact to the environment because it would not result in any construction activities on the Project Site or the intensification of land uses. While the No Action/No Project/No Build Alternative would avoid the impacts of the Proposed Project as well as the beneficial impacts of the Proposed Project — including the utilization of the Project Site and invigoration of the local economy would not occur — and none of the project objectives would be met.

The Multi-family Development Alternative would also result in either reduced or similar environmental impacts compared to the Proposed Project. However, the Multi-family Development Alternative would not meet all the project objectives.

With the exception of the No Action/No Project/No Build Alternative, the environmentally superior alternative would be the Reduced Intensity Alternative. This alternative would result in either reduced or similar environmental impacts compared to the Proposed Project. Although the Reduced Intensity Alternative would achieve all of the project objectives, it would not achieve these objectives to the same degree as the Proposed Project and would not maximize the potential of the Project Site. Therefore, the Reduced Intensity Alternative was identified as the Environmentally Superior Alternative.

Table 4 provides, in summary format, a comparison of the level of impacts for each alternative to the Proposed Project. The following Chapter 2 will discuss the full account of the impacts and mitigation measures with regard to the Proposed Project.

Table 4. Comparison of the Environmental Impacts of the Proposed Project to the Project Alternative

Topic	Proposed Project Level of Impacts After Mitigation	No Action/No Project/No Build Alternative	Existing Land Use Designation Alternative	Alternative Site Alternative	Multi-family Development Alternative	Reduced Intensity Alternative
Land Use	Less than significant	▼	▼	▲	=	=
Topography and Soils	Less than significant	▼	=	=	=	=
Natural Hazards	Less than significant	=	=	=	=	=
Climate Change	Less than significant	▼	=	=	=	▼
Hazardous Substances	Less than significant	=	▲	▲	=	=
Flora and Fauna	Less than significant	▼	=	=	=	=
Air Quality	Less than significant	▼	=	=	=	▼
Noise Quality	Less than significant	▼	= or ▲	=	= or ▲	▼
Historical and Archaeological Resources	Less than significant	▼	=	▲	=	=
Visual Resources	Less than significant	▼	= or ▲	=	=	▼
Agricultural Resources	Less than significant	▼	=	▲	=	=
Hydrology and Water Quality	Less than significant	▼	▼	▲	=	▼
Population and Housing	Less than significant	=	=	=	▲	=
Economy	Less than	▼	=	=	▼	▼

Table 4. Comparison of the Environmental Impacts of the Proposed Project to the Project Alternative

Topic	Proposed Project Level of Impacts After Mitigation	No Action/No Project/No Build Alternative	Existing Land Use Designation Alternative	Alternative Site Alternative	Multi-family Development Alternative	Reduced Intensity Alternative
	significant					
Cultural Resources	Less than significant	=	=	▲	=	=
Public Services and Utilities	Less than significant	▼	=	=	=	▼
Attainment of Project Objectives	Meets all of the project objectives	Meets none of the project objectives	Meets none of the project objectives	Meets some of the project objectives, but not to the same degree as the Proposed Project	Meets none of the project objectives	Meets some of the project objectives, but not to the same degree as the Proposed Project

Legend:

- ▲ Indicates an impact that is greater than the proposed Project.
- ▼ Indicates an impact that is less than the proposed Project.
- = Indicates an impact that is equal to the proposed Project.

2. AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATION MEASURES

2.1 Physical Environment

2.1.1 Surrounding Land Uses

This section identifies the existing land use conditions, existing land use designations, and recommends mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. This section also identifies on-site and surrounding land use conditions and relevant land use policies and regulations, as set forth by the County of Maui. Information in this section is based in part upon the *State Land Use District*, the *Maui Island Plan*, the *Wailuku-Kahului Community Plan*, and the *County of Maui Comprehensive Zoning Ordinance*.

Existing Conditions. The Project Site is situated within the project area known as Maui Business Park Phase II (MBP II). The MBP II includes approximately 179 acres of land designated for light industrial development in Kahului and in proximity with the Kahului Airport and Kahului Harbor. Kahului has been known as the Maui's commercial and business hub, home for a variety of businesses including but not limited to retail, car rentals, visitor accommodations, warehouses, and eating and drinking establishments.

The MBP II is comprised of a Northern Project Area (defined as between the Kahului Airport and Costco) and a Southern Project Area (defined as areas of the MBP II south of Hana Highway). Project Site of the Proposed Action is located within the North Project Area of the MBP II. The Project Site includes five parcels identified by Tax Map Key Nos. (2) 3-8-103:014 (portion), 015 (portion), 016, 017, and 019. All project parcels are currently owned in fee simple by Maui Business Park, LLC.

The existing land uses within the MBP II development include automobile sales, service, and storage such as Servco, BMW, and Kīhei Auto, and businesses needing service/storage/warehousing space for products, supplies, and equipment such as Pacific Pipe, Huber Pools, and Skyline Eco.

The Project Site is bound by Haleakalā Highway on the north, southbound traffic lane of Airport Access Road on the east and south, Lauo Loop, and the remaining parcels of the MBP II North Project Area on the west.

Beyond Haleakalā Highway, on the north, is the State Department of Land & Natural Resources (DLNR) Maui Baseyard. To the east of the Project Site is vacant land, the Consolidated Car Rental Facility (CONRAC), and Kahului Airport. The Kahului Airport is adjacent to the Project Site. The travel distance from the Project Site to the airport terminal, or vice versa, is approximately a 5-minute drive by private vehicle.

Beyond Airport Access Road, on the east and south, is an expansive vacant land owned by the State of Hawai'i, intended for Airport uses while also have remaining Agricultural Designations. The uses on the parcels situated between Lauo Loop and Haleakalā Highway, on the west of the Project Site, are vacant. Uses on the parcels south of the Project Site are also vacant. These parcels on the west and south of the Project Site are included within the MBP II North Project Area with some parcels are no longer owned by the A&B — however, those parcels are designated for Light Industrial Use.

Costco Gasoline and Wholesale are situated less than 0.5 miles from the Project Site or approximately a 2-minute drive. The nearest food trucks are situated north of Haleakalā Highway and approximately 0.2 miles from the Project Site or a 1-minute drive. More eating and drinking establishments are available west and south of Costco, approximately more or less than 1 mile from the Project Site or less than a 5-minute drive. Safeway is available on the south, approximately 1.5 miles from the Project Site or within a 5-minute drive. More retail, businesses, and eating and drinking establishments are available in Kahului, which is within 1.5 miles radius of the Project Site.

The proposed hotel site is located within an urban area adjacent to other urban developed lands. There are no adjacent farms or active agricultural uses, therefore no odors, noise, and dust pollution resulting from adjacent agricultural lands.

The following is a description of zoning, community plan designations, and existing land uses adjacent to the subject property:

North:	State Land Use: Agricultural & Urban District Maui Island Plan: Urban Growth Boundary Community Plan: “AG” Agriculture & “A” Airport Zoning: Road & “AP” Airport Existing uses. Haleakalā Highway and DLNR Maui Baseyard
East:	State Land Use: Agricultural District Maui Island Plan: Urban Growth Boundary Community Plan: “AG” Agriculture & “A” Airport Zoning: Road and “AG” Agriculture Existing uses. Airport Road, Vacant Land, and Kahului Airport
South:	State Land Use: Agricultural District Maui Island Plan: Urban Growth Boundary Community Plan: “AG” Agriculture Zoning: Road & “AG” Agriculture Existing uses. Airport Road and Vacant Land
West:	State Land Use: Urban District Maui Island Plan: Urban Growth Boundary Community Plan: “LI” Light Industrial Zoning: “M-1” Light Industrial Conditional Zoning (Ordinance 3559) Existing uses. Lauo Loop and Vacant Land

Potential Impacts and Mitigation Measures. From a land use impact standpoint, the proposed hotel development is appropriate for the urban location adjacent to the Kahului Airport. The proposed hotel is compatible with surrounding uses and will provide accommodations in close proximity to the Kahului Airport.

The current Wailuku-Kahului Community Plan (WKCP) was adopted by Ordinance No. 3061 on June 2, 2002 and identifies major problems and opportunities within the region. Problem 1.a. of the WKCP about Airport and Harbor Facilities and Other Public Facilities is excerpted as follows:

“The area comprising Kahului Airport is underutilized and should be improved to meet the needs over the next 20 years, including but not limited to the construction of a new access road; improvement of shoreline areas for recreational uses; and

expansion of facilities to accommodate air cargo and passenger services, including extension of the runway within the existing airport boundaries defined in the community plan.”

In addition, the WKCP, Part III C. Economic Activity, Objective 3. States:

“Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core.”

Based on the foregoing, the Proposed Project site is adjacent to the Kahului Airport and is an appropriate location for future hotel accommodations. The proposed Kānāhā Hotel will optimize land use within the immediate environs of the underutilized area comprising Kahului Airport.

In order to develop the proposed hotel, the Applicant will be required to request a Change of Zoning (CIZ) from “LI” Light Industrial to “H-M” Hotel zoning and an amendment to the Wailuku-Kahului Community Plan from “LI” Light Industrial to “H” Hotel. Prior to the processing of the CIZ and CPA, the Applicant is required to make a Motion to Amend the State Land Use Commission (LUC) Decision and Order of Docket No. A03-739 to allow the proposed hotel use within the Project Site.

2.1.2 Topography and Soils

This section evaluates the topographic conditions and the soils within the Project Site. This section also includes the assessment of the Project Site and recommends mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. Information in this section is based on the following documentation:

- *Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawai'i* prepared by the United States Department of Agriculture Soil Conservation Service dated August 1972;
- *Geotechnical Investigation Report Windward Hotel, Kahului, Maui, Maui, Hawai'i*, prepared by Hawai'i Geotechnical Consulting, Inc., dated July 23, 2017 (refer to Appendix 4, “Geotechnical Investigation Report”);
- *Preliminary Engineering and Drainage Report for the Kānāhā Hotel at Kahului Airport, Kahului, Maui, Hawai'i, TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017,*

- 018, prepared by Austin, Tsutsumi & Associates, Inc. (ATA), dated August 6, 2021 (refer to Appendix 5, “Preliminary Engineering and Drainage Report”);
- *Phase I Environmental Site Assessment 6.315-Acre Property, Portion of Tax Map Key No. (TMK): (2) 3-8-079: Parcel 013 (Lots 17-A-14, -15, -16, -17, and -18), Kahului, Maui, Hawai'i*, prepared by Ford Canty & Associates, Inc., dated June 21, 2017 (refer to Appendix 6, “Environmental Site Assessments Phase 1”);
 - *Phase II Environmental Site Assessment 6.315-Acre Property, (Tax Map Key [TMK]: [2] 3-8-079: Parcel 013), Kahului, Maui, Hawai'i*, prepared by Ford Canty & Associates, Inc., dated July 21, 2017 (refer to Appendix 7, “Environmental Site Assessments Phase 2”);
 - *County of Maui Soil Erosion and Sediment Control, Maui County Code Chapter 20.08.035 – Minimum BMPs*, prepared by the County of Maui, Ordinance No. 3135 (2003); and
 - *Low Impact Development, A Practitioner's Guide*, prepared by the Hawaii Office of Planning, Coastal Zone Management Program, Pursuant to National Oceanic and Atmospheric Administration Award No. NA03NOS4190082, dated June 2006.

Existing Conditions. The Project Site sits at approximately 28.5 to 34 feet mean sea level (msl) and is relatively flat with an average slope of approximately one (1) percent in the westerly direction. The ground surface of the site is currently covered with overgrown brush and weeds. (See: Appendix 5).

According to the *Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawai'i (August 1972)*, prepared by the United States Department of Agriculture Soil Conservation Service, the soils within the Project Site are classified as Molokai Silty Clay Loam (MuB) (See: Figure 15, “Soil Classification Map”). With this soil, runoff is slow to medium, and the erosion hazard is slight to moderate.

Ford Canty & Associates, Inc. prepared Phase I & II Environmental Site Assessment (ESA) reports of the Kahahā Hotel site in June, and July 2017. (See: Appendices 6 and 7). Their reports included a summary of historical use of the Project Site to understand the uses of the land in the past and to support the findings of environmental investigations on the site. The earliest available topographic map, dated 1922, depicts the subject property and adjoining areas as undeveloped land, except for a railroad extending through the southwest portion of the subject property and a roadway (currently Haleakalā Highway) depicted along the north boundary of the subject property. The earliest available aerial photograph,

from 1950, shows the subject property and immediate surroundings as undeveloped land covered with trees and other vegetation.

The 1976 and 1992 aerial photographs show the subject property and adjoining areas to the east, west, and south as sugar cane fields. A circular area on the north-central portion of the subject property is shown with a few structures. This area is the former Maui Pineapple Company Seed Treatment Plant. This seed treatment plant also appears in the aerial photographs from 2000 and 2004.

The aerial photographs from 2012 and 2013 show the subject property undergoing initial development, with the vegetation removed and earth-moving/infrastructure activities being conducted. A rectangular, fenced-in area is shown on the southwestern portion of the subject property, containing piles of soil. This is where asbestos- and lead-impacted soils were temporarily stored following cleanup of the former Maui Pineapple Company Seed Treatment Plant. The 2014 aerial photograph shows the earth-moving/infrastructure activities were completed at the subject property.

In addition to the environmental investigations and ESA reports prepared by Fort Canty & Associates, a geotechnical investigation was conducted by Hawaii Geotechnical Consulting, Inc. (HGC). This investigation aimed to explore and evaluate the site's subsurface conditions in order to provide geotechnical recommendations for the Proposed Project's design and construction. The said investigation involved five (5) phases including but not limited to field exploration, lab testing, and geotechnical analysis.

Based on the Geotechnical Investigation Report dated July 23, 2017, prepared by Hawai'i Geotechnical Consulting (HGC) — the proposed hotel development is believed to be feasible at the Project Site provided the recommendations of this report are incorporated into the project's design and construction. It should be noted that fresh basalt was encountered within the Project Site at depths as shallow as 1 ½ feet which may not be ripped. As noted in the Geotechnical Investigation Report, weathered to fresh basalt — that cannot be ripped — will likely require the use of hard rock removal techniques such as hoe ramming or blasting. (See: Appendix 4).

Potential Impacts and Mitigation Measures. The proposed grading plan will require both excavation and embankment, with attempts to balance “cuts” and “fills”, to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or

export of earthwork materials. Finish grades throughout the site will vary in elevation from 28 to 34 feet mean sea level (msl) and slopes will vary between 0 to 5 percent after improvements with a maximum of 2:1 grade used along the embankments.

Best Management Practices will be implemented during the construction phase and will be discussed further in Section 2.4.2 (Drainage) of this report. A National Pollution Discharge Elimination System (NPDES) Permit will be obtained for the Proposed Project, and if required, a Noise Permit will be obtained for construction activities. (See: Appendix 5).

During site preparation, storm runoff from the site will be controlled in accordance with the County's "Soil Erosion and Sediment Control Standards". Typical mitigation measures include appropriately stockpiling materials on the site to prevent runoff and commencing building construction and/or establishing landscaping as early as possible — to minimize the length of exposure of disturbed soils.

Less than significant impacts — with mitigation efforts incorporated — to the land include the soil erosion and the generation of dust during construction. Clearing and grubbing activities will temporarily disturb the soil retention values of the existing vegetation and expose soils to erosion forces. Some wind erosion of soils could occur without a proper watering and re-vegetation program.

Measures taken to control erosion during the site development period may include, but are not limited to:

- Minimizing the time of construction;
- Retaining existing ground cover as long as possible;
- Constructing drainage control features early;
- Using temporary area sprinklers in non-active construction areas when ground cover is removed;
- Providing a water truck on-site during the construction period to provide for immediate sprinkling as needed;
- Using temporary berms and cut-off ditches, where needed, for control of erosion;
- Watering graded areas when construction activity for each day has ceased;
- Grassing or planting all cut and fill slopes immediately after grading work has been completed; and
- Installing silt screens where appropriate.

Construction activities on the property will comply with all applicable Federal, State, and County regulations and rules for erosion and sediment control. Prior to the issuance of a grading permit, a final erosion control plan including best management practices will be submitted to the County of Maui for review and approval. All construction activities will comply with the provisions of Chapter 11-60.1, Hawai'i Administrative Rules (HAR), Section 11-60.1-33, pertaining to Fugitive Dust.

The Hawai'i Office of Planning, Coastal Zone Management Program, pursuant to National Ocean and Atmospheric Administration (NOAA) Award No. NA03NOS4190082 published a Practitioners Guide in 2006 for Low Impact Developments (LID) strategies. The Applicant will implement the following strategies for the proposed hotel project:

1. Parking reduction (i.e., minimum amount of parking allowed per code to increase total landscaping);
2. Sidewalk Reduction (i.e., limiting the path to the Right of Way to a single location on Lauo Loop to increase total landscaping); and
3. Tree planting (i.e., the Landscape Plan will exceed the number of trees required and incorporate native plants).

After construction of the proposed hotel, the establishment of permanent landscaping will provide additional long-term erosion control.

2.1.3 Natural Hazards

This section identifies the potential for the Proposed Project to expose the public or the environment to natural hazards that may be related to existing conditions and recommends mitigation measures, if necessary, to reduce the potential impacts to the extent feasible. This section is based on various resources including but not limited to the following documentation:

- *Tsunami Evacuation Zone Map, Kahului – Map 8*, prepared by County of Maui, dated September 2015 (refer to Figure 5, “Tsunami Evacuation Zone Map”);
- *Federal Emergency Management Agency’s (FEMA), National Flood Insurance Program, Flood Insurance Rate Map, Panel Number 150003 0411 E*, prepared by the United States Federal Emergency Management Agency, dated September 25, 2009 (refer to Figure 16, “Flood Map”); and
- *Sea Level Rise Exposure Area Map*, prepared by State of Hawai'i, Department of Land and Natural Resources, Office of Conservation and Coastal Lands, n.d. (refer to Figure

21, “Sea Level Rise Exposure Area Map”).

Existing Conditions. Natural hazards impacting the Hawaiian Islands include hurricanes, tsunamis, volcanic eruptions, earthquakes, and flooding. Seismic hazards are those related to ground shaking such as landslides, ground cracks, rock falls, and tsunamis. Engineers and other professionals have created a system of classifying seismic hazards based on the expected strength of ground shaking and the probability of the shaking occurring within a specified time. The results are included in the Uniform Building Code (UBC) as seismic provisions.

The UBC seismic provisions contain six seismic zones, ranging from 0 (no chance of severe ground shaking) to 4 (10 percent chance of severe shaking in a 50-year interval). Kauai County is in Zone 1, the City and County of Honolulu is in Zone 2A, the County of Maui is in Zone 2B, and the County of Hawai'i is in Zone 4.

In addition to seismic hazards, devastating hurricanes occur and have impacted Hawai'i twice since 1980: Hurricane Iwa in 1982 and Hurricane Iniki in 1992. While it is difficult to predict these natural occurrences, it is reasonable to assume that future events could be likely given the recent record.

Tsunamis are large, rapidly moving ocean waves triggered by a major disturbance of the ocean floor, which is usually caused by an earthquake but sometimes can be produced by a submarine landslide or a volcanic eruption. About 50 tsunamis have been reported in the Hawaiian Islands since the early 1800s, including the most recent tsunami because of the March 2011 earthquake in Japan. The Kānehā Hotel is located within the Civil Defense Agency's Tsunami Evacuation Zone. (See: Figure 5, “Tsunami Evacuation Zone Map”)

Volcanic hazard is not a concern in the Central Maui area due to the dormant status of Haleakalā. In Hawai'i, most earthquakes are linked to volcanic activity, unlike other areas where a shift in tectonic plates is the cause of an earthquake. Each year, thousands of earthquakes occur in Hawai'i, most of them so small they are detectable only with extremely sensitive instruments. On October 16, 2006, a magnitude 6.7 earthquake struck on the underwater segment of the major rift zone of the Hualalai volcano on the northwest side of the Island of Hawai'i. The earthquake caused rockslides and some damage to roadways on Maui.

Flood hazards are primarily identified by the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency's (FEMA), National Flood Insurance Program. According to Panel Number 150003 0411 E of the Flood Insurance Rate Map, September 25, 2009, prepared by the United States Federal Emergency Management Agency, the Project Site is situated in Flood Zone "X". Flood Zone "X" represents areas outside of the 0.2% annual chance floodplain. However, the Project Site is located approximately 0.66 miles from the shoreline and is located within the tsunami evacuation zone. (See: Figure 5, "Tsunami Evacuation Zone Map" and Figure 16, "Flood Map")

Potential Impacts and Mitigation Measures. The Applicant will coordinate with the Maui Emergency Management Agency (MEMA) to understand procedures during the event of a Tsunami evacuation. Therefore, proper emergency tsunami evacuation procedures will be implemented and adhered to.

Sea level rise will have adverse effects on all shoreline communities, our economies, and our natural and cultural resources. Sea level rise should be fully considered for properties within Kahului, given high exposure and vulnerability of the region to coastal hazards. The findings of the Hawai'i Sea Level Rise Vulnerability and Adaptation Report 2017 identify an expected 3.2 feet rise in sea level across the main Hawaiian Islands. The report includes the towns of Waihe'e, Hāna, Lāhainā, Kīhei, and Speckelsville as the most vulnerable areas to sea level rise. The improved Project Site is located approximately 0.66 miles from the shoreline and not situated within the sea level rise exposure area. Therefore, not anticipated that the Proposed Project site will be affected by sea level rise over the next 30-70 years. (See: Figure 21, "Sea Level Rise Exposure Area Map")

No adverse flood hazards impacting the site or the properties in the immediate vicinity are anticipated. The Kahahā Hotel will be constructed in accordance with the Building Code adopted by the County of Maui.

2.1.4 Climate Change Assessment

This section addresses the existing conditions with regard to climate change and evaluates the potential impacts of the implementation of the Proposed Project to climate change. Where significant impacts are identified, mitigation measures are provided to reduce these impacts to the extent feasible. This section is primarily based on *Climate Change Assessment: Kahahā Hotel at Kahului Airport, Kahului, Maui, Hawai'i*, prepared by Wilson

Okamoto Corporation, dated July 2021 (refer to Appendix 26, “Climate Change Assessment”).

Observed changes in the climate system have progressed at unprecedented rates on a global level since the pre-industrial era. Research indicates that over two centuries of unabated Greenhouse Gas (GHG) emissions from anthropogenic sources is largely responsible for increases in global atmospheric temperatures and ocean warming. The dire consequences of climate change impacts on natural and human systems around the world has made the need to address climate change a key priority.

The State of Hawai'i has adopted several policies and established clear energy goals as part of its commitment to reducing GHG emissions. These goals include achieving emission levels at or below 1990 GHG emission levels by 2020, carbon neutrality by 2045, 100 percent renewable energy by 2045, and 100 percent clean transportation by 2045.

A Climate Change Assessment document dated March 2021 was prepared by Wilson Okamoto Corporation. The assessment was conducted to identify the potential direct, indirect, and cumulative impacts that may be associated with the construction and development of the Kahahā Hotel. Climate change impacts were based on region specific trends identified for the State of Hawai'i from a qualitative frame view — primarily centered on available data and metrics. Region specific climate change trends likely to affect the project or be affected by the project include a rise in air temperature and variations in rainfall patterns. Other region-specific climate change trends such as flooding, sea level rise and shoreline erosion are not anticipated to affect or be affected by the project due to the location of the Project Site outside of areas of vulnerability.

The Proposed Project is in support of climate change mitigation efforts. As highlighted in the said Climate Change Assessment document, specific green building objectives included within the Proposed Project are as follows:

- Passive solar design;
- Photovoltaic solar panels;
- Thermoplastic polyolefin (TPO) single-ply roofing membrane in a light color that reflects solar energy and heat away from the roof;
- Efficient low emissivity glazing on glass to minimize ultraviolet and infrared light that passes through;
- Water conserving plumbing fixtures and fittings;

- Irrigation with automatic controllers, sensors, and metering of outdoor water use;
- Finish material pollutant controls meeting volatile organic compound (VOC) and formaldehyde limits (adhesives, sealants, caulks, paints and coatings, aerosol paints and coatings);
- Exterior material selection for sustainability and recycled content;
- Light pollution reduction;
- Low power consumption for lighting and design and dimming systems;
- Efficient variable refrigerant flow (VRF) heating and air-conditioning system design;
- Commissioning and testing of Heating, Ventilation, and Air Conditioning (HVAC) systems;
- Insulation and sealing of the exterior building envelope; and
- Electric Vehicle (EV) charging stations.

Temperature

Existing Conditions. Global mean temperature is projected to increase by at least 2.7°F (1.5°C) by the end of the century. Locally, the rate of warming air temperature in Hawai'i has quadrupled in the last 40 years — at a rate of over 0.3°F (0.17°C) per decade and is projected to continue warming with a range of +4-5°F (2.2-2.8°C) — for high emissions scenarios targeted by the year 2085.

Much of the heat trapped in the Earth's atmosphere is absorbed by the ocean. The strongest ocean warming is projected to be felt in tropical and Northern Hemisphere subtropical regions, with increases up to 3.6°F (2.0°C) in the upper ocean above 650 ft (200 m) by the end of the century. Sea surface temperatures have warmed between 0.13°F and 0.41°F (0.07°C and 0.23°C) per decade in the Pacific for the last 40 years. This trend is projected to accelerate, warming by 2.3°F to 4.9°F (1.3°C to 2.7°C) before the end of the century. This warming can influence ocean circulation and nutrient distribution and lead to coral bleaching events.

As an island, Maui has both a heavy economic and cultural dependency on the ocean. Consequently, warming ocean temperatures could also have potential impacts on the economy and cultural practices, in addition to ocean ecosystems and processes.

Potential Impacts and Mitigation Measures. The Proposed Project is in an urban area — where temperatures are significantly warmer than surrounding rural or natural areas. The Proposed Project will contribute to the increase in number of impervious surfaces that

reflect heat and contribute to an urban heat island effect.

The Proposed Project includes strategic landscaping to mitigate the increase of urban heat island effect. Landscaping will consist of an open lawn area, vegetative ground cover — approximately 55 shade trees evenly distributed throughout the parking lot — and approximately 19 palm trees situated along the perimeter of the property. Following the Maui County Code requirement of installing one (1) medium-sized shade tree for every five (5) parking spaces — the Proposed Project includes 221 parking spaces therefore 45 trees are required. The proposed 55 shade trees exceed the County requirements by about 20 percent and maximizes the amount of shaded area in the parking lot and near the hotel building. In addition, shade provided by the palm trees installed along the perimeter of the property would further help to cool impervious surfaces in the vicinity and minimize the heat island effect generated by the project.

In the long-term, energy demand for the Proposed Project could potentially increase over time — resulting in indirect impacts on climate change as cooling systems are required to be operated more frequently or for longer durations due to rising air temperatures. The following green building objectives to mitigate increased energy demand will passively cool the building as much as possible and minimize the need for supplemental cooling:

- Utilizing a passive solar design;
- Applying a low emissivity glazing on glass;
- Insulating and sealing the exterior building envelope; and
- Installing high-efficiency cooling systems, and commissioning and testing of HVAC systems.

In addition, the Proposed Project will incorporate a “cool roof” that reflects heat and solar energy away from the building using a TPO single-ply roofing membrane in a light color. TPO is highly reflective and would decrease the energy use and cooling costs associated with building operations. It would also require limited maintenance as it is extremely durable and resistant to tears and punctures throughout its lifetime. TPO is also sustainable and can be recycled. Photovoltaic solar panels are also proposed to be installed with the project to minimize and offset long-term demand on electrical utilities.

With the foregoing mitigation measures in place, the Proposed Project will not result in significant impacts to air temperatures in the vicinity of the project. Increases in regional air temperatures attributed to climate change are likely to have some effect on the project and

may indirectly increase GHG emissions through a corresponding increase in energy demand in the long-term. However, with implementation of green building objectives and installation of photovoltaic solar panels, the additional GHG emissions are anticipated to be negligible. It is acknowledged that GHG emissions are the main driver to observe increases in global air temperature. Cumulatively, any additional GHG emissions will contribute to the overall concentration of GHGs in the atmosphere. Further discussions about GHG emissions are presented within this section about Climate Change Assessment.

Rainfall

Existing Conditions. Rainfall trends and projections vary across the islands and the valleys. Hence, there are varying precipitation patterns anticipated with climate change. For Maui, trends in rainfall intensity are mixed. It is projected that the islands of Hawai'i and Maui may become wetter towards the end of the 21st century despite rainfall projections for Hawai'i are still quite uncertain.

Potential Impacts and Mitigation Measures. Development of the Proposed Project will decrease the amount of natural permeable land area at the Project Site. — Runoff may increase during rainfall events resulting in indirect impacts on stormwater infrastructure and coastal water quality. It should be noted that runoff volumes would be further affected by high intensity rainfall events that are projected to increase in frequency due to climate change.

The Proposed Project includes onsite drainage system improvements including concrete curbs and gutters, catch basins, manholes, underground drain lines, and storm water quality treatment systems. With these improvements in place, spatial or temporal changes in rainfall patterns in connection with climate change are not anticipated to impact the local environment. Furthermore, it is anticipated that the Proposed Project will not directly or indirectly result in significant impacts on rainfall patterns for the region, as GHG emissions generated by the Proposed Project are anticipated to be negligible. Runoff generated by the Proposed Project and the drainage plan will be further discussed in Section 2.4.2 (Drainage) of this Draft EIS.

Greenhouse Gas Emissions (GHG)

Existing Conditions. The Hawai'i Greenhouse Gas Emissions Report for 2016 was used to determine emission trends for the County of Maui and as a basis to determine the potential impacts of the project on climate change. The said report presents the emission estimates

for the State of Hawai'i for the years 1990, 2007, and 2015; inventories estimate for 2016; and outlines emission projections for 2020 and 2025. Emission estimates presented in the report include anthropogenic GHG emissions and sinks – natural systems that absorb and store carbon dioxide from the atmosphere – from the following four sectors: Energy, Industrial Processes and Product Use (IPPU), Agriculture, Forestry, and Other Land Use (AFOLU), and Waste. Estimates and projections from the Energy sector include emissions resulting from stationary combustion (generated by the burning of fossil fuels to generate energy), transportation, incineration of waste, and oil and natural gas systems.

The Hawai'i Greenhouse Gas Emissions Report for 2016 estimates that emissions for Maui County in 2016 accounted for 2.55 MMT CO₂e or 13 percent of the total GHG emissions for the State — which was estimated at 19.59 MMT CO₂e (ICF and UHERO, 2019). In 2016, emissions from the “Energy” sector accounted for the greatest share of the emissions in Maui County at 2.11 MMT CO₂e, or 83 percent.

Total emissions for the State are projected to decrease by the years 2020 and 2025. Stationary combustion emissions from the commercial sector are projected to slightly increase in 2020 and 2025. However, it is expected these increases would be offset by even greater reductions in emissions projected from the energy industries due to gained efficiencies in energy production (ICF and UHERO, 2019). Emissions from the transportation sector are also projected to increase.

Emission levels are impacted by several factors, such as the overall level of economic activity, the type of energy and technology used, and land use decisions. The Hawai'i Greenhouse Gas Emissions Report for 2016 determined a baseline projection for future emissions to the years 2020 and 2025 by relying heavily on projections of economic activities as well as an understanding of policies and programs that impact the intensity of GHG emissions. Due to the level of uncertainty associated with these estimates, several alternative emissions scenarios were also developed in addition to a baseline projection. These alternatives considered changes related to world oil prices, development of renewable energy infrastructure, and adoption of ground transportation technology. Under most scenarios, the total emissions for the State were projected to be below 1990 emission levels. However, future scenarios where low oil prices, delays in the development of renewable energy infrastructure, and low adoption rate of ground transportation technology are considered, total emissions for the State were projected to be above 1990 emission levels.

Potential Impacts and Mitigation Measures. Greenhouse gases of primary concern in land use development projects are carbon dioxide, methane, and nitrous oxide associated with the burning of fossil fuels for energy, transportation, or to operate heavy machinery. Other GHG are less of a concern because construction and operational activities associated with land use development projects are not likely to generate substantial quantities of these GHG. The Proposed Project is anticipated to generate GHG emissions during both construction and operation resulting in direct, indirect, and cumulative impacts to concentrations of GHG in the atmosphere.

Direct impacts during construction are anticipated to result primarily from exhaust emissions from the operation of construction equipment on-site. Indirect impacts during construction are expected to result from temporary increases in traffic from construction workers commuting to and from the site, temporary increases in traffic from roadway lane closures, and any “upstream” emissions that may be released through extraction or production of materials to build the project.

Indirect impacts during operations are anticipated to result primarily from the burning of fossil fuels to generate energy for the hotel and for vehicles transporting to and from the hotel, including vehicles servicing the hotel. Long-term operational emissions also include those related to maintenance activities.

It is anticipated that the Proposed Project individually will not result in a significant impact on GHG concentrations in the atmosphere.

In the short-term, increases in GHG emissions are anticipated to be negligible due to the scale and scope of the project and the temporary nature of construction activities. In the long-term, the Proposed Project will incorporate green building objectives and implement best management practices to ensure emissions are minimized. Traffic increases are not anticipated to significantly affect the level of service of surrounding roadways.

Cumulatively, the project will contribute to the total GHG emissions for the State. However, these increases are anticipated to be negligible relative to overall emissions. Moreover, increases in the commercial sector have already been anticipated in emission inventories for the State and are expected to be offset by even greater reductions in emissions produced by the energy industries.

Other recommended mitigation measures that could be implemented to ensure emissions are minimized to the maximum extent practicable include the following:

During Construction of The Proposed Project

- Improve fuel efficiency from construction equipment by minimizing idle time either by shutting equipment off when not in use or reducing the time of idling;
- Provide clear signage that posts this requirement for workers at the entrances to the site;
- Maintain all construction equipment in proper working condition according to manufacturer's specifications and prior to operation — ensure equipment is being checked by a certified mechanic;
- Train equipment operators in proper use of equipment;
- Use appropriately sized equipment for the job;
- Use equipment with high-efficiency technologies (e.g., repowered engines, electric drive trains);
- Perform on-site material hauling with trucks equipped with on-road engines (if determined to be less emissive than the off-road engines);
- Encourage and provide incentives for carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes;
- Reduce electricity use in the construction office or trailer by using compact fluorescent bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones;
- Recycle or salvage non-hazardous construction and demolition debris;
- Use locally sourced or recycled materials for construction materials and ensure the wood products utilized in the project should be certified through a sustainable forestry program;
- Avoid road closures during peak traffic hours; and
- Move heavy construction equipment and workers to and from construction areas during periods of low traffic volume.

During Operations of The Proposed Project

- Install high-efficiency equipment or energy-saving technologies throughout the facility;
- Ensure structures and facilities are properly maintained;
- Develop programs that encourage guests to be green and promote alternative transportation options.

2.1.5 Hazardous Substances

This section identifies the potential for the Proposed Project to expose the public or the environment to hazardous materials or substances that may be related to existing conditions or new hazards created as a result of the Proposed Project. This section also identifies mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. This section is based on the following documentation:

- *Phase I Environmental Site Assessment 6.315-Acre Property, Portion of Tax Map Key No. (TMK): (2) 3-8-079: Parcel 013 (Lots 17-A-14, -15, -16, -17, and -18), Kahului, Maui, Hawai'i*, prepared by Ford Canty & Associates, Inc., dated June 21, 2017 (refer to Appendix 6); and
- *Phase II Environmental Site Assessment 6.315-Acre Property, (Tax Map Key [TMK]: [2] 3-8-079: Parcel 013), Kahului, Maui, Hawai'i*, prepared by Ford Canty & Associates, Inc., dated July 21, 2017 (refer to Appendix 7).

Existing Conditions. Phase I & II Environmental Site Assessment (ESA) reports of the Kahahā Hotel site were prepared by Ford Canty & Associates, Inc. in June, and July 2017. (See: Appendices 6 and 7). The investigation and report format follows the guidelines of the American Society of Testing and Materials (ASTM) Publication E1527-13, *Standard Practice for Environmental Site Assessments: phase 1 Environmental site Assessment Process* as a guideline. These guidelines define good commercial and customary practice in the United States of America for conducting an environmental assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. [United States Code] §9601) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability (hereinafter, the “landowner liability protections,” or “LLPs”) — that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. §9601(35)(B).

The term “recognized environmental condition” means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any

release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

After a review of records the ESA noted that there were no current investigations of the site under any Federal, State, or local environmental agency. Two (2) historical recognized environmental conditions were identified within the Project Site.

1. A Maui Pineapple Company Seed Treatment Plant was located on the north-central portion of the subject property. Environmental investigations were conducted in 2007 and 2011 to investigate the areas, i.e., a former diesel AST, two former dip tank/overflow areas, a former bin storage area, the perimeter area, a cesspool area, and a former hydraulic lifts area.

Soil samples were collected and analyzed for various Chemicals of Potential Concern (COPC), including Total Petroleum Hydrocarbons-Diesel Range Organics (TPH-DRO), Pesticide Screen (including triademefon and diazinon), and Carbamate Pesticides (including benomyl, metalaxyl, and propiconazole), Polynuclear Aromatic Hydrocarbons (PAHs), Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), Polychlorinated Biphenyls (PCBs), Total Petroleum Hydrocarbons - Residual Range Organics (TPH-RRO), lead, and cadmium.

Based on the laboratory results, all of the COPC were detected at concentrations below the respective HDOH Tier 1 Environmental Action Levels (EALs) based on commercial/industrial land use or unrestricted land use. The State of Hawai'i Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) office subsequently issued a "No Further Action (NFA)" determination for the MPC Seed Treatment Plant on August 26, 2011. Therefore, this finding is not considered a current recognized environmental condition.

2. The north-central portion of the subject property was also identified as a former agricultural dump site, prior to its use as the Maui Pineapple Company Seed Treatment Plant. Following the removal of the seed treatment plant and associated environmental investigations in 2011, subsurface investigation of the former agricultural dump site was conducted. The said investigation included the excavation of exploratory trenches which identified a top layer of broken glass, scrap metal, and other wastes including asbestos-containing materials (ACM). A layer of burned material was discovered beneath this top layer of waste materials/ACM. Samples collected from the burn layer

were analyzed for organochlorine pesticides, dioxin, Polynuclear Aromatic Hydrocarbons (PAHs), arsenic, and lead.

Based on the laboratory results, only lead was identified at concentrations above the established Tier 1 Environmental Action Levels (EAL). Asbestos- and lead-impacted soils across the site were excavated in various stages, until confirmation soil sampling and analysis showed that asbestos and lead concentrations were below the respective regulatory levels of 1% asbestos and 200 milligrams per kilogram (mg/kg) lead. The State of Hawai'i Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) office subsequently issued a "No Further Action (NFA)" determination for the former agricultural dump site on June 8, 2017.

This finding is considered a historical recognized environmental condition because there is evidence of past releases of ACM and lead at the former agricultural dump site on the subject property. However, following remediation activities and confirmation soil testing, the site received a NFA determination from the HDOH, HEER Office. Therefore, this finding is not considered a current recognized environmental condition. Although no further action is recommended, future excavation activities should be monitored for evidence of potential buried waste materials.

As discussed in Section 2.1.2 (Topography and Soils) of this Draft EIS — Ford Canty & Associates, Inc. also reviewed historical aerial photographs and tax assessment records indicating that the subject property was formerly used as agricultural land to grow sugar cane, from at least 1947 until the 1990s.

Potential Impacts and Mitigation Measures. The ESA found no evidence of recognized environmental conditions in connection with the property. Additionally, Ford Canty & Associates, Inc. concluded that the two (2) historic findings are not considered a current recognized environmental condition and no further action is recommended. However, it is recommended that future excavation activities should be monitored for evidence of potential buried waste materials. This recommendation is relating to the former use of agricultural chemicals such as herbicides and pesticides on cane fields that may be an environmental concern — and the HDOH recommends that sites where pesticides were regularly applied be evaluated for residual contamination prior to re-development.

The Phase II ESA concluded that soil surfaces at the Project Site do not appear to be impacted with chemicals of potential concern (COPC). No impacts from hazardous substances are anticipated at the site based on the conclusions of the Phase I and II ESA reports. Although no further action is recommended, future excavation activities should be monitored for evidence of potential buried waste materials. (See: Appendices 6 and 7)

2.1.6 Flora and Fauna

This section describes the existing flora (botanical) and fauna resources on the Project Site, and the potential adverse impacts associated with implementation of the Proposed Project. A consultation with the United States Fish and Wildlife Service (USFWS) is conducted prior to the publication of this Draft EIS. The recommendations provided by the USFWS are included within the analysis of compliance with all Federal, State, and local regulations and policies regarding flora and fauna resources. This section is primarily based upon the following documentation:

- *Botanical and Fauna Surveys Windward Hotel Development Project, Kahului Maui*, prepared by Robert W. Hobdy (Environmental Consultant), dated August 2017 (refer to Appendix 8, “Botanical & Fauna Survey”);
- *Letter from the U.S. Fish and Wildlife Service to Sean O’Keefe (Alexander & Baldwin, Inc.)*, prepared by Paul Henson, Ph.D., United States Department of the Interior, Fish and Wildlife Service, Pacific Islands Fish and Wildlife Office, dated May 21, 2003 (refer to Appendix 9, “USFWS Acceptance Letter May 2003”);
- *Blackburn’s Sphinx Moth and Tobacco Tree Survey*, prepared by Robert W. Hobdy (Environmental Consultant), dated December 17, 2018 (refer to Appendix 10, “Blackburn’s Sphinx Moth Survey”);
- *Nēnē Goose Survey*, prepared by Robert W. Hobdy (Environmental Consultant), dated October 16, 2020 (refer to Appendix 11, “Nēnē Survey”); and
- *Letter from the U.S. Fish and Wildlife Service to Ms. Tara Furukawa (County of Maui Department of Planning)*, prepared by Michelle Bogardus (United States Department of the Interior, Fish and Wildlife Service, Pacific Islands Fish and Wildlife Office, dated October 15, 2019 (refer to Appendix 3, “Comment Letters with Responses”).

Existing Conditions. Rainfall at the Project Site averaged 20 (twenty) inches per year. The existing site contains sparse shrub growth. As noted, the site was previously disturbed for intensive sugarcane cultivation for several decades. During a Botanical Survey conducted by Robert W. Hobdy, seven species were most common throughout the Project Site,

buffelgrass (*Cenchrus ciliaris*), swollen fingergrass (*Chloris barbata*), Bermuda grass (*Cynodon dactylon*), coat buttons (*Tridax procumbens*), four-spiked heliotrope (*Heliotropium procumbens*), creeping indigo (*indigofera spicata*) and uhaloa (*Waltheria indica*). Three species occurring on the site were indigenous, native plants. None of these species were found to be of environmental concern, and all are common in Hawai'i. Those species include, uhaloa (*Waltheria indica*), kipukai (*Heliotropium curassavicum*), and popolo (*Solanum americanum*).

As noted in the Botanical Survey Report, “No Federally listed Threatened or Endangered species (USFWS, 2017) were found on the property nor were any found that are candidates for such status. No special habitats were found on the property either.” (See: Appendix 8).

The previous petitioner (A&B) submitted a tree tobacco shrub removal plan to USFWS dated February 5, 2003, that was accepted via letter dated May 21, 2003. The USFWS letter determined that the mitigation measures provided are unlikely to result in violations of Section 9 of the Endangered Species Act. (See: Appendix 9). The Applicant will distribute the DEIS to the USFWS for an additional opportunity to comment on this Proposed Project.

Potential Impacts and Mitigation Measures. Since no species determined to be especially rare, Threatened, Endangered or candidates for listing as Threatened or Endangered were identified within the Project Site, and no special habitats were identified within the Project Site, it is anticipated that the Proposed Action will not result in a significant impact to Terrestrial Biota.

To control bird nesting or occupation of insects, pest, or wildlife infestation to minimize hazards to aircraft operation — A&B has consulted with the County of Maui regarding utilizing the existing drainage basins adjacent to the South Project Area for open area recreational use by a private entity (related correspondences concerning this matter were included in the 2010 annual report). Alternatively, the basins will be maintained by the project's owner's association. The future use of these existing drainage basins will incorporate the provisions of the Decision and Order.

On December 15, 2018, Mr. Robert W. Hobdy — the environmental consultant on Maui — visited the Kahahā Hotel Development Project site in Kahului, Maui to conduct a Blackburn's sphinx moth and tree tobacco survey. This survey, following up on an August 2017 flora and fauna survey and assessment of this project area, was requested by the U.S.

Fish and Wildlife Service to evaluate the current presence or absence of the Endangered Blackburn's sphinx moth and its associated tree tobacco host plant.

The 2017 survey found two six-foot-tall tree tobacco plants growing along the eastern boundary fence with the Airport Access Road corridor. No Endangered Blackburn's sphinx moths, their eggs or their larvae were found on these plants at that time.

This current survey involved a careful inspection of the entire Kahahā Hotel Development project area. No tree tobacco plants of any size were found growing on the property at this time. Blackburn's sphinx moths have very specialized relationships with certain plants in the tobacco family, and without these special host plants they are unable to reproduce and survive and they are therefore not presently attracted to the area. As of this date there are no concerns regarding the Blackburn's sphinx moth on the Kahahā Hotel Development project. (See: Appendix 10)

It should be noted that the Project's Concept Landscape Plan does include a significant area of native species planting selected from the Maui County Planting Plan for their tolerance to environmental conditions within the Project's vicinity. (See: Appendix 2)

In response to comments from the Department of Fish and Wildlife Management, On October 16, 2020, Mr. Hobdy visited the Kahahā Hotel Development Project site in Kahului, Maui to conduct a Nēnē goose survey. The purpose of the survey was to verify the reported presence of a family of Nēnē geese living on the subject property and to assess the habitat with regards to the likelihood of Nēnē to occur within the subject property. The survey involved a thorough inspection of the Kahahā Hotel Development project area.

The inspection involved the search of tracks, droppings, or the remains of former nesting sites of the federally endangered Nēnē. The survey found no presence of Nēnē nor evidence of any sign of these geese on the project area. Nēnē usually prefer to gather and nest near wetland reservoirs and irrigated landscapes where feed is plentiful. Nēnē are widespread in open lands and can show up almost anywhere on Maui.

The project area has the physical characteristics of a desert. The land on the project area is heavily disturbed. The soil is well-drained and does not retain surface water. The vegetation is usually thin and dried. Kahahā Pond Wildlife Sanctuary — approximately 2,000 feet from the project area — and other wet habitats nearby are more likely to attract Nēnē.

However, there is no food, water, nor nesting resources in the project area that would attract Nēnē to land, spend time, or live on the project area. Therefore, the report concluded that the Kahahā Hotel Development project area is not the preferred habitat of Nēnē. (See: Appendix 11)

Despite the foregoing, the Proposed Project will follow guidelines of avoidance and minimization measures as listed in the letter from USFWS dated October 15, 2019, for the Proposed Project. In the event that any of the nine (9) federally listed animal species entering the Project Site — i.e., the federally threatened Newell’s shearwater (*Puffinus auricularis newelli*), and endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), Hawaiian petrel (*Pterodroma sandwichensis*), Band-rumped storm-petrel (*Oceanodroma castro*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Hawaiian coot (*Fulica alai*), Hawaiian common gallinule (*Gallinula galeata sandvicensis*), Hawaiian duck (*Anas wyvilliana*), and Blackburn’s sphinx moth (*Manduca blackburni*) — the following are the avoidance and minimization measures recommended by USFWS to be complied with. (See: Appendix 3)

Hawaiian hoary bat. “... To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend incorporating the following applicable measures into your project description:

- Do not disturb, remove, or trim woody plants greater than 15 feet tall during the bat birthing and pup rearing season (i.e., June 1 through September 15); and
- Do not use barbed wire for fencing.”

Hawaiian petrel, Band-rumped storm-petrel, and Newell’s shearwater. “... To avoid and minimize potential project impacts to seabirds we recommend you incorporate the following applicable measures into your project description:

- Fully shield all outdoor lights so the bulb can only be seen from below bulb height and only use when necessary;
- Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area; and
- Avoid nighttime construction during the seabird fledging period, September 15 through December 15.”

Hawaiian waterbirds. “Listed Hawaiian waterbirds are found in fresh and brackish-water marshes and natural or manmade ponds. Hawaiian stilts may also be found wherever

ephemeral or persistent standing water may occur. Threats to these species include non-native predators, habitat loss, and habitat degradation. Hawaiian ducks are also subject to threats from hybridization with introduced mallards.

- *... Hawaiian stilt is known to nest in sub-optimal locations (e.g., any ponding water), if water is present. Hawaiian waterbirds attracted to sub-optimal habitat may suffer adverse impacts, such as predation and reduced reproductive success, and thus the project may create an attractive nuisance. Therefore, we recommend you work with our office during project planning so that we may assist you in developing measures to avoid impacts to listed species (e.g., fencing, vegetation control, predator management)."*

Blackburn's sphinx moth. *"If no Blackburn's sphinx moth, aiea, or tree tobacco are found during surveys, it is imperative that measures be taken to avoid attraction of Blackburn's sphinx moth to the project location and prohibit 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 Blackburn's sphinx moth. We therefore recommend that you:*

- *Remove any tree tobacco less than 3 feet tall.*
- *Monitor the site every 4-6 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."*

In addition, the USFWS also recommended the following for landscaping, through the letter dated October 15, 2019, for the Proposed Project. (See: Appendix 3)

Native Plants for Landscaping. *"Where disturbed areas do not need to be maintained as an open area, restore disturbed areas using native plants as appropriate for the location. Whenever possible we recommend using native plants for landscaping purposes."*

The Proposed Project incorporates at least nine (9) native plants into the landscaping plan, i.e., Kukui Tree, Loulu Tree, Hala Tree, Kamani Tree, Naupaka, Pōhinahina, Kalo, Naio, and Ma'o. The total area of proposed native shrub and groundcover plant material to be installed at the proposed Kānaha Hotel site will total approximately 30,000 square feet. This represents approximately half of the total project installed landscape area. These

native Hawaiian species will have lower water requirements, will increase native plant biodiversity and also have historical ethnobotanical importance to Hawaiian culture. (See: Appendix 2)

2.1.7 Air Quality

This section addresses the air emissions generated by the construction and operation of the Proposed Project, and the short-term and long-term potential impacts to air quality. The analysis also includes the mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. This section is primarily based on the *Air Quality Study for the Proposed Kahahā Hotel Project, Kahului, Maui, Hawai'i*, prepared by B.D. Neal & Associates, dated March 2021 (refer to Appendix 12, “Air Quality Study”).

Existing Conditions. An Air Quality Study was prepared by B.D. Neal & Associates — examining the potential short- and long-term air quality impacts that could occur because of project construction and use — and suggests mitigation measures to reduce any potential air quality impacts where possible and appropriate (See: Appendix 12).

Ambient concentrations of air pollution are regulated by both national and state Ambient Air Quality Standards (AAQS). National AAQS are specified in Section 40, Part 50 of the Code

of Federal Regulations (CFR), while State of Hawai'i AAQS are defined in Chapter 11-59 of the Hawai'i Administrative Rules (HAR). The national AAQS are reviewed periodically, and multiple revisions have occurred over the past 30 years. The national and state AAQS have been established for particulate matter, sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, and lead. The state has also set a standard for hydrogen sulfide.

National AAQS are stated in terms of both primary and secondary standards for most of the regulated air pollutants. The purpose of the national primary standards is to protect the public health with an “adequate margin of safety”. Whereas the national secondary standards define air quality necessary to protect levels of air quality necessary to protect the public welfare from “any known or anticipated adverse effects of a pollutant”. Secondary public welfare impacts may include such effects as decreased visibility, diminished comfort levels, or other potential injury to the natural or man-made environment, e.g., soiling of materials, damage to vegetation or other economic damage. In contrast to the national AAQS, Hawaii State AAQS are given in terms of a single standard that is designed “to

protect public health and welfare and to prevent the significant deterioration of air quality".

Each of the regulated air pollutants has the potential to create or exacerbate some form of adverse health effect or to produce environmental degradation — when present in sufficiently high concentration for prolonged periods of time. The AAQS specify a maximum allowable concentration for a given air pollutant for one or more averaging times to prevent harmful effects. Averaging times vary from one hour to one year — depending on the pollutant and type of exposure necessary to cause adverse effects. In the case of the short-term (i.e., 1- to 24-hour) AAQS, both national and state standards allow a specified number of exceedances each year.

In general, the national AAQS have become more stringent with the passage of time and as more information and evidence become available concerning the detrimental effects of air pollution. Changes to the Hawai'i AAQS over the past several years have tended to follow revisions to the national AAQS, making several of the Hawai'i AAQS the same as the national AAQS.

Regional and local climatology significantly affect the air quality of a given location. Wind, temperature, atmospheric turbulence, mixing height and rainfall all influence air quality. Most differences in regional and local climates within the state are caused by the mountainous topography. Maui lies well within the belt of northeasterly trade winds generated by the semi-permanent Pacific high-pressure cell to the north and east. Because the Project Site is located near the northern side of the valley between Haleakalā and the West Maui Mountains, the predominant trade wind flow tends to be channeled through the area from north to south by the terrain to the east and west. Local winds such as land/sea breezes and/or upslope/downslope winds also influence the wind pattern for the area when the trade winds are weak or absent. During winter, occasional strong winds from the south or southwest occur in association with the passage of winter storm systems.

The climate of the project area is moderately dry due to the low elevation. Historical records from Kahului show that this area of Maui averages about 16 inches of precipitation per year with the summer months being the driest.

Existing air quality in the project area is mostly affected by air pollutants from vehicular, industrial, natural and/or agricultural sources. The largest sources of air pollution in the immediate project area are most likely airport operations and automobile traffic using local

roadways. Emissions from these sources consist primarily of particulate, hydrocarbons, carbon monoxide and nitrogen oxides. The Kahului Power Plant, which is located about 1 mile to the west, emits mostly sulfur dioxide, nitrogen oxides and particulate. Volcanic emissions from distant natural sources on the Big Island also affect the air quality at times during Kona wind conditions. By the time the volcanic emissions reach the project area, they consist mostly of fine particulate sulfate.

The State Department of Health operates a network of air quality monitoring stations at various locations around the state, but only limited data are available for Maui Island. Concentrations at Kahului for the period 2014 to 2018 were similar but slightly lower. Given the limited air pollution sources in the area, it is likely that air pollution concentrations are near natural background levels most of the time, except possibly for locations adjacent to agricultural operations or near traffic-congested intersections. With the cessation of sugarcane cultivation in 2017, it is likely that air quality has improved. Present concentrations of carbon monoxide in the project area are estimated later in this study based on computer modeling of motor vehicle emissions. (See: Appendix 12).

Potential Impacts and Mitigation Measures. Air quality impacts attributed to the Proposed Project could include dust generated by construction-related activities. Site work, such as, grubbing, grading, and building construction, could generate airborne particulate. Adequate dust control measures that comply with the provisions of Hawai'i Administrative Rules — Chapter 11-60.1, “Air Pollution Control,” Section 11-60.1-33, Fugitive Dust — will be implemented throughout the construction phase.

Short- and/or long-term impacts on air quality will occur either directly or indirectly because of project construction and use.

Short Term Impacts of The Proposed Project

Short-term direct and indirect impacts on air quality could potentially occur due to project construction. For a project of this nature, there are two potential types of air pollution emissions that could directly result in short-term air quality impacts during project construction, i.e., (1) fugitive dust from vehicle movement and soil excavation activities; and (2) exhaust emissions from on-site construction equipment. Indirectly, there also could be short-term impacts from slow-moving construction equipment traveling to and from the Project Site, from a temporary increase in local traffic caused by commuting construction workers, and from the disruption of normal traffic flow caused by roadway lane closures.

State of Hawai'i Air Pollution Control Regulations prohibit visible emissions of fugitive dust from construction activities at the property line. Thus, an effective dust control plan for the project construction phase is essential. Fugitive dust emissions can be controlled to a large extent by implementing the following types of mitigation measures:

- Erecting a dust fence to shield the adjacent Project Sites;
- Establishment of a frequent watering program to keep bare-dirt surfaces in construction areas from becoming significant sources of dust;
- In dust-prone or dust-sensitive areas, measures include limiting the area that can be disturbed at any given time, applying chemical soil stabilizers, and mulching and/or using wind screens;
- Open-bodied trucks to be always covered during the transportation of materials that could become airborne;
- Road cleaning or tire washing as a form of dust control since the haul trucks tracking dirt onto paved streets from unpaved areas; and
- Paving of parking areas and/or establishment of landscaping as early in the construction schedule as possible can also lower the potential for fugitive dust emissions.

On-site mobile and stationary construction equipment will also emit air pollutants from engine exhausts. The largest of this equipment is usually diesel-powered. Over the longer term of operation, models analyzed in the Air Quality Study indicate that air quality in the vicinity will improve — not by any direct result of the Proposed Action, but due to vehicle technology advances in emission control and the retirement of older less efficient vehicles. Carbon monoxide emissions from diesel engines are low and should be relatively insignificant compared to vehicular emissions on nearby roadways.

Long-Term Impacts of The Proposed Project

After construction is complete, use of the proposed facilities may result in increased motor vehicle traffic in the project area, potentially causing long-term impacts on ambient air quality. Motor vehicles with gasoline-powered engines are significant sources of carbon monoxide. They also emit nitrogen oxides and other contaminants.

Existing background concentrations of carbon monoxide in the project vicinity are believed to be at low levels. Thus, background contributions of carbon monoxide from sources or

roadways not directly considered in the analysis were accounted for by adding a background concentration of 0.5 ppm to all predicted concentrations for 2019. Although increased traffic is expected to occur within the project area within the next few years with or without the project, background carbon monoxide concentrations may not change significantly since individual emissions from motor vehicles are forecast to decrease with time. Hence, a background value of 0.5 ppm was assumed to persist for the future scenarios studied.

After construction, motor vehicles coming to and from the proposed development will result in a long-term increase in air pollution emissions in the project area. To assess the impact of emissions from these vehicles, a computer modeling study was undertaken — to estimate current ambient concentrations of carbon monoxide at intersections in the project vicinity and to predict future levels both with and without the Proposed Project.

During worst-case conditions, model results indicated that existing 1-hour and 8-hour carbon monoxide concentrations are well within both the state and the national Ambient Air Quality Standards (AAQS).

In the year 2024 without the project, worst-case carbon monoxide concentrations were predicted to decrease (improve) slightly despite an increase in traffic, and concentrations would remain well within standards. This is because emissions from increase in traffic will be more than offset by the retirement of older, more polluting vehicles over time.

Due to the negligible impact the project is expected to have, implementing mitigation measures for long-term traffic related air quality impacts is probably unnecessary and unwarranted. (See: Appendix 12)

Depending on the demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal requirements. Renewable energy sources, if developed, could reduce these emissions substantially. Incorporating energy conservation design features and promoting energy conservation programs within the proposed hotel could also serve to reduce any associated emissions. Presently, all solid waste on Maui is landfilled, and any associated air pollution emissions are relatively negligible. Nevertheless, promoting conservation and recycling programs within the proposed hotel could serve to further reduce any associated impacts.

2.1.8 Noise Quality

This section evaluates noise source impacts on-site and to surrounding land uses as a result of implementation of the Proposed Project. This section evaluates existing and potential noise impacts including aircraft, traffic, and short-term construction-related impacts. Mitigation measures are also recommended to avoid or lessen the project's noise impacts. Information in this section is primarily based on the *Acoustic Study for the Kānahā Hotel at Kahului Airport, Maui, Hawai'i*, prepared by Y. Ebisu & Associates, dated April 2021 (refer to Appendix 13, "Acoustic Study").

Existing Conditions. At the Project Site existing noise is primarily generated by vehicular traffic, air travel from Kahului Airport, heavy machinery, construction activities, and heating and cooling systems. The ramifications of various activities and their corresponding sound levels may impact health conditions and the physical or sensory appeal of an area.

An Acoustic Study (June 2019 and updated in April 2021) was prepared by Y. Ebisu & Associates to describe the existing and future traffic noise levels in the environs of the proposed hotel. Traffic noise level increases and impacts associated with the Proposed Project were determined within the Project Site and along public roadways servicing the development. The Acoustic Study assumes the Proposed Project will be built out in 2025. (See: Appendix 13)

The existing traffic noise levels at ground level along the perimeter of the proposed hotel building vary from levels of approximately 55 DNL at the southwest corner, to 57 to 58 DNL along the north sides.

The existing aircraft noise levels were measured onsite on August 17, 2017. Because the Kānahā hotel site is located southwest of the south end of the main runway 2/20 — the noisier jet aircraft typically fly to and from the airport on a north-south flight track aligned to the main airport runway which is located northeast of the hotel site. Tour helicopters arriving from the west may fly over the Project Site while landing at the tour helicopter pads which are located east of the main runway 2/20.

During typical trade wind conditions, the noisier fixed wing jet aircraft land on the main Runway 2 from the south and depart seaward towards the north. During Kona wind

conditions — occur approximately twelve (12) percent of the time — the noisier jet aircraft departures leave the airport via Runway 20 heading south and are the loudest aircraft noise events.

At the measurement site, the loudest aircraft noise events were overhead tour helicopters landing at their facility northeast of the Project Site. Their measured noise levels were like those expected during commercial and private jet aircraft departures toward the south during Kona wind conditions. The noisier military jet aircraft can produce higher noise levels, but they number less than two (2) percent of all aircraft noise events.

The Project Site is located adjacent to the Kahului Airport and based on previously published calendar year (CY) 1993 and 1998 14 CFR Part 150 aircraft noise contours for Kahului Airport — the Project Site is affected by the 65 DNL to 75 DNL noise contours. The Acoustic Consultant estimates that current, CY 2019 aircraft noise levels on the Project Site ranges between 60 and 65 DNL.

Potential Impacts and Mitigation Measures.

Traffic Noise. The increases in traffic noise levels attributable to the project from the present to CY 2025 are predicted to range from 0.0 to 1.9 DNL along the roadways in the immediate vicinity of the project. Except for traffic volumes associated with project traffic on Lauo Loop, future project traffic on the Airport Access Road, Haleakalā Highway, and Hāna Highway — should not cause traffic noise levels to increase by more than 0.5 DNL. These increases in traffic noise levels — attributable to the project — are in the insignificant category. These increases of 0.5 DNL or less will be difficult to measure or perceive.

Along Lauo Loop, traffic noise increases resulting from the project are predicted to be 3.1 DNL — attributable to the exceptionally low existing traffic volumes (and noise levels) on that roadway. Even with the projected increases in future traffic noise levels along Lauo Loop — the 65 DNL contour should not extend beyond 23 feet from the centerline of Lauo Loop. Future traffic noise levels at the proposed hotel should not exceed 61 DNL by 2025. For these reasons, traffic noise impacts resulting from project traffic are not expected — and traffic noise mitigation measures should not be required.

Aircraft Noise. Based on the official 14 CFR Part 150 noise contours for 1993 and 1998 — aircraft noise mitigation measures should be included in the exterior envelope of the

proposed hotel building. An interior noise level of 45 DNL is recommended for noise sensitive occupancies and for exterior aircraft noise levels of 70 to 75 DNL. A minimum exterior-to-interior noise reduction of 30 dBA is recommended. This amount of noise reduction should provide a safety margin of at least 10 dBA above that — would be recommended for the estimated existing aircraft noise levels of 55 to 65 DNL over the Project Site. Normally, the use of closure and air conditioning within a building should provide approximately 20 dBA of exterior-to-interior noise reduction.

To achieve the minimum 30 dBA noise reduction goal for aircraft noise events — the following acoustical treatments are recommended to the exterior envelope of the Kanahele Hotel building adjoining the guest suites. The use of 1" laminated, insulating glass (1/4" laminated glass + 1/2" air + 3/16" glass) with STC 39 rating; the use of a roof assembly with minimum STC 42 rating; and EFS exterior walls with minimum STC 47 rating are the recommended acoustical properties of these major exterior components.

The exterior glazed areas should be limited to not exceed 25 percent of the exterior wall area — unless the use of glazing with higher STC ratings is possible. If a metal deck roof is used, additional construction elements (drywall furring, resilient clips, plus insulation) will be required — due to the lower surface weight of the metal roof panels. Commercial or common areas of the hotel should not require special noise attenuation measures other than those typically available from closure and air conditioning.

Construction Noise. Audible construction noise will probably be unavoidable during the entire project construction period. It is anticipated that the actual work will be moving from one location on the Project Site to another during the construction period. Actual length of exposure to construction noise at any receptor location will probably be less than the total construction period for the entire project.

The closest noise sensitive property — which may experience noise during construction activities on the Project Site — is the Courtyard by Marriott approximately 1,500 feet to the west. Predicted construction noise levels at the Courtyard are relatively low at 50 to 58 dBA — during the noisier site preparation phase of the work.

Existing lands located within 150 to 1,000 feet north and northwest of the project construction site are occupied by commercial and light industrial establishments. Lands to the east and south are primarily vacant or in airport use. Risks of adverse construction noise impacts at these locations should be relatively low.

Adverse impacts from construction noise are not expected to be in the "public health and welfare" category — due to the temporary nature of the work and due to the administrative controls available for its regulation. Instead, these impacts will probably be limited to the temporary degradation of the quality of the acoustic environment in the immediate vicinity of the Project Site.

Mitigation of construction noise to inaudible levels will not be practical in all cases — due to the intensity of construction noise sources (72 to 80+ dBA at 150 FT distance) and the exterior nature of the work (grading and earth moving, trenching, concrete pouring, hammering, etc.).

The use of properly muffled construction equipment should be required on the job site. The incorporation of State Department of Health construction noise limits and curfew times — applicable on the island of Maui — is another noise mitigation measure which will be applied to this project.

Notwithstanding this, the project will comply with State Department of Health noise regulations for construction activities. As stipulated by Department of Health permit requirements, noise-generating construction activities are not allowed on Sundays and holidays, during the early morning, and during the late evening and nighttime periods.

2.1.9 Historical and Archaeological Resources

The purpose of this section is to determine if historical and archaeological resources occur within the Project Site and to assess the significance of such resources, as well as if any necessary mitigation measures are recommended. Information in this section is based on the following documentation:

- *An Archaeological Assessment for the Windward Hotel Project, Kahului, Wailuku Ahupua'a, Wailuku District, Island of Maui, Hawaii'i*, prepared by Chonnikarn Kehajit, B.A., and Michael F. Dega, Ph.D., of the Scientific Consultant Services, Inc., dated June 2018 (refer to Appendix 14.1, "Archaeological Assessment");

- *SHPD Letter about Chapter 6E-42 Historic Preservation Review*, prepared by Alan S. Downer, PhD (State of Hawai'i, Department of Land and Natural Resources, State Historic Preservation Division) for Glen Ueno (County of Maui, Department of Public Works) dated July 20, 2020 (refer to Appendix 14.2, "SHPD Letter dated July 20, 2020).
- *Supplemental Archaeological Assessment Report for the Kahahā Hotel at Kahului Airport*, prepared by Amanda Ruberti, M.A., Napali Souza, B.A., and Tanya Lee-Greig, M.A., of the 'Āina Archaeology, dated April 29, 2021 (refer to Appendix 15.1, "Supplemental Archaeological Assessment"); and
- *SHPD Letter about Chapter 6E-42 Historic Preservation Review*, prepared by Alan S. Downer, PhD (State of Hawai'i, Department of Land and Natural Resources, State Historic Preservation Division) for Michele Chouteau McLean (County of Maui Planning Department) dated October 12, 2021 (refer to Appendix 15.2, "SHPD Letter dated October 12, 2021).

Existing Conditions. The Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. In May of 2013, the Department of Land & Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

For the proposed hotel project, the Applicant retained Scientific Consultant Services (SCS) to conduct an archaeological inventory survey with subsurface testing at the project site. The purpose of this study was to determine the presence/absence of historically significant archaeological midden, deposits, and/or artifact deposits on the surface of the parcels and to assess the potential for the presence of significant subsurface cultural deposits. (**See:** Appendices 14.1 and 14.2). The study did not identify historically significant sites within the project parcel and was therefore submitted as an Archaeological Assessment to SHPD for review.

In response to comments on the Archaeological Assessment from the SHPD, 'Āina Archaeology was consulted to prepare a Proposed Supplemental Archaeological Inventory Survey Subsurface Testing Plan dated November 2020 for the Proposed Project. The plan includes the following actions:

- Excavations with a maximum depth expected to be 10 feet where the sewage manhole is located — for the construction of a swimming pool, a manhole for sewage services, a fire pump room, an underground fire water tank, and two elevator pits;

- Excavations with depths range between 6 to 8 feet — for the remaining construction; and
- Additional seven (7) mechanically assisted test excavation units (BTs) placed in areas sustaining the deepest ground disturbance during construction — to supplement the previous archaeological work.

Excavation will cease if C horizon or bedrock is reached prior to the planned minimum depths. Upon reaching C horizon, excavation will cease if a minimum of 2 feet of sterile soil is reached. The proposed testing strategy will provide adequate information to characterize the upper 2 feet of the overall project area stratigraphy — also to identify the presence or absence of historically significant subsurface cultural deposits within the construction footprint of the Proposed Project.

After approval of the Testing Plan, 'Āina Archaeology prepared a Draft Archaeological Assessment Report for the Kahahā Hotel at Kahului Airport dated April 29, 2021, that includes a variety of documentary research methods and field methods specifically regarding areas of deep excavation. The field methods include pedestrian survey and subsurface testing.

Potential Impacts and Mitigation Measures. The archaeological assessment of the project area was conducted by SCS with trenching. No traditional or historic sites were identified in surface or subsurface contexts during fieldwork. Based on the negative findings and that the project area is within an existing built environment, no further archaeological work is recommended for the proposed hotel project. (See: Appendix 14)

In response to comments on the Archaeological Assessment from the SHPD, The Applicant retained 'Āina Archaeology to prepare a Supplemental Archaeological Assessment Report dated April 29, 2021, for the Proposed Project. (See: Appendix 15.1) The results of the Survey include the following.

The pedestrian survey revealed no visible archaeological features, historic properties, or formal artifacts. A low density of cultural material was identified including three false brain coral fragments, two unidentifiable marine shell fragments, and three possible historic ceramic fragments (porcelain). However, the surface of the project area consists of imported fill containing clam shells commonly found in soils taken from areas of irrigation ditches and reservoirs associated with plantation water control systems in central Maui. This suggests that the cultural material found is not contextually related to the project area.

Additionally, the two identified marine shells were visible for only a portion of the day until strong winds blew them away. The marine shells were unable to be relocated, further suggesting that cultural material identified during the pedestrian survey are secondary deposits and are not related to any surface or potentially subsurface historic properties and/or cultural deposits.

The subsurface survey utilized nine (9) mechanically assisted test excavation units (BTs) placed in locations that will sustain the greatest amount of ground disturbance during construction including a swimming pool, a manhole for sewage services, a fire pump room, underground chambers for storm water quality control, and two elevator pits.

The Draft Archaeological Assessment Report's Summary and Interpretation concludes that:

“Due to the presence of a fairly shallow topsoil that is primarily comprised of imported fill and its location on top of a layer of decomposing bedrock, it is highly unlikely that any historically significant subsurface cultural deposits are present within the current project area.”

The report's Recommendations state:

“The pedestrian survey and subsurface testing revealed no evidence of potentially significant historical properties within the project area. Additionally, due to the nature of the soil located within the project area it is highly unlikely that any potentially significant historical properties exist subsurface. As such, no further archaeological work is recommended.”

Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021),

SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (**See:** Appendix 15.2).

2.1.10 Visual Resources

This section assesses the potential for visual resources impacts from the implementation of the Proposed Project. The information in this section is primarily based on the following documentation:

- *Scenic Resources Study Map*, prepared by Maui Coastal Scenic Resources Study, dated August 31, 1990 (refer to Figure 19, “Scenic Resources Study Map”);
- *Kānāhā Hotel Photo Simulations*, prepared by Interacta Inc., dated May 13, 2021 (refer to Appendix 16, “View Analysis”).

Existing Conditions. The Project Site is in Kahului adjacent to the Kahului Airport and major roadways (i.e., the Kahului Airport Access Road and Haleakalā Highway). Elevations on the Project Site range from 28.5 feet above mean sea level (AMSL) to approximately 34 feet AMSL. The Project Site lies between the Airport to the north and east, existing light industrial and commercial development to the west of the site and the Kahului Airport Access Road defines the southern boundary of the site (See: Figure 1, “Location Map”).

Scenic resources include view corridors over the Project Site to Haleakalā and the West Maui Mountains do exist from different roadway locations abutting the Project Site.

Potential Impacts and Mitigation Measures. The Maui Coastal Scenic Resources Study (August 31, 1990) was prepared by Environmental Planning Associates, Inc. on behalf of the Maui Planning Department. The proposed Kānāhā Hotel is in an area which is largely characterized by urban development with views towards Haleakalā and the West Maui Mountains (See: Figure 19, “Scenic Resources Study Map”).

The proposed hotel building sections vary from one (1), two (2), and four (4) stories in height and will be massed towards the center of the Project Site with generous setbacks on all sides accommodating the width of a landscape buffer, the width of two parking stalls and a parking lot drive isle. Landscape planting will be used to screen the building where possible and to provide visual context in blending the massing of the building to the site and surrounding environs.

At the request of the Maui County Planning Department a view analysis was prepared by Interacta Inc. (See: Appendix 16). The view analysis involves photo simulations that were developed using Interacta’s methodology process that integrates input from aerial

photograph, topographical map, architectural drawings, landscape design, and on-site photographs to produce 3D site rendering that creates an accurate and comprehensive representation of the Proposed Project. While the proposed development will have an impact on views across the site, in the context of its undeveloped condition, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity.

At the request of a member of the public identified as Ms. Linda Kim through her comment letter dated August 07, 2019, this DEIS is to clearly indicate that the Urban Design Review Board (UDRB) previously reviewed the visual analysis study for the Maui Business Park Phase II and not the Kahahā Hotel (previously known as the Windward Hotel at the time of the comment letter). However, the proposed project will eventually be reviewed by Maui UDRB.

The project will set forth building height limits and setbacks to help maintain views towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kahahā Hotel will provide view corridors in between buildings toward Haleakalā.

Regarding design, the Proposed Project will complement the high-quality architectural character as other developed properties in the area. The Kahahā Hotel is being designed to control the density, architectural design, and variation of all buildings in the project without sacrificing views or the aesthetic character of the Proposed Project.

As noted, portions of the hotel are one-story, two-story, and four-story with elevator towers will be setback from Haleakalā Highway to maintain public views towards the summit of Haleakalā from Haleakalā Highway and views of the West Maui Mountains from the Airport Access Road and Haleakalā Highway. Overall urban design of the project will position buildings fronting landscaped roadways to screen the massing of the buildings.

All buildings within the Kahahā Hotel will be designed in accordance with the applicable Maui County building code standards.

2.1.11 Agricultural Resources

The purpose of this section is to evaluate existing agricultural resources within the Project Site and the potential impacts of the Proposed Project to such resources. Analysis in this

section is primarily based on the following documentation:

- *Land Study Bureau Map*, prepared by the University of Hawai'i, Land Study Bureau (LSB), dated 1967 (refer to Figure 17, "Land Study Bureau Map");
- *Agricultural Lands of Importance to the State of Hawai'i (ALISH)*, prepared by State of Hawai'i, Department of Agriculture, dated 1977 (refer to Figure 18, "Agricultural Lands of Importance to the State of Hawai'i Map"); and
- Final EIS for the Maui Business Park Phase II, TMK 3-8-01: 2 (portion), 3-8-06: 4 (portion), and 3-8-79: 13, prepared by PBR Hawai'i, dated December 2004.

Existing Conditions. The Project Site is in an urban subdivision where the lots have previously been graded and improved with roadways, water meters, and underground utilities. The property is in the State Urban District, the County's M-1, Light Industrial Zoning District, and is designated for Light Industrial (LI) use by the Wailuku-Kahului Community Plan.

In 1967 The University of Hawai'i, Land Study Bureau (LSB), developed the Overall Productivity Rating, which classifies soils according to five (5) levels, ranging from "A", representing the class of highest productivity soils, to "E", representing the lowest.

The lands underlying the Project Site are classified as "A", or the class of highest productivity soils suited for agricultural production. (**See:** Figure 17, "Land Study Bureau Map").

ALISH. In 1977, the State Department of Agriculture developed a classification system to identify Agricultural Lands of Importance to the State of Hawai'i (ALISH). The classification system is based primarily, although not exclusively, upon the soil characteristics of the lands. The three (3) classes of ALISH lands are: "Prime", "Unique", and "Other", with all remaining lands termed "Unclassified". When utilized with modern farming methods, "Prime" agricultural lands have a soil quality, growing season and moisture supply necessary to produce sustained crop yields economically. "Unique" agricultural lands possess a combination of soil quality, growing season, and moisture supply to produce sustained high yields of a specific crop. "Other" agricultural lands include those that have not been rated as "Prime" or "Unique" but are still considered important agricultural lands.

The ALISH system classifies most of the Project Site as "Prime". When utilized with modern farming methods, "Prime" agricultural lands have a soil quality, growing season

and moisture supply necessary to produce sustained crop yields economically. (See: Figure 18, “Agricultural Lands of Importance to the State of Hawai‘i Map”).

Potential Impacts and Mitigation Measures. The LSB and ALISH classification systems indicate that the lands underlying the Project Site possess soil ratings for productive agricultural uses. As noted, the Project Site lots have previously been graded and improved with water meters, underground utilities, and roadways.

The accepted MBPFI FEIS document dated December 2004 states “*given the large supply of land in other areas on Maui available for agriculture due to the decline of plantation agriculture, use of 179 acres for MBPFI will not affect the statewide growth of diversified agriculture.*”

A Phase I and 2 ESA was prepared for the Proposed Project found no presence of any fertilizers, herbicides, pesticides, or other types of agricultural products which may have been used on the site or the presence of any hazardous substance or petroleum products on the property.

In addition, there were 2 identified historic sites on the subject property and no further action was recommended by the SDOH, DEEH (See: Appendices 6 and 7). While the previously approved MBPFI project resulted in the loss of 149 acres of high-quality agricultural land, there is a large supply of good farmland on Maui. As such, the proposed hotel project is not expected to impact the long-term viability or growth of agriculture on the island of Maui.

2.1.12 Surface Water Resources

This section identifies existing surface water resources and recommend mitigation measures that would avoid or lessen the significance of potential impacts. Information in this section is based in part upon the *Preliminary Engineering and Drainage Report for the Kahahā Hotel at Kahului Airport, Kahului, Maui, Hawai‘i, TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017, 018*, prepared by Austin, Tsutsumi & Associates, Inc. (ATA), dated August 6, 2021 (refer to Appendix 5).

Existing Conditions. Maui has two primary forested *mauka* watersheds, i.e., the East and West Maui. As discussed in the 2030 Maui Island Plan, the West Maui watershed is

composed of the mountain ridges, valleys, streams, and aquifers stretching from the top of Pu'u Kukui down to the sea. The East Maui watershed begins at the summit of Haleakalā as the island's largest water producer. Maui's perennial streams are predominantly situated on the windward slopes of the island's watersheds. Periods of prolonged drought resulting in minimal flow, or a dry stream bed have influenced the streams in Maui.

The most well-known surface water resources in Maui are the streams of the valley of Waikapū, Wailuku, Waiehu, and Waihe'e — also known as the four streams area (*Na Wai Eha*). The four great valleys cut far back into the slopes of West Maui and drain the eastward watershed of Pu'u Kukui and the ridges radiating northeastward, eastward, and southeastward from it. The area from Waihe'e to Wailuku was formally the most extensive continuous area of wet taro cultivation in the Hawaiian Islands during the pre-contact period or prior to 1778. However, these streams are situated west of Kahului area.

Historic maps indicate that Kalialinui Stream possibly ran close to the project area at one time. Kalialinui watershed runs from Halakalā down to the coastal outlet called Ka'a. Today, the watershed is 23.9 square miles, with the maximum elevation of 8,333 feet. Historic rankings completed on the streams within the watershed determined that no streams within the watershed were of sufficient condition for protection. The watershed is a non-perennial stream with intermittent flow running along the west side of Sunny Side Road, currently known as Dairy Road.

The nearest surface water resource is the Kahahā Pond — designated as a State Wildlife Sanctuary in 1951. The Kahahā Pond is approximately 143-acre wetland providing a safe habitat for many native and vagrant waterbirds.

Potential Impacts and Mitigation Measures. The Proposed Project will involve land-disturbing activities that generally may result in some soil erosion and may contribute to sedimentation into the nearby areas. The accidental release of construction equipment fluids could also contaminate surface and coastal waters. However, none of the above-mentioned surface water resources are located adjacent to the Project Site. The nearest surface water resources are the Kahahā Pond and the Kalialinui watershed, approximately 0.4 miles from the Project Site.

As discussed in Section 2.1.2 (Topography and Soils) of this Draft EIS and as documented within the Preliminary Engineering and Drainage Report (See: Appendix 5), temporary

erosion control measures will be incorporated during construction to minimize soil loss and erosion hazards. Best Management Practices (BMPs) will include temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, inlet protection, slope protection, stabilized construction entrances and truck wash-down areas. Periodic water spraying of loose soils will be implemented to minimize air-borne dirt particles from reaching adjacent properties.

An application for a National Pollution Discharge Elimination System (NPDES) permit for construction activities will be submitted to the State Department of Health for approval prior to start of construction. Permanent sediment control measures will be used once construction is completed.

2.1.13 Coastal Water Resources

This section identifies existing coastal water resources and recommend mitigation measures that would avoid or lessen the significance of potential impacts. Information in this section is primarily based on the *Baseline Assessment of Marine Water Chemistry, Kānāhā Hotel at Kahului Airport, Wailuku-Kahului, Maui, Hawai'i*, prepared by Marine Research Consultants, Inc., dated March 2021 (refer to Appendix 19, “Baseline Assessment of Marine Water Chemistry”).

Existing Conditions. Maui’s pristine beaches and clear, clean waters are key elements in tourism and the public’s recreational opportunities. The nearest coastal water offshore of the Project Site are Kānāhā Beach and Kahului Bay — located approximately 0.66 miles to over 1 mile north of the Project Site. The Applicant retained Marine Research Consultants, Inc. to prepare a Baseline Assessment of Marine Water Chemistry for the proposed hotel dated March 2021. The purpose of the report was to assess potential impacts to water quality within the ecosystems down slope from the Proposed Project. Water quality testing was conducted from the shoreline to the offshore open ocean. (See: Appendix 19)

Water chemistry field collection was conducted on October 2, 2017, and October 23, 2020. All samples were collected by investigators working from a personal watercraft (jet-ski). Water chemistry was assessed along three survey transects oriented perpendicular to the shoreline. The transects originated at the sand-water interface of the beach and extend approximately 150 meters (m) offshore. Transect 1 was located off of Kānāhā Beach Park downslope from the runways of the Kahului airport. Transect 2 was located off a large

drainage channel that extends to the shoreline from the airport area (although the channel was dry during sampling). Transect 3 was located downslope from the Kānehā Pond State Wildlife Sanctuary at the eastern side of the revetment separating the retention basin of the Wailuku-Kahului Wastewater Reclamation Facility (W-K WWRF).

State of Hawaii Department of Health Water Quality Standards (HDOH-WQS) that apply to the areas offshore of the Kānehā Hotel at Kahului Airport Project Site are listed as “open coastal water” in Hawaii Revised Statutes (HRS) Chapter §11-54-6(b). Two sets of standards are listed depending on whether an area receives more than 3 million gallons per day (mgd) of freshwater input per shoreline mile (“wet standards”), or less than 3 mgd of freshwater input per shoreline mile (“dry”). While the study area off the north coast of Maui probably receives less than 3 mgd per mile, both wet and dry criteria were used for this evaluation.

Overall, all of the areas within the scope of the present project are close to or below the specific criteria of the State Water Quality Standards, with the caveat that this consideration is for two sample sets. As a result, it does not appear that there are any significant inputs of materials from land beyond the immediate shoreline that are impacting coastal ocean waters downslope from the proposed Kānehā Hotel site.

Potential Impacts and Mitigation Measures. Results of this baseline study reveal that the marine habitat offshore of the region downslope from the hotel site consists of a shallow reef platform — primarily covered with a mix of sand and rubble interspersed with coral reef communities. Results of the water quality survey indicate some detectable differences between the three transect sites, although the exact cause of these differences are not clear. Sources of groundwater input from the area immediately adjacent to the Wailuku-Kahului WWRF contains different groundwater signatures than the other two survey areas that were located to the west.

However, the results of the present survey indicate that water quality within the survey area downslope from the Kānehā Hotel Project Site are near, or within the appropriate Department of Health Water Quality Standards, indicating that at present there are no significant factors from land influencing water quality. The small amount of groundwater input at the shoreline is rapidly mixed to background coastal oceanic values through wave action and other physical processes. More details about the result of this survey will be discussed and concluded with the following Section 2.1.14 about groundwater resources.

2.1.14 Groundwater Resources

This section identifies existing groundwater resources and recommend mitigation measures that would avoid or lessen the significance of potential impacts. Information in this section is based on the following documentation:

- *Potential Impact on Water Resources of the Proposed Kahahā Hotel at Kahului Airport, Island of Maui*, prepared by Tom Nance Water Resource Engineering (TNWRE), dated June 2021 (refer to Appendix 17, “Potential Impact on Water Resources”); and
- *Baseline Assessment of Marine Water Chemistry, Kahahā Hotel at Kahului Airport, Wailuku-Kahului, Maui, Hawai‘i*, prepared by Marine Research Consultants, Inc., dated March 2021 (refer to Appendix 19, “Baseline Assessment of Marine Water Chemistry”).

Existing Conditions. A&B developed two private water systems to supply the MBPIL, one for potable consumption and the other for irrigation and other non-potable uses. The potable system is supplied by two offsite wells which draw water from the Kahului Aquifer (State Nos. 5129-004 and -005). The wells pump into an adjacent 0.60 million-gallon (MG) storage tank and gravity delivery to customers is via a 16-inch transmission pipeline. The irrigation system consists of a former plantation skimming well, State No.5226-001, as its source of supply. Delivery to customers is directly from the well by an on-demand pump station. Well No. 5226-001 was developed in 1899 and was known during its period of plantation use as Shaft 19 and Pu‘unene Pump 5. The water provided by the irrigation system is slightly brackish, requiring the use of appropriately salt tolerant grasses and plants if irrigated by this source.

Available supply from MDWS’ Central Maui system is subject to County of Maui Administrative Rules, Title 16, Chapter 201 which was adopted in January 2018. This rule specifies the method to determine water availability in each of MDWS’ systems based on a three-year forecast of water usage in comparison to the system’s maximum reliable capacity. As of January 2019, water availability in MDWS’ Central Maui System is in tier [c]. This means that any request for water which exceeds 5400 GPD is considered to be a “large quantity of water” for which the developer would have to provide a new source of supply. The potable supply required by Kahahā Hotel puts it into this category.

MDWS has completed improvements to its Iao (Surface) Water Treatment Plant to expand its capacity from 1.7 to 3.2 MGD. It also has a pending water use permit application requesting that its diversion amount from the stream be increased from 1.7 to 3.2 MGD. The time frame for approval of the application is not known, as it is dependent on the time that the State Commission on Water Resource Management (CWRM) will be re-examining the Na Wai Eha contested case. If the water use application is approved, it would move the Central Maui System to tier [d] of the Administrative Rules, allowing projects of less than 120,000 GPD such as the Kānāhā Hotel to be served by the system.

The Applicant retained Tom Nance Water Resource Engineering (TNWRE) to prepare a report of Potential Impact on Water Resources for the proposed hotel. The report focused on the use of groundwater and the potential impact to groundwater body — since no streams or other inland water bodies would be impacted by the Proposed Project. (See: Appendix 17)

Potential Impacts and Mitigation Measures. Of the Proposed Project's 200 rooms, 120 would be standard rooms and 80 would be extended stay, meaning they would be equipped with kitchenettes. Using the Maui Department of Water Supply (MDWS) design standards of 350 GPD for standard hotel rooms and using 560 GPD for the extended stay rooms, the latter equivalent to the standard for multi-family units, the projected average water supply requirement would be 86,800 GPD. It should be noted that these design standards include water use by various amenities and for landscape irrigation.

Design of the hotel rooms and related facilities are intended for the business traveler. As such, many of the facilities and services offered for resort hotels, including restaurants, other amenities, and more extensive landscaping, will not be a part of the Kānāhā Hotel. Further, all landscape irrigation for the Kānāhā Hotel would be provided by the private non-potable system owned and operated by the Business Park developer, A&B. As such, applying typical design standards for water use on a per hotel room basis, which anticipate more extensive amenities and landscape irrigation with potable water, would greatly overestimate the Kānāhā Hotel's actual potable water use.

Actual water use by two hotels, the nearby Courtyard by Marriott in Kahului, and the Residence Inn Wailea, provide the best basis to estimate what the potable use by the Kānāhā Hotel is likely to be. The Courtyard is a 138-room hotel of which only four (4) of the rooms include kitchen facilities. Per room potable water use averaged 119 GPD over the 21-month period with a high of 147 GPD per room in January 2018.

The Residence Inn at Wailea consists of 200 rooms, all of which have kitchen facilities. It also has a greater amount of landscaping than the Courtyard in Kahului or as proposed for the Kānāhā Hotel. Figure 6 of the Water Assessment depicts its monthly average use based on billing records with potable use and landscape irrigation metered separately. Over the 21-month period, potable use per room averaged 112 GPD, with a high of 152 GPD per room in August 2018. Of the hotel's total use over this period, landscape irrigation amounted to 50 percent.

As currently planned, 80 of the Kānāhā Hotel's 200 rooms would be equipped with kitchen facilities similar to the rooms at the Residence Inn Wailea and the remaining 120 rooms would not have kitchens and would be similar to those at Courtyard by Marriott in Kahului. Based on the documented use rates at these two hotels and the fact that all landscape irrigation would be provided by the private system operated by A&B Properties, it can be conservatively estimated that the **average potable water use by the Kānāhā Hotel will not exceed 150 GPD per room or 30,000 GPD** for its 200 rooms. (See: Appendix 17)

TNWRE report concludes that the impact to the Kahului Aquifer of supplying water for the proposed hotel project is not considered to be significant. Analysis on the amounts of groundwater use — reflected by the comparison of the current pumpage in the Aquifer and the additional pumpage to supply the proposed hotel project — showed that the increase of groundwater use would be less than one (1) percent of the ongoing total pumpage in the Aquifer. Furthermore, nutrients removed from the Aquifer by the wells would be greater than the nutrients returned to the aquifer from the irrigated landscaping — but the amounts are exceedingly small and of no significant environmental consequence.

Based on the results of the baseline survey — previously discussed in Section 2.1.13 (Coastal Water Resources) of this Draft EIS — as well as the results of the TNWRE evaluation of impacts to water resources, it can be concluded that with proper management practices to prevent material input to groundwater discharge by the proposed Kānāhā Hotel, there is little or no potential for the project to provide any affects to the marine environment

that differs substantially from the present condition. Indeed, as major sources of nutrient inputs including Kahā Pond and the Wailuku-Kahului WWRf do not presently exert a significant effect on coastal waters, it is not expected that the proposed hotel will have a different effect. The Proposed Project, which is not located on the shoreline, should not affect water quality in either a positive or negative manner. (See: Appendix 19)

2.2 Socio-Economic Environment

2.2.1 Population and Housing

The purpose of this section is to identify existing data of population and housing and evaluates the potential impacts of the Proposed Project to the population and housing in Maui. Information in this section is based in part upon the *United States Census Bureau (USCB)* and *Maui County Data Book*. In addition, this section also includes information from the *Kahahā Hotel Economic Effects, Assessment of Proposed New Airport Hotel*, prepared by John M. Knox & Associates, Inc., dated May 15, 2021 (refer to Appendix 20, “Economic Impact Analysis and Public Fiscal Assessment”).

Existing Conditions. The United States Census Bureau (USCB) conducts a census every ten years to count the population and housing units for the entire United States. The most recent decennial census was conducted in 2020. While data is available covering the Counties in the United States, 2020 census data for Maui Island is still very limited.

According to the USCB, the April 2020 Maui County population was 164,754 residents — about 6.4% increase from the April 2010 population, i.e., 154,834 residents. In 2020, the population density for Maui County was about 142 people per square mile — slightly higher than the approximately 133 people per square mile population density in 2010.

Population growth in Maui County was projected to continue with the year 2030’s resident population projected to reach 189,947 and the year 2040’s to reach 205,040. The said projection is presented within the Maui County Data Book 2019 page 23. The 2019 housing count in Maui County was recorded to reach 74,561 units with a total occupancy of 61% between 2015 to 2019.

The Project Site is situated within the Kahului Census Designated Place (CDP). The United States Census Bureau records that the April 2020 population for Kahului CDP is 28,219

residents — about 7.1% increase from the April 2010 population, i.e., 26,337 residents. Kahului CDP has the largest population in Maui County, with Kihei CDP on the second (21,423 residents), Wailuku CDP on the third (17,697 residents), and Lahaina CDP on the fourth rank (12,702 residents).

Potential Impacts and Mitigation Measures. The Project Site is currently designated for Light Industrial development. The new designation would be to accommodate Hotel uses and would be anticipated to have a minimal or secondary impact on population and housing. The proposed Hotel or transient accommodations are anticipated to have a similarly insignificant impact on the population. A study on the economic effects of a proposed hotel was prepared by John M. Knox and Associates. The report projects that the average daily number of hotel guests at the Kahahā Hotel will be **295 people** after project completion and stabilization. (See: Appendix 20)

Pursuant to Section 2.96.050, Maui County Code, residential workforce housing credits may be used to satisfy the requirements of Chapter 2.96, MCC, additionally Act 141 (2009) requires that the County recognize affordable housing credits issued to the Department of Hawaiian Home Lands to satisfy any county affordable housing requirements.

It should be noted that credits are issued to developers who build units in excess of their requirement, which allows an individual or family to enjoy the unit before the unit was “required” to be built. The credits allow the affordable housing developer to recoup some of their costs as typically affordable housing units are subsidized in some fashion (County affordable housing fund, market units, low-income housing tax credits, etc.), potentially allowing the developer to again build additional “excess” affordable housing units, once again allowing early access for an individual or family. It is important to remember that credits are earned, after an affordable housing unit is built.

In the alternative, instead of purchasing credits earned for affordable housing units already built and enjoyed by Maui residents, the Applicant may explore the option of working with a local affordable housing developer on the construction of affordable housing units that will be built concurrently with or within a set time period, as established in the required Residential Workforce Housing Agreement, of the proposed Kahahā Hotel. This option has many variables so it may not be feasible.

2.2.2 Economy

This section identifies existing economic conditions and evaluates the potential impacts of the Proposed Project to the economy. Information in this section is primarily based on the following documentation:

- *Kānāhā Hotel Economic Effects, Assessment of Proposed New Airport Hotel*, prepared by John M. Knox & Associates, Inc., dated May 15, 2021 (refer to Appendix 20, “Economic Impact Analysis and Public Fiscal Assessment”);
- *Analysis of Potential Market Demand and Estimated Annual Operating Results for the Proposed Kānāhā Hotel at Kahului Airport*, prepared by CBRE, Inc., dated May 19, 2021 (refer to Appendix 21, “Market Study”); and
- *Analysis of the Maui Lodging Market and the Proposed Kānāhā Hotel at Kahului Airport*, prepared by Kloninger & Sims Consulting LLC., dated September 15, 2021 (refer to Appendix 22, Tourism Study).

Existing Conditions. Tourism remains one of Hawai‘i’s leading employers, revenue producers, and growth sectors. Visitor Expenditures for 2019 were \$17.7 billion and due to the global pandemic Visitor Expenditures for 2020 were \$5.1 billion and projected to grow to \$9.8 billion in 2021 and \$14.5 billion in 2022 (**See:** Appendix 21). According to the Maui Island Plan (December 2012), diversifying Maui’s economy has been a key, longstanding County policy. The Economic Development chapter of the plan includes the following statement in its analysis of the island’s challenges and opportunities:

“The Island of Maui, like the County as a whole, faces two fundamental challenges in economic development: (1) diversification; and (2) increasing the number and proportion of living wage jobs. There is a subset of more specific challenges, such as the high cost of housing and the need to strengthen public education”.

A Market Study was prepared by CBRE (**See:** Appendix 21) to understand current economic conditions and project future market demand.

Maui’s employment is comprised primarily of jobs in the retail trade, accommodation, eating and drinking, and government sectors, which collectively comprise more than 40 percent of total jobs in the county. The civilian labor force has increased at the compound average annual rate of 1.2 percent between 1990 and 2018. The 2020 unemployment rate of 17.8 percent was a result of COVID-19, and well above the long term (1990 to 2019) average of 5.1 percent. The countywide unemployment rate for first quarter 2021 was at

12.8 percent, indicating the economy is starting to recover.

Given that Kahului/Wailuku is the civic and commercial hub of Maui, and also the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (**See:** Appendix 21)

The Applicant previously owned and operated The Courtyard by Marriott located in Kahului down the street from the proposed hotel. Demand for The Courtyard has experienced an annualized occupancy rate of 92% prior to 2020. The hotel industry standard is stabilization at 80% occupancy and hotel occupancy of 90% or greater is essentially at full capacity.

A study of Maui lodging market and the role of the proposed Kānāhā Hotel within Maui's mix of lodging inventory was prepared by Kloninger & Sims Consulting, LLC in a report dated September 15, 2021 (**See:** Appendix 22). The study includes secondary research consisting of analysis of data gathered and published by the HTA. The study also includes primary research involving interviews with numerous individuals associated with Maui's lodging market — i.e., hotel general managers and sales managers, executives at various demand generators familiar with the Kahului lodging market, and airline executives familiar with the flight crew and distressed traveler markets on Maui.

Due to its location, the proposed Kānāhā Hotel is expected to serve demand generated by Kahului Airport and travelers doing business in the area. Therefore, demand generators include County Government, Maui Memorial Hospital, event-driven demand for sporting and cultural events, and airport-driven demand such as distressed travelers. The following is the discussion of the findings of the Tourism Study.

Finding #1 of the Tourism Study: Maui Arrivals and ADC (Average Daily Visitor Census) have increased in recent years, driven by growth in the supply of vacation rentals. The supply of hotel rooms has decreased, in response to market conditions.

Based on the HTA ADC data and an estimated 2019 Maui Island population of about 157,000, the average number of visitors on the island was about 42% during 2019, well in excess of the Maui Island Plan policy metric of 33.33%. During 2020, Maui Island's ADC was 20,591, far below prior years due to the COVID-19 pandemic. The resulting mandatory 14-day quarantine for trans-Pacific travelers arriving in Hawai'i was in effect until October,

followed by a pre-departure testing program that allowed arriving travelers to bypass quarantine. Maui Island's 2020 population was 154,100. During 2020, the ADC on the island was about 13%, far below the Maui Island Plan policy metric of 33.33%.

Year-to-date July 2021, Maui Island's ADC was 52,769. Maui Island's 2020 population according to the 2020 Census was 154,100, meaning that through July, the average number of Maui visitors on the island equaled 34.2% of the resident population, slightly higher than the Maui Island Plan policy metric of 33.33%. Based on the seasonality of Maui tourism, which typically slows down during the fall before picking up around Christmas, we have estimated Maui's year end 2021 ADC at 50,829, equal to 33.33% of the island's population.

The proposed Kahahā Hotel is anticipated to contain 200 hotel rooms with an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, and with 2.3 individuals per room. Kahahā Hotel is anticipated to accommodate an average of 138 out-of state visitors per night. This translates to a contribution of 0.27% of the 33% ADC policy metric. Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kahahā Hotel on an average night would equal 0.09% of the island's resident population of 154,100. An increase of approximately 0.09% (less than one-tenth of one percent) to the visitor to resident ratio is an insignificant increase.

The Tourism Study report also noted that Maui's 2021 ADC could decrease further if the number of vacation rentals on the island continues to decrease, as it has in recent months. In July, Maui County entered into agreements with Expedia (VRBO) and Airbnb, under which the vacation rental platforms will display the tax map key ("TMK") for each listing on the platforms. This will greatly enhance the county's ability to enforce laws against illegal vacation rentals. In July, the number of vacation rentals in Maui County decreased 22.2% compared to July 2019, suggesting that the TMK requirement is contributing to a decrease in the supply of vacation rentals on the 33.33% policy metric.

In addition to the foregoing study, a Market Study for the proposed Kahahā Hotel at Kahului Airport was prepared by CBRE, Inc. dated May 19, 2021. The field work for the study was undertaken in February 2019, and the updates reflect data compiled and market conditions as of April 2021. The purpose of the study was to estimate the size and value of the intended market, review visitor trends, identify existing and future competition, analyze historical and current key performance indicators for the competitive hotel market, and summarize other factors that could influence the demand for the proposed Kahahā Hotel.

As it relates to the moratorium on new transient accommodations, the market study finds that there is no correlation between visitor growth and the supply of hotel rooms. This finding is evidently supported in the market study by the fact that the number of visitors has increased at a compounded average annual rate of 4.8 percent between 2015 and 2019 (excluding the impact of COVID-19) while the number of hotel rooms have declined at the compounded average annual rate of -2.7 percent over the same time period. Thus, a moratorium on new hotels is unlikely to curb visitor volume.

While both studies make clear that the moratorium is unlikely to reduce tourism on Maui, the Kloninger Report shows that Kahului area hotels primarily serve the interisland market and non-leisure travelers. While there is no denying that there will be some leisure traveler demand for the proposed Kānāhā Hotel, based on existing data from the other hotels in the area, it is likely that the majority of the guests will be non-leisure travelers. Due to its close proximity to the Kahului Airport the proposed Kānāhā Hotel is in an ideal location for business travelers, helping to promote the diversification of Maui's economy by providing additional, centrally located, non-resort accommodations for off-island support services to utilize when working on Maui.

Finding #2 of the Tourism Study: In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kānāhā Hotel would be built, the estimated visitor ratio is below 10%.

On an island-wide basis, Maui's ratio of visitors to residents was 42.1% in 2019, well above the 33.33% policy goal. The study estimated the Average Daily Visitor Census (ADC) by Community Plan Area, based on the supply of hotel rooms, timeshare units and vacation rentals and associated occupancy rates and average party size reported by the HTA. Estimation was also based on the allocation of friends and family visitor market by population. West Maui and South Maui exceeded the 33.33% metric by a wide margin, unsurprisingly given the large number of visitor accommodations in those areas. The study estimated that visitors in Central Maui in 2019 equaled 7.3% of the resident population in that area on any given day. This was driven both by the large resident population of Central Maui and the small number of accommodations in the area. Because the boundaries of the Community Plan Areas for North Maui, East Maui and Upcountry Maui do not align with the Zip Code data used to pull resident counts from US Census data, the study combined

the three areas into one. This combined area had the lowest ratio of visitors to residents in 2019, at 6.2%.

Finding #3 of the Tourism Study: The proposed Kahahā Hotel is expected to primarily serve the kama'āina market, with only a marginal contribution to the island's average daily census of visitors.

Based on the analysis of the Maui lodging market, we estimate that the proposed Kahahā Hotel will accommodate an average of 138 visitors per night. This translates to a contribution of 0.27% of the 33.33% ADC policy metric (See: Appendix 22, Tourism Study). The following Table 5 summarizes our analysis.

Table 5. Estimated Contribution of Kahahā Hotel to Policy Metric of 33.33% ADC		
Kahahā Hotel Room Count	200	Rooms
Estimated Occupancy	80.0%	Occupancy
Estimated Nightly Occupied Rooms	160	Occupied Rooms
Estimated Share Kahahā Hotel Guests from Out of State	37.5%	Share
Estimated Nightly Rooms Occupied by Out-of-State Visitors	60	Occupied Visitor Rooms
Maui Average Visitor Party Size	2.3	Visitors
Estimated Nightly Out-of-State Visitors Staying in Kahahā Hotel	138	Visitors
Maui ADC Based on Population of 154,100 and Policy Metric of 33.33%	50,853	Visitors
Estimated Contribution of Kahahā Hotel to Policy Metric of 33.33% ADC	0.27%	Contribution

Source: Kloninger & Sims

We have applied an occupancy rate of 80% in the analysis, higher than the 2019 Maui County hotel occupancy rate of 77.7%. Based on 200 total rooms, an average of 160 rooms would be occupied nightly at the hotel. Our market interviews indicate that most of the room demand in the Kahului area is generated by interisland travel, not out-of-state visitors. We have applied a 37.5% share of occupancy to out-of-state visitors or 60 occupied rooms on an average night. According to HTA statistics, the average visitor party to Maui in 2019 consisted of 2.3 travelers, meaning an estimated 138 out-of-state visitors each night staying in Kahahā Hotel. Applying the 33.33% ADC metric to the 2020 Maui Island population of 154,100 results in an ADC of 50,853 visitors. The estimated 138 visitors accommodated at the Kahahā Hotel represent 0.27% of the policy target number of

50,853 visitors on the island.

Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kānahā Hotel on an average night would equal 0.09% of the island's resident population of 154,100.

Finding #4 of the Tourism Study: Some of the popularity of vacation rentals on Maui is likely value-driven, providing an alternative to Maui's high-priced hotel rooms.

Maui has the most expensive hotel rooms in the state by a wide margin, according to HTA data. Maui County's 2019 ADR of \$399 exceeded every other county's by more than \$100. Maui's vacation rentals are generally less expensive than hotel rooms. In 2019, the average nightly rate at a Maui vacation rental was \$248, \$151 less expensive than the \$399 average nightly rate at a hotel. The average hotel room in the Wailea resort cost \$618 per night in 2019, compared to \$239 for the average vacation rental in the Wailea/Kihei area. For Maui visitors, vacation rentals clearly represent the value option for accommodations.

Maui's accommodation market has higher prices than the state as a whole, with Maui having a lower percentage of rooms in the Budget (Up to \$100/night), Standard (\$101 to \$250/night) and Deluxe (\$251 to \$500/night) categories compared with the state. Most of the rooms on Maui (55.9%) are in the Luxury category (Over \$500/night), compared with 39.7% of statewide visitor rooms being in the Luxury category.

In the vacation rental market, Maui's accommodations also skew toward the higher price categories but less so than the overall accommodation market. Similar to the overall accommodation market, Maui has a lower share of vacation rental units in the Budget and Standard categories. Maui however, has a greater share in the Deluxe category (60.7%) than the average for the statewide vacation rental market, where 44.1% of the units are priced between \$251 and \$500. Maui has a slightly greater share of vacation rentals in the Luxury category compared with the overall state vacation rental market, 16.2% vs 13.0%.

The rate category data suggests that Maui's vacation rental market is serving a segment of the Maui accommodation market that is currently under-served by the island's hotels. This is particularly true with respect to the Standard (\$101 to \$250/night) and Deluxe (\$251 to \$500) categories. In both these categories, Maui's vacation rental supply is providing a higher share of the supply than the overall market. The Standard category represents 22.4%

of the vacation rental market but only 18.1% of the overall accommodation market. The Deluxe category accounts for 60.7% of the vacation rental market but only 25.2% of the overall supply of visitor accommodations on the island.

Finding #5 of the Tourism Study: Hotels in the Kahului area primarily serve the interisland market and area nonleisure demand generators.

The overwhelming share of out-of-state visitors to Maui are on vacation, with corporate meeting, convention, and incentive (“MCI”) visitors and other non-leisure visitors comprising much smaller shares of the market. In 2019, 85% of the out-of-state visitors to Maui were in the leisure segment, with corporate MCI and other non-leisure visitors representing 8% and 7% of the market, respectively.

The three Kahului-area hotels (i.e., Courtyard Maui, Maui Beach Hotel, and Maui Seaside Hotel) cater to some out-of-state demand but primarily serve demand from inter-island travelers and demand generated by the airport — according to the interviews of hotel management and hotel sales managers familiar with the Kahului market.

The market interviews indicate that collectively, the three hotels receive slightly more than 60% of their business from the *kama’āina* market — consists of both leisure and business travel. The two older hotels, the Maui Beach and Maui Seaside are located on the beach shoreline of Kahului Harbor, the island’s primary port for cargo and cruise ships. Because of the poor water quality this beach is not popular for swimming, especially with so many excellent swimmable white sand beaches nearby. The two older properties cater to the price-sensitive segment of the market. According to the study interviews, these hotels achieved estimated ADRs of about \$200 during 2019, while the Courtyard achieved an estimated 2019 ADR of \$250. In addition to being much newer, the Courtyard offers a superior physical product than the Maui Beach and Maui Seaside. Collectively, the three hotels ran substantially higher occupancy in 2019 than Maui County’s 77.7% occupancy, according to our interviews.

With *kama’āina* leisure, corporate, government, group business from the social, military, education, religion and fraternal (“SMERF”) demand representing an estimated 62.5% of demand at the Kahului hotels, the remaining 37.5% of demand comes from out of state.

Within each market segment, the Maui Beach and Maui Seaside cater to the more price-sensitive guests. In the *kama'āina* corporate segment, for example the Maui Beach and Maui Seaside compete with each other for the lower-end business, while the Courtyard captures the higher-rated business from professionals from Oahu doing business with the County and employees of large companies, whose travel policies may favor branded properties such as the Courtyard.

According to the study, the proposed Kānāhā Hotel will primarily compete with the Courtyard for the *kama'āina* market, both corporate and leisure, as well as for the mainland leisure market. The price-conscious segment of each market will continue to be served by the Maui Beach and Maui Seaside. As a newbuild hotel, the Kānāhā Hotel will have a higher quality physical product than the older harbor-front hotels, making it directly competitive with the Courtyard.

The Kānāhā Hotel will also likely generate some new room demand from the *kama'āina* corporate segment. With a greater supply of high-quality rooms in the area, some of the in-state day trips to Maui from other islands to conduct business in the Kahului/Wailuku can be expected to convert to overnight stays. This incremental demand is likely marginal, on the order of an additional ten occupied room nights per day.

The area demand generators for lodging include:

- Maui Memorial Hospital

The Kahului hotels capture some demand from medical professionals traveling to Maui, including physicians and nurses based either on the mainland or Oahu. The hospital also generates demand from off-island family members of patients staying in the hospital. According to the study interviews, all three area hotels compete for this business, with much of the family demand being captured by the Maui Beach and Maui Seaside, due to having lower room rates than the Courtyard.

- War Memorial Stadium Complex

High school sports teams visiting from other islands, often during state tournaments, generate room night demand from players, coaches, and family members. In recent years Hawai'i high school sports adopted a multi-division structure, which greatly increased the number of state tournament games. Historically, the Maui Beach and Maui Seaside captured most of this demand, due to their lower room rates.

- **Maui County Government and Courts**
Nearby Wailuku is Maui's County seat. Residents from other islands doing business with Maui County or legal proceedings in the Wailuku Courthouse generate room demand from area hotels. According to our market interviews, each of the three area hotels capture some of this demand.
- **Maui Arts and Cultural Center**
The Maui Arts & Cultural Center (MACC) in Kahului is Maui's largest performing arts venue, with indoor venues accommodating up to 1,500 and an amphitheater for up to 5,500 spectators. The MACC generates room demand in the area several times per year, from off-island talent and production crews, as well as off-island residents traveling to Maui to attend the events.
- **Kahului Airport**
Kahului Airport is the island's major airport, serving nearly eight million passengers in 2019. Flight crews generate some room demand in the area but many of the labor agreements for pilots and cabin attendants prohibit housing crews at airport hotels. As a result, most of the airline crew demand is accommodated in hotels located some distance from the airport. The airport does generate demand from distressed travelers, the term for airline passengers whose flights are delayed due to mechanical issues with aircraft. While this demand is impossible to plan for, it does generate room demand throughout the year.

When there is a flight delay requiring an overnight stay, there can be un-planned-for demand for 100 to 200 rooms. Due to Maui's high hotel occupancy and limited supply of hotels near the airport, distressed travelers from a delayed flight are often accommodated in a number of different hotels, including properties in the resort areas of Wailea and Kaanapali. With a growing number of direct mainland flights coming into Kahului Airport, many of them wide body aircraft, the airport is generating more hotel room nights due to flight delays. With the addition of the Kahahā Hotel, which borders the airport property, there will be a greater supply of hotel rooms near the airport to accommodate distressed traveler room demand. This provides a community benefit by reducing the traffic generated transporting distressed travelers to and from hotels in resort areas.

- Kahului Area Business and Construction Projects

According to the market interviews, *kama'āina* corporate demand is the single largest market segment for the hotels in Kahului. This includes people primarily from Oahu but also Hawai'i Island, Lāna'i, Molokai and Kauai, doing business in the area. Much of this demand is related to construction, from specialty trades people working on projects being temporarily housed on Maui during construction projects in Kahului, Wailuku, Maui Lani, Kīhei, Wailea and Makena. The construction accounts are more price sensitive than other corporate accounts. As a result, the construction industry demand is primarily accommodated at the Maui Beach and Maui Seaside.

- Mainland Leisure

The hotels in the Kahului area cater to mainland leisure demand as well. According to the study interviews, the visitors staying in these hotels tend to be value-driven, attracted to the relatively low room rates available in the area, as well as the central location. While the beaches in the area are not particularly attractive, visitors staying in Kahului often take day trips to beaches in South Maui.

Finding #6 of the Tourism Study: The proposed Kahahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market.

With average hotel room rates on Maui approaching \$400 per night, the value-driven segment of the market has been accommodated largely by vacation rentals, where average rates are about \$250 per night. In recent years, the supply of vacation rentals on the island has grown dramatically. Much of the new supply has been located outside of traditional resort areas, encroaching upon the island's residential neighborhoods. The three existing hotels in Kahului serve the medical, sports, government and corporate *kama'āina* markets, in addition to demand generated by Kahului airport and some mainland leisure demand. Kahului area hotels accommodate non-leisure demand from mostly inter-island travelers visiting Maui for business, to attend an event or visit friends and family. To a lesser extent, the hotels serve the value-driven segment of the mainland leisure market seeking accommodations that are less expensive than hotels and condos in the island's resort areas.

Once built, the proposed Kahahā Hotel will likely cater to a mix of demand generated by the airport and other area demand generators, competing with the three existing Kahului area hotels. With additional rooms in the market, there will be more hotel room supply

available to visitors seeking accommodations priced lower than hotels in the resort areas. As such, the Kahahā Hotel will compete with the island's vacation rentals, many of which are not licensed or are located in areas that are not zoned for transient rental. The hotel will provide price-conscious visitors with a legal alternative to vacation rentals.

By increasing the supply of legal accommodations priced well below the average pricing for Maui hotels, the Kahahā Hotel will capture market share from vacation rentals. Rather than attracting additional visitors to Maui, the proposed Kahahā Hotel will likely displace demand currently accommodated by vacation rentals, many of which are unlicensed. As such the Kahahā Hotel will support the Maui DMAP's objective strengthening the economic contribution of the visitor industry. To the extent that it reduces demand for vacation rentals, Kahahā Hotel will also align with the DMAP objective of creating positive contribution to the quality of life for Maui residents.

Potential Impacts and Mitigation Measures. Prior to the global pandemic, the development of three (3) proposed hotel projects within Wailuku-Kahului area seemed likely to compete with the proposed hotel project. These Proposed Projects have now been indefinitely delayed or abandoned.

Maui Palms Expansion – This project was proposed adjacent to the Maui Beach Hotel and will consist of 136 rooms, according to the most recent news. The proposed configuration will consist of three buildings of about four to five stories each, as well as a two-story lobby, swimming pool, a restaurant with breakfast service and a gazebo for special events.

Proposed Kahului Shopping Center Hotel – This project was planned within the Kahului Shopping Center located at the intersection of Pu'unene and Kamehameha Avenues and has now been abandoned.

Proposed Wailuku Hotel – This project has been proposed for a site assemblage on the blocks between North Market Street and Central Avenue fronting Main Street in Wailuku as a Hilton Garden Inn. CBRE has determined that this project is indefinitely delayed due to the lack of project capital.

The proposed Kahahā Hotel Project Site is located adjacent to the Kahului Airport and within the MBPIL, an emerging destination for business and commerce, which is an ideal location for hotel use. This convenient location would provide a hotel option to

accommodate future growth in airport traffic and commercial activity. The project will generate positive short-term construction-phase economic effects and will contribute lasting long-term effects on the Maui economy. Given that Kahului/Wailuku is the civic and commercial hub of Maui, and the island's transportation gateway, CBRE concludes that the market is currently underserved in terms of hotel facilities. (See: Appendix 21)

Short-term construction related impacts. On a short-term basis, the project will support the economy via direct and indirect construction-related employment, as well as through the purchase of construction materials and building-related services. Employment from construction is estimated to generate 295 direct jobs during the construction phase. (See: Appendix 20)

Long-term community related impacts. On a long-term basis, the hotel landowner, operator, guests, and employees will contribute to the economy in the form of taxes and commercial transactions. The fiscal effects of the proposed hotel taxes were analyzed over a thirteen (13) year period in three (3) different scenarios in the economic assessment report. (The 13 years includes a year of planning prior to construction, two years of construction, and the first ten year of operation.) Scenario two (2) is the most likely scenario which results in the proposed hotel contributing taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the state of Hawai'i over a twelve (12) year period. (See: Appendix 20)

In addition, the Maui community has expressed an interest in diversifying the economy. If successful, this will result in many new businesses on Maui. In general, these new businesses will interact and do business with individuals and businesses out of state and on other islands; hence, these activities will likely require travel to Maui. An example of the said activities is the probable need for new businesses to receive technical support from businesses and consultants not located on Maui. A business traveler hotel next to the airport and near the business center of Maui, designed for these types of individuals, will serve as a support feature for the diversification of Maui's economy. The non-resort environment with business amenities — in a location which will not require extensive travel for many businesses — will be a desired convenience for the business community on Maui. An additional benefit is the location of the proposed Kahahā Hotel should reduce the impact that business travelers have on the already overcrowded roadways on Maui. Therefore, the Proposed Action will contribute as a necessary component for the diversification of Maui's economy.

Furthermore, the Proposed Project will benefit the Maui community — i.e., friends and family from other islands will have a resort alternative when traveling to Maui. The proximity of the Kahahā Hotel to Kahului and Wailuku, where a majority of Maui's population resides, is ideal for visiting family or friends. Visiting youth sports teams may also benefit from additional available accommodations near Central Maui's various sports fields and facilities. The proximity of the proposed hotel to the Kahului Airport and the location within the Central Maui will appeal to *kama'āina* travelers.

In conclusion, the Proposed Action will help meet the demand for visitor accommodations adjacent to the Kahului Airport as identified by the market study and supported by the occupancy rates at The Courtyard by Marriott hotel facility in the immediate vicinity. The Proposed Action is estimated to generate a total of \$14.2 million in taxes over 12 years for the state and county. Providing additional accommodation for business travelers, as well as resource accommodations in support of the Island's primary air transportation hub, will also contribute to the convenience of doing business on Maui.

2.2.3 Cultural Resources

The purpose of this section is to determine if cultural resources occur within the Project Site and to assess the significance of such resources, as well as to determine if any mitigation measures are recommended. Information in this section is primarily based on the *Cultural Impact Assessment Report for the Kahahā Hotel at the Kahului Airport, Kahului 'Ili, Wailuku Ahupua'a, Wailuku District, Maui Island*, prepared by Honua Consulting, dated April 2021 (refer to Appendix 23, "Cultural Impact Assessment").

Existing Conditions. A Cultural Impact Assessment (CIA) Report was completed for the Project Site by Honua Consulting in April 2021 (See: Appendix 23). The CIA was conducted in accordance with Act 50 (2000 Session Laws of Hawaii) and the State of Hawaii Office of Environmental Quality Control (OEQC) guidelines for Assessing Cultural Impact Assessments, including extensive archival research in addition to interviews with culturally knowledgeable individuals. The CIA also complies with the Ka Pa'akai decision and the state's obligation to assess the potential impact any state action or decision may have on traditional and customary practices.

Interviews with individuals and cultural practitioners knowledgeable about the lands, history, traditional practices, customs and cultural resources of the Wailuku *ahupua'a* were conducted in 2018 and 2019 by Honua Consulting as part of the CIA. The oral history interviews were conducted to collect information on possible pre-historic and historic cultural resources associated with these lands, as well as traditional cultural practices. A summary of all interviews is available in Appendix 23. Interviewees, which included Kumu Hula and other practitioners, shared valuable information about the cultural history of the larger geographic areas of Wailuku and Kahului, which effectively illustrates the important traditional history of this area for Hawaiians.

Archival research conducted for the CIA did identify culturally significant sites and practices in the region but not specifically within the Project Site or in its immediate vicinity.

Traditional cultural uses of the commonly occurring native plant species identified within the Project Site were documented, although the CIA specified that no practitioners currently gather any resources from the project area. Additionally, the plant species are widely available in the area and the geographic extent, as such any potential impact to the individual species located within the project area would not impact any traditional uses associated with these species.

The CIA indicates that any resources or practices occurring traditionally in the area are non-existent and would have been removed during prior land clearing. (See: Appendix 23).

Potential Impacts and Mitigation Measures. The CIA discussed the relationship between natural and cultural resources with regards to the Hawaiian community. As they are believed to be interrelated, the CIA includes the impact assessment to flora and fauna. The CIA concludes that the potential of the Proposed Project to have significant effects to flora, fauna, cultural resources, beliefs, or practices is highly unlikely considering the long use of the project area for industrial uses, including plantation activities extending back to the 19th century. Based on extensive research in both Hawaiian and English language resources conducted for the CIA and the archaeological investigation conducted for the AIS, the subject property bears no apparent signs of cultural practices or gatherings currently taking place. The oral history interviews did not reveal any known contemporaneously gathering places on the subject property or any access concerns as a result of the Proposed Project. Therefore, it can be reasonably concluded that development of the site will not impact

cultural resources on the property or within its immediate vicinity.

Interviewees did not identify any specific features, customs or practices currently occurring within the Project Site; however, the following summarizes their concerns:

- Two (2) interviewees expressed concern for the proper management of stormwater and its potential effect on nearby wetland areas and nearshore waters. Construction best management practices will be implemented accordingly to minimize any potential impact of stormwater run-off such that it does not impact any adjacent areas or surrounding properties.
- Traffic impacts due to the Proposed Project. Further discussion about existing traffic condition and mitigation measures will be detailed in Section 2.4.1 (Roadways) of the DEIS.
- One (1) interviewee mentioned about the frequent appearance of Nēnē in the area. However, as discussed in Section 2.1.6 (Flora and Fauna) of the DEIS, the survey found no presence of Nēnē nor evidence of any sign of the geese on the project area and concluded that the Kānāhā Hotel Development project area is not the preferred habitat of Nēnē.
- A suggestion with regards to naming practices for the hotel was discussed by one of the interviewees. The name of the hotel was changed to *Kānāhā* in recognition of the traditional name widely used in the area. Traditional name practices are of great importance to the Hawaiian community.
- A positive response to the proposed Kānāhā Hotel was brought up in one of the interviews highlighting the necessity of more hotel development in the project area to accommodate distressed travelers.
- Interviewees identified the paddling club and activities as nearby cultural practices and *limu* gathering along the shoreline area as another cultural practice occurring in the larger geographic extent. Considering the distance to the project area and the heavy industrial areas between the project area and *hālau wa'a*, it is highly unlikely the project has any potential to adversely impact the tangible cultural resources located at the *hālau wa'a* or otherwise impact any of the ongoing cultural activities that take place at Kānāhā Beach Park or in the adjacent waters.
- An interviewee requested use of native plants within the Landscaping. Native Plants have been incorporated into the landscape design. This recommendation has been incorporated into the hotel design. (See: Appendix 2)

Additionally, other cultural elements, unique to Maui Island and the Kānāhā area have been

integrated into the design of the hotel to support increasing awareness about Maui's cultural history among hotel guests. These include usage of patterns inspired by the Kahului cultural landscape, the nearby Kahahā pond, the lokelani rose (pink damask rose, the Official Flower of the Island of Maui), and other culturally inspired patterns and designs. A māla (traditional Hawaiian garden) has also been added to the site plan that will feature native flora with accompanying identification signage.

The CIA analysis states that the project has limited adverse impacts; therefore, few mitigation measures were recommended for the Proposed Project. The CIA states that it would benefit the site to incorporate water conservation measures, pursue partnerships with community and cultural practitioners to develop educational interpretive materials and cultural programming, utilization of native flora throughout the property, and compliance with all environmental and cultural mitigation measures.

The CIA concludes:

“While there are currently no known cultural resources or cultural practices in the project area, the project should nonetheless embrace all opportunities to honor both the traditional history and modern history of the region, which the local residents of Maui take great pride in perpetuating. To this end, the project is urged to continue to work closely with area practitioners and cultural experts, who generously gave their time for this assessment. The Hawaiian culture remains a thriving living culture in the larger Wailuku area and there are numerous practitioners, organizations, and initiatives that would add value to the hotel, the hotel activities, and the experiences of its future guests.”

2.3 Public Services

This section identifies existing recreational facilities, medical facilities, police and fire protection services, schools, solid waste, and emergency management agency that service Central Maui. Where significant impacts are identified, mitigation measures are provided to reduce these impacts to the extent feasible. Information in this section is based in part upon the *County of Maui Website: Facilities*, *State of Hawai'i Department of Education Website*, and *Integrated Solid Waste Management Plan (ISWMP) dated February 17, 2009*.

2.3.1 Recreational Facilities

Existing Conditions. Several recreational facilities are in the vicinity of the Project Site including Kānāhā Pond State Wildlife Sanctuary, Kānāhā Beach Park and Keolu Park.

Potential Impacts and Mitigation Measures. As the intent of the proposed development is to focus on users of the Kahului Airport, business travelers and inter-island travelers preferring accommodations in Central Maui it is not anticipated that impacts to recreational resources will be significant.

2.3.2 Medical Facilities

Existing Conditions. Major medical facilities are located approximately 3.1 miles from the Project Site at Maui Memorial Medical Center and the Kaiser Permanente Health Clinic.

Potential Impacts and Mitigation Measures. The proposed hotel Project will not generate population like a multi-family development or residential subdivision project and therefore is not anticipated to have an adverse impact upon existing medical facilities.

2.3.3 Police and Fire Protection Services

Existing Conditions. Police protection for the region is provided by the Maui County Police Department (MPD) headquartered at the Wailuku station approximately 3.1 miles away. The Central Maui patrol includes approximately 100 full time personnel.

Fire prevention, suppression, and protection are provided by Maui County Fire Department's Kahului Station, located on Dairy Road, approximately 2.1 miles from the Project Site.

Potential Impacts and Mitigation Measures. The proposed hotel project will not increase the population of the immediate area and is of a moderate scale, therefore the proposed hotel is not anticipated to result in significant adverse impact upon existing police and fire protection services.

Increased tax revenues generated by the project will provide additional funds to the County for police and fire capital facility improvements and service upgrades. Additionally, the Project will comply with any impact fee ordinances for police and fire that may be adopted.

2.3.4 Schools

Existing Conditions. Maui schools are organized into complexes and complex areas. A complex consists of a high school and all the intermediate/middle and elementary schools that flow into it. Groups of two to four complexes form a "complex area" that is under the supervision of a complex area superintendent.

The Kānāhā Hotel site is located within the State Department of Education's (DOE) Maui Complex, within the Baldwin-Kekaulike-Maui Complex-Area.

The Central Maui area is also serviced by private schools, which provide education for preschool through high school age children.

Potential Impacts and Mitigation Measures. It is not anticipated that the Proposed Action will have a direct impact on population or public education facilities. Any secondary impacts resulting from an increased population due to employment creation are anticipated to be minimal.

2.3.5 Solid Waste

Existing Conditions. Weekly, residential solid-waste collection in the area is provided by the County of Maui, Department of Environmental Management (DEM), Solid Waste Division. The Department's Residential Collection program collects and disposes of residential waste in three major districts: Wailuku (including Kahului and South Maui), Makawao (including Kula, Pukalani, Paia, and Haiku) and Lāhainā (West Maui).

The Central Maui Landfill, which is in the Wailuku-Kahului Community Plan region, receives residential solid waste from the area. Green waste is collected by Eko Compost, which is located at the Central Maui Landfill.

Residential solid waste collection is provided by the County and taken to the Central Maui Landfill (CML), which also accepts waste from private refuse collection companies. The CML will reach capacity in 2026. In March 2020, the Council adopted a resolution allowing the County to acquire an approximately 59.037 acres of land to be used as Central Maui Sanitary Landfill "Puu Nene 2" to accommodate future landfill needs.

A privately run Construction and Demolition (C&D) landfill in Maalaea reached capacity in 2016. The County now requires contractors to obtain a Construction & Demolition number from the county to begin disposing of debris in the central Maui landfill.

In addition, the County is implementing an Integrated Waste Conversion and Energy Project that is expected to divert approximately 85 percent of waste from the CML.

Plastic, glass, metal, cardboard, and newspaper can be recycled when left at various drop-boxes throughout the County. Green waste recycling is provided by several private organizations.

Potential Impacts and Mitigation Measures. The Proposed Project is not anticipated to have an adverse impact upon existing solid waste facilities. Green waste will be mulched onsite when practicable. During construction, as required by County regulations, construction and demolition waste will be properly disposed.

The County's DEM, Solid Waste Division estimates that hotel units on Maui generate approximately 4-5 lbs. of solid waste per visitor and employee per day. Solid waste generation includes all the waste produced in a residence or business, including that which is reused or recycled as well as that which is disposed of in landfills.

Using the above rates, after full build-out and occupancy of all 200 hotel units employing an estimated 100 people at the Project site, total waste generated is estimated to be approximately 2,315 lbs. per day. ($363 + 100 = 2,315$ lbs. per day).

Using the County's waste diversion rate of 30 percent, total waste from the Project site is estimated to be approximately 1,621 lbs. per day. Achieving the County's waste diversion rate of 50 percent by 2030 would reduce the Project's waste to 1,158 lbs. per day.

In 2009 the Integrated Solid Waste Management Plan (ISWMP) for Maui County was updated and projected that the Central Maui Landfill will have adequate capacity to accommodate Residential and Commercial waste through the year 2026. This estimate does not consider future increases in source reduction and waste diversion. Increases in waste diversion achieved through education, recycling, composting, and reuse programs are expected to decrease demand for landfill space and extend the life of the Central Maui Landfill beyond the currently projected closure year. In March 2020, the Council adopted a

resolution allowing the County to acquire an approximately 59.037 acres of land to be used as Central Maui Sanitary Landfill “Puu Nene 2” to accommodate future landfill needs.

Little demolition material is expected, as the site is vacant.

During the short term, construction activities will require the disposal of the existing onsite waste, as well as cleared vegetation and construction-related solid waste. A solid waste management plan will be coordinated with the County’s Solid Waste Division for the disposal of onsite and construction-related waste material. The applicants will work with the contractor to minimize the amount of solid waste generated during the construction of the project.

In addition, the project will provide on-site recycling opportunities to reduce solid waste entering the landfill.

2.3.6 Emergency Management Agency

Existing Conditions. The Maui Emergency Management Agency has a mission to achieve community resiliency within the County of Maui by planning, preparing, and coordinating emergency management operations during disaster situations and coordinating post-disaster recovery operations. The closest shelter locations from the Project Site are War Memorial Gym and Maui High School — about 3 miles and 5 miles respectively.

Potential Impacts and Mitigation Measures. It is not anticipated that the Proposed Action will have a direct impact on population or public education facilities. Any secondary impacts resulting from an increased population due to employment creation are anticipated to be minimal.

2.4 Infrastructure

2.4.1 Roadways

This section is based upon the *Draft Final of Kahahā Hotel Traffic Impact Analysis Report*, prepared by Austin, Tsutsumi & Associates, Inc., dated April 30, 2021 (refer to Appendix 24, “Traffic Impact Analysis Report”). The purpose of the Traffic Impact Analysis Report (TIAR) is to evaluate development of the Proposed Project from a traffic and circulation

standpoint. This analysis considers impacts on intersections and roadways within the vicinity of the Project Site. Mitigation measures are recommended, if necessary, to avoid or reduce project impacts on traffic and circulation.

The TIAR describes existing roadways system and analyzes existing and future weekday daily peak hour traffic conditions for the following conditions:

- Existing Intersection Operations;
- Base Year 2025 Intersection Analysis;
- Future Year 2023 Traffic Conditions (i.e., Travel Demand Estimations, Trip Generation, and Trip Distribution and Assignment);
- Future Year 2025 Intersection Analysis; and
- Conclusion and Recommended Mitigation Measures for the Existing Conditions, Base Year 2025, and Future Year 2025.

Existing Conditions: A Traffic Impact Analysis Report (TIAR) was prepared by Austin, Tsutsumi & Associates, Inc. (ATA) in May 2019 and updated in October 2020 and April 2021 — describing the traffic characteristics of the Proposed Project and possible impacts to the adjacent roadway network (See: Appendix 24).

Existing Roadway System

A‘alele Street is a two-lane, undivided, north-south roadway connecting Keolani Place to Haleakalā Highway with a posted speed limit of 25 miles per hour (mph).

Dairy Road/Keolani Place is a five-lane, undivided, north-south roadway connecting the Kahului Airport to Kūihelani Highway at its intersection with Pu‘unene Avenue and providing access to the Kahului Industrial area. At its intersection with Haleakalā Highway, Dairy Road forms the south leg and Keolani Place forms the north leg of the intersection. The posted speed limit along Dairy Road and Keolani Place is 30 mph.

Haleakalā Highway is a two-lane, undivided, east/west roadway fronting the MBP NPA. Haleakalā Highway provides access to various commercial uses as well as the Kahului Airport. The posted speed limit on Haleakalā Highway is 30 mph west of its intersection with Dairy Road and 25 mph east of the intersection.

Lauo Loop is a two-lane roadway that intersects with Haleakalā Highway at two locations (East and West) and will service the MBP NPA. Lauo Loop West currently services the east

end of the Costco warehouse and gas station.

Hanakai Street is a two-lane, undivided, north-south roadway. Hanakai Street begins to the south at its intersection with Alamaha Street and terminates to the north at its intersection with Haleakalā Highway. This roadway services various commercial uses.

Kele Street/U-Haul Driveway is a two-lane, undivided, east-west roadway. East of its intersection with Dairy Road allowing access to the former K-mart site, currently the U-Haul baseyard. Kele Street provides access to various commercial and industrial uses. Note that existing traffic counts were conducted when Kmart was still in operation.

Hāna Highway is generally a four- to five-lane, divided, east/west State Arterial roadway in the vicinity of the Project. Hāna Highway is a regional roadway providing access to Wailuku, located west of Kahului, and towns on the north and east side of the island. Hāna Highway mainly provides access to various commercial and industrial uses. The posted speed limit in the vicinity of the Project is 45 mph.

Airport Access Road (AAR) is generally a four-lane, undivided, north/south State roadway. AAR begins at its intersection with Pu‘unene Avenue and Kūihelani Highway and continues north through Hāna Highway to serve as a direct route to the Kahului Airport. The posted speed limit on AAR is 45 mph.

Ho‘okele Street is generally a divided, four-lane, two-way major collector roadway that provides access between Pu‘unene Avenue and Hāna Highway. Ho‘okele Street currently services various restaurants, office buildings, and big box retailers such as Target, Home Depot and Wal-Mart. The posted speed limit along this roadway is 35 mph.

Existing Traffic Volumes

Most hourly traffic volume data utilized in this report was collected in 2017. However, existing traffic volumes have been supplemented with new traffic counts collected in 2019 at the Haleakalā Highway/Dairy Road/Keolani Place intersection and Hāna Highway/Airport Access Road intersection.

Due to the opening of the Consolidated Rental Car Facility (CONRAC) and roadway circulation changes at Kahului Airport, 2019 data collection was conducted to accurately capture the redistribution of trips in the study area.

Traffic counts at the Haleakalā Highway/Costco Main Access intersection were also collected in 2019 and reflected similar to 2017 conditions. Existing traffic volumes at the intersections collected in 2017 have been modified to match the in/out volumes at the Haleakalā Highway/Dairy Road/Keolani Place intersection and the Hāna Highway/Airport Access Road intersection.

The 2019 volumes and subsequent 2017 volume modifications include traffic generated by various businesses in the Maui Business Park South Project Area (MBP SPA) that opened between 2017 and 2019 — including Pacific Pipe, Lexus, BMW, American Savings Bank, Safeway Store, Safeway Gas Station, and new tenants at the Pu‘unene Shopping Center. In total, the 2019 volumes and 2017 adjusted volumes constitute the baseline of Existing 2019 traffic condition.

*Note that the Haleakalā Highway/ Hāna Highway/Hanakai Street intersection was analyzed as four (4) separate intersections for analysis purposes.

1. Haleakalā Highway/A‘alele Street (Year 2017 - unsignalized)
2. Haleakalā Highway/Kuleana Street/Lauo Loop East (Year 2017 - unsignalized)
3. Haleakalā Highway/Lauo Loop West (Year 2017 - unsignalized)
4. Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway (Year 2017 - unsignalized)
5. Haleakalā Highway/Dairy Road/Keolani Place (Year 2019 - signalized)
6. Haleakalā Highway/Hanakai Street (North) (Year 2017 - unsignalized)
7. Haleakalā Highway/ Hāna Highway (Year 2017 - unsignalized)
8. Hāna Highway/Hanakai Street (North) (Year 2017 - unsignalized)
9. Hāna Highway/Hanakai Street (South) (Year 2017 - unsignalized)
10. Dairy Road/Kele Street (Year 2017 - unsignalized)
11. Hāna Highway/Dairy Road (Year 2017 - unsignalized)
12. Hāna Highway/Airport Access Road (Year 2019 - signalized)
13. Hāna Highway/Ho‘okele Street (Year 2017 - unsignalized)

Existing Intersection Operations

Based on traffic count data, the weekday morning and afternoon peak hours were determined to occur between 7:00 AM and 8:00 AM and 3:30 PM and 4:30 PM. Note that along Hāna Highway, the weekday afternoon peak hours along the mainline occurred

between 4:00 PM to 5:00 PM and were used along the three (3) Hāna Highway intersections. The Saturday midday peak hour was determined to occur between 11:45 AM and 12:45 PM.

Operating conditions at an intersection by approach are expressed as a qualitative measure known as Level of Service (LOS) ranging from A to F. LOS A represents free-flow operations with low delay, while LOS F represents congested conditions with relatively high delay. The overall intersection LOS is a weighted average of the LOS of individual traffic movement groups.

The observations and analysis described below are based on prevailing observations during the time at which the data was collected. Hereinafter, observations that are expressed as ongoing and current shall represent the conditions that prevailed at the time at which the data was collected. All movements at the study intersections generally operated adequately at LOS D or better. However, the following intersection movements operated at LOS E/F:

3. Haleakalā Highway/Lauo Loop West

The northbound left-turn operated at LOS D or better during the AM and PM peak hours of traffic and at LOS E during the SAT MD peak hours of traffic — due to the high turning volumes.

However, multiple northbound left-turn vehicles were able to proceed through the intersection at once — since eastbound through traffic along Haleakalā Highway operated in platoons — with gaps in traffic generated by the nearby traffic signal at the Haleakalā Highway/Dairy Road/Keolani Place intersection. The northbound left-turn is also provided with a median refuge lane to cut down on northbound left-turn delays by allowing two-stage left-turn movements.

Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant, a traffic signal is currently not warranted. Signal warrant figures are shown in Appendix D of the TIAR.

4. Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway

The northbound left-turn operated at LOS F during the PM and the SAT MD peak hours of traffic — due to the high turning volumes.

However, similar to the Haleakalā Highway/Lauo Loop West intersection, multiple northbound left-turn vehicles were able to proceed through the intersection at once — since eastbound through traffic along Haleakalā Highway operated in platoons — with gaps in traffic generated by the nearby traffic signal at the Haleakalā Highway/Dairy Road/Keolani Place intersection.

Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant, a traffic signal is currently warranted. Signal warrant figures are shown in Appendix D of the TIAR.

5. Haleakalā Highway/Dairy Road/Keolani Place

Since the completion of the Consolidated Rental Car Facility (CONRAC) and roadway circulation changes at the Kahului Airport, all movements at this intersection operate adequately at LOS D or better — due to reduced volumes along all approaches.

The westbound left-turn movement — previously exhibited lengthy queues prior to Kahului Airport circulation changes — has since improved, with the majority of westbound left-turn vehicles remaining within the westbound left-turn lane and generally clear in one signal cycle.

8 & 9. Hāna Highway/Hanakai Street (North) & Hāna Highway/Hanakai Street (South)

During the AM, PM and SAT MD peak hours of traffic, various minor street approaches operated at LOS E/F. Delay to the minor street approaches was due to the high through volumes along Hāna Highway. However, gaps in through traffic along Hāna Highway were available — due to upstream and downstream signals. Therefore, only 1-2 vehicles were observed to queue along Hanakai Street during both peak hours.

10. Dairy Road/Kele Street

The westbound shared left-turn/through lane operated at LOS E during the PM peak hour and at under capacity LOS F during the SAT MD peak hour due to the high volumes along Dairy Road. However, it should be noted that the U-Haul baseyard currently occupies the site east of the intersection and generates lower traffic than the previous K-mart tenant.

11. Hāna Highway/Dairy Road

During the AM and PM peak hours of traffic, various left-turn movements and the northbound and southbound through movements operated at LOS E/F — due to the long

cycle length at this intersection required to accommodate the high volumes along Hāna Highway.

However, all movements operated under capacity, and observations indicated all left-turn movements generally queued within its given storage lane lengths. During the heavier PM peak hour, eastbound queues along Hāna Highway can queue to Hanakai Street and occasionally require two signal cycles to clear.

12. Hāna Highway/Airport Access Road

Similar to the Hāna Highway/Dairy Road intersection, during the AM and PM peak hours of traffic — various left-turn movements and the northbound and southbound through movements operated at LOS E/F due to the long cycle length at this intersection required to accommodate the high volumes along Hāna Highway. However, all movements operated under capacity, and observations indicated all left-turn movements generally queued within its given storage lane lengths.

13. Hāna Highway/Ho'okele Street

During the AM and PM peak hours of traffic, left-turn and minor street volumes operated at LOS E/F due to long cycle lengths which prioritize the high volumes along the mainline Hāna Highway. The heavy through movement along Hāna Highway operates at LOS A or B across all peak hours. Northbound queues along Ho'okele Street can queue near to Pulehu Road.

Table 6 displays the existing conditions Level of Service (LOS) for each signalized and unsignalized intersection.

Table 6. Existing Conditions Level of Service (LOS)

Intersection	Existing 2019 Conditions								
	AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
2: Haleakalā Hwy & A‘alele St									
EB LT	8.2	0.06	A	8.2	0.10	A	8.5	0.15	A
SB LT/RT	11.9	0.08	B	22.6	0.46	C	17.4	0.29	C
OVERALL	2.1	-	-	5.1	-	-	4.0	-	-
3: Lauo Loop East & Haleakalā Hwy									
NB LT/TH	11.9	0.00	B	16.4	0.01	C	15.7	0.01	C
NB RT	8.9	0.01	A	10.6	0.05	B	10.7	0.08	B
EB LT	7.8	0.00	A	7.9	0.00	A	7.9	0.00	A
WB LT	7.5	0.00	A	8.1	0.02	A	8.0	0.01	A
SB LT/TH/RT	11.3	0.06	B	16.6	0.18	C	13.6	0.02	B
OVERALL	1.1	-	-	2.1	-	-	1.1	-	-
4: Lauo Loop West & Haleakalā Hwy									
NB LT	16.9	0.37	C	29.6	0.66	D	37.8	0.73	E
NB RT	9.0	0.06	A	11.3	0.26	B	11.3	0.26	B
WB LT	7.7	0.09	A	8.3	0.11	A	8.3	0.14	A
OVERALL	6.9	-	-	9.9	-	-	11.9	-	-
5: Costco Main Driveway/Costco Hwy & Haleakalā Hwy									
NB LT/TH	12.5	0.03	B	58.6	0.85	F	61.4	0.87	F
NB RT	8.9	0.00	A	10.1	0.13	B	9.9	0.14	A
EB LT	8.0	0.00	A	8.2	0.00	A	8.2	0.00	A
WB LT	7.6	0.01	A	8.6	0.05	A	8.7	0.05	A
SB LT/TH/RT	11.3	0.02	B	14.2	0.03	B	15.6	0.03	C
OVERALL	0.7	-	-	12.4	-	-	12.7	-	-
6: Dairy Rd/Keolani Place & Haleakalā Hwy									
NB LT	48.4	0.53	D	44.9	0.77	D	44.3	0.77	D
NB TH/RT	17.9	0.19	B	27.9	0.16	C	28.7	0.23	C
EB LT	23.0	0.73	C	39.6	0.75	D	37.2	0.75	D
EB TH/RT	14.8	0.37	B	26.9	0.78	C	26.4	0.77	C
WB LT	21.6	0.73	C	27.8	0.86	C	26.5	0.86	C
WB TH	16.1	0.64	B	12.4	0.35	B	12.3	0.37	B
WB RT	12.5	0.00	B	0.0	0.00	A	0.0	0.00	A
SB LT	48.4	0.53	D	48.2	0.63	D	46.4	0.65	D
SB TH	20.3	0.50	C	33.7	0.58	C	33.0	0.51	C
SB RT	17.3	0.07	B	29.0	0.06	C	28.9	0.03	C
OVERALL	19.1	-	B	26.7	-	C	25.8	-	C
7: Hanakai St & Haleakalā Hwy									
NB RT	10.0	0.01	B	11.2	0.04	B	11.3	0.05	B
WB LT	7.9	0.01	A	8.3	0.01	A	8.3	0.02	A
OVERALL	0.3	-	-	0.4	-	-	0.6	-	-

Intersection	Existing 2019 Conditions								
	AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
8: Hāna Hwy & Haleakalā Hwy									
EB LT	31.6	0.72	D	24.9	0.73	C	20.6	0.67	C
OVERALL	3.5	-	-	3.7	-	-	3.4	-	-
9: Hanakai St (North) & Hāna Hwy									
NB LT/TH	35.0	0.08	E	18.7	0.08	C	18.5	0.08	C
SB TH	37.9	0.06	E	22.8	0.04	C	21.5	0.08	C
OVERALL	0.4	-	-	0.5	-	-	0.8	-	-
10: Hanakai St (South) & Hāna Hwy									
NB TH/RT	19.0	0.08	C	34.5	0.36	D	45.2	0.21	E
WB LT	10.6	0.12	B	14.2	0.09	B	13.0	0.14	B
SB LT/TH	23.9	0.03	C	40.1	0.07	E	43.8	0.17	E
OVERALL	1.5	-	-	2.0	-	-	2.0	-	-
11: Dairy Rd & Kele St									
NB LT	7.8	0.05	A	8.7	0.06	A	8.6	0.06	A
EB RT	9.1	0.04	A	10.4	0.09	B	10.6	0.14	B
WB LT/TH	14.3	0.12	B	45.0	0.62	E	116.2	0.95	F
WB RT	8.9	0.01	A	10.0	0.05	B	11.0	0.12	B
SB LT	7.7	0.01	A	8.4	0.02	A	9.0	0.05	A
OVERALL	3.1	-	-	6.0	-	-	12.8	-	-
12: Dairy Rd & Hāna Hwy									
NB LT	90.1	0.77	F	96.5	0.85	F	50.2	0.77	D
NB TH	66.1	0.33	E	67.2	0.46	E	32.8	0.40	C
NB RT	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A
EB LT	92.2	0.77	F	96.3	0.86	F	47.9	0.80	D
EB TH	16.0	0.35	B	29.0	0.68	C	28.3	0.79	C
EB RT	12.7	0.05	B	18.4	0.11	B	20.7	0.12	C
WB LT	62.0	0.86	E	81.0	0.83	F	42.9	0.73	D
WB TH	0.7	0.59	A	34.8	0.50	C	27.0	0.70	C
WB RT	0.1	0.06	A	24.9	0.10	C	21.3	0.18	C
SB LT	93.9	0.77	F	103.9	0.87	F	49.0	0.79	D
SB TH/RT	75.8	0.74	E	81.7	0.85	F	38.3	0.77	D
OVERALL	23.4	-	C	48.9	-	D	33.1	-	C
13: Airport Access Road & Hāna Hwy									
NB LT	78.8	0.66	E	82.1	0.70	F	36.3	0.46	D
NB TH	73.0	0.77	E	70.0	0.49	E	31.5	0.66	C
NB RT	65.4	0.08	E	66.7	0.12	E	28.7	0.26	C
EB LT	74.9	0.73	E	82.5	0.71	F	36.6	0.61	D
EB TH	0.2	0.23	A	32.5	0.52	C	17.7	0.53	B
EB RT	0.1	0.04	A	21.7	0.06	C	14.2	0.06	B
WB LT	78.8	0.87	E	70.2	0.89	E	34.8	0.68	C

Intersection	Existing 2019 Conditions								
	AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
WB TH	44.5	0.68	D	0.5	0.45	A	18.7	0.74	B
WB RT	20.0	0.07	B	0.2	0.11	A	13.6	0.21	B
SB LT	77.6	0.44	E	83.1	0.74	F	36.8	0.60	D
SB TH	68.7	0.35	E	76.8	0.83	E	28.9	0.44	C
SB RT	66.2	0.01	E	65.0	0.05	E	26.8	0.07	C
OVERALL	43.5	-	D	36.5	-	D	23.2	-	C
14: Ho'okele St & Hāna Hwy									
NB LT	75.1	0.74	E	67.1	0.56	E	26.9	0.68	C
NB RT	54.7	0.18	D	60.7	0.73	E	15.9	0.26	B
EB TH	16.7	0.34	B	1.8	0.75	A	15.8	0.71	B
EB RT	12.4	0.12	B	0.3	0.17	A	12.2	0.30	B
WB LT	73.2	0.84	E	89.3	0.87	F	28.7	0.74	C
WB TH	3.9	0.64	A	5.7	0.46	A	5.3	0.51	A
OVERALL	18.1	-	B	20.2	-	C	14.8	-	B

* Denotes overcapacity conditions, $v/c \geq 1$.

Potential Impacts and Mitigation Measures. By the Year 2025, the following developments (excluding the Project) are expected to be completed — may impact the traffic in the surrounding area as described below. The trips generated by these developments have been distributed to the network based on proximity of access and expected travel patterns as described previously.

Keolani Triangle Retail Center is planned to be located on the vacant parcel of land bound by Keolani Place to the north, Haleakalā Highway to the south, and the existing Courtyard Marriott Hotel to the east. The project proposes an approximate 1,800 square foot drive-through restaurant and approximately 3,000 square feet of retail space.

Primary access will be provided on the south side of the parcel from a right-in right out (RIRO) access along Haleakalā Highway. Secondary access will be provided by a driveway from a shared easement on the east side of the project — also serves the Courtyard by Marriott Hotel. The TIAR assumes that the Keolani Triangle Retail Center will be completed by Year 2025.

Costco Gas Expansion is planned to include the installation of 10 new fuel dispensers at the existing Costco Gas Station located at the southwest corner of the Haleakalā Highway/Lauo Loop West intersection.

Skyline Eco-Adventures is a planned development located within the Maui Business Park North Project Area (MBP NPA) — proposes to build a 7,000 square foot corporate office building and a 5,900 square foot vehicle maintenance building and baseyard.

The site will mainly be accessed by employees, company tour, and hotel pick-up/drop-off vehicles — some guests may also access the site by personal vehicle. Access will be via Lauo Loop. We understand that an SMA application is currently being reviewed for approval of this project. The TIAR assumes that the Skyline Eco-Adventures will be completed by Year 2025.

Maui Business Park South Project Area (MBP SPA) is a 121.2-acre site located in the vicinity of Ho'okele Street to the south of Hāna Highway and to the east of Dairy Road. Existing traffic counts that were taken from 2017 to 2019 incorporate various completed developments in MBP SPA — Pacific Pipe, Lexus, BMW, American Savings Bank, Safeway and Safeway Gas Station, and various tenants at the Pu'unene Shopping Center.

Three (3) future developments are also planned for development in MBP SPA including Maui County Service Center (MCSC), Kīhei Auto Sales (currently operating) and remaining tenants at Ho'okele Shopping Center. For purposes of this traffic study, these developments were included in this TIAR. It was also conservatively assumed that Pu'unene Shopping Center would be fully occupied by Year 2025.

Maui Palms Hotel Redevelopment is a planned redevelopment of the old Maui Palms Hotel site — adjacent to the Maui Beach Hotel and is currently vacant. Current plans propose a 136-room hotel spread across three buildings.

Access to the site will likely be provided from the existing Maui Beach Hotel accesses via School Street and Lono Avenue. Based on an article in the Maui News dated February 19, 2019, construction on the hotel may start during the end of 2019. This TIAR assumes that the Maui Palms Redevelopment project will be completed and occupied by 2025.

Kahului Lani Senior Affordable Housing proposes to construct 164 senior rental units, 1 managers unit, approximately 2,500 square feet of recreational space for the residents of the Project, 5,000 square feet of office type space for Catholic Charities of Hawaii, and park space. Access will be provided via Project driveways from School Street, Vevau Street and Kane Street. The Kane Street access is proposed as a right-in right-out access only.

Maui Transit Hub proposes to relocate the Maui Bus Transit hub from its existing location at Queen Kaahumanu Center (QKC) to a portion of land fronting Vevau Street, on the northwest quadrant of the Vevau Street/School Street intersection. The Vevau Street Bus Hub location will provide a canopy for shade, ticket booth, restrooms, storage of six (6) buses and six (6) parking stalls for the transit hub employees.

Hale Pilina Family Affordable Housing proposes to construct 179 multi-family residential units on a currently undeveloped lot previously hosted the Kahului Swap Meet. Access to the Project will be provided along Kaulawahine Street and RIRO access via Puunene Avenue.

Additionally, HDOT has future plans to provide an on-ramp from Haleakalā Highway onto AAR, adjacent to the Project site. Since the timeline and design of this on-ramp has not yet been determined, the on-ramp was not considered for the Base Year or Future Year scenarios.

Base Year 2025 Analysis

It is anticipated that by Base Year 2025, traffic will have increased over existing conditions due to the development in the Kahului region. Actual growth within the study region may vary based upon the actual construction of the various nearby developments.

Base Year 2025 Intersection Analysis

3. Haleakalā Highway/Lauo Loop West

The northbound left-turn is expected to operate worsen to LOS E during the SAT MD peak hour of traffic. Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant — a traffic signal is not anticipated to be warranted by Base Year 2025. However, the intersection is expected to operate similar to existing conditions with gaps in traffic generated by nearby traffic signals.

4. Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway

As previously discussed, a signal is currently warranted under existing conditions, so the intersection was analyzed to include a traffic signal. With a signal, all movements at this intersection are anticipated to operate adequately at LOS C or better during all peak hours of traffic. If a signal is not installed, the northbound shared left-turn/through movement is anticipated to operate at LOS F and overcapacity conditions for the PM and SAT MD peak hours.

Based on zoning conditions, Costco is required to monitor this intersection on a biannual basis to determine if a signal will be warranted. If warranted, Costco will coordinate with the County on design and construction of a traffic signal. If HDOT constructs an on-ramp from Haleakalā Highway onto AAR, this would likely reduce the critical exiting left-turn movements out of Costco and impact the warranting of the signal.

7. Haleakalā Highway/ Hāna Highway

By Base Year 2025, the eastbound left-turn is expected to operate worsen to LOS F during the AM and LOS E during the PM peak hour of traffic. However, based on observations of existing conditions, multiple eastbound left-turn vehicles were able to proceed through the intersection at once — since the opposing westbound through traffic along Hāna Highway operates in platoons — with gaps in traffic generated by the nearby traffic signal at the Hāna Highway/Dairy Road/Keolani Place intersection — may result in less delay than is projected by Synchro analysis.

8 & 9. Hāna Highway/Hanakai Street (North) & Hāna Highway/Hanakai Street (South)

By Base Year 2025, various minor northbound and southbound approaches are expected to operate at LOS E/F during all peak hours of traffic. However, based on existing conditions — these movements were of relatively low volume with 10-25 vehicles per movement. Minimal existing queuing (1-2 vehicles long) and delay were observed — due to traffic being controlled by the downstream signal at Hāna Highway/Dairy Road and the upstream signal at Hāna Highway/Kamehameha Avenue. Traffic queues will likely continue operating similar to existing conditions.

10. Dairy Road/Kele Street

The shared westbound left-turn/through movement is expected to operate at LOS F during the PM peak hour and at LOS F and over capacity during the SAT MD peak hour. However,

as noted earlier, the Kmart store has closed. No mitigation is proposed — due to the anticipated reduction in traffic along the westbound approach.

11-13. Hāna Highway from Dairy Road to Ho’okele Street

By Base Year 2025, various minor street and left-turn movements are expected to continue operating at or worsen to LOS E/F during all peak hours of traffic — due to the long cycle lengths at the intersections and traffic growth along Hāna Highway. However, the intersections will continue to operate adequately at LOS D or better overall — with all movements operating under capacity during all peak hours.

Table 7 below summarizes the Base Year 2025 LOS at the study intersections compared to existing conditions.

Table 7. Summary of Base Year 2025 LOS

Intersection	Existing 2019 Conditions									Base Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
1: Haleakala Hwy & Aalele St																		
EB LT	8.2	0.06	A	8.2	0.10	A	8.5	0.15	A	8.4	0.07	A	8.5	0.12	A	8.9	0.18	A
SB LT/RT	11.9	0.08	B	22.6	0.46	C	17.4	0.29	C	13.2	0.10	B	33.1	0.58	D	23.4	0.38	C
OVERALL	2.1	-	-	5.1	-	-	4.0	-	-	2.0	-	-	6.2	-	-	4.3	-	-
2: Lauro Loop East & Haleakala Hwy																		
NB LT/TH	11.9	0.00	B	16.4	0.01	C	15.7	0.01	C	13.8	0.02	B	21.2	0.11	C	20.2	0.07	C
NB RT	8.9	0.01	A	10.6	0.05	B	10.7	0.08	B	9.2	0.02	A	11.5	0.08	B	11.6	0.10	B
EB LT	7.8	0.00	A	7.9	0.00	A	7.9	0.00	A	8.0	0.00	A	8.0	0.00	A	8.1	0.00	A
WB LT	7.5	0.00	A	8.1	0.02	A	8.0	0.01	A	7.6	0.02	A	8.3	0.02	A	8.3	0.02	A
SB LT/TH/RT	11.3	0.06	B	16.6	0.18	C	13.6	0.02	B	12.8	0.07	B	21.0	0.23	C	16.3	0.03	C
OVERALL	1.1	-	-	2.1	-	-	1.1	-	-	1.4	-	-	2.8	-	-	1.4	-	-
3: Lauro Loop West & Haleakala Hwy																		
NB LT	15.4	0.34	C	25.1	0.61	D	28.2	0.64	D	18.6	0.43	C	38.5	0.76	E	47.7	0.81	E
NB RT	9.0	0.06	A	11.3	0.26	B	11.3	0.26	B	9.4	0.08	A	12.3	0.31	B	12.4	0.32	B
WB LT	7.7	0.09	A	8.3	0.11	A	8.3	0.14	A	7.9	0.11	A	8.6	0.13	A	8.7	0.16	A
OVERALL	6.5	-	-	8.9	-	-	9.7	-	-	6.8	-	-	11.4	-	-	13.2	-	-
4: Costco Main Driveway/Costco Dwy & Haleakala Hwy																		
NB LT/TH	12.5	0.03	B	58.6	0.85	F	61.4	0.87	F	27.0	0.08	C	16.9	0.52	B	24.7	0.68	C
NB RT	8.9	0.00	A	10.1	0.13	B	9.9	0.14	A	26.9	0.03	C	13.6	0.06	B	13.4	0.05	B
EB LT	8.0	0.00	A	8.2	0.00	A	8.2	0.00	A	3.7	0.01	A	11.1	0.00	B	15.9	0.01	B
EB TH	-	-	-	-	-	-	-	-	-	4.1	0.15	A	12.9	0.49	B	17.4	0.46	B
EB RT	-	-	-	-	-	-	-	-	-	3.7	0.04	A	11.2	0.18	B	15.8	0.23	B
WB LT	7.6	0.01	A	8.6	0.05	A	8.7	0.05	A	3.4	0.01	A	9.5	0.12	A	13.4	0.14	B
WB TH/RT	-	-	-	-	-	-	-	-	-	5.2	0.33	A	13.8	0.75	B	20.5	0.82	C
SB LT/TH/RT	11.3	0.02	B	14.2	0.03	B	15.6	0.03	C	27.2	0.04	C	13.8	0.02	B	15.8	0.00	B
OVERALL	0.7	-	-	12.4	-	-	12.7	-	-	5.5	-	A	13.9	-	B	19.9	-	B

Intersection	Existing 2019 Conditions									Base Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
5: Dairy Rd/Keolani Place & Haleakala Hwy																		
NB LT	48.4	0.53	D	44.9	0.77	D	44.3	0.77	D	49.9	0.53	D	47.9	0.76	D	47.3	0.77	D
NB TH/RT	17.9	0.19	B	27.9	0.16	C	28.7	0.23	C	19.4	0.24	B	31.2	0.22	C	32.4	0.31	C
EB LT	23.0	0.73	C	39.6	0.75	D	37.2	0.75	D	23.5	0.73	C	41.4	0.75	D	38.6	0.76	D
EB TH/RT	14.8	0.37	B	26.9	0.78	C	26.4	0.77	C	15.4	0.42	B	28.9	0.81	C	28.5	0.80	C
WB LT	21.6	0.73	C	27.8	0.86	C	26.5	0.86	C	21.8	0.73	C	30.1	0.88	C	28.7	0.88	C
WB TH	16.1	0.64	B	12.4	0.35	B	12.3	0.37	B	16.6	0.67	B	13.0	0.40	B	13.3	0.43	B
WB RT	12.5	0.00	B	0.0	0.00	A	0.0	0.00	A	12.5	0.00	B	10.3	0.00	B	0.0	0.00	A
SB LT	48.4	0.53	D	48.2	0.63	D	46.4	0.65	D	42.9	0.54	D	52.4	0.66	D	51.2	0.70	D
SB TH	20.3	0.50	C	33.7	0.58	C	33.0	0.51	C	21.2	0.49	C	37.1	0.60	D	36.4	0.52	D
SB RT	17.3	0.07	B	29.0	0.06	C	28.9	0.03	C	18.3	0.06	B	31.9	0.05	C	31.8	0.01	C
OVERALL	19.1	-	B	26.7	-	C	25.8	-	C	19.5	-	B	28.3	-	C	27.6	-	C
6: Hanakal St & Haleakala Hwy																		
NB RT	10.0	0.01	B	11.2	0.04	B	11.3	0.05	B	10.3	0.01	B	11.8	0.05	B	11.9	0.06	B
WB LT	7.9	0.01	A	8.3	0.01	A	8.3	0.02	A	8.0	0.01	A	8.5	0.01	A	8.5	0.02	A
OVERALL	0.3	-	-	0.4	-	-	0.6	-	-	0.2	-	-	0.4	-	-	0.5	-	-
7: Hana Hwy & Haleakala Hwy																		
EB LT	31.6	0.72	D	24.9	0.73	C	20.6	0.67	C	60.6	0.92	F	52.1	0.94	F	37.6	0.87	E
OVERALL	3.5	-	-	3.7	-	-	3.4	-	-	7.5	-	-	7.9	-	-	6.4	-	-
8: Hanakal St (North) & Hana Hwy																		
NB LT/TH	35.0	0.08	E	18.7	0.08	C	18.5	0.08	C	52.8	0.13	F	23.6	0.10	C	25.1	0.12	D
SB TH	37.9	0.06	E	22.8	0.04	C	21.5	0.08	C	56.8	0.09	F	29.1	0.05	D	29.7	0.11	D
OVERALL	0.4	-	-	0.5	-	-	0.8	-	-	0.5	-	-	0.6	-	-	0.9	-	-
9: Hanakal St (South) & Hana Hwy																		
NB TH/RT	19.0	0.08	C	34.5	0.36	D	45.2	0.21	E	17.2	0.07	C	37.1	0.38	E	38.5	0.18	E
WB LT	10.6	0.12	B	14.2	0.09	B	13.0	0.14	B	0.0	-	A	0.0	-	A	0.0	-	A
SB LT/TH	23.9	0.03	C	40.1	0.07	E	43.8	0.17	E	20.1	0.03	C	40.5	0.07	E	37.8	0.14	E
OVERALL	1.5	-	-	2.0	-	-	2.0	-	-	0.5	-	-	1.6	-	-	1.1	-	-
10: Dairy Rd & Kele St																		
NB LT	7.8	0.05	A	8.7	0.06	A	8.6	0.06	A	7.9	0.05	A	8.8	0.06	A	8.7	0.06	A
EB RT	9.1	0.04	A	10.4	0.09	B	10.6	0.14	B	9.2	0.04	A	10.5	0.09	B	10.7	0.14	B
WB LT/TH	14.3	0.12	B	45.0	0.62	E	116.2	0.95	F	14.9	0.13	B	53.2	0.67	F	149.0	1.04	F*
WB RT	8.9	0.01	A	10.0	0.05	B	11.0	0.12	B	9.0	0.01	A	10.1	0.05	B	11.2	0.13	B
SB LT	7.7	0.01	A	8.4	0.02	A	9.0	0.05	A	7.7	0.01	A	8.5	0.03	A	9.2	0.06	A
OVERALL	3.1	-	-	6.0	-	-	12.8	-	-	2.9	-	-	6.6	-	-	15.2	-	-

Intersection	Existing 2019 Conditions									Base Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
11: Dairy Rd & Hana Hwy																		
NB LT	90.1	0.77	F	96.5	0.85	F	50.2	0.77	D	90.1	0.77	F	97.1	0.85	F	56.7	0.79	E
NB TH	66.1	0.33	E	67.2	0.46	E	32.8	0.40	C	85.7	0.35	E	66.4	0.47	E	36.5	0.40	D
NB RT	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A
EB LT	92.2	0.77	F	96.3	0.86	F	47.9	0.80	D	89.1	0.78	F	99.5	0.87	F	53.6	0.83	D
EB TH	16.0	0.35	B	29.0	0.68	C	28.3	0.79	C	17.2	0.41	B	32.7	0.76	C	31.1	0.82	C
EB RT	12.7	0.05	B	18.4	0.11	B	20.7	0.12	C	13.1	0.05	B	19.2	0.12	B	22.0	0.15	C
WB LT	62.0	0.86	E	81.0	0.83	F	42.9	0.73	D	61.5	0.86	E	80.4	0.83	F	49.1	0.75	D
WB TH	0.7	0.59	A	34.8	0.50	C	27.0	0.70	C	0.8	0.65	A	38.3	0.58	D	30.5	0.75	C
WB RT	0.1	0.06	A	24.9	0.10	C	21.3	0.18	C	0.1	0.07	A	26.4	0.11	C	23.5	0.21	C
SB LT	93.9	0.77	F	103.9	0.87	F	49.0	0.79	D	92.7	0.77	F	105.0	0.87	F	55.1	0.80	E
SB TH/RT	75.8	0.74	E	81.7	0.85	F	38.3	0.77	D	75.2	0.75	E	82.7	0.85	F	42.0	0.78	D
OVERALL	23.4	-	C	48.9	-	D	33.1	-	C	23.4	-	C	50.8	-	D	36.5	-	D
12: Airport Access Road & Hana Hwy																		
NB LT	78.8	0.66	E	82.1	0.70	F	36.3	0.46	D	78.8	0.66	E	82.0	0.71	F	42.5	0.52	D
NB TH	73.0	0.77	E	70.0	0.49	E	31.5	0.66	C	72.4	0.78	E	69.9	0.52	E	36.2	0.70	D
NB RT	65.4	0.08	E	66.7	0.12	E	28.7	0.26	C	64.6	0.10	E	67.6	0.26	E	33.2	0.33	C
EB LT	74.9	0.73	E	82.5	0.71	F	36.6	0.61	D	74.3	0.75	E	65.8	0.23	E	42.0	0.64	D
EB TH	0.2	0.23	A	32.5	0.52	C	17.7	0.53	B	0.2	0.26	A	35.1	0.57	D	18.8	0.54	B
EB RT	0.1	0.04	A	21.7	0.06	C	14.2	0.06	B	0.1	0.04	A	22.6	0.06	C	14.7	0.06	B
WB LT	78.8	0.67	E	70.2	0.89	E	34.8	0.68	C	75.3	0.88	E	70.0	0.89	E	40.2	0.71	D
WB TH	44.5	0.68	D	0.5	0.45	A	18.7	0.74	B	31.5	0.74	C	1.2	0.61	A	20.5	0.77	C
WB RT	20.0	0.07	B	0.2	0.11	A	13.6	0.21	B	14.1	0.08	B	0.3	0.14	A	14.4	0.23	B
SB LT	77.6	0.44	E	83.1	0.74	F	36.8	0.60	D	78.5	0.53	E	82.8	0.75	F	42.1	0.64	D
SB TH	68.7	0.35	E	76.8	0.83	E	28.9	0.44	C	67.6	0.35	E	77.3	0.84	E	32.4	0.44	C
SB RT	66.2	0.01	E	65.0	0.05	E	26.8	0.07	C	65.2	0.03	E	64.2	0.07	E	30.0	0.08	C
OVERALL	43.5	-	D	36.5	-	D	23.2	-	C	36.3	-	D	37.0	-	D	25.7	-	C
13: Hookele St & Hana Hwy																		
NB LT	75.1	0.74	E	67.1	0.56	E	26.9	0.68	C	74.0	0.75	E	71.6	0.71	E	32.5	0.73	C
NB RT	54.7	0.18	D	60.7	0.73	E	15.9	0.26	B	52.3	0.24	D	66.6	0.84	E	18.4	0.31	B
EB TH	16.7	0.34	B	1.8	0.75	A	15.8	0.71	B	30.9	0.38	C	2.5	0.82	A	19.2	0.75	B
EB RT	12.4	0.12	B	0.3	0.17	A	12.2	0.30	B	22.7	0.16	C	0.3	0.22	A	14.8	0.35	B
WB LT	73.2	0.84	E	89.3	0.88	F	28.7	0.74	C	71.7	0.85	E	93.5	0.90	F	34.9	0.80	C
WB TH	3.9	0.64	A	5.7	0.46	A	5.3	0.51	A	4.9	0.69	A	6.0	0.49	A	6.4	0.54	A
OVERALL	18.1	-	B	20.2	-	C	14.8	-	B	14.5	-	B	9.3	-	A	5.6	-	A

* Denotes overcapacity conditions, v/c ≥ 1.

Future Year 2023 Traffic Conditions

The Project is anticipated to be completed by 2025. Access to the Project will be provided by the existing Lauo Loop which services the MBP NPA. HDOT's requested additional discussion on cumulative traffic impacts from the Kahahā Hotel on the full build-out of MBP NPA. Appendix E of the TIAR discusses these cumulative impacts.

Travel Demand Estimations

The State of Hawai'i Department of Transportation (HDOT) and Maui County provide various Transportation Demand Management (TDM) programs that promote the use of transit, walking, biking, and alternative modes of transportation to reduce the use of single-occupant vehicles on roadways. These TDM measures have only been identified and conservatively assumed to yield no vehicular reductions for Project generated traffic.

Maui County currently provides a bus system that offers several routes that connect the major areas in Maui. The Kahului Loop Route 5 & 6 provide transportation within the Kahului area. Additionally, the Haiku Islander Route 35 and the Upcountry Islander Route 40 provide transportation within Kahului to the Kahului Airport as well as to nearby regions.

HDOT currently provides the Bike Plan Hawai'i Master Plan — identifies existing and proposed bike routes that could potentially be implemented in the future. Within Kahului, several bicycle facilities are currently provided or proposed. In the immediate vicinity of the Project, signed shared roadways are proposed along Hāna Highway and Dairy Road/Keolani Place.

Trip Generation

The Institute of Transportation Engineers (ITE) publishes a book based on empirical data compiled from a body of more than 4,250 trip generation studies — submitted by public agencies, developers, consulting firms, and associations. This publication, titled *Trip Generation Manual, 9th Edition* — provides trip rates and/or formulae based on graphs that correlate vehicular trips with independent variables.

The independent variables can range from Dwelling Units (DU) for single-family attached homes to Gross Floor Area (GFA) for commercial or office development. These trip rates/formulae and their associated directional distributions were used to estimate the increase in the number of vehicular trips generated by the proposed Project. The rates

selected were based on the land use description. See Tables 5 and 6 for Trip Generation formula and projections for the Project.

Trip Distribution and Assignment

Trips generated by the Project were assigned throughout the study area — generally based upon existing travel patterns and anticipated traffic reroutes from known projects in the area.

The traffic generated by the Project was added to the forecast Base Year 2025 traffic volumes within the vicinity of the Project — to constitute the traffic volumes for Future Year 2025 traffic conditions.

Table 8. Trip Generation Rates

Land Use (ITE Code)	Independent Variable	AM Peak Hour		PM Peak Hour		SAT MD Peak Hour	
		Trip Rate	% Enter	Trip Rate	% Enter	Trip Rate	% Enter
Hotel (310)	Rooms	0.53	59%	0.60	51%	[a]	56%

[a] $T = 0.69X + 4.32$

Table 9. Project-Generated Trips

Land Use (ITE Code)	Independent Variable	AM Peak Hour			PM Peak Hour			SAT MD Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
		(vph)								
Hotel (310)	200 Rooms	63	43	106	61	59	120	80	63	143

Note:

The Project will provide a sundry shop and offer a variety of light food options — a common amenity incorporated in the ITE Trip Generation rates for Hotel (ITE 310).

Future Year 2025 Analysis

By full buildout in Future Year 2025, the Project is projected to generate a total of 106 trips during the AM peak hour, 120 trips during the PM peak hour, and 143 new external trips

during the Saturday Mid-Day (SAT MD) peak hours of traffic.

Trips generated by the Project are expected to result in growth along major roadways in the study area. Project traffic will access the site via a driveway along the existing Lauo Loop near the Haleakalā Highway/Lauo Loop East intersection.

Future Year 2025 Intersection Analysis

Upon completion of the Project, all study intersections are forecasted to operate like Base Year 2025. Study intersections are anticipated to experience minimal increases in overall delay ranging from 1-5 seconds. Additionally, most intersection movements are expected to experience minimal increases in delay from 1-7 seconds. All movements forecast to operate at LOS E/F for Base Year 2025 conditions will continue to operate similarly during Future Year 2025 with the Project.

As discussed, HDOT is considering the acquisition of the east portion of the Project site to fulfill its long-term plan and goal to provide an on-ramp from Haleakalā Highway onto AAR. Since the timeline and design of this on-ramp have not yet been determined, the on-ramp was not considered for the Future Year scenarios. The on-ramp would primarily reduce traffic at the Haleakalā Highway/Dairy Road/Keolani Place intersection. However, since all movements at this intersection will continue to operate adequately at LOS D or better and below capacity conditions, the on-ramp is not needed for the Project.

As discussed, a signal is currently warranted under existing conditions, so the Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway intersection was analyzed to include a traffic signal. With a signal, all movements at this intersection are anticipated to operate adequately at LOS C or better all peak hours of traffic. If a signal is not installed, the northbound shared left-turn/through movement will continue operating at LOS F and overcapacity conditions for the PM and SAT MD peak hours.

Based on zoning conditions, Costco is required to monitor this intersection on a biannual basis to determine if a signal will be warranted. If warranted, Costco will coordinate with the County on design and construction of a traffic signal. If HDOT constructs an on-ramp from Haleakalā Highway onto AAR, this would likely reduce the critical exiting left-turn movements out of Costco and impact the warranting of the signal.

Several minor street and left-turn movements at unsignalized intersections along Hāna Highway and Haleakalā Highway are expected to continue operating at LOS E/F during all peak hours of traffic. However, all movements will continue to operate at under capacity conditions. Additionally, vehicles are currently able to proceed through these unsignalized intersections due to gaps in through traffic — resulting from nearby upstream and downstream signals, and traffic is anticipated to operate like existing conditions.

Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant, at the Haleakalā Highway/Lauo Loop West intersection, a traffic signal is still not anticipated to be warranted by Future Year 2025 with Project volumes. The intersection is expected to operate like existing conditions with gaps in traffic generated by nearby traffic signals.

Various minor street and left-turn movements at signalized intersections along Hāna Highway from Dairy Road to Ho'okele Street are expected to continue operating at LOS E/F during all peak hours of traffic — due to signal coordination and long cycle lengths. However, all vehicular movements are anticipated to experience minimal increases in delay of only 1-2 seconds. The intersections will continue to operate adequately at overall LOS D or better — with all movements operating under capacity during all peak hours.

Table 10 below summarizes the Future Year 2025 LOS at the study intersections compared to Base Year 2025 conditions.

Table 10. Summary of Future Year 2025 LOS

Intersection	Base Year 2025 Conditions									Future Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
1: Haleakalā Hwy & Aalele St																		
EB LT	8.4	0.07	A	6.5	0.12	A	8.9	0.18	A	8.6	0.08	A	8.6	0.13	A	9.1	0.20	A
SB LT/RT	13.2	0.10	B	33.1	0.58	D	23.4	0.38	C	14.0	0.12	B	43.3	0.68	E	29.3	0.46	D
OVERALL	2.0	-	-	6.2	-	-	4.3	-	-	2.1	-	-	7.8	-	-	5.0	-	-
2: Lauo Loop East & Haleakalā Hwy																		
NB LT/TH	13.8	0.02	B	21.2	0.11	C	20.2	0.07	C	16.5	0.11	C	30.2	0.32	D	29.4	0.27	D
NB RT	9.2	0.02	A	11.5	0.08	B	11.6	0.10	B	9.5	0.05	A	12.1	0.14	B	12.4	0.17	B
EB LT	8.0	0.00	A	8.0	0.00	A	8.1	0.00	A	8.0	0.01	A	8.1	0.01	A	8.2	0.01	A
WB LT	7.6	0.02	A	8.3	0.02	A	8.3	0.02	A	7.8	0.04	A	8.6	0.05	A	8.6	0.06	A
SB LT/TH/RT	12.8	0.07	B	21.0	0.23	C	16.3	0.03	C	14.1	0.09	B	27.8	0.33	D	19.9	0.04	C
OVERALL	1.4	-	-	2.8	-	-	1.4	-	-	2.6	-	-	4.8	-	-	3.1	-	-
3: Lauo Loop West & Haleakalā Hwy																		
NB LT	18.6	0.43	C	38.5	0.76	E	47.7	0.81	E	20.5	0.47	C	46.5	0.81	E	61.8	0.88	F
NB RT	9.4	0.08	A	12.3	0.31	B	12.4	0.32	B	9.7	0.08	A	12.9	0.32	B	13.2	0.34	B
WB LT	7.9	0.11	A	8.6	0.13	A	8.7	0.16	A	8.1	0.11	A	8.7	0.14	A	8.9	0.17	A
OVERALL	6.8	-	-	11.4	-	-	13.2	-	-	6.8	-	-	12.4	-	-	15.2	-	-
4: Costco Main Driveway/Costco Dwy & Haleakalā Hwy																		
NB LT/TH	27.0	0.08	C	16.9	0.52	B	24.7	0.68	C	14.3	0.06	B	17.7	0.52	B	27.1	0.71	C
NB RT	26.9	0.03	C	13.6	0.06	B	13.4	0.05	B	14.2	0.02	B	14.5	0.06	B	14.4	0.05	B
EB LT	3.7	0.01	A	11.1	0.00	B	15.9	0.01	B	6.7	0.01	A	10.8	0.02	B	15.8	0.03	B
EB TH	4.1	0.15	A	12.9	0.49	B	17.4	0.46	B	7.4	0.33	A	12.7	0.52	B	17.7	0.52	B
EB RT	3.7	0.04	A	11.2	0.18	B	15.8	0.23	B	6.5	0.07	A	10.7	0.17	B	15.5	0.22	B
WB LT	3.4	0.01	A	9.5	0.12	A	13.4	0.14	B	6.1	0.02	A	9.2	0.12	A	13.3	0.15	B
WB TH/RT	5.2	0.33	A	13.8	0.75	B	20.5	0.82	C	9.0	0.65	A	14.0	0.77	B	21.8	0.84	C
SB LT/TH/RT	27.2	0.04	C	13.8	0.02	B	15.8	0.00	B	14.4	0.02	B	14.7	0.02	B	17.0	0.07	B
OVERALL	5.5	-	A	13.9	-	B	19.9	-	B	8.5	-	A	14.0	-	B	20.8	-	C

Intersection	Base Year 2025 Conditions									Future Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
5: Dairy Rd/Koolani Place & Haleakala Hwy																		
NB LT	49.9	0.53	D	47.9	0.76	D	47.3	0.77	D	42.1	0.54	D	48.9	0.76	D	48.9	0.76	D
NB TH/RT	19.4	0.24	B	31.2	0.22	C	32.4	0.31	C	20.1	0.26	C	33.3	0.23	C	34.4	0.33	C
EB LT	23.5	0.73	C	41.4	0.75	D	38.6	0.76	D	24.1	0.73	C	43.3	0.76	D	40.2	0.76	D
EB TH/RT	15.4	0.42	B	28.9	0.81	C	28.5	0.80	C	16.0	0.46	B	30.5	0.83	C	29.5	0.82	C
WB LT	21.8	0.73	C	30.1	0.88	C	28.7	0.88	C	22.0	0.74	C	31.9	0.89	C	30.0	0.89	C
WB TH	16.6	0.67	B	13.0	0.40	B	13.3	0.43	B	16.9	0.69	B	13.3	0.42	B	13.4	0.45	B
WB RT	12.5	0.00	B	10.3	0.00	B	0.0	0.00	A	12.5	0.00	B	10.4	0.00	B	10.3	0.00	B
SB LT	42.9	0.54	D	52.4	0.66	D	51.2	0.70	D	37.3	0.56	D	56.2	0.71	E	54.5	0.73	D
SB TH	21.2	0.49	C	37.1	0.60	D	36.4	0.52	D	21.6	0.48	C	39.6	0.61	D	38.3	0.53	D
SB RT	18.3	0.06	B	31.9	0.05	C	31.8	0.01	C	18.8	0.05	B	34.0	0.04	C	33.5	0.01	C
OVERALL	19.5	-	-	28.3	-	-	27.6	-	-	19.9	-	-	29.7	-	-	28.5	-	-
6: Hanakai St & Haleakala Hwy																		
NB RT	10.3	0.01	B	11.8	0.05	B	11.9	0.06	B	10.5	0.02	B	12.0	0.05	B	12.2	0.06	B
WB LT	8.0	0.01	A	8.5	0.01	A	8.5	0.02	A	8.1	0.01	A	8.5	0.01	A	8.6	0.02	A
OVERALL	0.2	-	-	0.4	-	-	0.5	-	-	0.3	-	-	0.4	-	-	0.6	-	-
7: Hana Hwy & Haleakala Hwy																		
EB LT	60.6	0.92	F	52.1	0.94	F	37.6	0.87	E	74.7	0.98	F	61.4	0.98	F	45.1	0.92	E
OVERALL	7.5	-	-	7.9	-	-	6.4	-	-	9.2	-	-	9.6	-	-	7.9	-	-
8: Hanakai St (North) & Hana Hwy																		
NB LT/TH	52.8	0.13	F	23.6	0.10	C	25.1	0.12	D	53.0	0.18	F	24.0	0.13	C	26.6	0.14	D
SB TH	56.8	0.09	F	29.1	0.05	D	29.7	0.11	D	61.0	0.15	F	30.1	0.07	D	30.6	0.13	D
OVERALL	0.5	-	-	0.6	-	-	0.9	-	-	0.9	-	-	0.7	-	-	1.1	-	-
9: Hanakai St (South) & Hana Hwy																		
NB TH/RT	17.2	0.07	C	37.1	0.38	E	38.5	0.18	E	17.5	0.07	C	37.6	0.40	E	40.9	0.21	E
WB LT/TH	0.0	-	A	-	-	-	0.0	-	A	0.0	-	A	0.0	-	A	0.0	-	A
SB LT/TH	20.1	0.03	C	40.5	0.07	E	37.8	0.14	E	17.9	0.04	C	37.4	0.09	E	40.1	0.18	E
OVERALL	0.5	-	-	1.6	-	-	1.1	-	-	0.5	-	-	1.7	-	-	1.3	-	-
10: Dairy Rd & Kele St																		
NB LT	7.9	0.05	A	8.8	0.06	A	8.7	0.06	A	7.9	0.06	A	8.8	0.06	A	8.8	0.06	A
EB RT	9.2	0.04	A	10.5	0.09	B	10.7	0.14	B	9.2	0.04	A	10.6	0.10	B	10.8	0.15	B
WB LT/TH	14.9	0.13	B	53.2	0.67	F	149.0	1.04	F*	15.9	0.14	C	63.9	0.73	F	209.4	1.20	F*
WB RT	9.0	0.01	A	10.1	0.05	B	11.2	0.13	B	9.0	0.01	A	10.2	0.05	B	11.4	0.14	B
SB LT	7.7	0.01	A	8.5	0.03	A	9.2	0.06	A	7.8	0.01	A	8.5	0.03	A	9.3	0.06	A
OVERALL	2.9	-	-	6.6	-	-	15.2	-	-	2.9	-	-	7.5	-	-	20.4	-	-

Intersection	Base Year 2025 Conditions									Future Year 2025 Conditions								
	AM			PM			SAT MD			AM			PM			SAT MD		
	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS	HCM Delay	v/c Ratio	LOS
11: Dairy Rd & Hana Hwy																		
NB LT	90.1	0.77	F	97.1	0.85	F	56.7	0.79	E	88.6	0.78	F	97.1	0.85	F	57.6	0.79	E
NB TH	65.7	0.35	E	66.4	0.47	E	36.5	0.40	D	65.1	0.35	E	66.2	0.48	E	37.1	0.41	D
NB RT	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A	0.0	0.00	A
EB LT	89.1	0.78	F	99.5	0.87	F	53.6	0.83	D	88.0	0.78	F	101.9	0.88	F	54.0	0.84	D
EB TH	17.2	0.41	B	32.7	0.76	C	31.1	0.82	C	17.9	0.41	B	33.6	0.77	C	31.8	0.82	C
EB RT	13.1	0.05	B	19.2	0.12	B	22.0	0.15	C	13.6	0.05	B	19.5	0.12	B	22.4	0.15	C
WB LT	61.5	0.86	E	80.4	0.83	F	49.1	0.75	D	61.3	0.86	E	80.3	0.83	F	49.9	0.76	D
WB TH	0.8	0.65	A	38.3	0.58	D	30.5	0.75	C	0.8	0.66	A	39.4	0.59	D	31.9	0.77	C
WB RT	0.1	0.07	A	26.4	0.11	C	23.5	0.21	C	0.1	0.08	A	27.3	0.12	C	24.6	0.22	C
SB LT	92.7	0.77	F	105.0	0.87	F	55.1	0.80	E	91.6	0.77	F	105.7	0.87	F	55.9	0.81	E
SB TH/RT	75.2	0.75	E	82.7	0.85	F	42.0	0.78	D	74.9	0.76	E	83.2	0.86	F	42.6	0.78	D
OVERALL	23.4	-	-	50.8	-	-	36.5	-	-	24.0	-	-	51.8	-	-	37.5	-	-
12: Airport Access Road & Hana Hwy																		
NB LT	78.8	0.66	E	82.0	0.71	F	42.5	0.52	D	78.6	0.67	E	82.0	0.71	F	43.6	0.55	D
NB TH	72.4	0.78	E	69.9	0.52	E	36.2	0.70	D	72.2	0.78	E	70.0	0.53	E	36.8	0.71	D
NB RT	64.6	0.10	E	67.6	0.26	E	33.2	0.33	C	64.2	0.09	E	68.2	0.32	E	33.8	0.35	C
EB LT	74.3	0.75	E	65.8	0.23	E	42.0	0.64	D	74.0	0.75	E	65.9	0.24	E	42.8	0.65	D
EB TH	0.2	0.26	A	35.1	0.57	D	18.8	0.54	B	0.2	0.26	A	35.7	0.58	D	19.2	0.54	B
EB RT	0.1	0.04	A	22.6	0.06	C	14.7	0.06	B	0.1	0.04	A	23.0	0.06	C	15.0	0.06	B
WB LT	75.3	0.88	E	70.0	0.89	E	40.2	0.71	D	75.3	0.88	E	69.9	0.90	E	41.1	0.71	D
WB TH	31.5	0.74	C	1.2	0.61	A	20.5	0.77	C	32.1	0.75	C	1.2	0.61	A	21.0	0.77	C
WB RT	14.1	0.08	B	0.3	0.14	A	14.4	0.23	B	14.5	0.08	B	0.3	0.14	A	14.7	0.23	B
SB LT	78.5	0.53	E	82.8	0.75	F	42.1	0.64	D	79.4	0.58	E	82.6	0.76	F	42.8	0.65	D
SB TH	67.6	0.35	E	77.3	0.84	E	32.4	0.44	C	67.5	0.36	E	77.5	0.84	E	32.7	0.45	C
SB RT	65.2	0.03	E	64.2	0.07	E	30.0	0.08	C	65.3	0.06	E	64.0	0.08	E	30.1	0.07	C
OVERALL	36.3	-	-	37.0	-	-	25.7	-	-	36.9	-	-	37.6	-	-	26.3	-	-
13: Hookele St & Hana Hwy																		
NB LT	74.0	0.75	E	71.6	0.71	E	32.5	0.73	C	73.9	0.75	E	72.0	0.71	E	33.0	0.73	C
NB RT	52.3	0.24	D	66.6	0.84	E	18.4	0.31	B	52.2	0.25	D	66.8	0.85	E	18.6	0.32	B
EB TH	30.9	0.38	C	2.5	0.82	A	19.2	0.75	B	31.1	0.37	C	2.5	0.83	A	19.4	0.75	B
EB RT	22.7	0.16	C	0.3	0.22	A	14.8	0.35	B	22.9	0.16	C	0.3	0.22	A	15.0	0.36	B
WB LT	71.7	0.85	E	93.5	0.90	F	34.9	0.80	C	71.7	0.85	E	93.7	0.90	F	35.4	0.80	D
WB TH	4.9	0.69	A	6.0	0.49	A	6.4	0.54	A	5.0	0.70	A	6.1	0.49	A	6.4	0.54	A
OVERALL	14.5	-	-	9.3	-	-	5.6	-	-	14.5	-	-	9.3	-	-	5.7	-	-

* Denotes overcapacity conditions, v/c ≥ 1.

Conclusion and Recommended Mitigation Measures

Existing Conditions

Traffic counts at the study intersections were collected in 2017 and supplemented by updated counts collected in 2019 at the following intersections:

- Haleakalā Highway/Dairy Road/Keolani Place
- Hāna Highway/Airport Access Road
- Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway

2019 data collection was to capture the redistribution of trips in the study area due to the opening of the Consolidated Rental Car Facility (CONRAC), roadway circulation changes at Kahului Airport, and inclusion of various nearby completed developments — including Pacific Pipe, Lexus, BMW, American Savings Bank, Safeway Store, Safeway Gas Station, and new tenants at the Puunene Shopping Center.

The remaining 2017 intersections were adjusted based on the 2019 intersection volumes to constitute the baseline Existing 2019 traffic condition. Most movements at the study intersections operated adequately at LOS D or better.

Because of the high mainline through volumes, signal coordination, and long cycle lengths along Hāna Highway at signalized intersections — some minor street and left-turn movements experienced longer delays and LOS E/F conditions, but all movements operated below capacity.

Based on 2019 volumes at the Haleakalā Highway/Costco Main Access intersection, a signal is currently warranted.

Base Year 2025

It is anticipated that by Base Year 2025, traffic will have increased over existing conditions due to ambient growth and various developments — the Keolani Triangle Retail Center, Skyline Eco-Adventures, Maui Palms Hotel Redevelopment, and other developments within the Maui Business Park South Project Area.

As discussed, HDOT is considering the acquisition of the east portion of the Project site to fulfill its long-term plan and goal to provide an on-ramp from Haleakalā Highway onto AAR. As the timeline and design of this on-ramp have not yet been determined, the on-

ramp was not considered for the Base Year scenario.

Since a signal is currently warranted at the Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway under existing conditions — the intersection was analyzed to include a traffic signal for Base Year 2025 conditions. With a signal, all movements at this intersection are anticipated to operate adequately at LOS C or better during all peak hours of traffic. If a signal is not installed, the northbound shared left-turn/through movement is anticipated to operate at LOS F and overcapacity conditions for the PM and SAT MD peak hours.

Based on zoning conditions, Costco is required to monitor this intersection on a biannual basis to determine if a signal will be warranted. If warranted, Costco will coordinate with the County on design and construction of a traffic signal. If HDOT constructs an on-ramp from Haleakalā Highway onto AAR, this would likely reduce the critical exiting left-turn movements out of Costco and impact the warranting of the signal.

At the Haleakalā Highway/La'o Loop West intersection, the northbound left-turn is expected to operate worsen to LOS E during the SAT MD peak hour of traffic. Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant — a traffic signal is not anticipated to be warranted by Base Year 2025. The intersection is expected to operate like existing conditions with gaps in traffic generated by nearby traffic signals.

Various minor street and left-turn movements at the signalized intersections along Hāna Highway from Dairy Road to Ho'okele Street are expected to continue operating at or worsen to LOS E/F during all peak hours of traffic — due to the coordination and long cycle lengths at the intersections and traffic growth along Hāna Highway. However, the intersections will continue to operate adequately at overall LOS D or better with all movements operating under capacity during all peak hours. No improvements are recommended for Base Year 2025 conditions.

Future Year 2025

By full buildout in Future Year 2025, the Project is projected to generate a total of 106 trips during the AM peak hour, 120 trips during the PM peak hour, and 143 new external trips during the Saturday Mid-Day (SAT MD) peak hours of traffic. Trips generated by the Project were distributed in the study area based on current traffic patterns.

Upon completion of the Project, all study intersections are forecast to operate similar to Base Year 2025. Study intersections are anticipated to experience minimal increases in overall delay ranging from 1-5 seconds. Additionally, the majority of intersection movements are expected to experience minimal increases in delay from 1-7 seconds. All movements forecast to operate at LOS E/F for Base Year 2025 conditions will continue to operate similarly during Future Year 2025 with the Project.

As mentioned, HDOT is considering the acquisition of the east portion of the Project site to fulfill its long-term plan and goal to provide an on-ramp from Haleakalā Highway onto AAR. Since the timeline and design of this on-ramp has not yet been determined — the on-ramp was not considered for the Future Year scenarios. The on-ramp would primarily reduce traffic at the Haleakalā Highway/Dairy Road/Keolani Place intersection. However, since all movements at this intersection will continue to operate adequately at LOS D or better and below capacity conditions — the on-ramp is not needed for the Project.

Several minor street and left-turn movements at unsignalized intersections along Hāna Highway and Haleakalā Highway — are expected to continue operating at LOS E/F during all peak hours of traffic. However, all movements will continue to operate at under capacity conditions. Additionally, vehicles are currently able to proceed through these unsignalized intersections due to gaps in through traffic resulting from nearby upstream and downstream signals — and traffic is anticipated to operate similar to existing conditions.

Based on the MUTCD Four-Hour Vehicular Volume traffic signal warrant, at the Haleakalā Highway/Lauo Loop West intersection — a traffic signal is still not anticipated to be warranted by Future Year 2025 with Project volumes. The intersection is expected to operate similar to existing conditions with gaps in traffic generated by nearby traffic signals. Signal warrant figures are shown in Appendix D of the TIAR.

Various minor street and left-turn movements at signalized intersections along Hāna Highway from Dairy Road to Ho'okele Street — are expected to continue operating at LOS E/F during all peak hours of traffic due to signal coordination and long cycle lengths. However, most movements are anticipated to experience minimal increases in delay of 1-2 seconds. The intersections will continue to operate adequately at overall LOS D or better — with all movements operating under capacity during all peak hours. **No improvements are recommended for Future Year 2025 conditions with the Project.**

2.4.2 Drainage

This section evaluates the existing conditions of the drainage system within the Project Site and recommends mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. Information in this section is based upon the *Preliminary Engineering and Drainage Report for the Kahahā Hotel at Kahului Airport, Kahului, Maui, Hawai'i, TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017, 018*, prepared by Austin, Tsutsumi & Associates, Inc. (ATA), dated August 6, 2021 (refer to Appendix 5, “Preliminary Engineering and Drainage Report”).

Existing Conditions. As discussed in Section 2.1.2 (Topography and Soils) of this Draft EIS, elevations across the project area range from approximately 34 feet above Mean Sea Level (MSL) to approximately 28.5 feet MSL.

Onsite Storm Flows. Storm water runoff generated from the existing property generally flows in a westerly direction and is collected in a catch basin located within Lauo Loop.

The existing runoff is ultimately discharged to the existing A&B 30' wide concrete channel located about 1,300 feet west of the Project Site near Costco. Pre-development onsite runoff is estimated to be approximately **6.88 cubic feet per second (cfs)**, based on the 50-year recurrence interval storm. (See: Appendix 5).

Potential Impacts and Mitigation Measures. ATA has prepared a drainage plan to mitigate surface runoff caused by seasonal storm events.

The Proposed Project includes the construction of the new parking areas and building pad — requiring both excavation (earthwork cut) and embankment (fill). Balancing cut and fill will be practiced to the extent feasible to accommodate drainage and service utilities. Import and/or export of earthwork materials will also be minimized. Finish grades throughout the site will have elevations varied from 28 feet to 34 feet MSL and slopes will vary between 0 to 5 percent after improvements with a maximum of 2:1 grade used along the embankments.

The quantities of stormwater runoff will be determined by using the Rational Method for drainage areas less than 100 acres — which is applicable to this project. The proposed onsite drainage system will be designed to manage the 50-year, 1-hour storm runoff from onsite drainage areas.

Once developed, the Kahahā Hotel project area is expected to produce a peak runoff volume of **17.8 cfs** from a 50-year 1-hour storm. This represents a net increase of approximately **10.92 cfs** attributable to development of the project area as shown in Table 11.

Table 11. Increase in Runoff Attributable to Development of Kahahā Hotel

Drainage Area	Pre-Development Flow	Post-Development Flow before Mitigation	Net Change
Onsite	6.88 cfs	17.8 cfs	+10.92 cfs

(See: Appendix 5)

The Applicant understands that County standards require retention of increased runoff. However, retention for the increases in runoff throughout the entire MBP development has been accounted for — as the project is located within the MBP development. Runoff retention in other areas of MBP project collects and retains this runoff — such retention does more than offset the increase in runoff produced by the Kahahā Hotel project area. Existing conditions allow the discharge of runoff generated from the Project Site to the A&B ditch. In compliance with the Maui County stormwater quality requirements, stormwater produced by the project will be treated before being discharged to the Laou Loop drainage system.

The proposed onsite drainage system improvements will include concrete curbs and gutters, catch basins, manholes, underground drain lines, and storm water quality treatment systems.

Water Quality Measures

Maui County now requires the implementation of water quality control measures to reduce water pollution from stormwater runoff. The proposed stormwater management system will provide water quality treatment and/or natural Low Impact Development (LID) features, such as vegetative swales, to reduce the discharge of pollutants to the maximum extent practicable.

In compliance with the stormwater quality requirements, implementation of other LID strategies may include installing underground stormwater treatment devices or chambers, minimizing parking, complying with the parking code limits, and reducing sidewalks — as

sidewalks are currently present around the perimeter of the Project Site.

An appropriate maintenance plan will be developed for each stormwater quality feature — where accumulated debris and sediments will be removed during regularly scheduled maintenance and disposed at a County approved disposal site — to achieve appropriate stormwater quality.

Construction process will involve temporary erosion control measures to minimize soil loss and erosion hazards. Best Management Practices (BMPs) will include but not limited to the following measures:

- Provide temporary sediment basins, temporary diversion berms, and swales to intercept runoff;
- Install silt fences to detain sediment-laden stormwater runoff;
- Install dust fences to control dust generated from construction;
- Provide inlet protection to prevent sediment in stormwater runoff entering drain inlets;
- Provide slope protection to help control erosion and stabilize slopes; and
- Stabilize construction entrances and truck wash-down areas.

Permanent sediment control measures will be used once construction is completed. The proposed grading and drainage design for this project will impose no adverse effects from storm runoff to adjacent and downstream areas. Soil loss will be minimized during the construction period by implementing appropriate erosion control measures. The proposed stormwater management system will provide water quality treatment and reduce the discharge of pollutants to the maximum extent practicable. All drainage improvements will conform to the Maui County Standards.

The proposed improvements for this project will be designed in accordance with the applicable rules and regulations of the County of Maui. Based on the preceding information, the project is expected to have no adverse effects on existing facilities or the surrounding environment.

An application for a National Pollution Discharge Elimination System (NPDES) permit for construction will be submitted to the State Department of Health for review and approval prior to start of construction.

2.4.3 Water

This section evaluates the existing conditions of the water system within the Project Site and recommends mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. Information in this section is based upon the following documentation:

- *Preliminary Engineering and Drainage Report for the Kahahā Hotel at Kahului Airport, Kahului, Maui, Hawai'i, TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017, 018*, prepared by Austin, Tsutsumi & Associates, Inc. (ATA), dated August 6, 2021 (refer to Appendix 5, “Preliminary Engineering and Drainage Report”);
- *Potential Impact on Water Resources of the Proposed Kahahā Hotel at Kahului Airport, Island of Maui*, prepared by Tom Nance Water Resource Engineering (TNWRE), dated June 2021 (refer to Appendix 17, “Potential Impact on Water Resources”); and
- *Memorandum: Alternative Approaches for Water Supply for the Kahahā Hotel at Kahului Airport from A&B's Private Potable and Irrigation Systems*, prepared by Tom Nance Water Resource Engineering (TNWRE), dated April 7, 2021 (refer to Appendix 18, “Alternative Approaches for Water Supply”).

Existing Conditions. Drinking water for the Central Maui area currently comes from existing wells located in upper Waiehu and North Waihe'e which draws groundwater from the Iao and Waihe'e Aquifers.

Existing Water Distribution System. The Project Site currently has existing water meters in place and connected to the MBP II private dual water system. The MBP II system was constructed in 2011 and is owned by A&B Properties. The MBP II system consists of separate waterlines for potable and irrigation water. The dual water system is currently operated by Pural Water Specialty Company Inc.

The separate waterlines for the private potable and irrigation water systems are located within the MBP II roadways. There is an existing 12-inch potable waterline in the Lau'o Loop right-of-way supplying water to fire hydrants and domestic water meters. An 8-inch non-potable irrigation waterline runs parallel to the potable waterline and supplies water to the irrigation water meters. Each parcel within MBP II is provided with one domestic water meter and one irrigation meter.

There is an existing 12-inch Department of Water Supply (DWS) waterline within Haleakalā Highway near the project area. The waterline terminates at the intersection of Kuleana Street and Haleakalā Highway. However, this waterline does not provide any water to MBP II.

Existing Potable Water Source. The source water for the potable water system is two (2) existing off-site water wells — i.e., Waiale Wells No. 1 and No. 2 (State Well Nos. 5129-04 and 5129-05) — located approximately three miles to the southwest of MBP II. Only one well operates at a time, with the other well acting as a standby. The wells pump into an adjacent 600,000-gallon storage tank. Each well is outfitted with a 450 gallon per minute (gpm) pump.

Existing Non-Potable Water Source. The source water for the irrigation system is an on-site irrigation well system located in the MBP II South Project area. The irrigation system consists of three irrigation well pumps, each outfitted with a 450 gpm pump.

Potential Impacts and Mitigation Measures. Of the project's 200 rooms, 120 would be standard rooms and 80 would be extended stay, meaning they would be equipped with kitchens. Using the Maui Department of Water Supply (DWS) design standards of 350 GPD for the standard rooms and 560 GPD for the extended stay rooms, the latter equivalent to the standard for multi-family units, the projected average water supply requirement would be 86,800 GPD. It should be noted that these design standards include water use by various amenities and for landscape irrigation.

Based on the business traveler market intended for the Kānāhā Hotel, actual water use is expected to be less than the amount based on Maui DWS design standards. To determine what the actual water use is likely to be, metered use by two hotels on Maui, the nearby Courtyard by Marriott in Kahului, and the Residence Inn Wailea, has been collected and analyzed. Like the Kānāhā Hotel, the Courtyard is designed for the business traveler. It is a 138-room hotel of which only four (4) of the rooms include kitchen facilities. On a per room basis, potable use averaged 119 GPD over the 21-month period with a high of 147 GPD per room in January 2018. The Residence Inn at Wailea consists of 200 rooms, all of which have kitchen facilities. It also has a greater amount of landscaping than the Courtyard in Kahului or as proposed for the Kānāhā Hotel. Over the 28-month period, potable use per room averaged 112 GPD, with a high of 152 GPD per room in August 2018. Of the hotel's total use over this period, landscape irrigation amounted to about 50

percent. Based on the documented use rates at these two hotels and the fact that all landscape irrigation for the Kahahā Hotel would be provided by the private potable and non-potable systems operated by A&B Properties (described subsequently), it can be conservatively estimated that **the average potable water use by the Kahahā Hotel will not exceed 150 GPD per room or 30,000 GPD for its 200 rooms. Estimated irrigation use on its 1.40 acres of landscaping, at approximately 2,814 GPD per acre, would be 3,940 GPD.**

The estimated domestic and irrigation water demand for the project is shown in Tables 12 and 13 below.

Table 12. Estimated Domestic Water Demand

Description	Quantity	Units	Average Day Demand	Unit	Total Average Day Demand (gpd)
Hotel Rooms	200	units	150	gpd/unit	30,000
Total	200				30,000

Table 13. Estimated Irrigation Water Demand

Description	Irrigated Area	Units	Total Irrigation Demand (gpd)
Private Potable System	0.44	acres	1,287
Private Non-Potable System	0.96	acres	2,653
Total	1.40		3,940

Potential Sources of Water Supply

Tom Nance Water Resource Engineering, Inc. considered two alternative water sources for the proposed Hotel project. The following alternatives were considered:

Alternative 1. Increase the Pump Capacities of the Potable System's Two Wells. As previously mentioned, Waiale Well Nos. 1 and 2 (State Nos. 5129-004 and -005) are identified as the existing wells supporting the potable water system. The water system's potable well pumping capacity must be sufficient to provide the maximum day supply requirement. This requirement is defined as providing 1.5 times the average use in a 24-hour pumping day. For all A&B's Business Park lots, the projected average day potable use at full build out and occupancy was computed by Austin Tsutsumi & Associates to be 389,685 gallons per minute (GPM). With the 1.5 factor, the maximum day use of 584,528

GPD would require pumping continuously over 24 hours at 406 GPM. Each of the system's two wells is outfitted with a 450 GPM pump. This enables each well to provide all the system's supply requirement with the other well providing 100% backup capacity.

Each of the wells was originally pump tested at about 510 GPM for 48 hours continuously. If the pump capacities were increased from 450 to 500 GPM, the excess capacity would be more than sufficient to cover the water use of the Kahahā Hotel. Although this alternative appears to be a possibility in terms of the quantity of water that could be produced, it is not recommended for the salinity concerns explained in the discussion of Alternative 2 below.

Alternative 2. Develop a New Well for the A&B Potable System at an Appropriate Distance from the System's Two Existing Wells. Both Waiale Wells are in the system's offsite well and tank lot and draw water from the Kahului Aquifer. Groundwater in this aquifer exists as a relatively thin basal lens overlying saline groundwater beneath it. As such, the salinity of water pumped by wells in the aquifer will increase if over pumpage occurs or if recharge to the aquifer is reduced significantly.

Historically, the aquifer was pumped by more than 10 HC&S well facilities at combined rates more than 50 million gallons per day for decades and with offsetting recharge to the aquifer occurring by percolation to groundwater of excess irrigation water applied on the HC&S fields. With the termination of HC&S operations and the yet unknown amounts of future water use by agriculture on the fallowed fields, there is a legitimate concern regarding the long-term salinity of wells drawing water from this aquifer. Because of this, monitoring pumped water salinity as a function of pumped water amount must be continuously and accurately done to detect any long-term adverse trend. No obvious trend of pumped water salinity is defined but updating the data with consistently accurate determinations of salinity should be undertaken.

The back-up capacity provided by the two wells at the same site covers the possibility of pump or motor failures. However, due to their proximity to each other, they do not address the long-term possibility of increasing salinity in the aquifer. Such an increase would require pumpage at individual wells to be appropriately reduced. If the A&B system were to have a third well located at an appropriate distance to avoid any interference effect on the two existing wells — then the system's supply requirement could be met by reduced pumpage from the third well plus reduced pumpage by one or the other of the two existing wells. This would be a significant benefit to the system as it would be the only way, except

for reverse osmosis filtration, to deal with a salinity increase in the aquifer to an unacceptable level. One possible location for the third well is shown on Figure 3 of the Memorandum by Tom Nance. Other locations could be evaluated, if necessary, to avoid conflicts with development plans of A&B.

Conclusion

The project proposes to use — potable and non-potable water — from the Maui Business Park II water system. As previously discussed, the system is privately owned A&B Properties and operated by Pural Water Specialty Company Inc. The project's onsite water distribution systems will be designed and constructed to provide water for domestic consumption, fire protection and irrigation.

To fulfill the project's fire protection requirements based on zoning — 2,500 gallons per minute (gpm) for a duration of 2 hours — an onsite fire protection system will be constructed. A proposed fire line will supply water for fire protection, and a double check detector assembly will be installed on the fire line at the connection to the MBP II potable water system. The onsite fire system will have new fire hydrants spaced at a maximum of 250-intervals within the site where required.

An onsite water storage tank and fire line booster pump for fire protection service may be required to provide adequate flow and pressure to meet fire flow requirements. However, final fire flow and pressure requirements will be determined during the permit application review process through the County of Maui. The final requirements may be different than the previously discussed requirement of 2,500 gpm for a duration of 2 hours. Requirements and design for the onsite water storage tank and fire line booster pump for fire protection service have not been finalized at this time.

Off-site fire protection system can be provided through existing fire hydrants located in the right-of-way around and near the Project Site. This system will be supported through the existing subdivision's water system and the DWS water system.

Both non-potable and potable water from Maui Business Park II will be used for irrigation purposes onsite — including a dedicated non-potable connection with a meter. However, non-potable water will be prioritized for irrigation purposes and potable water will only be used where required by specific flora.

The project Applicant is working with A&B Properties to drill a third potable water well, in the vicinity of the two existing Waiale Wells, to provide an additional source of water for the MBP II and the proposed Kahahā Hotel.

2.4.4 Wastewater

This section evaluates the existing conditions of the wastewater system within the Project Site and recommends mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. Information in this section is based upon the *Preliminary Engineering and Drainage Report for the Kahahā Hotel at Kahului Airport, Kahului, Maui, Hawai'i, TMK: (2) 3-8-103: 014 (por.), 015 (por.), 016, 017, 018*, prepared by Austin, Tsutsumi & Associates, Inc. (ATA), dated August 6, 2021 (refer to Appendix 5, “Preliminary Engineering and Drainage Report”).

Existing Conditions. The Project Site is situated within the MBP II North Project Area which is an approved County subdivision with planned wastewater flows. A&B Properties currently owns and maintains the existing sewer system within the MBP II North Project subdivision. Each lot has an available sewer lateral that connects to the existing 8-inch sewer main within Lauo Loop — previously constructed during the development of the MBP North Project Subdivision. The existing 8-inch gravity sewer line connects to an existing County 12-inch gravity sewer line within Haleakalā Highway. The wastewater from MBP PII is ultimately conveyed to the Wailuku/Kahului Wastewater Reclamation Facility (W-K WWRF).

Wastewater generated from the MBP PII North Project area flows by gravity to the A&B Triangle Wastewater Pump Station (WWPS), which is privately-owned by A&B Properties, Inc. The wastewater is pumped by the A&B Triangle WWPS — via a 6-inch force main to a discharge sewer manhole in Alamaha Street — where it combines with wastewater generated by the MBP South Project area and other lots in the vicinity. The wastewater then enters an existing 16-inch gravity sewer line and flows toward the existing Alamaha WWPS — where it is pumped to the Kahului Pump Station and then to the W-K WWRF.

Potential Impacts and Mitigation Measures. A new onsite sewer system will collect sewer flow generated from the project. The system will connect to one of the four existing sewer laterals — connected to the existing 8-inch sewer main within Lauo Loop that was constructed during the development of the MBP II North Project area.

In compliance with the requirements from the County of Maui, Department of Environmental Management (DEM), the Proposed Project will involve installation of a new sewer service property manhole on the sewer lateral.

It is anticipated that improvements to the A&B Triangle Square Wastewater Pump Station (WWPS) located at 417 Kele Street in Kahului, TMK No. (2) 3-8-079: 004 and the Alamaha WWPS, TMK No. (2) 3-7-012:027 may be required because of the Proposed Action. Other wastewater infrastructure improvements, e.g., upgrading a short segment of a gravity sewer line, may also be required. The potential improvements are in the process of being defined with appropriate State and County Agencies. The design of the onsite and offsite sewer system improvements will be determined during the design phase of the project.

The average day wastewater flow estimated for the Proposed Project is associated with the amount of domestic water consumption. Estimation is based on the domestic water demand of 150 gallons/unit/day. Typically, wastewater flows are on the order of 80 percent to 90 percent of the water use. To be conservative, the wastewater flow for the hotel is estimated to be 100 percent of the water demand, which would be 150 gpd/unit for the project. The following Table 14 about the wastewater flows expected for the Proposed Project.

Table 14. Wastewater Flows Expected for the Proposed Project

Description	Quantity	Units	Average Day Demand	Unit	Total Wastewater Contribution (gpd)
Hotel Rooms	200	units	150	gpd/unit	30,000
Total	200				30,000

The wastewater generated by the Kahahā Hotel will ultimately be conveyed to the County's W-K WWRF for treatment. The Maui County Code, Section 20.28.040 – Wastewater treatment facility expansion – Allocation of capacity, states how the expansion capacity of the W-K WWRF will be allocated for new developments. The code notes that 70,000 gpd will be allocated to new hotels, which will be allocated on a first come, first serve basis. At this time, none of the 70,000 gpd has been allocated to new hotels. Therefore, the proposed estimated wastewater flow of 30,000 gpd from the Kahahā Hotel is significantly less than the available allocated capacity of 70,000 gpd.

The primary means of effluent disposal from the W-K WWRF is by injection wells. It is acknowledged that the County of Maui is currently addressing the use of injection wells at the Lahaina Wastewater Reclamation Facility which does not service the subject Project. The County may revise their systems island-wide to accommodate future regulations regarding injection well use; however, there are currently no restrictions on the Kahahā Hotel's planned flows to the W-K WWRF.

2.4.5 Electrical

This section evaluates the existing conditions of the electrical system within the Project Site, anticipated electrical demand, and recommended mitigation measures, if necessary, that would avoid or lessen the significance of potential impacts. Information in this section is based upon the information provided by the project Applicant.

Existing Conditions. The property is currently improved as part of the MBPII development, including and underground utility connections onsite for future development.

Potential Impacts and Mitigation Measures. The Applicant previously developed the 200 room Wailea Residence Inn hotel in Wailea. The Residence Inn electrical system has a maximum capacity of 2,000 amps (480Y/277V 3P 4W), therefore the Applicant is anticipating a similar electrical demand for the proposed 200 room Kahahā hotel.

In addition, the Applicant is proposing the energy-saving features that will be incorporated to minimize electrical demand for the proposed Kahahā Hotel project. The following list includes but not limited to:

- 1) Installation of Photovoltaic Solar Panels on the roof
- 2) Use of energy efficient and/or Energy Star labeled appliances and fixtures;
- 3) Use of passive solar cooling;
- 4) Use of natural lighting;
- 5) Use of energy efficient lighting;
- 6) Use of lighting controls in storage areas, closets, stairwells, and other low use areas;
- 7) Use of window tinting film that filters glare (white light) and UV while allowing in all the "useable light";
- 8) Use of variable frequency drives on pumps (pool, water features);
- 9) Use of electronically commutated motors and controls in walk in refrigeration units;
- 10) Use of low flow water fixtures;

- 11) Use of smart thermostats in units; and
- 12) Use of appropriate landscaping to shade buildings and parking lots.

Development of the project is not anticipated have any adverse impact upon the existing electrical or telephone systems that will serve the subject property.

3. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS

3.1 Chapter 343 Hawai'i Revised Statutes

This EIS has been prepared in accordance with the provisions of Chapter 343, Hawai'i Revised Statutes (HRS), on Environmental Impact Statements (EIS), and Title 11, Chapter 200.1, Hawai'i Administrative Rules (HAR), on EIS Rules.

Section 343-5 HRS, establishes nine “triggers” that require the preparation of an Environmental Assessment (EA) or EIS. The trigger for the proposed Kahahā Hotel includes proposal to amend the Wailuku-Kahului Community Plan designation from Light Industrial to Hotel use.

This document has been prepared in accordance with the following significance criteria specified in Section 11-200.1-13 of the Department of Health rules relating to Environmental Impact Statements:

(1) *Irrevocably commit a natural, cultural, or historic resource.*

As discussed throughout the DEIS, there are no significant natural, cultural, or historic resources on the Project Site as the Project Site is located within the Maui Business Park Phase II (MBPII) — where the area has been planned for any future developments and improved with utility and roadway services. In addition, the Proposed Project includes a Supplemental Archaeological Inventory Survey (SAIS) involving a pedestrian survey and subsurface testing.

The pedestrian survey indicated no archaeological sites were present on the surface of the project area and any observed portable material remains were likely a secondary deposit from modern fill used during previous construction activities within the area. Subsurface testing revealed culturally sterile subsurface conditions with little to no potential to contain any significant historic properties.

Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021),

SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

(2) *Curtails the range of beneficial uses of the environment.*

The Proposed Project introduces a compatible use to the urban center of Maui, i.e., Kahului — particularly area adjacent to the Kahului Airport and within proximity to the surrounding businesses — including retail, car rentals, warehouses, visitor accommodations, and eating and drinking establishments. Therefore, the project will not curtail the range of beneficial uses of the environment in the project vicinity.

Instead, the Proposed Project will optimize the underutilized urban land uses, hence optimizing the beneficial uses of the environment.

(3) *Conflicts with the State's environmental policies or long-term environmental goals established by law.*

The project is being developed in compliance with the State's long term environmental goals. As documented in this Draft EIS, adequate mitigation measures will be implemented to minimize the potential for negative impacts to the environment. The Proposed Project includes specific green building objectives as discussed in Section 2.1.4 (Climate Change Assessment) of this DEIS.

(4) *Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State.*

As documented in this Draft EIS, significant negative long-term impacts to the socio-economic environment are not anticipated as a result of the Proposed Action. As discussed, the Project Site and its immediate environment has been used for industrial uses, including the plantation activities extending back to the 19th century. Both the CIA and AIS found no apparent signs of cultural practices or gatherings currently taking place on the subject property. Therefore, no significant negative long-term impacts to the cultural practices due to the Proposed Action are anticipated.

(5) *Have a substantial adverse effect on public health.*

There are no special or unique aspects of the project which will have a negative impact on public health. The Proposed Project is limited to the development of a hotel adjacent to the Kahului

Airport targeting business travelers and Hawai'i resident market. The Proposed Project includes specific green building objectives, investigation of hazardous substances on the subject property, Best Management Practices (BMPs), and mitigation efforts — to limit the less than significant impacts on air quality and noise quality.

(6) *Involve adverse secondary impacts, such as population changes or effects on public facilities.*

The Proposed Project will not lead to an impact on population levels since there is no residential component. As documented in this Draft EIS, the project will not result in a significant negative impact on public facilities.

(7) *Involve a substantial degradation of environmental quality.*

The Applicant has proposed a series of mitigation measures to limit the less than significant impact to the environment and will respond to issues raised during the review and approval process.

(8) *Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions.*

The project does not involve a commitment for larger actions on behalf of the applicant or any public agency. The Proposed Project is limited to the proposed hotel development adjacent to the Kahului Airport.

(9) *Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat.*

There are no known rare, threatened, or endangered species or habitat identified at the Project Site. Surveys done by the environmental consultant for the Proposed Project support this conclusion. In addition, the Proposed Project is committed to comply with the avoidance and minimization measures recommended by the USFWS as detailed in Section 2.1.6 (Flora and Fauna) of this Draft EIS.

(10) *Have a substantial adverse effect on air or water quality or ambient noise levels.*

As documented, there will be short term impacts on air and water quality and ambient noise levels during construction; however, mitigation measures will be employed to minimize these impacts. Adverse long-term impacts are not anticipated.

(11) *Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as 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 not located within any flood plain and is not in the coastal area. The subject property is in Zone X, an area outside the 0.2% annual chance floodplain. Compliance with County grading requirements have been or will be met.

(12) *Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies.*

The Proposed Action is not anticipated to substantially affect scenic vistas or view planes identified in County or State plans or studies. As discussed in Section 2.1.10 (Visual Resources) of the DEIS, the project will set forth building height limits and setbacks to help maintain views towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kanahā Hotel will provide view corridors in between buildings toward Haleakalā.

(13) *Require substantial energy consumption or emit substantial greenhouse gases.*

Construction of proposed structure will comply with Chapter 16.26.1300, "Energy Conservation", Maui County Code. Where practical and economically feasible, the proposed structure will meet or exceed the building efficiency standard for the State of Hawai'i.

3.2 State Land Use

Chapter 205, Hawai'i Revised Statutes, relating to the Land Use Commission (LUC), establishes four (4) major land use districts in which all lands in the state are placed. These districts are designated as Urban, Rural, Agricultural, and Conservation. The lands of the proposed Kanahā Hotel lie within the State Urban district. (See: Figure 11, "State Land Use Map")

Pursuant to Chapter 15-15, Hawai'i Administrative Rules, any and all uses permitted by local (County) government, either by ordinances or rules, may be allowed in the State Urban District, subject to any conditions imposed by the State Land Use Commission.

Analysis. The proposed Hotel use is a permissible land use in the State Urban District; however, the Project Site is subject to a March 25, 2004, Findings of Fact, Conclusions of Law, and Decision and Order identified as Docket No. A03-739 for the development of a Light Industrial development, Maui Business Park Phase II. Based on technical studies completed to date, and associated analysis it is anticipated that a Final Environmental Impact Statement will be

submitted to the LUC for its consideration. Following the hopeful acceptance of a Final Environmental Impact Statement, a Motion to Amend (MTA) the State Land Use Commission's Decision & Order will be processed in order to request the necessary amendment to allow for the Development of the proposed Hotel Project.

The following section has been prepared at the request of the Maui County Planning Department as part of the early consultation process to analyze the conditions of the Docket No. A03-739 Decision & Order (D&O). A copy of the D&O is included in the DEIS. (See: Appendix 1)

Condition 1a. Housing Study. Within one hundred eighty days (180) of this decision and order, the Petitioner shall complete and submit to and for the approval of the Commission, with copies to the Department of Planning, the Department of Housing and Human Concerns and the Office of Planning, a housing study that addresses the following:

- i. *The impact the Project will have on the current labor force;*
- ii. *The type of employee/affordable housing demands that will be created by the Project;*
- iii. *Any employee/affordable housing policy adopted and in place by the County for commercial and industrial developments;*
- iv. *The proposed mitigation measures to alleviate the impact on both the labor market and the employee/affordable housing situation, including, but not limited to, the acreage, siting, timing, type of housing and eligibility for the employee/affordable housing project and the identity of potential developers and recipient of land to be contributed and conveyed by Petitioner for affordable/employee housing (collectively, the "Proposed Mitigation Measures"); and*
- v. *Recommendations and timeframe for implementing any applicable county housing policy (in place at the time of this study) or requirements and/or the Petitioner's proposed mitigation measures, including the minimum contribution of land described in Condition 1b immediately herein below (collectively, the "Proposed Timeline ").*

The reclassification of the Petition Area, as described in this Decision and Order, shall be subject to the further condition of Petitioner's compliance with the Proposed Mitigation Measures and Proposed Timeline, as modified and/or approved by the Commission (the "Approved Mitigation Measures and Timeline ").

1b. Minimum Contribution of Land by the Petitioner. *In compliance and consistent with the Approved Mitigation Measures and Timeline, Petitioner shall contribute, no later than one (1) year after any Maui County zoning approval authorizing the use of the Property for light*

industrial and/or commercial use, to the County of Maui or a non-profit housing entity or other appropriate entity, a minimum of ten (10) acres of land useable for residential development within the Central Maui region reasonably acceptable to the County of Maui towards development of employee/affordable housing or satisfy such more stringent employee/affordable housing requirements for the Project as may be imposed by the Maui County Council. The Approved Mitigation Measures and Timeline shall be an obligation of the recipient of the land conveyed for affordable housing purposes, as memorialized in the conveyance document from the Petitioner to such recipient.

Response. The 2021 Annual Report prepared by A&B to the State Land Use Commission has been included as appendix in the DEIS. Responses from the 2021 Annual Report are quoted for each condition stated below. (See: Appendix 25)

“In compliance with this condition, Petitioner prepared and submitted the subject housing study to the SLUC in September 2004. The study focused on the increased housing unit demand due to the in-migration of job seekers at the Project. Based on the study, approximately 13 acres of land for affordable housing would be needed. The timing of the demand for these units would be over an approximately 13-year period from 2008 through 2020. The analysis confirmed that the preferable location for the land contribution would be in the Central Maui region. By letter dated November 10, 2004, the Maui Department of Housing and Human Concerns concurred with the findings of the housing study and recommended its approval to the Maui Planning Department. It should also be noted that although the Maui County's Residential Workforce Housing Policy was enacted in 2006, it did not address nor specify affordable housing requirements for commercial and industrial projects.

Affordable housing requirements related to the Project were deliberated by the Maui County Council as part of the zoning application. The Council, as a condition of zoning for the Project, has required the Petitioner to contribute a total of 50 acres of land for affordable housing, community center and park purposes. The specific provisions of the zoning condition are described below.

“That Alexander & Baldwin, Inc. shall provide land for affordable housing, a community multi-purpose center, and park purposes at the approximate location of the terminus of Kamehameha Avenue, near the new Maui Lani Park and Pomaikai Elementary School, as follows:

- a. Approximately 40 acres for affordable housing purposes;
- b. Approximately 7 acres for a Kahului community multi-purpose center; and

c. Approximately 3 acres for park purposes.

The precise location of these lands shall be acceptable to the Department of Housing and Human Concerns and the Department of Parks and Recreation, and Alexander & Baldwin, Inc. shall perform archaeological and topographic surveys of the land for the County's evaluation of the property's acceptability.

As a result of initial land planning work and discussions with various representatives of the County, a suitable location within the Petitioner's Waiale master planned residential community just south of the Maui Lani development was identified.

In August 2010, Petitioner filed a land use petition with the State Land Use Commission to reclassify the Waiale lands from the Agricultural to the Urban District. The SLUC subsequently conducted hearings on the Waiale petition and in June 2012 approved the reclassification of the land. Pursuant to A&B's discussions with the County, an application to subdivide parcels for affordable housing, community center and park sites, was filed in April 2015. Additionally, the Petitioner worked with the County Department of Housing and Human Concerns in developing conceptual housing plans for the lands to be dedicated to the County for affordable housing and park use. With the receipt of final subdivision approval, draft deeds and other applicable conveyance documents were transmitted to the County Department of Housing and Human Concerns and Department of Parks and Recreation in March 2018. The dedication of lands per this requirement is with the Maui County Council for appropriate action."

Condition 2. Water Facilities. *Petitioner shall participate in the funding and construction of adequate water source, storage and transmission facilities and improvements or remit applicable fees for water source, storage and transmission facilities and improvements to accommodate projected water usage generated by the Project. Water facilities and improvements, including adequate storage facilities, should surface water sources be developed, or the payment of applicable fees, shall be coordinated and approved by the County of Maui, Department of Water Supply and, if applicable, the Commission on Water Resources Management of the Department of Land and Natural Resources. Adequate water source shall be made available prior to the issuance of any occupancy permits for buildings developed on the Property.*

Response. "Construction of an offsite water system comprised of two wells, pumps, equipment, and storage and transmission facilities was completed in December 2011. This private water system is sufficient to provide potable water for the Maui Business Park Phase II project. On

March 24, 2014, the Safe Drinking Water Branch of the State Department of Health, granted conditional approval for Maui Business Park Phase II Water System to operate as a Public Water System No. 261.”

Condition 3. Aircraft Operations. *Petitioner shall implement procedures to address notification and liability issues which arise from the potential adverse impacts from noise, right of flight, emissions, vibrations and other incidences of aircraft operations upon the present and future Owners and future lessees or occupants of the Property resulting from the adjacent Kahului Airport operations. The following covenant shall encumber the Property and be included in any transfer of any interest in the Property.*

"The Property is located in the vicinity of Kahului Airport, a commercial airport, and each Owner is aware that there is a likelihood of noise from aircraft passing overhead or nearby and other potential adverse impacts from other incidence of aircraft operation. Each Owner hereby assumes the risk of any potential adverse impacts from such noise, right of flight, emissions, vibrations or other incidents of aircraft operations upon the Owner's lot or uses thereon. Each Owner shall be responsible for appropriate mitigation measures to address the abovementioned potential adverse impacts. Each Owner shall indemnify and hold harmless Declarant and the State of Hawai'i from and against all claims, liability and losses that arise out of noise, right of flight, emissions, vibrations and other incidences of aircraft operations, unless such claim, liability or loss arises out of the State of Hawai'i's willful misconduct in the operation of Kahului Airport or violating any applicable federal, state or county requirement governing aircraft safety and noise abatement measures, in which case, the indemnification of the State of Hawai'i will be inapplicable. "

Response. “In accordance with this condition, the above language has been incorporated into the Declaration of Covenants and Restrictions for the Project.”

Condition 4. FAA Form 7460-1, Notice of Proposed Construction or Alteration. *Petitioner shall impose a covenant encumbering the Property and be included in any transfer of any interest in the Property requiring the submittal of Federal Aviation Administration (FAA) Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA's Hawai'i District Office when or if required under applicable FAA Regulations with a copy to DOT's Airports Division.*

Response. “The following language has been incorporated into the Declaration of Covenants and Restrictions recorded at the Bureau of Conveyances.”

"Each Owner is aware of the obligation to submit Federal Aviation Administration ("FAA") Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA's Hawai'i District Office and will submit the same when or if required under applicable FAA Regulations with a copy to DOT's Airports Division."

Condition 5. Runway Protection Zone. *Petitioner acknowledges that a portion of Petition Area A overlaps the runway protection zone (hereinafter "RPZ") for a proposed extension of the Kahului Airport runway of up to 9,600 feet in length, as further described in the State Office of Planning's Exhibits Nos. 9 and 10 and the testimony of DOT Airports Division witness Benjamin Schlapak. Petitioner agrees to restrict uses in the RPZ to light industrial, parking, roadway and other infrastructure uses that do not entail the congregation of people, provided all such uses are approved by the Federal Aviation Administration. This restriction on uses within the RPZ shall automatically terminate if the State Department of Transportation (DOT) does not attain all governmental approvals for the extension of the Kahului Airport runway within a period of five (5) years from March 25, 2004, the date of the Commission's Decision and Order in Docket No. A03-739. Notwithstanding the foregoing, and for good cause shown, the Commission may grant an extension of time for the DOT if DOT during such five-year period has been using its best efforts, in DOT during such five-year period has been using its best efforts, in good faith, to attain all governmental approvals for the extension of the Kahului Airport runway. The size of the RPZ shall be adjusted if the runway length sought by the DOT is less than 9,600 feet. Should the DOT desire to acquire an easement or the fee simple interest in the RPZ, the fair market value of the land shall be based on its current Agricultural District classification and present zoning designation by the County of Maui provided that: a) the acquisition occurs within a period of five (5) years from March 25, 2004, the date of the Commission's Decision and Order in Docket No. A03-739; and b) the DOT during such five-year period has been using its best efforts, in good faith, to attain all governmental approvals for the extension of the Kahului Airport runway.*

Response. “In July 2012, Petitioner and DOT executed a Memorandum of Understanding setting forth the terms for the transfer of portions of the Petition area to DOT for the proposed RPZ. A draft Memorandum of Agreement incorporating such terms was submitted to DOT in April 2013 (included in 2013 annual report). In December 2016, the DOT acquired approximately 3.7 acres of the Project area for the RPZ.”

Condition 6. Traffic Impact Analysis Report. *Prior to obtaining County zoning, Petitioner shall revise or supplement its traffic impact analysis report (hereafter TIAR) dated May 2003 to the satisfaction of the DOT. The TIAR shall identify the impact of Petitioner's project on the transportation system and recommend any required mitigation measures. Conditions and assumptions reflected in the TIAR shall be developed in consultation with DOT, including but not limited to, various proportions of retail and light industrial uses to be developed at the Property, plans for the proposed airport access road, permitted accesses, trip generation rates, and traffic projections. Petitioner shall obtain the DOT's prior written approval of the final TIAR, and Petitioner may not proceed with the development of Petitioner's project unless and until the DOT approves the TIAR. As development occurs within the Property, the TIAR shall be revised or supplemented as may be requested and required by the DOT. Petitioner shall be responsible for constructing, implementing and/or contributing its fair share of the cost of those improvements or mitigation measures as recommended or required by the TIAR and as dictated by the actual proportion of light industrial and retail uses developed at the Property. The TIAR shall also address the impact to County of Maui roadways and shall be submitted to the County of Maui, Department of Planning for the County's review and consideration in the zoning approval process.*

Response. “Petitioner prepared a revised TIAR for the Project dated July 2004 in compliance with this condition. The revised TIAR updates the previous study dated May 2003. The study was revised in response to comments received from the DOT concerning completion of the proposed Airport Access Road and development scenarios with a higher percentage of retail versus industrial uses. Prior to preparing the revised TIAR, input concerning applicable assumptions was solicited and obtained from the DOT. A copy of the revised TIAR was included in the environmental impact statement that was prepared for the Project and accepted by the SLUC.

In an effort to further update the traffic data for key intersections analyzed in the TIAR, new traffic counts were undertaken in 2006. The results of the 2006 traffic counts were consistent with the projections of the TIAR, confirming the validity of the conclusions and recommendations of the TIAR. The DOT reviewed the 2006 supplemental traffic counts and found them reasonably consistent with the 2004 traffic report assumptions concerning growth in regional traffic.

In further compliance with this condition, Petitioner updated the TIAR with new traffic counts in June 2010. The updated TIAR served as the basis for development of construction drawings and discussions with DOT regarding Petitioner's fair share contribution toward regional transportation improvements.”

Condition 7. Regional Transportation Improvements. *Petitioner shall contribute Petitioner's fair share of the cost of regional transportation improvements in the area, as such fair share shall be determined by the DOT based on appropriate transportation planning methodologies to establish a rational nexus.*

Response. In 2006, Petitioner worked in cooperation with the State Department of Transportation-Maui District Office, to fund and implement the coordination of traffic signals during the AM and PM peak periods along the Dairy Road corridor from Haleakalā Highway to Pu‘unene Avenue. This work consisted of an evaluation of existing traffic signal equipment, the procurement and installation of new traffic signal equipment and communication systems, and the preparation and implementation of timing plans to coordinate the traffic signals at all intersections. The system was activated in December 2006.

In September 2012, Petitioner executed an agreement with the DOT concerning fair share costs and contributions, in compliance with this condition. A copy of the agreement was previously provided to the SLUC.

The Petitioner had been in discussions with the DOT regarding the DOT’s acquisition of a portion of land near Haleakalā Highway for a new onramp to the DOT’s Airport Access Road. The onramp would serve south bound traffic in the vicinity of Haleakalā Highway. Land costs relating to the onramp were to be charged against the Petitioner’s documented fair share contribution, however, in January 2020 the DOT instead requested full payment of the previous Petitioner’s fair share contribution. Pursuant to that request the previous Petitioners remitted the amount of \$4,601,026.00 to the DOT in February 2020 in full payment of its fair share contribution.”

Condition 8. Best Management Practices. *The Petitioner shall coordinate with the County of Maui, the State Department of Land and Natural Resources and the State Department of Health to establish Best Management Practices to contain spills, and prevent materials associated with light industrial uses such as petroleum products, chemicals, and other pollutants from leaching or draining into the ground or the storm drain system.*

Response. “Petitioner acknowledges this condition, and as development of the Project progresses, will continue to comply with this condition.”

Condition 9. Hazardous Materials. *Storage and/or disposal of hazardous materials shall be approved by the State Department of Health prior to their establishment on the subject Property.*

Response. “Petitioner acknowledges this condition, and as development of the Project progresses, will continue to comply with this condition.”

Condition 10. Wastewater Facilities. *Petitioner shall provide a sewer impact study to the County Department of Public Works and Environmental Management evaluating the wastewater system requirements for the Project. Petitioner shall fund and develop, as required by the County of Maui and the State Department of Health, wastewater transmission and treatment facilities to accommodate the additional wastewater generated by the Project.*

Response. “Petitioner completed a sewer system study for the Project and construction of approved offsite and onsite wastewater facilities has been completed. The County of Maui Department of Environmental Management has acknowledged completion of improvements and satisfaction of this condition (copy provided with 2013 report).”

Condition 11. Drainage. *Petitioner shall fund, design and construct any drainage system improvements required to mitigate the additional runoff resulting from the project without creating adverse effects on adjacent and downstream properties. The master drainage plan for Maui Business Park shall be constructed to mitigate the additional runoff resulting from this development.*

Response. “Petitioner completed a Drainage Report dated October 2010 and submitted the report to appropriate government agencies. Construction of drainage system improvements consistent with the Report has been completed.”

Condition 12. Aircraft Operation Hazards. *Petitioner shall fund and implement a program to control any bird nesting or occupation and any insect, pest or wildlife infestation, in any drainage retention basins serving the Property to minimize the hazards to aircraft operations, as deemed necessary by the DOT.*

Response. “The Petitioner has consulted with the County of Maui regarding utilizing the existing drainage basins adjacent to the South Project Area for open area recreational use by a private entity (related correspondences concerning this matter were included in the 2010 annual report). Alternatively, the basins will be maintained by the project's owner's association. The future use of these existing drainage basins will incorporate the provisions of this condition.”

Condition 13. Provisions of the Hawai'i Right to Farm Act. *Petitioner shall inform all prospective occupants of possible odor, noise, and dust pollution resulting from adjacent Agricultural Districts lands, and that the Hawai'i Right-to-Farm Act, Chapter 165, HRS, limits the circumstances under which preexisting farming activities may be deemed a nuisance.*

Response. “The Declaration of Covenants and Restrictions for the Project includes provisions which satisfy this condition.”

Condition 14. Solid Waste. *Petitioner shall develop a Solid Waste Management Plan in conformance with the Integrated Solid Waste Management Act, Chapter 342G, HRS. The Plan shall be approved by the County of Maui and shall address the need to divert the maximum amount of waste material caused by the development away from the County's landfills.*

Response. “A solid waste management plan was prepared for the Project and included in the environmental impact statement prepared for the Project.”

Condition 15. Visual Analysis. *That as part of its zoning application submittal, the Petitioner shall submit a visual analysis study for the location of the Ho'okele Street Extension emphasizing the maintenance of a "view corridor" toward Haleakalā.*

Response. “The visual analysis study was submitted to the County of Maui as part of the change in zoning application for the MBPIL. The study was also included in the environmental impact statement prepared for the Project. The visual analysis study was reviewed and approved by the Maui Urban Design Review Board on December 7, 2004.”

R.D. Olson Development has prepared a view analysis that focuses on the proposed Kahahā hotel. This Draft EIS discusses visual impacts in Section 2.1.10 Visual Resources, and a view analysis is provided as an appendix in the DEIS. (See: Appendix 16)

Condition 16. Visual Impacts. *That as part of its zoning application, the Petitioner shall submit design guidelines with renderings on how a landscaped aesthetic visual corridor along all adjacent highways and how a landscaped berm utilizing trees and shrubbery shall be constructed along the entire proposed collector road (Ho'okele Street Extension) to soften the visual impact of the buildings along the road. (Wailuku-Kahului Community Plan Update).*

Response. “The design guidelines were submitted to the County of Maui as part of the change in zoning application for the Project. The design guidelines were reviewed and approved by the Maui Urban Design Review Board on December 7, 2004.”

Condition 17. Dual Water System. *Petitioner shall evaluate the feasibility of developing a dual water system for the Project, utilizing non-potable water for landscape irrigation purposes.*

Response. “Petitioner received approval of construction plans for a non-potable water system for landscape irrigation purposes. The system has been completed with other Project improvements.”

Condition 18. Energy Conservation. *Petitioner shall implement energy conservation measures such as the use of solar energy and solar heating and incorporate such measures into the Project.*

Response. “Petitioner acknowledges this condition, and as development of the Project progresses, Petitioner will comply with this condition.”

R.D. Olson proposes energy-saving features for the proposed Hotel project, as discussed in Section 2.1.4 Climate Change Assessments. The following list includes but not limited to the use of:

1. Passive solar design;
2. Photovoltaic solar panels;
3. Thermoplastic polyolefin (TPO) single-ply roofing membrane in a light color that reflects solar energy and heat away from the roof;
4. Efficient low emissivity glazing on glass to minimize ultraviolet and infrared light that passes through;
5. Water conserving plumbing fixtures and fittings;
6. Irrigation with automatic controllers, sensors, and metering of outdoor water use;

7. Finish material pollutant controls meeting volatile organic compound (VOC) and formaldehyde limits (adhesives, sealants, caulks, paints and coatings, aerosol paints and coatings);
8. Exterior material selection for sustainability and recycled content;
9. Light pollution reduction;
10. Low power consumption for lighting and design and dimming systems;
11. Efficient variable refrigerant flow (VRF) heating and air-conditioning system design;
12. Commissioning and testing of Heating, Ventilation, and Air Conditioning (HVAC) systems;
13. Insulation and sealing of the exterior building envelope; and
14. Electric Vehicle (EV) charging stations.

Development of the project is not anticipated have any adverse impact upon the existing electrical or telephone systems that will serve the subject property

Condition 19. Project Composition. *For a period of eight (8) years from the date of the County's approval of zoning for the Project a total of at least fifty percent (50%) of the Project acreage shall be (a) used and developed by Petitioner for non-retail, light industrial use and/or (b) sold or leased to and developed and used by third-party buyers for non-retail, light industrial use. For this same eight-year period, simultaneous with Petitioner's development or offer for sale or lease of the Property for retail use, Petitioner shall develop or offer for sale or lease an equal amount of acreage within the Property for non-retail, light industrial use. The phrase "light industrial", as used in this paragraph, includes warehousing and distribution types of activity as well as compounding, assembly, or treatment of articles or materials with the exception of heavy manufacturing and processing of raw materials. It is the intent of this paragraph that at the end of the above-described eight-year period, to the extent that the Project is developed or in the process of being developed by Petitioner or any third party, no less than fifty percent (50%) of such development or development in process shall be for non-retail, light industrial purposes.*

Response. “As provided herein, the Property was subject to a Declaration of Use Restriction for an eight (8) year period. (Copy previously provided.) As specified by this Condition, the eight (8) year period terminated on May 2, 2016. The Cancellation of Declaration of Use Restriction was provided in the 2016 annual report.”

Condition 20. Compliance with Representations to the Commission. *Petitioner shall develop the Property in substantial compliance with the representations made to the Commission. Failure to so develop the Property may result in reversion of the Property to its former classification or change to a more appropriate classification.*

Response. “Petitioner is developing the Property in substantial compliance with representations made to the Commission. The Petitioner sold lands to a buyer who plans to seek applicable land use entitlements to allow hotel development within a portion of the Project near Haleakalā Highway. The buyer is aware of the need to attain appropriate approvals from the Commission and other governmental agencies.”

Condition 21. Notice of Change to Ownership Interests. *Petitioner shall give notice to the Commission of any intent to sell, lease, assign, place in trust, or otherwise voluntarily alter the ownership interests in the Property, prior to development of the Property.*

Response. “With the development of the Property, lot sales with respective notices commenced in 2021 and remain ongoing. The unsold parcels remain under the ownership of Alexander & Baldwin, LLC, Series T.”

Condition 22. Annual Reports. *Petitioner shall timely provide without any prior notice, annual reports to the Commission, the Office of Planning, and the County of Maui Planning Department in connection with the status of the subject project and Petitioner's progress in complying with the conditions imposed herein. The annual report shall be submitted in a form prescribed by the Executive Officer of the Commission.*

Response. “This annual report is being submitted in compliance with this condition for both Dockets A03-739 and A88-634.” (See: Appendix 25)

Condition 23. Release of Conditions. *The Commission may fully or partially release the conditions provided herein as to all or any portion of the Property upon timely motion and upon the provision of adequate assurance of satisfaction of these conditions by Petitioner.*

Response. “Not applicable at this time.”

Comment 24. Notice of Imposition of Conditions. *Within 7 days of the issuance of the Commission's Decision and Order for the subject reclassification, Petitioner shall (a) record*

with the Bureau of Conveyances a statement that the Property is subject to conditions imposed herein by the Land Use Commission in the reclassification of the Property, and (b) shall file a copy of such recorded statement with the Commission.

Response. “Docket A03-739: On April 11, 2004 the Notice of the Imposition of Conditions by the SLUC was filed with the Bureau of Conveyances as Document No. 2004-066861 and a copy was filed with the SLUC.”

Comment 25. Recordation of Conditions. *Petitioner shall record the conditions imposed herein by the Commission with the Bureau of Conveyances pursuant to Section 15-15-92 Hawai'i Administrative Rules.*

Response. “Docket A03-739: On April 20, 2004 the Declaration of Conditions imposed by the SLUC was filed with the Bureau of Conveyances as Document Nos. 2004-078771 thru 2004-078772 and a copy was filed with the SLUC.”

Section 15-15-18, Hawai'i Administrative Rules.

The proposed Kānāhā Hotel is consistent with the following standards of the Urban District, Section 15-15-18, Hawai'i Administrative Rules:

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

Analysis:

The Project Site of the proposed Kānāhā Hotel is located in Kahului — the urban center of Maui. The Project Site is located immediately adjacent to existing commercial uses, Costco, the Courtyard Marriott Hotel, the Kahului Airport, and food and drinking establishments.

- 2. *It shall take into consideration the following specific factors:***

- (A) *Proximity to centers of trading and employment except where the development would generate new centers of trading and employment;***

Analysis:

The Kānāhā Hotel is located within close proximity to the major transportation and commercial hub of the Island of Maui. The Maui Mall, Queen Ka'ahumanu Shopping Center, along with numerous professional and business services are all located within 10-

minute drive from the Kanahā Hotel. The Proposed Project will generate substantial employment with regards to the management and operation of the hotel. In addition, the Wailuku-Kahului Community Plan and the Maui Island Plan identify the project in the Urban Growth Boundary.

(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; and

Analysis:

Basic public services and facilities, such as transportation systems, sewer, water, drainage, and public utility hook-ups are available on or within close proximity to the Project Site. All of the drainage improvements for the proposed development will comply with County of Maui standards. The County of Maui currently does not provide solid waste disposal service to hotel uses, so a private company will be hired to dispose of solid waste.

The lands of the project area are improved and are closed to existing infrastructures making the subject property a suitable location for the proposed development. Section 2.4 (Infrastructure) of the DEIS details the preliminary engineering and drainage analyses conducted for the proposed development. The hotel is not anticipated to generate students therefore no impact to schools is anticipated.

Nearest public park is the Kanahā Beach Park located approximately 1.2 miles from the proposed hotel.

Police protection for the region is provided by the Maui County Police Department (MPD) headquartered at the Wailuku station approximately 3.1 miles away. The Central Maui patrol includes approximately 100 full time personnel.

Fire prevention, suppression, and protection are provided by Maui County Fire Department's Kahului Station, located on Dairy Road, approximately 2.1 miles from the Project Site. The proposed development will not result in any extension of the existing service area limits for these emergency services.

(C) Sufficient reserve areas for foreseeable urban growth;

Analysis:

The Wailuku-Kahului Community Plan region will have sufficient reserve areas for foreseeable urban growth. The Maui Island Plan, Directed Growth Plan identifies Urban Planned Growth Boundaries Areas in Kahului. Vacant areas are located primarily around Maui Lani Parkway, around the Kahului Airport, and vacant commercial areas along Ho'okele Street.

3. *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;*

Analysis:

The Project Site sits at approximately 28.5 to 34 feet mean sea level (msl) and is relatively flat with an approximate 1 (one) percent slope in the westerly direction. The ground surface of the site is currently covered with overgrown brush and weeds.

The site includes the soil type “Molokai silty clay loam” (MuB). For this series, runoff is slow to medium, and the erosion hazard is slight to moderate. Runoff is slow therefore these soils are appropriate for urban development.

As indicated by the Flood Insurance Rate Map, the Kahahā Hotel is located within Zone X — area outside of the Special Flood Hazard Areas (SFHAs). The Project Site located in the tsunami zone; however, the improved lots have been created following the MBP II subdivision and are appropriate for the proposed development.

4. *Land contiguous with existing urban areas shall be given more consideration than non-contiguous land, particularly when indicated for future urban use on state or county general plans or county community plans or development plans;*

Analysis:

As reflected on the State Land Use Classification map, the Project Site is already designated “Urban”. In addition, the surrounding project is within the Maui Island Plan’s Urban Growth Boundary and is also designated by the Wailuku-Kahului Community Plan for urban use.

As noted above, the Project Site is contiguous to existing urban areas, including a Hotel, Costco, and light industrial/commercial uses, the MBP II, and areas included within the Kahului Airport Master Plan.

- 5. It shall include lands in appropriate locations for new urban concentrations and shall give consideration to areas of urban growth as shown on the state and county general plans or county community plans or development plans;***

Analysis:

Given the Light Industrial (LI) designation of the property by the Wailuku-Kahului Community Plan and the placement of the Project area within the Urban Growth Boundary by the Maui Island Plan, the Project Site is in an appropriate location for new urban concentration and growth. Both of these plans support an urban use of the subject property, and with existing infrastructure and public facilities in close proximity. However, in order to ensure consistency with the proposed hotel use, the current Wailuku-Kahului Community Plan designation needs to be amended to hotel.

- 6. It may include lands which do not conform to the standards in paragraphs (1) to (5):***
(A) When surrounded by or adjacent to existing urban development; and
(B) Only when those lands represent a minor portion of this district;

Analysis:

The Project Site is located in the State Land Use Urban District and conforms to the standards in paragraphs (1) to (5).

- 7. It shall not include lands, the urbanization of which will contribute toward scattered spot urban development, necessitating unreasonable investment in public infrastructure or support services; and***

Analysis:

Development of the Project area will not contribute to scattered spot urban development. The property is located in the MBP2 designated for urban uses and all infrastructure is privately owned and maintained; therefore, there was no public investment in infrastructure as part of the MBP2.

The proposed development will not necessitate unreasonable public investment in infrastructure facilities or public services. The Applicant will be engaging in infrastructure improvements to mitigate any potential impacts of the proposed development.

- 8. It may include lands with a general slope of twenty per cent 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 interests in the aesthetic quality of the landscape.

Analysis:

The Project Site sits at approximately 28.5 to 34 feet mean sea level (msl) and is relatively flat with an approximate 1 (one) percent slope in the westerly direction. The ground surface of the site is currently covered with overgrown brush and weeds. The site has been developed and improved with water meters, roadways, sewer, and utilities making the site no longer suitable for productive agricultural land use and is better suited for urban development.

The proposed development would provide additional opportunities for visitor accommodations — primarily targeting business travelers and Hawai'i resident market — situated within 3-minute drive to the airport and committed to employment generation. Basic services such as schools, parks, wastewater systems, solid waste disposal, drainage, water, transportation systems, public utilities, and police and fire protection are in close proximity to the site. The Kahahā Hotel is currently within the General Plan's Urban Growth Boundary.

\Sec 15-15-24, Hawai'i Administrative Rules. Permissible uses within the “U” Urban District

Any and all uses permitted by the counties, either by ordinances or rules may be allowed within this district, subject to any conditions imposed by the commission pursuant to section 205-4(g), HRS.

Analysis:

The proposed Kahahā Hotel is located within the Urban District; therefore, the project is in compliance with section 15-15-24 HAR.

3.3 Hawai'i State Plan

The Hawai'i State Plan (Chapter 226, HRS) establishes a set of goals, objectives, and policies that serve to guide the long-term growth and development of the State. The Plan consists of three (3) parts. Part I includes its Overall Theme, Goals, Objectives, and Policies; Part II encompasses Planning, Coordination, and Implementation; and Part III establishes Priority Guidelines. Since Part II of the State Plan covers its administrative structure and implementation process, comments

relating to the applicability of Part II to the Proposed Project are not appropriate. In addition to sections of the State Plan that are applicable to the Proposed Project, a discussion of how the project conforms to the State Plan is included below.

To facilitate describing the relationships of the Proposed Action to the numerous land use and natural or cultural resource plans, policies, and controls for the affected, some of those plans, policies, and controls are presented in tabular form, and are described with text and/or the following letter code:

S = Supportive, N/S = Not Supportive, N/A = Not Applicable

Hawai'i State Plan, Chapter 226, HRS Part 1. Overall Themes, Goals, Objectives and Policies	S	N/S	N/A
Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
HRS 226-1: Findings and Purpose			
HRS 226-2: Definitions			
HRS 226-3: Overall Theme			
<p>HRS 226-4: State Goals. In order to guarantee, for the present and future generations, those elements of choice and mobility that ensure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:</p> <ol style="list-style-type: none"> 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. 2. A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being 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. 			
<p>Analysis: The proposed Kānāhā Hotel is in alignment with and will support the State of Hawai'i's commitment and efforts to promote its economic, environmental, and socio-cultural goals as outlined in the Hawai'i State Plan. The Proposed Project will accomplish the above goals by fulfilling the need for additional hotel rooms near the Kahului Airport, creating employment opportunities in Central Maui for residents, generating tax revenues, and promoting the quality of life by transforming the vacant land into a</p>			

compatible and productive urban land use. Objective 3 of the Proposed Project includes the contribution of the proposed Kahahā Hotel to the diversification of Maui's economy by providing complementary services that support new businesses and commercial activities. Therefore, the Proposed Project will provide greater opportunity for self-reliance and self-determination on the local economy. In addition, the project is subject to the Workforce housing requirements of Maui County, Department of Housing and Human Concerns.

Pursuant to Section 2.96.050, Maui County Code, residential workforce housing credits may be used to satisfy the requirements of Chapter 2.96, MCC, additionally Act 141 (2009) requires that the County recognize affordable housing credits issued to the Department of Hawaiian Home Lands to satisfy any county affordable housing requirements. While we understand the sentiment of the Commission, we hope that the Commission recognizes that credits are issued to developers who build units in excess of their requirement, which allows an individual or family to enjoy the unit before the unit was "required" to be built. The credits allow the affordable housing developer to recoup some of their costs as typically affordable housing units are subsidized in some fashion (County affordable housing fund, market units, low-income housing tax credits, etc.), potentially allowing the developer to again build additional "excess" affordable housing units, once again allowing early access for an individual or family. It is important to remember that credits are earned, after an affordable housing unit is built.

In the alternative, instead of purchasing credits earned for affordable housing units already built and enjoyed by Maui residents, the Applicant may explore the option of working with a local affordable housing developer on the construction of affordable housing units that will be built concurrently with or within a set time period, as established in the required Residential Workforce Housing Agreement, of the proposed Kahahā Hotel. This option has many variables so it may not be feasible.

Chapter 226-5, HRS, Objective and Policies for Population

Objective: It shall be the objective in planning for the state's population to guide population growth to be consistent with the achievement of physical, economic, and social objectives contained in this chapter.

Policies:

	S	N/S	N/A
(1) Manage population growth statewide in a manner that provides			✓

increased opportunities for Hawai'i's people to pursue their physical, social, and economic aspirations while recognizing the unique needs of each county.			
(2) Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.	✓		
(3) Promote increased opportunities for Hawai'i's people to pursue their socio-economic aspirations throughout the islands.	✓		
(4) Encourage research activities and public awareness programs to foster an understanding of Hawai'i's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawai'i's population.			✓
(5) Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among the states, provided that such actions do not prevent the reunion of immediate family members.			✓
(6) Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			✓
(7) Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.	✓		
Analysis: The Proposed Project is a non-resort hotel located within the MBP II where improvements including utility and roadways services have been made available to accommodate future developments. The Kānaha Hotel will contribute to a strong and viable economy on Maui by not only generating employment closer to the workforce who may reside in Kahului, but also generate income from the visitors staying at the hotel. The Proposed Project will also help to create an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires — eventually, will promote increased opportunities for Hawai'i. Based on the foregoing, the Proposed Project is not anticipated to increase population growth on Maui.			
Chapter 226-6, HRS, Objectives and Policies for the Economy – in General			
Objectives: Planning for the State's economy in general shall be directed toward achievement of the following objectives:			
Objectives:	S	N/S	N/A

(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawai'i's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.	✓		
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries and includes the development and expansion of industries on the neighbor islands.	✓		
Policies:	S	N/S	N/A
(1) Promote and encourage entrepreneurship within Hawai'i by residents and nonresidents of the State.	✓		
(2) Expand Hawai'i's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.	✓		
(3) Promote Hawai'i as an attractive market for environmentally and socially sound investment activities that benefit Hawai'i's people.	✓		
(4) Transform and maintain Hawai'i as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.	✓		
(5) Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawai'i.			✓
(6) Seek broader outlets for new or expanded Hawai'i business investments.	✓		
(7) Expand existing markets and penetrate new markets for Hawai'i's products and services.			✓
(8) Assure that the basic economic needs of Hawai'i's people are maintained in the event of disruptions in overseas transportation.	✓		
(9) Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives.	✓		
(10) Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawai'i's small-scale producers, manufacturers, and distributors.	✓		

(11)	Encourage labor-intensive activities that are economically satisfying, and which offer opportunities for upward mobility.	✓		
(12)	Encourage innovative activities that may not be labor-intensive but may otherwise contribute to the economy of Hawai'i.	✓		
(13)	Foster greater cooperation and coordination between the government and private sectors in developing Hawai'i's employment and economic growth opportunities.	✓		
(14)	Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.	✓		
(15)	Maintain acceptable working conditions and standards for Hawai'i's workers.	✓		
(16)	Provide equal employment opportunities for all segments of Hawai'i's population through affirmative action and nondiscrimination measures.			✓
(17)	Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			✓
(18)	Encourage businesses that have favorable financial multiplier effects within Hawai'i's economy, particularly with respect to emerging industries in science and technology.			✓
(19)	Promote and protect intangible resources in Hawai'i, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.	✓		
(20)	Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new, potential growth industries in particular.			✓
(21)	Foster a business climate in Hawai'i — including attitudes, tax and regulatory policies, and financial and technical assistance programs — that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.	P		
Analysis: As discussed in Section 2.2.2 (Economy) of this Draft EIS, employment from construction is estimated to generate 335 full-time positions for two years during the construction phase (See: Appendix 20). The construction of the Kānāhā Hotel is expected to contribute taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the				

<p>State of Hawai'i over a thirteen (13) year period. The effect of these expenditures will have positive direct, indirect, and induced beneficial impacts on the economy of the County of Maui. During its operations phase, the Kahahā Hotel will increase the level of capital investment in the region — creating employment opportunities and economic stimulus for the region. The Proposed Project will provide direct employment opportunities for Maui residents and contribute to economic diversification and growth for both Maui and the State. After “stabilization”, the Kahahā Hotel is envisioned to support 100 to 125 permanent jobs.</p>			
<p>Chapter 226-7 Objectives and policies for the economy-agriculture</p>			
<p>Objectives: Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:</p>			
Objectives:	S	N/S	N/A
(1) Viability of Hawai'i's sugar and pineapple industries.			✓
(2) Growth and development of diversified agriculture throughout the State.			✓
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawai'i's strategic, economic, and social well-being.			✓
Policies:	S	N/S	N/A
(1) Establish a clear direction for Hawai'i's agriculture through stakeholder commitment and advocacy.			✓
(2) Encourage agriculture by making best use of natural resources.			✓
(3) Provide the governor and the legislature with information and options needed for prudent decision making for the development of agriculture.			✓
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.			✓
(5) Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawai'i's economy.			✓
(6) Seek the enactment and retention of federal and state legislation that benefits Hawai'i's agricultural industries.			✓

(7)	Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawai'i's food producers and consumers in the State, nation, and world.			✓
(8)	Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			✓
(9)	Enhance agricultural growth by providing public incentives and encouraging private initiatives.			✓
(10)	Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			✓
(11)	Increase the attractiveness and opportunities for an agricultural education and livelihood.			✓
(12)	In addition to the State's priority on food, expand Hawai'i's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			✓
(13)	Promote economically competitive activities that increase Hawai'i's agricultural self-sufficiency, including the increased purchase and use of Hawai'i-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D-104.			✓
(14)	Promote and assist in the establishment of sound financial programs for diversified agriculture.			✓
(15)	Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			✓
(16)	Facilitate the transition of agricultural lands in economically nonfeasible agricultural production to economically viable agricultural uses.			✓
(17)	Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko i'a, māla, and irrigated lo'i, and growth of traditional Hawaiian crops, such as kalo, 'uala, and 'ulu.			✓
(18)	Increase and develop small-scale farms.			✓

Analysis: As discussed in Section 2.1.11 (Agricultural Resources) of this DEIS, the LSB and ALISH classification systems indicate that the lands underlying the Project Site possess soil with soil ratings for productive agricultural uses. However, the Project Site is situated within the Maui Business Park Phase II (MBP II), hence the site is included within the planned development area. The lands within the MBP II have been improved with water meters, grading, sewer, underground utilities, and roadway services.

Furthermore, the accepted MBP II FEIS document dated December 2004 states, “given the large supply of land in other areas on Maui available for agriculture due to the decline of plantation agriculture, use of 179 acres for MBP II will not affect the statewide growth of diversified agriculture.” As such, the utilization of the Project Site for urban use and development is deemed appropriate.

Chapter 226-8 Objective and policies for the economy-visitor industry

Objectives: Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawai'i's economy.

Policies:	S	N/S	N/A
(1) Support and assist in the promotion of Hawai'i's visitor attractions and facilities.	✓		
(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people.	✓		
(3) Improve the quality of existing visitor destination areas by utilizing Hawai'i's strengths in science and technology.			✓
(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.	✓		
(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawai'i's people.	✓		
(6) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the visitor industry.	✓		
(7) Foster a recognition of the contribution of the visitor industry to Hawai'i's economy and the need to perpetuate the aloha spirit.	✓		

(8) Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawai'i's cultures and values.	✓		
<p>Analysis: The Proposed Project strongly supports the State's objectives and policies for the economy as they pertain to the visitor industry. The Kānāhā Hotel will directly support the visitor industry by providing new non-resort hotel rooms in Central Maui adjacent to the Kahului Airport — approximately 5-minute drive to the airport terminal. In addition, the location of the Proposed Project also supports compatibility with surrounding businesses including but not limited to retail, offices, car rentals, and eating and drinking establishment. Therefore, in general, the proposed hotel is anticipated to positively contribute to the surrounding economic activity through the spending of its visitors.</p> <p>The economic study prepared as part of the DEIS has concluded that there is a demand for hotel rooms in Central Maui — development of the hotel will continue to provide new job opportunities and steady employment. The hotel management company will provide job training programs to encourage and allow for upward mobility within the visitor industry.</p>			
Chapter 226-9 Objective and policies for the economy-federal expenditures			
<p>Objective: Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawai'i's economy.</p>			
Policies:	S	N/S	N/A
(1) Encourage the sustained flow of federal expenditures in Hawai'i that generates long-term government civilian employment.			✓
(2) Promote Hawai'i's supportive role in national defense in a manner consistent with Hawai'i's social, environmental, and cultural goals by building upon dual-use and defense applications to develop thriving ocean engineering, aerospace research and development, and related dual-use technology sectors in Hawai'i's economy.			✓
(3) Promote the development of federally supported activities in Hawai'i that respect state-wide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawai'i's environment.			✓
(4) Increase opportunities for entry and advancement of Hawai'i's			✓

people into federal government service.			
(5) Promote federal use of local commodities, services, and facilities available in Hawai'i.			✓
(6) Strengthen federal-state-county communication and coordination in all federal activities that affect Hawai'i.			✓
(7) Pursue the return of federally controlled lands in Hawai'i that are not required for either the defense of the nation or for other purposes of national importance and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.			✓
Analysis: The proposed Kānāhā Hotel does not include the use of federal funds or land, nor does it require additional federal expenditures in the State. The Proposed Project is fully private funded. Therefore, Chapter 226-9, HRS, is not applicable to the Proposed Project.			
Chapter 226-10 Objective and policies for the economy-potential growth activities			
Objective: Planning for the State's economy with regard to potential growth activities shall be directed towards achievement of the objective of development and expansion of potential growth activities that serve to increase and diversify Hawai'i's economic base.			
Policies:	S	N/S	N/A
(1) Facilitate investment and employment growth in economic activities that have the potential to expand and diversify Hawai'i's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors.	✓		
(2) Facilitate investment in innovative activity that may pose risks or be less labor-intensive than other traditional business activity, but if successful, will generate revenue in Hawai'i through the export of services or products or substitution of imported services or products.			✓
(3) Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements.			✓
(4) Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently			✓

knowledgeable, and equipped with the attitude necessary to undertake innovative activity.			
(5) Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus.	✓		
(6) Expand Hawai'i's capacity to attract and service international programs and activities that generate employment for Hawai'i's people.			✓
(7) Enhance and promote Hawai'i's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts.			✓
(8) Accelerate research and development of new energy-related industries based on wind, solar, ocean, and underground resources and solid waste.			✓
(9) Promote Hawai'i's geographic, environmental, social, and technological advantages to attract new or innovative economic activities into the State.			✓
(10) Provide public incentives and encourage private initiative to attract new industries that best support Hawai'i's social, economic, physical, and environmental objectives.			✓
(11) Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research.			✓
(12) Develop, promote, and support research and educational and training programs that will enhance Hawai'i's ability to attract and develop economic activities of benefit to Hawai'i.			✓
(13) Foster a broader public recognition and understanding of the potential benefits of new or innovative growth-oriented industry in Hawai'i.			✓
(14) Encourage the development and implementation of joint federal and state initiatives to attract federal programs and projects that will support Hawai'i's social, economic, physical, and environmental objectives.			✓
(15) Increase research and development of businesses and services in the telecommunications and information industries.			✓

(16) Foster the research and development of nonfossil fuel and energy efficient modes of transportation.			✓
(17) Recognize and promote health care and health care information technology as growth industries.			✓
<p>Analysis: The Proposed Action is a hotel development to provide non-resort hotel rooms in Kahului targeting business travelers and Hawai'i resident market. The visitor industry has been established in Hawai'i for decades and many hotels provide a location for conferences, cultural events, and other visitor-oriented events that may stimulate the creation of potential growth activities.</p> <p>Despite not including such services, the proposed hotel will still contribute to the potential growth activities by providing necessary accommodation located within 5-minute from the airport — for business travelers who may attend the said events. Therefore, on the long-term basis, the Proposed Project is in alignment and will support the State's objectives and policies for the economy as they pertain to the potential growth activities.</p>			
Chapter 226-10.5 Objectives and policies for the economy-information industry			
<p>Objective: Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawai'i as a leader in broadband and wireless communications and applications in the Pacific Region.</p>			
Policies:	S	N/S	N/A
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawai'i and between Hawai'i and the world, and make high speed communication available to all residents and businesses in Hawai'i;			✓
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawai'i to accommodate future growth and innovation in Hawai'i's economy;			✓
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawai'i;			✓
(4) Encourage mainland-and foreign-based companies of all sizes, whether information technology-focused or not, to allow their			✓

principals, employees, or contractors to live in and work from Hawai'i, using technology to communicate with their headquarters, offices, or customers located out-of-state;			
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well-designed information industry;			✓
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people;			✓
(7) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the information industry;			✓
(8) Foster a recognition of the contribution of the information industry to Hawai'i's economy; and			✓
(9) Assist in the promotion of Hawai'i as a broker, creator, and processor of information in the Pacific.			✓
Analysis: The Proposed Project is limited to the hotel development within the Project Site. The Proposed Project is not anticipated to adversely affect the telecommunications and information technology industry. Therefore, Chapter 226-10.5, HRS, is not applicable to the Proposed Project.			
Chapter 226-11, HRS, Objectives and Policies for the Physical Environment – Land Based, Shoreline, and Marine Resources			
(a) Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of the following objectives:			
Objectives:	S	N/S	N/A
(1) Prudent use of Hawai'i's land-based, shoreline, and marine resources.	✓		
(2) Effective protection of Hawai'i's unique and fragile environmental resources.	✓		
Policies:			
(1) Exercise an overall conservation ethic in the use of Hawai'i's natural resources.	✓		
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.	✓		

(3)	Take into account the physical attributes of areas when planning and designing activities and facilities.	✓		
(4)	Manage natural resources and environs to encourage their beneficial and multiple use without generating costly or irreparable environmental damage.	✓		
(5)	Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.	✓		
(6)	Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.	✓		
(7)	Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			✓
(8)	Pursue compatible relationships among activities, facilities, and natural resources.	✓		
(9)	Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.			✓
<p>Analysis: The Proposed Project is in alignment with the State's objectives and policies for the physical environment, particularly the land-based, shoreline, and marine resources outlined herein.</p> <p>The proposed Kānāhā Hotel is situated within the Hawai'i Coastal Zone Management Area and within the Special Management Area (SMA) for the Island of Maui. However, the Proposed Project is situated approximately 0.66 miles from the shoreline. The Proposed Project will comply with the SMA rules and pursue an SMA Use Permit. No short- or long-term significant impacts on surface and/or coastal waters are anticipated to result from the construction and operation of the proposed Kānāhā Hotel.</p> <p>Results of the Botanical survey, Nēnē Goose survey, and the Blackburn's Sphinx Moth and Tree Tobacco survey show no listed or endangered species of flora and fauna including their habitat were identified on the subject property. Despite the foregoing, the Proposed Project will follow guidelines of avoidance and minimization measures as listed in the letter from USFWS dated October 15, 2019, for the Proposed Project. In the event that any of the nine (9) federally listed animal species entering the Project Site — i.e., the federally threatened Newell's shearwater (<i>Puffinus auricularis newelli</i>), and endangered Hawaiian hoary bat (<i>Lasiurus cinereus semotus</i>), Hawaiian petrel (<i>Pterodroma</i></p>				

sandwichensis), Band-rumped storm-petrel (*Oceanodroma castro*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Hawaiian coot (*Fulica alai*), Hawaiian common gallinule (*Gallinula galeata sandvicensis*), Hawaiian duck (*Anas wyvilliana*), and Blackburn's sphinx moth (*Manduca blackburni*) — as discussed in Section 2.1.6 (Flora and Fauna) of this Draft EIS.

As discussed in Section 1.6 (Alternatives) of the DEIS, the alternative of no action (leaving the lands as it is) would not stop development of the property as the lots have been planned for the Maui Business Park Phase II (MBPII) and improved with roadways, water, sewer, and utilities.

During the construction and operational phases of the project, Best Management Practices (BMPs) will be implemented to mitigate non-point source pollution to coastal resources and mitigate the effects of fugitive dust. BMPs include but not limited to the following.

- During site preparation, storm runoff from the site will be controlled in accordance with the County's "Soil Erosion and Sediment Control Standards".
- Minimizing the time of construction;
- Retaining existing ground cover as long as possible;
- Constructing drainage control features early;
- Using temporary area sprinklers in non-active construction areas when ground cover is removed;
- Providing a water truck on-site during the construction period to provide for immediate sprinkling as needed;
- Using temporary berms and cut-off ditches, where needed, for control of erosion;
- Watering graded areas when construction activity for each day has ceased;
- Grassing or planting all cut and fill slopes immediately after grading work has been completed; and
- Installing silt screens where appropriate.

In addition, the proposed grading plan will require both excavation and embankment, with attempts to balance "cuts" and "fills", to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or export of earthwork materials.

Chapter 226-12, HRS, Objective and Policies for the Physical Environment – Scenic, Natural Beauty, and Historic Resources			
Objective: Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawai'i's scenic assets, natural beauty, and multi-cultural/historical resources.			
Policies:	S	N/S	N/A
(1) Promote the preservation and restoration of significant natural and historic resources.	✓		
(2) Provide incentives to maintain and enhance historic, cultural, and scenic amenities.			✓
(3) Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	✓		
(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage.	✓		
(5) Encourage the design of developments and activities that complement the natural beauty of the islands.	✓		
<p>Analysis: The Proposed Project is in alignment with the State's objectives and policies for the physical environment, particularly the scenic, natural beauty, and historic resources.</p> <p>The Project Site has been improved with utility and roadway services and is situated in a highly developed urban environment with existing modern structures and roadways in the vicinity.</p> <p>As discussed in Section 2.1.9 (Historical and Archaeological Resources) of this DEIS, the Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. The results of the archaeological survey indicated that no significant materials or cultural remains were located on the previously disturbed land. In May 2013, the Department of Land and Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site. Although the Proposed Action is not anticipated to generate adverse impacts, SHPD has outlined the following plan to mitigate against potential impacts.</p> <ul style="list-style-type: none"> Excavations with a maximum depth expected to be 10 feet where the sewage manhole is located — for the construction of a swimming pool, a manhole for sewage services, a fire pump room, an underground fire water tank, and two elevator pits; 			

- Excavations with depths range between 6 to 8 feet — for the remaining construction; and
- Additional seven (7) mechanically assisted test excavation units (BTs) placed in areas sustaining the deepest ground disturbance during construction — to supplement the previous archaeological work.

Furthermore, the project involves a Proposed Supplemental Archaeological Inventory Survey Subsurface Testing Plan. The document includes testing strategy to provide adequate information to characterize the upper 2 feet of the overall project area stratigraphy — also to identify the presence or absence of historically significant subsurface cultural deposits within the construction footprint of the Proposed Project. Both of the archaeological works show the commitment of the Proposed Project to be aligned with the objective and policies of Chapter 226-12, HRS.

Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021), SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended, and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

As discussed in Section 2.2.3 of the DEIS (Cultural Resources) of this DEIS, the cultural impact statement (CIA) prepared for the Proposed Project — reported no visible cultural resources, i.e., medicinal plants, shoreline resources, religious sites, or archeological resources, observed on the property.

From the cultural practices and beliefs perspective, the subject property bears no apparent signs of cultural practices or any gatherings currently taking place on the site. The oral history interviews did not reveal any known gathering places on the subject property nor did any access concerns surfaced as a result of the Proposed Project.

As discussed in Section 2.1.10 (Visual Resources) of this DEIS, the Kahahā Hotel is not anticipated to have significant impacts on views from Haleakalā Highway toward the summit of Haleakalā. The proposed hotel building varies from one (1), two (2), and four

(4) stories in height and will be massed toward the center of the Project Site with generous setbacks on all sides — including setback from the Haleakalā Highway. Despite the foregoing, landscape planting will be used to screen the building where possible and to provide visual context in blending the massing of the building to the site and surrounding environs. All buildings within the Proposed Action will be designed in accordance with the applicable Maui County building code standards.			
Chapter 226-13, Hawai'i Revised Statutes, Objectives and Policies for the Physical Environment – Land, Air, and Water Quality			
Objectives:	S	N/S	N/A
(1) Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.	✓		
(2) Greater public awareness and appreciation of Hawai'i's environmental resources.	✓		
Policies:	S	N/S	N/A
(1) Foster educational activities that promote a better understanding of Hawai'i's limited environmental resources.			✓
(2) Promote the proper management of Hawai'i's land and water resources.	✓		
(3) Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.	✓		
(4) Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawai'i's people.	✓		
(5) Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.	✓		
(6) Encourage design and construction practices that enhance the physical qualities of Hawai'i's communities.	✓		
(7) Encourage urban developments in close proximity to existing services and facilities.	✓		
(8) Foster recognition of the importance and value of the land, air, and water resources to Hawai'i's people, their cultures and visitors.	✓		
Analysis: The Proposed Project is in alignment with the State's objectives and policies for the physical environment, specifically the land, air, and water quality.			

As discussed throughout the DEIS, the Proposed Project is situated within the MBP II area where the land has been improved with utility and roadway services. The Proposed Project is also located within the State Land Use Urban District where urban development is expected to happen. The Proposed Project is also situated adjacent to the Kahului Airport — showing a highly compatible use of the proposed hotel with the critical public infrastructure serving the visitor industry and the general population of Maui.

As discussed in Section 2.4.2 (Drainage) of this Draft EIS, retention for the potential increases in runoff throughout the entire MBP II development has been accounted for — as the project is located within the MBP II development. In addition to the BMPs, permanent sediment control measures will be used once construction is completed. The proposed grading and drainage design for this project will impose no adverse effects from storm runoff to adjacent and downstream areas. Soil loss will be minimized during the construction period by implementing appropriate erosion control measures. The proposed stormwater management system will provide water quality treatment and reduce the discharge of pollutants to the maximum extent practicable. All drainage improvements will conform to the Maui County Standards.

As discussed in Section 2.4.3 (Water) of this Draft EIS, the Project Site has an existing water system and a separate irrigation system — both are owned by A&B Properties and operated by Pural Water Specialty Company Inc. Both non-potable and potable water from MBP II water system will be used for irrigation purposes onsite — including a dedicated non-potable connection with a meter. However, non-potable water will be prioritized for irrigation purposes and potable water will only be used where required by specific flora. An onsite fire protection system will be constructed and connected to the MBP II potable water system. Off-site fire protection system can be provided through existing fire hydrants located in the right-of-way around and near the Project Site. This system will be supported through the existing subdivision's water system.

During the construction and operational phases of the project, Best Management Practices (BMPs) will be implemented to mitigate non-point source pollution to coastal resources and mitigate the effects of fugitive dust. In addition, the proposed grading plan will require both excavation and embankment, with attempts to balance “cuts” and “fills”, to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or export of earthwork materials.

From a site planning perspective, the design and layout of the project involved an evaluation of existing topographic conditions in order to create a viable development plan which would minimize potential impacts to the land form. To the extent practicable, the layout and orientation of future buildings will strive to preserve view planes.

As discussed in Section 2.1.7 (Air Quality) of this DEIS, appropriate mitigation measures will be implemented during construction to minimize any temporary impacts on air quality. The Proposed Project will be developed in accordance with applicable Federal and/or State air quality standards.

As discussed in Section 2.1.3 (Natural Hazards) of this DEIS, the development of the Kahahā Hotel will not increase the possibility of natural hazards such as flooding, tsunami inundation, hurricanes, and earthquakes. The Kahahā Hotel will be constructed and operated in compliance with County, State, and Federal standards with regards to natural hazards.

Chapter 226-14 Objective and policies for facility systems-in general

Objective: Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.

Policies:	S	N/S	N/A
(1) Accommodate the needs of Hawai'i's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.			✓
(2) Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.			✓
(3) Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.			✓
(4) Pursue alternative methods of financing programs and projects and cost saving techniques in the planning, construction, and maintenance of facility systems.			✓

Analysis: The proposed Kahahā Hotel does not involve planning for the State's facility systems; therefore, these objectives and policies of Chapter 226-14, HRS, are not

applicable to the Proposed Project.			
Chapter 226-15, Hawai'i Revised Statutes, Objectives and Policies for Facility Systems - Solid and Liquid Waste			
Objectives: Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.			
Objectives:	S	N/S	N/A
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.	✓		
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.	✓		
Policies:	S	N/S	N/A
(1) Encourage the adequate development of sewerage facilities that complement planned growth.	✓		
(2) Promote reuse and recycling to reduce solid and liquid wastes and employ a conservation ethic.	✓		
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			✓
Analysis: The Proposed Project is in alignment with the State's objectives and policies for facility systems, specifically the solid and liquid waste.			
As discussed in Section 2.4.4 (Wastewater) of this DEIS, the property is located in the MBPFI where a private sewer system has been installed and has a sufficient capacity to accommodate the expected wastewater generated by the Proposed Action. In addition, a new onsite sewer system will collect sewer flow generated from the project.			
An application for a National Pollution Discharge Elimination System (NPDES) permit for construction will be submitted to the State Department of Health for review and approval prior to start of construction.			
As discussed in Section 2.3.5 (Solid Waste) of this DEIS, the Kahahā Hotel will develop strategies for reducing solid waste delivered to the County landfill by providing options for recycling and promoting recycling practices to guests.			

Chapter 226-16, Hawai'i Revised Statutes, Objectives and Policies for Facility Systems - Water			
Objective: Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.			
Policies:	S	N/S	N/A
(1) Coordinate development of land use activities with existing and potential water supply.	✓		
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.	✓		
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.	✓		
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.	✓		
(5) Support water supply services to areas experiencing critical water problems.	✓		
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs. [L 1978, c 100, pt of §2; am L 1986, c 276, §15]	✓		
<p>Analysis: The Proposed Project is in alignment with the State's objectives and policies for facility systems, specifically water. As discussed in Section 2.4.3 (Water) of this DEIS, the drinking water source for the Kahahā Hotel is from the Maui Business Park II water system for domestic consumption and irrigation water for the project's landscaped areas. The system has been owned by A&B Properties and operated by Pural Water Specialty Company Inc .</p> <p>The project's onsite domestic water distribution system will be designed and constructed to not only provide water for domestic consumption but also for fire protection.</p> <p>In addition to developing its own onsite water source, the developer is committed to water conservation strategies for reducing consumption, conserving resources, and minimizing water demands, and implementing the water conservation measures of the DWS.</p>			

Chapter 226-17 Objectives and policies for facility systems-transportation.			
Objectives: Planning for the State's facility systems with regard to transportation shall be directed towards the achievement of the following objectives:			
Objectives:	S	N/S	N/A
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.	✓		
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.	✓		
Policies:			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			✓
(2) Coordinate state, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;	✓		
(3) Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;	✓		
(4) Provide for improved accessibility to shipping, docking, and storage facilities;			✓
(5) Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			✓
(6) Encourage transportation systems that serve to accommodate present and future development needs of communities;	✓		
(7) Encourage a variety of carriers to offer increased opportunities and advantages to interisland movement of people and goods;			✓
(8) Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			✓
(9) Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;	✓		
(10) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawai'i's natural environment;	✓		
(11) Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;	✓		

(12) Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and	✓		
(13) Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency. [L 1978, c 100, pt of §2; am L 1986, c 276, §16; am L 1993, c 149, §1; am L 1994, c 96, §3]	✓		
<p>Analysis: The Proposed Project is in alignment with the State's objectives and policies for facility systems, specifically transportation. As discussed in the DEIS, the Proposed Project is located in the MBPII that is improved with roadways that will accommodate planned growth around the Kahului airport. Roadway improvements around the airport have been completed to accommodate expected increase in airport arrivals. The State DOT has plans to provide an additional onramp to the Airport Access Road at some time in the future; however, the timeline is not decided yet. In addition, an existing bus stop is available at Dairy Road/Kele Street for Maui Bus Route 5 and 6 serving Kahului. The bus stop is approximately 0.6 miles from the Project Site.</p>			
<p>Chapter 226-18, Hawai'i Revised Statutes, Objectives and Policies for Facility Systems - Energy</p>			
<p>Objectives: Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:</p>			
Objectives:	S	N/S	N/A
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;	✓		
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawai'i's dependence on imported fuels for electrical generation and ground transportation;	✓		
(3) Greater energy security and diversification in the face of threats to Hawai'i's energy supplies and systems; and	✓		
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and	✓		
(5) Utility models that make the social and financial interests of Hawai'i's utility customers a priority.	✓		
Policies:	S	N/S	N/A

(1)	Support research and development as well as promote the use of renewable energy sources;			✓
(2)	Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;			✓
(3)	Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;			✓
(4)	Promote all cost-effective conservation of power and fuel supplies through measures, including: (A) Development of cost-effective demand-side management programs; (B) Education; (C) Adoption of energy-efficient practices and technologies; and (D) Increasing energy efficiency and decreasing energy use in public infrastructure;	✓		
(5)	Ensure, to the extent that new supply-side resources are needed, that the development or expansion of energy systems uses the least-cost energy supply option and maximizes efficient technologies;			✓
(6)	Support research, development, demonstration, and use of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			✓
(7)	Promote alternate fuels and transportation energy efficiency;			✓
(8)	Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications;	✓		
(9)	Support actions that reduce, avoid, or sequester Hawai'i's greenhouse gas emissions through agriculture and forestry initiatives; and			✓
(10)	Provide priority handling and processing for all state and county permits required for renewable energy projects.			✓
(11)	Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other			✓

cost-effective renewable energy sources; and			
(12) Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawai'i.			✓
<p>Analysis: The Proposed Project is in alignment with the State's objectives and policies for facility systems, specifically energy. As discussed in Section 2.1.4 (Climate Change Assessment) of this DEIS, the Proposed Project will include conservation measures to encourage the use of energy-efficient technology throughout the project, including but not limited to the areas involving lighting, air-conditioning, and building materials.</p> <p>It is anticipated that the Proposed Project individually will not result in a significant impact on GHG concentrations in the atmosphere. In the short-term, increases in GHG emissions are anticipated to be negligible due to the scale and scope of the project and the temporary nature of construction activities. In the long-term, the Proposed Project will incorporate green building objectives and implement best management practices to ensure emissions are minimized.</p> <p>Cumulatively, the project will contribute to the total GHG emissions for the State; however, these increases are anticipated to be negligible relative to overall emissions. Increases in the commercial sector have already been anticipated in emission inventories for the State and are expected to be offset by even greater reductions in emissions produced by the energy industries. In addition, the Proposed Project includes mitigation measures during construction and operation of the proposed hotel as detailed in Section 2.1.4 (Climate Change Assessment) of this DEIS.</p>			
Chapter 226-18.5 Objectives and policies for facility systems-telecommunications			
<p>Objective: Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.</p>			
<p>Policies: To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand. To further achieve the telecommunications objective, it shall be the policy of this State to:</p>	S	N/S	N/A
(1) Facilitate research and development of telecommunications systems			✓

and resources;			
(2) Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			✓
(3) Promote efficient management and use of existing telecommunications systems and services; and			✓
(4) Facilitate the development of education and training of telecommunications personnel.			✓
Analysis: The proposed Kanahe Hotel does not involve any planning for the State's telecommunication systems; therefore, this objective and policies of Chapter 226-18.5, HRS, are not applicable to the Proposed Project.			
Chapter 226-19 Objectives and policies for socio-cultural advancement-housing			
Objectives: Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:			
Objectives:	S	N/S	N/A
(1) Greater opportunities for Hawai'i's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing is made available to very low-, low- and moderate-income segments of Hawai'i's population.	✓		
(2) The orderly development of residential areas sensitive to community needs and other land uses.			✓
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawai'i's people.			✓
Policies:	S	N/S	N/A
(1) Effectively accommodate the housing needs of Hawai'i's people.			✓
(2) Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.			✓
(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.			✓
(4) Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.			✓

(5)	Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.			✓
(6)	Facilitate the use of available vacant, developable, and underutilized urban lands for housing.			✓
(7)	Foster a variety of lifestyles traditional to Hawai'i through the design and maintenance of neighborhoods that reflect the culture and values of the community.			✓
(8)	Promote research and development of methods to reduce the cost of housing construction in Hawai'i. [L 1978, c 100, pt of §2; am L 1986, c 276, §18; am L 1992, c 27, §2]			✓
<p><i>Analysis:</i> The Proposed Action is development of a hotel at the MBPIL. The MBPIL prohibits residential development; therefore, Chapter 226-19, HRS, is not directly applicable to the Proposed Project.</p> <p>Pursuant to Section 2.96.050, Maui County Code, residential workforce housing credits may be used to satisfy the requirements of Chapter 2.96, MCC, additionally Act 141 (2009) requires that the County recognize affordable housing credits issued to the Department of Hawaiian Home Lands to satisfy any county affordable housing requirements. While we understand the sentiment of the Commission, we hope that the Commission recognizes that credits are issued to developers who build units in excess of their requirement, which allows an individual or family to enjoy the unit before the unit was “required” to be built. The credits allow the affordable housing developer to recoup some of their costs as typically affordable housing units are subsidized in some fashion (County affordable housing fund, market units, low-income housing tax credits, etc.), potentially allowing the developer to again build additional “excess” affordable housing units, once again allowing early access for an individual or family. It is important to remember that credits are earned, after an affordable housing unit is built.</p> <p>In the alternative, instead of purchasing credits earned for affordable housing units already built and enjoyed by Maui residents, the Applicant may explore the option of working with a local affordable housing developer on the construction of affordable housing units that will be built concurrently with or within a set time period, as established in the required Residential Workforce Housing Agreement, of the proposed Kahahā Hotel. This option has many variables so it may not be feasible.</p>				

Chapter 226-20 Objectives and policies for socio-cultural advancement-health			
Objectives: Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:			
Objectives:	S	N/S	N/A
(1) Fulfillment of basic individual health needs of the general public.	✓		
(2) Maintenance of sanitary and environmentally healthful conditions in Hawai'i's communities.	✓		
(3) Elimination of health disparities by identifying and addressing social determinants of health.			✓
Policies:	S	N/S	N/A
(1) Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.			✓
(2) Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.			✓
(3) Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			✓
(4) Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.			✓
(5) Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.			✓
(6) Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			✓
(7) Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be			✓

reviewed every ten years and revised based on the best available epidemiological and public health data.			
Analysis: The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to health. However, the proposed Kanahe Hotel does not involve or require the advancement of a State initiative or program with regard to health. Based on the preceding, Chapter 226-20, HRS, is not applicable to the Proposed Project.			
Chapter 226-21, Hawai'i Revised Statutes, Objectives for Socio-Cultural Advancement - Education			
Objective: Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.			
Policies:	S	N/S	N/A
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			✓
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			✓
(3) Provide appropriate educational opportunities for groups with special needs.			✓
(4) Promote educational programs which enhance understanding of Hawai'i's cultural heritage.			✓
(5) Provide higher educational opportunities that enable Hawaii's people to adapt to changing employment demands.			✓
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			✓
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			✓
(8) Emphasize quality educational programs in Hawaii's institutions to promote academic excellence.			✓

(9) Support research programs and activities that enhance the education programs of the State.			✓
<i>Analysis</i> The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to education. However, as discussed in Section 2.3.4 (Schools) of this DEIS, the proposed Kahahā Hotel will not impact public school facilities as the project does not generate population growth or increase demands on existing educational services and facilities. Based on the preceding, Chapter 226-21, HRS, is not applicable to the Proposed Project.			
Chapter 226-22 Objective and policies for socio-cultural advancement-social services.			
Objective: Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being.			
Policies:	S	N/S	N/A
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.			✓
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.			✓
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawai'i's communities.			✓
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.			✓
(5) Support public and private efforts to prevent domestic abuse and child molestation and assist victims of abuse and neglect.			✓
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			✓
<i>Analysis:</i> The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to social services. However, the Proposed Project does not require nor does it involve any State initiative or program for the advancement of social services. Therefore, Chapter 226-22, HRS, is not applicable to			

the Proposed Project.			
Chapter 226-23, Hawai'i Revised Statutes, Objectives for Socio-Cultural Advancement – Leisure			
Objective: Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.			
Policies:	S	N/S	N/A
(1) Foster and preserve Hawai'i's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.			✓
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.			✓
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.			✓
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.			✓
(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.			✓
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.			✓
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawai'i's people.			✓
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.			✓
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawai'i's population to participate in the creative arts.			✓
(10) Assure adequate access to significant natural and cultural resources			✓

in public ownership.			
Analysis: The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to leisure. However, the Proposed Project does not require, nor does it involve any State initiative or program for the advancement of leisure. Therefore, Chapter 226-23, HRS, is not applicable to the Proposed Project.			
Chapter 226-24 Objective and policies for socio-cultural advancement-individual rights and personal well-being			
Objective: Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.			
Policies:	S	N/S	N/A
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			✓
(2) Uphold and protect the national and state constitutional rights of every individual.			✓
(3) Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			✓
(4) Ensure equal opportunities for individual participation in society.			✓
Analysis: The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to individual rights and personal well-being as outlined herein. Furthermore, the Proposed Project will not infringe upon or obstruct individual rights and personal well-being.			
Chapter 226-25, Hawai'i Revised Statutes, Objectives for Socio-Cultural Advancement – Culture			
Objective: Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawai'i's people.			
Policies:	S	N/S	N/A

(1) Foster increased knowledge and understanding of Hawai'i's ethnic and cultural heritages and the history of Hawai'i.			✓
(2) Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawai'i's people and which are sensitive and responsive to family and community needs.			✓
(3) Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawai'i.			✓
(4) Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawai'i's people and visitors.			✓
Analysis: The Proposed Project will not adversely oppose the State's objectives and policies for socio-cultural advancement with regards to culture. The aloha spirit will be applied throughout the operation of the proposed hotel. However, the Proposed Project will not directly affect the State's objectives and policies for advancement relating to culture.			
Chapter 226-26 Objectives and policies for socio-cultural advancement-public safety			
Objectives:	S	N/S	N/A
(1) Assurance of public safety and adequate protection of life and property for all people.	✓		
(2) Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.	✓		
(3) Promotion of a sense of community responsibility for the welfare and safety of Hawai'i's people.	✓		
Policies:	S	N/S	N/A
(1) Ensure that public safety programs are effective and responsive to community needs.			✓
(2) Encourage increased community awareness and participation in public safety programs.			✓
Policies Related to Criminal Justice:	S	N/S	N/A
(1) Support criminal justice programs aimed at preventing and curtailing			✓

criminal activities.			
(2) Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			✓
(3) Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			✓
Policies Related to Emergency Management:	S	N/S	N/A
(1) Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.			✓
(2) Enhance the coordination between emergency management programs throughout the State.			✓
Analysis: The Applicant is supportive of advances in public safety. However, the Proposed Project will not directly affect the State's objectives and policies for socio-cultural advancement with regards to public safety. To the extent practicable, and in alignment with specific guidance on emergency management, the Proposed Project will adhere to the safety measures during any emergency event including natural hazards. Based on the foregoing, Chapter 226-26, HRS, is not applicable to the Proposed Project.			
Chapter 226-27 Objectives and policies for socio-cultural advancement-government			
Objectives: Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:			
Objectives:	S	N/S	N/A
(1) Efficient, effective, and responsive government services at all levels in the State.	✓		
(2) Fiscal integrity, responsibility, and efficiency in the state government and county governments.	✓		
Policies:	S	N/S	N/A
(1) Provide for necessary public goods and services not assumed by the private sector.			✓
(2) Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			✓
(3) Minimize the size of government to that necessary to be effective.			✓

(4)	Stimulate the responsibility in citizens to productively participate in government for a better Hawaii.			✓
(5)	Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			✓
(6)	Provide for a balanced fiscal budget.			✓
(7)	Improve the fiscal budgeting and management system of the State.			✓
(8)	Promote the consolidation of state and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			✓
Analysis: The Applicant supports government responsibility and efficiency; however, the Proposed Project does not involve planning for the State's socio-cultural advancement with regard to government. In light of the foregoing, Chapter 226-27, HRS, is not applicable to the Proposed Project.				

Part III. Priority Guidelines

The priority guidelines of the Hawai'i State Plan establish overall priority guidelines which address areas of State-wide concern. The Hawai'i State Plan notes that the State shall strive to improve the quality of life for Hawai'i's present and future population through the pursuit of desirable courses of action in five (5) major areas of Statewide concern which merit priority attention: 1) economic development; 2) population growth 3) affordable housing; 4) crime and criminal justice; and 5) quality education (§226-102). The priority guidelines applicable to the Kahahā Hotel are discussed below.

Hawai'i State Plan, Chapter 226, HRS Part III. Priority Guidelines	S	N/S	N/A
Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
HRS 226-101: Purpose. The purpose of this part is to establish overall priority guidelines to address areas of statewide concern			
HRS 226-102: Overall Direction. The State shall strive to improve the quality of life for Hawai'i's present and future population through the pursuit of desirable courses of action in five major areas of statewide concern which merit priority attention: economic development, population growth and land resource management, affordable housing, crime and criminal justice, and quality education. [L 1978, c 100, pt of §2; am L 1986, c 276, §29]			
HRS 226-103: Economic Priority Guidelines.			

(a) Priority Guidelines to stimulate economic growth and encourage business expansion and development to provide needed jobs for Hawai'i's people and achieve a stable and diversified economy;			
Priority Guidelines:	S	N/S	N/A
(1) Seek a variety of means to increase the availability of investment capital for new and expanding enterprises.	✓		
(A) Encourage investments which:			
(i) Reflect long term commitments to the State;	✓		
(ii) Rely on economic linkages within the local economy;	✓		
(iii) Diversify the economy;	✓		
(iv) Reinvest in the local economy;	✓		
(v) Are sensitive to community needs and priorities; and	✓		
(vi) Demonstrate a commitment to provide management opportunities to Hawai'i residents.	✓		
(B) Encourage investments in innovative activities that have a nexus to the State, such as			
(i) Present or former residents acting as entrepreneurs or principals			✓
(ii) Academic support from an institution of higher education in Hawai'i			✓
(iii) Investment interest from Hawai'i residents;			✓
(iv) Resources unique to Hawai'i that are required for innovative activity; and			✓
(v) Complementary or supportive industries or government programs or projects.			✓
(2) Encourage the expansion of technological research to assist industry development and support the development and commercialization of technological advancements.			✓
(3) Improve the quality, accessibility, and range of services provided by government to business, including data and reference services and assistance in complying with governmental regulations.			✓

(4)	Seek to ensure that state business tax and labor laws and administrative policies are equitable, rational, and predictable.			✓
(5)	Streamline the building and development permit and review process and eliminate or consolidate other burdensome or duplicative governmental requirements imposed on business, where public health, safety and welfare would not be adversely affected.	✓		
(6)	Encourage the formation of cooperatives and other favorable marketing or distribution arrangements at the regional or local level to assist Hawai'i's small-scale producers, manufacturers, and distributors.			✓
(7)	Continue to seek legislation to protect Hawai'i from transportation interruptions between Hawai'i and the continental United States.			✓
(8)	Provide public incentives and encourage private initiative to develop and attract industries which promise long-term growth potentials, and which have the following characteristics:	✓		
(A)	An industry that can take advantage of Hawai'i's unique location and available physical and human resources.	✓		
(B)	A clean industry that would have minimal adverse effects on Hawai'i's environment.	✓		
(C)	An industry that is willing to hire and train Hawai'i's people to meet the industry's labor needs at all levels of employment.	✓		
(D)	An industry that would provide reasonable income and steady employment.	✓		
(9)	Support and encourage, through educational and technical assistance programs and other means, expanded opportunities for employee ownership and participation in Hawai'i business.			✓
(10)	Enhance the quality of Hawai'i's labor force and develop and maintain career opportunities for Hawai'i's people through the following actions:			✓
(A)	Expand vocational training in diversified agriculture, aquaculture, information industry, and other areas where growth is desired and feasible.			✓
(B)	Encourage more effective career counseling and guidance in high schools and post-secondary institutions to inform students of present and future career opportunities.			✓
(C)	Allocate educational resources to career areas where high employment is expected and where growth of new industries is desired.			✓

(D) Promote career opportunities in all industries for Hawai'i's people by encouraging firms doing business in the State to hire residents.			✓
(E) Promote greater public and private sector cooperation in determining industrial training needs and in developing relevant curricula and on- the-job training opportunities.			✓
(F) Provide retraining programs and other support services to assist entry of displaced workers into alternative employment.			✓
(b) Priority guidelines to promote the economic health and quality of the visitor industry:			
Priority Guidelines:	S	N/S	N/A
(1) Promote visitor satisfaction by fostering an environment which enhances the Aloha Spirit and minimizes inconveniences to Hawai'i's residents and visitors.	✓		
(2) Encourage the development and maintenance of well-designed, adequately serviced hotels and resort destination areas which are sensitive to neighboring communities and activities, and which provide for adequate shoreline setbacks and beach access.	✓		
(3) Support appropriate capital improvements to enhance the quality of existing resort destination areas and provide incentives to encourage investment in upgrading, repair, and maintenance of visitor facilities.	✓		
(4) Encourage visitor industry practices and activities which respect, preserve, and enhance Hawai'i's significant natural, scenic, historic, and cultural resources.	✓		
(5) Develop and maintain career opportunities in the visitor industry for Hawai'i's people, with emphasis on managerial positions.	✓		
(6) Support and coordinate tourism promotion abroad to enhance Hawai'i's share of existing and potential visitor markets.	✓		
(7) Maintain and encourage a more favorable resort investment climate consistent with the objectives of this chapter.	✓		
(8) Support law enforcement activities that provide a safer environment for both visitors and residents alike.	✓		
(9) Coordinate visitor industry activities and promotions to business visitors through the state network of advanced data communication techniques.	✓		

(c) Priority guidelines to promote the continued viability of the sugar and pineapple industries:			
(1)	Provide adequate agricultural lands to support the economic viability of the sugar and pineapple industries.		✓
(2)	Continue efforts to maintain federal support to provide stable sugar prices high enough to allow profitable operations in Hawai'i.		✓
(3)	Support research and development, as appropriate, to improve the quality and production of sugar and pineapple crops.		✓
(d) Priority guidelines to promote the growth and development of diversified agriculture and aquaculture:			
(1)	Identify, conserve, and protect agricultural and aquacultural lands of importance and initiate affirmative and comprehensive programs to promote economically productive agricultural and aquacultural uses of such lands.		✓
(2)	Assist in providing adequate, reasonably priced water for agricultural activities.		✓
(3)	Encourage public and private investment to increase water supply and to improve transmission, storage, and irrigation facilities in support of diversified agriculture and aquaculture.		✓
(4)	Assist in the formation and operation of production and marketing associations and cooperatives to reduce production and marketing costs.		✓
(5)	Encourage and assist with the development of a waterborne and airborne freight and cargo system capable of meeting the needs of Hawai'i's agricultural community.		✓
(6)	Seek favorable freight rates for Hawai'i's agricultural products from interisland and overseas transportation operators.		✓
(7)	Encourage the development and expansion of agricultural and aquacultural activities which offer long-term economic growth potential and employment opportunities.		✓
(8)	Continue the development of agricultural parks and other programs to assist small independent farmers in securing agricultural lands and loans.		✓
(9)	Require agricultural uses in agricultural subdivisions and closely monitor the uses in these subdivisions.		✓
(10)	Support the continuation of land currently in use for diversified agriculture.		✓

(11) Encourage residents and visitors to support Hawai'i's farmers by purchasing locally grown food and food products.			✓
(e) Priority guidelines for water use and development:			
Priority Guidelines:	S	N/S	N/A
(1) Maintain and improve water conservation programs to reduce the overall water consumption rate.	✓		
(2) Encourage the improvement of irrigation technology and promote the use of non-drinking water for agricultural and landscaping purposes.	✓		
(3) Increase the support for research and development of economically feasible alternative water sources.	✓		
(4) Explore alternative funding sources and approaches to support future water development programs and water system improvements.	✓		
(f) Priority guidelines for energy use and development:			
Priority Guidelines:	S	N/S	N/A
(1) Encourage the development, demonstration, and commercialization of renewable energy sources.			✓
(2) Initiate, maintain, and improve energy conservation programs aimed at reducing energy waste and increasing public awareness of the need to conserve energy.	✓		
(3) Provide incentives to encourage the use of energy conserving technology in residential, industrial, and other buildings.			✓
(4) Encourage the development and use of energy conserving and cost-efficient transportation systems.	✓		
(g) Priority guidelines to promote the development of the information industry:			
Priority Guidelines:	S	N/A	N/A
(1) Establish an information network, with an emphasis on broadband and wireless infrastructure and capability, that will serve as the foundation of and catalyst for overall economic growth and diversification in Hawai'i.			✓
(2) Encourage the development of services such as financial data processing, products and services exchange, foreign language translations, telemarketing, teleconferencing, a twenty-four-hour			✓

	international stock exchange, international banking, and a Pacific Rim management center.			
(3)	Encourage the development of small businesses in the information field such as software development, the development of new information systems and peripherals, data conversion and data entry services, and home or cottage services such as computer programming, secretarial, and accounting services.			✓
(4)	Encourage the development or expansion of educational and training opportunities for residents in the information and telecommunications fields.			✓
(5)	Encourage research activities, including legal research in the information and telecommunications fields.			✓
(6)	Support promotional activities to market Hawai'i's information industry services.			✓
(7)	Encourage the location or co-location of telecommunication or wireless information relay facilities in the community, including public areas, where scientific evidence indicates that the public health, safety, and welfare would not be adversely affected.			✓
<p><i>Analysis: The Proposed Project is in alignment with and will support the Economic Priority Guidelines outlined herein. The proposed Kahahā Hotel will expand Maui's employer base and increase employment and management opportunities for residents.</i></p> <p>As discussed in Section 2.4.3 (Water) of this DEIS, the project will utilize the existing private water system to provide potable and non-potable water for domestic consumption, fire protection, and irrigation. The project will incorporate water conservation and responsible use of water such as prioritizing the use of non-potable water for irrigation purposes and use of potable water where required by specific flora. Off-site fire protection system will be supported by the existing private water system and the DWS water system.</p> <p>As discussed in Section 2.4.5 (Electrical) of this DEIS, the Kahahā Hotel will include energy-efficient design and conservation measures. Specifically, the Applicant will encourage the use of energy efficient technology throughout the project, specifically, in lighting, air-conditioning, and building materials.</p> <p>As discussed in Section 2.2.2 (Economy) of this DEIS, employment from construction is</p>				

estimated to generate 335 full-time positions for two years during the construction phase. The construction of the Kānehā Hotel is expected to contribute taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the State of Hawai'i over a thirteen (13) year period. The effect of these expenditures will have positive direct, indirect, and induced beneficial impacts on the economy of the County of Maui. During its operations phase, the Kānehā Hotel will increase the level of capital investment in the region — creating employment opportunities and economic stimulus for the region. The Proposed Project will provide direct employment opportunities for Maui residents and contribute to economic diversification and growth for both Maui and the State. After “stabilization,” the Kānehā Hotel is envisioned to support 100-125 permanent jobs.

Chapter 226-104, HRS, Population Growth and Land Resources Priority Guidelines

(a) Priority guidelines to effect desired statewide growth and distribution:

Priority Guidelines:	S	N/S	N/A
(1) Encourage planning and resource management to ensure that population growth rates throughout the State are consistent with available and planned resource capacities and reflect the needs and desires of Hawai'i's people.			✓
(2) Manage a growth rate for Hawai'i's economy that will parallel future employment needs for Hawai'i's people.			✓
(3) Ensure that adequate support services and facilities are provided to accommodate the desired distribution of future growth throughout the State.	✓		
(4) Encourage major state and federal investments and services to promote economic development and private investment to the neighbor islands, as appropriate.	✓		
(5) Explore the possibility of making available urban land, low-interest loans, and housing subsidies to encourage the provision of housing to support selective economic and population growth on the neighbor islands.			✓
(6) Seek federal funds and other funding sources outside the State for research, program development, and training to provide future employment opportunities on the neighbor islands.			✓
(7) Support the development of high technology parks on the neighbor			✓

islands.			
(b) Priority guidelines for regional growth distribution and land resource utilization:			
Priority Guidelines:	S	N/S	N/A
(1) Encourage urban growth primarily to existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditures, and away from areas where other important benefits are present, such as protection of important agricultural land or preservation of lifestyles.	✓		
(2) Make available marginal or nonessential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district.	✓		
(3) Restrict development when drafting of water would result in exceeding the sustainable yield or in significantly diminishing the recharge capacity of any groundwater area.	✓		
(4) Encourage restriction of new urban development in areas where water is insufficient from any source for both agricultural and domestic use.	✓		
(5) In order to preserve green belts, give priority to state capital-improvement funds which encourage location of urban development within existing urban areas except where compelling public interest dictates development of a noncontiguous new urban core.			✓
(6) Seek participation from the private sector for the cost of building infrastructure and utilities and maintaining open spaces.	✓		
(7) Pursue rehabilitation of appropriate urban areas.			✓
(8) Support the redevelopment of Kakaako into a viable residential, industrial, and commercial community.			✓
(9) Direct future urban development away from critical environmental areas or impose mitigating measures so that negative impacts on the environment would be minimized.	✓		
(10) Identify critical environmental areas in Hawai'i to include but not be limited to the following: watershed and recharge areas; wildlife habitats (on land and in the ocean); areas with endangered species of plants and wildlife; natural streams and water bodies; scenic and recreational shoreline resources; open space and natural areas; historic and cultural sites; areas particularly sensitive to reduction in water and air quality;	✓		

and scenic resources.			
(11) Identify all areas where priority should be given to preserving rural character and lifestyle.			✓
(12) Utilize Hawai'i's limited land resources wisely, providing adequate land to accommodate projected population and economic growth needs while ensuring the protection of the environment and the availability of the shoreline, conservation lands, and other limited resources for future generations.	✓		
(13) Protect and enhance Hawai'i's shoreline, open spaces, and scenic resources.	✓		
<p>Analysis: With regards to Population Growth and Land Resources Priority Guidelines, the Project Site is appropriately located within the State Urban District and Maui Island Plan Urban Growth Boundary — where adequate public facilities and private onsite improvements including utilities and roadway services are readily available and where future urban development is targeted to happen.</p> <p>The Project Site is currently vacant or underutilized, and will be transformed, under the Proposed Project to provide non-resort hotel rooms in close proximity with the Kahului Airport. Therefore, the Proposed Project will generate employment opportunities with regards to Visitor Industry in Kahului.</p> <p>While the Proposed Project involves the change and development of land uses on MBPII from designated Light Industrial to Hotel, the property is not designated a critical environmental area, conservation land, shoreline, or other limited resource area.</p> <p>No listed or endangered species of flora and fauna were identified on the subject property. During the construction and operational phases of the project, Best Management Practices (BMPs) will be implemented to mitigate non-point source pollution to coastal resources and mitigate the effects of fugitive dust.</p>			
Chapter 226-105 Crime and criminal justice.			
Priority guidelines in the area of crime and criminal justice:	S	N/S	N/A
(1) Support law enforcement activities and other criminal justice efforts that are directed to provide a safer environment.			✓

(2)	Target state and local resources on efforts to reduce the incidence of violent crime and on programs relating to the apprehension and prosecution of repeat offenders.			✓
(3)	Support community and neighborhood program initiatives that enable residents to assist law enforcement agencies in preventing criminal activities.			✓
(4)	Reduce overcrowding or substandard conditions in correctional facilities through a comprehensive approach among all criminal justice agencies which may include sentencing law revisions and use of alternative sanctions other than incarceration for persons who pose no danger to their community.			✓
(5)	Provide a range of appropriate sanctions for juvenile offenders, including community-based programs and other alternative sanctions.			✓
(6)	Increase public and private efforts to assist witnesses and victims of crimes and to minimize the costs of victimization. [L 1978, c 100, pt of §2; am L 1984, c 236, §17; am L 1986, c 276, §32]			✓
<p>Analysis: The priority guidelines for crime and criminal justice are not directly applicable to the proposed Kanahā Hotel. However, it should be noted that the Proposed Project will ensure that safety of the visitors and employees of the Kanahā Hotel is of paramount importance. The development of the proposed hotel will involve cooperation and work with the needs and guidance set forth by law enforcement agencies. The site-wide design, construction, and operation of the proposed hotel will follow suit with BMPs for safety and security.</p>				
<p>Chapter 226-106 Affordable housing. Priority guidelines for the provision of affordable housing:</p>				
Priority guidelines for the provision of affordable housing:		S	N/S	N/A
(1)	Seek to use marginal or nonessential agricultural land and public land to meet housing needs of low- and moderate-income and gap-group households.			✓
(2)	Encourage the use of alternative construction and development methods as a means of reducing production costs.	✓		
(3)	Improve information and analysis relative to land availability and suitability for housing.			✓

(4)	Create incentives for development which would increase home ownership and rental opportunities for Hawai'i's low- and moderate-income households, gap-group households, and residents with special needs.	✓		
(5)	Encourage continued support for government or private housing programs that provide low interest mortgages to Hawai'i's people for the purchase of initial owner-occupied housing.	✓		
(6)	Encourage public and private sector cooperation in the development of rental housing alternatives.	✓		
(7)	Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations.	✓		
(8)	Give higher priority to the provision of quality housing that is affordable for Hawai'i's residents and less priority to development of housing intended primarily for individuals outside of Hawai'i.	✓		
<p>Analysis: The Proposed Project does not include residential component, nor does it directly provide additional housing units. However, as discussed in Section 2.2.1 (Population and Housing) of this DEIS, the proposed Kanhā Hotel will comply with Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents.</p> <p>Pursuant to Section 2.96.050, Maui County Code, residential workforce housing credits may be used to satisfy the requirements of Chapter 2.96, MCC, additionally Act 141 (2009) requires that the County recognize affordable housing credits issued to the Department of Hawaiian Home Lands to satisfy any county affordable housing requirements. While we understand the sentiment of the Commission, we hope that the Commission recognizes that credits are issued to developers who build units in excess of their requirement, which allows an individual or family to enjoy the unit before the unit was “required” to be built. The credits allow the affordable housing developer to recoup some of their costs as typically affordable housing units are subsidized in some fashion (County affordable housing fund, market units, low-income housing tax credits, etc.), potentially allowing the developer to again build additional “excess” affordable housing units, once again allowing early access for an individual or family. It is important to remember that credits are earned, after an affordable housing unit is built.</p> <p>In the alternative, instead of purchasing credits earned for affordable housing units</p>				

<p>already built and enjoyed by Maui residents, the Applicant may explore the option of working with a local affordable housing developer on the construction of affordable housing units that will be built concurrently with or within a set time period, as established in the required Residential Workforce Housing Agreement, of the proposed Kahahā Hotel. This option has many variables so it may not be feasible.</p>			
<p>Chapter 226-107 Quality education.</p>			
<p>Priority guidelines to promote quality education:</p>			
Priority Guidelines:	S	N/S	N/A
(1) Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement;			✓
(2) Continue emphasis on general education "core" requirements to provide common background to students and essential support to other university programs;			✓
(3) Initiate efforts to improve the quality of education by improving the capabilities of the education work force;			✓
(4) Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities;			✓
(5) Increase and improve the use of information technology in education by the availability of telecommunications equipment for:			✓
(A) The electronic exchange of information;			✓
(B) Statewide electronic mail; and			✓
(C) Access to the Internet.			✓
Encourage programs that increase the public's awareness and understanding of the impact of information technologies on our lives;			✓
(6) Pursue the establishment of Hawai'i's public and private universities and colleges as research and training centers of the Pacific;			✓
(7) Develop resources and programs for early childhood education;			✓
(8) Explore alternatives for funding and delivery of educational services to improve the overall quality of education; and			✓
(9) Strengthen and expand educational programs and services for students with special needs.			✓

<i>Analysis:</i> The Proposed Project will not directly affect the State’s initiative and efforts to improve the existing quality of education. Therefore, Chapter 226-107, HRS, is not applicable to the Proposed Project.			
Chapter 226-108 Sustainability			
Priority guidelines to promote sustainability shall include:			
Priority Guidelines:	S	N/S	N/A
(1) Encouraging balanced economic, social, community, and environmental priorities;	✓		
(2) Encouraging planning that respects and promotes living within the natural resources and limits of the State	✓		
(3) Promoting a diversified and dynamic economy;	✓		
(4) Encouraging respect for the host culture;	✓		
(5) Promoting decisions based on meeting the needs of the present without compromising the needs of future generations	✓		
(6) Considering the principles of the ahupua'a system; and	✓		
(7) Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawai'i.	✓		
<i>Analysis:</i> The Proposed Project is limited to a development of non-resort hotel in Kahului and approximately within 5-minute drive to the airport. The project location is within the MBPFI which has been improved with utilities and roadway services as it has been planned for urban development to support light industrial and commercial growth in Kahului.			
Focusing future development in the State Urban District and the planned urban areas identified in the Maui Island Plan where infrastructure and services are readily available — will promote a sustainable pattern of future development and urban growth. In addition, the Proposed Project involves a commitment to sustainability through the implementation of green building objectives for energy conservation and mitigation measures relating to climate change during the construction and operation of the Kānāhā Hotel.			

Chapter 226-109 Climate change adaptation priority.			
Priority guidelines to prepare the State to address the impacts of climate change, including impacts to the areas of agriculture; conservation lands; coastal and nearshore marine areas; natural and cultural resources; education; energy; higher education; health; historic preservation; water resources; the built environment, such as housing, recreation, transportation; and the economy shall:			
Priority Guidelines:	S	N/S	N/A
(1) Ensure that Hawai'i's people are educated, informed, and aware of the impacts climate change may have on their communities;			✓
(2) Encourage community stewardship groups and local stakeholders to participate in planning and implementation of climate change policies;			✓
(3) Invest in continued monitoring and research of Hawai'i's climate and the impacts of climate change on the State;			✓
(4) Consider native Hawaiian traditional knowledge and practices in planning for the impacts of climate change;			✓
(5) Encourage 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;			✓
(6) Explore adaptation strategies that moderate harm or exploit beneficial opportunities in response to actual or expected climate change impacts to the natural and built environments;			✓
(7) Promote sector resilience in areas such as water, roads, airports, and public health, by encouraging the identification of climate change threats, assessment of potential consequences, and evaluation of adaptation options;			✓
(8) Foster cross-jurisdictional collaboration between county, state, and federal agencies and partnerships between government and private entities and other nongovernmental entities, including nonprofit entities;			✓
(9) Use management and implementation approaches that encourage the continual collection, evaluation, and integration of new information and strategies into new and existing practices, policies, and plans; and			✓

(10) Encourage planning and management of the natural and built environments that effectively integrate climate change policy.			✓
<p>Analysis: Sea level rise will have adverse effects on all shoreline communities, our economies, and our natural and cultural resources. The findings of the Hawai'i Sea Level Rise Vulnerability and Adaptation Report 2017 identify an expected 3.2 feet rise in sea level across the main Hawaiian Islands. The report includes the towns of Waihe'e, Hāna, Lāhainā, Kīhei, and Speckelsville as the most vulnerable areas to sea level rise. The improved Project Site is located approximately 0.66 miles from the shoreline and not situated within the sea level rise exposure area. Therefore, it is not anticipated that the proposed Kānāhā Hotel will be affected by sea level rise over the next 30-70 years.</p>			

3.4 Hawai'i State Functional Plans

The Hawai'i State Plan directs State agencies to prepare functional plans for their respective program areas. The Applicant is not a State Agency and therefore the Functional Plans are not applicable. There are fourteen (14) State Functional Plans that serve as the primary implementing vehicle for the goals, objectives, and policies of the Hawai'i State Plan. The functional plans which are pertinent to the Proposed Project, along with each plan's applicable objectives, policies, and actions are discussed below.

To facilitate describing the relationships of the Proposed Action to the numerous land use and natural or cultural resource plans, policies, and controls for the affected, some of those plans, policies, and controls are presented in tabular form, and are described with text and/or the following letter code:

S = Supportive, N/S = Not Supportive, N/A = Not Applicable

Hawai'i State Functional Plans Key: S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
State Functional Plan – Agriculture (1991)			
Objectives:	S	N/S	N/A
Objective A: Achievement of increased agricultural production and growth through cultural and management practices.			✓

Objective B:	Achievement of an orderly agricultural marketing system through product promotion and industry organization.			✓
Objective C:	Achievement of increased consumption of and demand for Hawai'i's agricultural products through consumer education and product quality.			✓
Objective D:	Achievement of optimal contribution by agriculture to the State's economy.			✓
Objective E:	Achievement of adequate capital, and knowledge of its proper management, for agricultural development.			✓
Objective F:	Achievement of increased agricultural production and growth through pest and disease controls.			✓
Objective G:	Achievement of effective protection and improved quality of Hawai'i's land, water, and air.			✓
Objective H:	Achievement of productive agricultural use of lands most suitable and needed for agriculture.			✓
Objective I:	Achievement of efficient and equitable provision of adequate water for agricultural use.			✓
Objective J:	Achievement of maximum degree of public understanding and support of agriculture in Hawai'i.			✓
Objective K:	Achievement of adequate supply of properly trained labor for agricultural needs.			✓
Objective L:	Achievement of adequate transportation services and facilities to meet agricultural needs.			✓
Objective M:	Achievement of adequate support services and infrastructure to meet agricultural needs.			✓
Analysis: The Project Site is located in the MBP11 — a light industrial subdivision of improved lots with utilities and roadway services readily available for urban development. The Proposed Project is limited to a non-resort hotel development and does not involve any agricultural component. Therefore, the State Agriculture Functional Plan (1991) is not applicable to the Proposed Project.				
State Functional Plan – Conservation Lands (1991)				
Objectives:		S	N/S	N/A
1a.	Establishment of data bases for inventories of existing lands and resources.			✓
1b.	Establishment of criteria for management of land and natural resources.			✓
2a.	Establishment of plans for natural resources and land management.			✓
2b.	Protection of fragile or rare natural resources.			✓
2c.	Enhancement of natural resources.			✓
2d.	Appropriate development of natural resources designated for commercial development.			✓

2e.	Promotion and marketing of appropriate natural resources designated for commercial development.			✓
2f.	Increase enforcement of land and natural resource use laws and regulations.			✓
3a.	Develop and implement conservation education programs for the general public and visitors.			✓
3b.	Increase access to land and natural resources data by the public and increase cooperation between agencies by making access to land and natural resource information more efficient.			✓
Analysis: The proposed Kahahā Hotel is not located within, nor it is adjacent to the State Conservation District. The Project Site is located within the State Urban District. Therefore, the State Conservation Lands Functional Plan (1991) is not applicable to the Proposed Project.				
State Functional Plan – Education (1989)				
Objectives:		S	N/S	N/A
A1.	Academic Excellence. Emphasize quality educational programs in Hawai'i's institutions to promote academic excellence.			✓
A2.	Basic Skills. Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning. Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement.			✓
A3.	Education Workforce. Initiate efforts to improve the quality of education by improving the capabilities of the education workforce.			✓
A4.	Services and Facilities. Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			✓
B1.	Alternatives for Funding and Delivery. Explore alternatives for funding and delivery of educational services to improve the overall quality of education.			✓
B2.	Autonomy and Flexibility. Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities.			✓
B3.	Increase Use of Technology. Increase and improve the use of information technology in education and encourage programs which increase the public's awareness and understanding of the impact of information technologies on our lives.			✓
B4.	Personal Development. Support education programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			✓
B5.	Students with Special Needs. Provide appropriate educational opportunities for groups with special needs.			✓

C1. Early Childhood Education. Develop resources and programs for early childhood education.			✓
C2. Hawai'i's Cultural Heritage. Promote educational programs which enhance understanding of Hawai'i's cultural heritage.			✓
C3. Research Programs and (Communication) Activities. Support research programs and activities that enhance the education programs of the State.			✓
Analysis: The Proposed Project is a non-resort hotel development. The Proposed Project will directly affect any objectives of the State Education Functional Plan (1989). Therefore, State Education Functional Plan (1989) is not applicable to the Proposed Project.			
State Functional Plan – Employment (1991)			
Objectives:	S	N/S	N/A
a. Improve the qualifications of entry-level-workers and their transition to employment.			✓
b. Develop and deliver education, training, and related services to ensure and maintain a quality and competitive workforce.			✓
c. Improve labor exchange.			✓
d. Improve the quality of life for workers and families.			✓
e. Improve planning of economic development, employment, and training activities.			✓
<p>Analysis: The Proposed Project is in alignment with the State Employment Functional Plan as the construction and operation of the Kanahele Hotel will generate both short- and long-term employment opportunities in Kahului, Maui. However, currently the Proposed Project does not involve any commitments directly related to the above referenced objectives. On a long-term basis, the Kanahele Hotel will follow the State's guidelines on employment management and procedure including but not limited to the opportunities for training activities with regards to the hospitality industry.</p> <p>As discussed in Section 2.2.2 (Economy) of this DEIS, employment from construction is estimated to generate 335 full-time positions for two years during the construction phase. The construction of the Kanahele Hotel is expected to contribute taxes in the amount of \$5.9 million for Maui County and \$8.3 million for the State of Hawai'i over a thirteen (13) year period. The effect of these expenditures will have positive direct, indirect, and induced beneficial impacts on the economy of the County of Maui. During its operations phase, the Kanahele Hotel will increase the level of capital investment in the region — creating employment opportunities and economic stimulus for the region. The Proposed Project will provide direct employment opportunities for Maui residents and contribute to</p>			

economic diversification and growth for both Maui and the State. After “stabilization,” the Kahahā Hotel is envisioned to support 100-125 permanent jobs.			
State Functional Plan – Energy (1991)			
Objectives:	S	N/S	N/A
a. Moderate the growth in energy demand through conservation and energy efficiency.	✓		
b. Displace oil and fossil fuels through alternate and renewable energy resources.	✓		
c. Promote energy education and legislation.			✓
d. Support and develop an integrated approach to energy development and management.	✓		
e. Ensure State’s ability to implement energy emergency actions immediately in event of fuel supply disruptions. Ensure essential public services are maintained and provisions are made to alleviate economic and personal hardships which may arise.			✓
Analysis: The Proposed Project supports the State Energy Functional Plan (1991). As discussed in Section 2.1.4 (Climate Change Assessment) of this DEIS, the Kahahā Hotel will include conservation measures to encourage the use of energy-efficient technology throughout the project, including but not limited to areas involving lighting, air-conditioning, and building materials.			
State Functional Plan – Health (1989)			
Objectives:	S	N/S	N/A
1. Health promotion and disease prevention. Reduction in the incidence, morbidity and mortality associated with the preventable and controllable conditions.			✓
2. Prevention and control of communicable diseases. Reduction in the incidence, morbidity, and mortality associated with infectious and communicable diseases.			✓
3. Health needs of special populations with impaired access to health care. Increased availability and accessibility of health services for groups with impaired access to health care programs.			✓
4. Community hospitals system. Development of a community hospital system which is innovative, responsive and supplies high quality care to the constituencies it serves.			✓
5. Environmental programs to protect and enhance the environment. Continued development of new environmental protection and health services programs to protect, monitor, and enhance the quality of life in Hawai’i.			✓

6. DOH leadership. To improve the Department of Health's ability to meet the public health need of the State of Hawai'i in the most appropriate, beneficial and economical way possible.			✓
Analysis: The proposed Kahahā Hotel does not propose the creation of any medical or health programs; therefore, the State Health Functional Plan is not directly applicable to the Proposed Project.			
State Functional Plan – Higher Education (1984)			
Objectives:	S	N/S	N/A
A. A number and variety of postsecondary education institutions sufficient to provide the diverse range of programs required to satisfy individual and societal needs and interests.			✓
B. The highest level of quality, commensurate with its mission and objectives, of each educational, research, and public service program offered in Hawai'i by an institution of higher education.			✓
C. Provide appropriate educational opportunities for all who are willing and able to benefit from postsecondary education.			✓
D. Provide financing for postsecondary education programs sufficient to ensure adequate diversity, high quality, and wide accessibility.			✓
E. Increase program effectiveness and efficiency through better coordination of education resources.			✓
Analysis: The proposed Kahahā Hotel does not propose the creation of higher education programs or involve any components directly supportive to achieve the above referenced objectives. Therefore, the State Higher Education Functional Plan (1984) is not applicable to the Proposed Project.			
State Functional Plan – Historic Preservation (1991)			
Objectives:	S	N/S	N/A
A. Identification of historic properties.	✓		
B. Protection of historic properties.	✓		
C. Management and treatment of historic properties.	✓		
D. Provision of adequate facilities to preserve historic resources.			✓
E. The establishment of programs to collect and conserve historic records, artifacts, and oral histories and to document and perpetuate traditional arts, skills, and culture.			✓
F. Provision of better access to historic information.	✓		
G. Enhancement of skills and knowledge needed to preserve historical resources.			✓

Analysis: The Proposed Project conforms to the purposed and intent of the State Historic Preservation Functional Plan (1991). As discussed throughout the DEIS, the Project Site has been successively improved with utility and roadway services. The Project Site is also situated in a highly developed urban environment where modern structures and roadways have been existing in Kahului.

As discussed in Section 2.1.9 (Historical and Archaeological Resources) of this DEIS, the Project Site has undergone several decades of intensive sugar cultivation and has been disturbed extensively. The results of the archaeological survey indicated that no significant materials or cultural remains were located on the previously disturbed land. In May 2013, the Department of Land and Natural Resources, State Historic Preservation Division (SHPD) concluded that no further work was warranted for the Project Site.

Furthermore, the project involves a Proposed Supplemental Archaeological Inventory Survey Subsurface Testing Plan. The document includes testing strategy to provide adequate information to characterize the upper 2 feet of the overall project area stratigraphy — also to identify the presence or absence of historically significant subsurface cultural deposits within the construction footprint of the Proposed Project. Both of the archaeological works show the commitment of the Proposed Project to be aligned with the State Historic Preservation Functional Plan (1991).

Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021), SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

State Functional Plan – Housing (2017)

Objectives and Policies:		S	N/S	N/A
A.	Increase and sustain the supply of permanent rental housing that is affordable and accessible to Hawai'i residents, particularly those with incomes at or below 80% AMI. Attain the legislative goal of 22,500 rental housing units by 2026.			✓
B.	Increase the homeownership rate.			✓
C.	Address barriers to residential development.			✓
D.	Maintain a statewide housing data system for use by public and private agencies engaged in the provision of housing.			✓
Analysis: The Proposed Project does not include any residential components. However, the proposed Kahahā Hotel will comply with the County's Residential Workforce Housing Policy set forth in Chapter 2.96, MCC.				

Pursuant to Section 2.96.050, Maui County Code, residential workforce housing credits may be used to satisfy the requirements of Chapter 2.96, MCC, additionally Act 141 (2009) requires that the County recognize affordable housing credits issued to the Department of Hawaiian Home Lands to satisfy any county affordable housing requirements. While we understand the sentiment of the Commission, we hope that the Commission recognizes that credits are issued to developers who build units in excess of their requirement, which allows an individual or family to enjoy the unit before the unit was “required” to be built. The credits allow the affordable housing developer to recoup some of their costs as typically affordable housing units are subsidized in some fashion (County affordable housing fund, market units, low-income housing tax credits, etc.), potentially allowing the developer to again build additional “excess” affordable housing units, once again allowing early access for an individual or family. It is important to remember that credits are earned, after an affordable housing unit is built.

In the alternative, instead of purchasing credits earned for affordable housing units already built and enjoyed by Maui residents, the Applicant may explore the option of working with a local affordable housing developer on the construction of affordable housing units that will be built concurrently with or within a set time period, as established in the required Residential Workforce Housing Agreement, of the proposed Kanahele Hotel. This option has many variables so it may not be feasible.

State Functional Plan – Human Services (1989)

Objectives and Policies:	S	N/S	N/A
A. To sustain and improve current elder abuse and neglect services.			✓
B. To increase cost-effective, high quality home and community-based services.			✓
C. To increase home-based services to keep children in their homes and to increase placement resources for those children who must be temporarily or permanently removed from their homes, due to abuse or neglect.			✓
D. To address factors that contribute to child abuse and other forms of family violence.			✓
E. To provide affordable, accessible, and quality childcare.			✓
F. To maximize efforts of self-sufficiency through provision of transitional medical care services.			✓
G. To provide AFDC recipients with a viable opportunity to become independent of the welfare system.			✓
H. To facilitate client access to human services.			✓
I. To eliminate organizational barriers which limit client access to human services.			✓

Analysis: The State Human Services Functional Plan (1989) is not applicable to the Proposed Project. However, the Proposed Project will not conflict with the effort and initiative for promoting human services as outlined herein.			
State Functional Plan – Recreation (1991)			
Objectives and Policies:	S	N/S	N/A
1a. Address the problem of saturation of the capacity of beach parks and nearshore waters.			✓
1b. Reduce the incidence of ocean recreation accidents.			✓
1c. Resolve conflicts between different activities at heavily used ocean recreation areas.			✓
1d. Provide adequate boating facilities. Balance the demand for boating facilities against the need to protect the marine environment from potential adverse impacts.			✓
2a. Plan, develop, and promote recreational activities and facilities in <i>mauka</i> and other areas to provide a wide range of alternatives.	✓		
2b. Meet special recreation needs of the elderly, the disabled, woman, single-parent families, immigrants, and other groups.			✓
2c. Improve and expand the provision of recreation facilities in urban areas and local communities.	✓		
3a. Prevent the loss of access to shoreline and upland recreation areas due to new developments.			✓
3b. Resolve the problem of landowner liability that seriously hampers public access over private lands.			✓
3c. Increase access to State Forest Reserve lands over federal property, leased State lands, and other government lands.			✓
3d. Acquire, develop, and manage additional public access ways.	✓		
4a. Promote a conservation ethic in the use of Hawai'i's recreational resources.			✓
4b. Prevent degradation of the marine environment.			✓
4c. Improve the State's enforcement capabilities.			✓
4d. Mitigate adverse impacts of tour helicopters on the quality of recreational experiences in wilderness areas.			✓
5a. Properly maintain existing park and recreation areas.			✓
5b. Promote interagency coordination and cooperation to facilitate sharing of resources, joint development efforts, clarification of responsibilities and jurisdictions, and improvements in enforcement capabilities.			✓
5c. Assure adequate support for priority outdoor recreation programs and facilities.			✓
6a. Increase recreational access and opportunities in Hawai'i's wetlands.			✓

6b.	Develop and adequate information base to assist the County planning departments and other regulatory agencies in making decisions regarding the wetlands.			✓
6c.	Assure the protection of the most valuable wetlands in the State.			✓
Analysis: The Proposed Project does not involve ocean recreation areas, upland recreation area (or access to those areas), parks, or wetlands. Therefore, the State Recreation Functional Plan is not applicable to the Proposed Project.				
State Functional Plan – Tourism (1991)				
Objectives:		S	N/S	N/A
1a.	Development, implementation and maintenance of policies and actions which support the steady and balanced growth of the visitor industry.	✓		
2a.	Development and maintenance of well-designed visitor facilities and related developments which are sensitive to the environment, sensitive to neighboring communities and activities, and adequately serviced by infrastructure and support services.	✓		
3a.	Enhancement of respect and regard for the fragile resources which comprise Hawai'i's natural and cultural environment. Increased preservation and maintenance efforts.	✓		
4a.	Support of Hawai'i's diverse range of lifestyles and natural environment.	✓		
4b.	Achievement of mutual appreciation among residents, visitors, and the visitor industry.	✓		
5a.	Development of a productive workforce to maintain a high-quality visitor industry.	✓		
5b.	Enhancement of career and employment opportunities in the visitor destination in specific desired market segments.	✓		
6a.	Maintenance of a high customer awareness of Hawai'i as a visitor destination in specific desired market segments.	✓		
Analysis: The Proposed Project is a non-resort hotel development providing accommodations in closed proximity to the Kahului Airport. The property is improved with utilities and is adequately serviced by infrastructure. Therefore, the Proposed Project supports the State Tourism Functional Plan 1991.				
State Functional Plan – Transportation (1991)				
Objectives:		S	N/S	N/A
1a.	Expansion of transportation system.	✓		
1b.	Reduction of travel demand through zoning and decentralization initiatives.			✓
1c.	Management of existing transportation systems through a program of transportation systems management (TSM).			✓

1d.	Identification and reservation of lands and right-of-way required for future transportation improvements.	✓		
1e.	Planning and designing State highways to enhance inter-regional mobility.	✓		
1f.	Improving and enhancing transportation safety.	✓		
1g.	Improved transportation maintenance programs.			✓
1h.	Ensure that transportation facilities are accessible to people with disabilities.	✓		
2a.	Development of a transportation infrastructure that supports economic development initiatives.			✓
3a.	Expansion of revenue bases for transportation improvements.	✓		
4a.	Providing educational programs.			✓
<p>Analysis: The objectives outlined in the State Transportation Functional Plan 1991 are largely applicable to the State Department of Transportation. However, coordination is occurring with the State Department of Transportation on the development of the future on ramp to the Airport Access Road. As discussed in Section 1.5 (Proposed Action) of this Draft EIS, anticipated future offsite infrastructure improvements to be provided by the State of Hawai'i, Department of Transportation include construction of a new on-ramp to the Airport Access Road located on the eastern corner of the Project Site. Land costs relating to the onramp were to be charged against the Previous Petitioner's (A&B) documented fair share contribution, however, in January 2020 the DOT instead requested full payment of the Previous Petitioner's fair market value share contribution. Pursuant to that request the Previous Petitioners remitted the amount of \$4,601,026.00 to the DOT in February 2020 in full payment of its fair share contribution. The State's timing of the future on-ramp construction is unknown at this time. In addition to the foregoing, the Proposed Project will not adversely affect any improvements to transportation system and programs.</p> <p>During a May 2021 meeting between the State of Hawaii, Department of Transportation, Highways Division, and the Petitioner — it was clarified that DOT does not have a timeline for the construction of the on-ramp and that DOT will approach Petitioner or future landowner at the appropriate time to purchase the necessary land area at fair market value. Section 1.5 of the DEIS provides further detail on the background of the onramp.</p>				

3.5 Maui County General Plan

The General Plan of the County of Maui refers to a hierarchy of planning documents that together set forth future growth and policy direction in the County. The General Plan is comprised of the following documents: 1) Countywide Policy Plan; 2) Maui Island Plan; and 3) nine community plans. The discussion of the community plan relevant to the Proposed Project can be found on the following Section 3.6 of this Draft EIS (Wailuku-Kahului Community Plan).

The Countywide Policy Plan (CPP) was adopted in March 2010 and is a broad policy document that identifies a vision for the future of Maui County. It establishes a set of guiding principles and provides comprehensive goals, objectives, policies and implementing actions that portray the desired direction of the County's future. The CPP provides the policy framework for the development of the Maui Island Plan and nine Community Plans.

The Maui Island Plan functions as a regional plan and addresses the policies and issues that are not confined to just one community plan area, including regional systems such as transportation, utilities and growth management, for the Island of Maui. Together, the Island and Community Plans develop strategies 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.

3.5.1 County-wide Policy Plan

The County-wide Policy Plan establishes a list (below) of county-wide goals, objectives, policies, and implementing actions related to key strategies. The *Countywide Policy Plan* (CPP) was adopted by the Maui County Council on March 19, 2010, and provides a long-term vision, principles, goals, policies, and objectives directed toward improving living conditions in the County. The CPP provides the policy framework for the development of the *Maui Island Plan* and the nine Community Plans. The following Themes, Objectives and Policies are applicable to the Proposed Project:

Section II: Maui County Today:

B. Land Use and Development Patterns:

1. *Land Use* *A fair amount of the land on all of the islands is permanently designated as land within the State Conservation District; however, a large percentage of the land within other designations could be developed. This makes it extremely important to evaluate what type*

of development is appropriate and where it should be located through the General Plan process. The State of Hawai'i is unique in that both the State and the County regulate land uses for all properties.

2. *Sprawl* *Sprawl segregates people by income level and relies upon automobile-scaled development and cheap fossil fuel. Sprawl occurs when rural and agricultural lands are developed into large-lot subdivisions or when new population or economic centers are built away from the existing infrastructure grid that still has available capacity.*
3. *Smart Growth* *Smart Growth is development that serves the economy, the community, and the environment. Smart growth is about being good stewards of our communities and of our rural lands, parks, and forests. In short, Smart Growth is based on development designed at a scale to be comfortable to pedestrian, not an automobile.*

Analysis. The Project Site is situated within the State Urban District and the Urban Growth Boundary of the Maui Island Plan. The Proposed Project is an appropriate urban development located on a previously entitled lot — in an area adjacent to lots primarily made up of Light Industrial uses. The Applicant proposes to add functional convenience and utility to the existing State air transportation hub for the County of Maui, the Kahului Airport. Furthermore, the Proposed Project is compatible with the surrounding land uses in Kahului — including the existing retail, commercial, office, warehouse, and eating and drinking establishment.

Countywide Goals, Objectives, Policies, and 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.*

Objective:

1. *Improve the opportunity to experience the natural beauty and native biodiversity of the islands for present and future generations.*

Policy:

- g. *Preserve and provide ongoing care for important scenic vistas, view planes, landscapes, and open-space resources.*

Objective:

3. ***Improve the stewardship of the natural environment.***

Policy:

- c. *Evaluate development to assess potential short-term and long-term impacts on land, air, aquatic, and marine environments.*

Analysis. The Proposed Project incorporates a significant area of native species within the grounds and utilizes landscape planting to soften the massing of the proposed development in its relation to surrounding uses. The project will set forth building height limits and setbacks in order to help maintain views towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kahahā Hotel will provide view corridors in between buildings toward Haleakalā. As discussed throughout Chapter II of this DEIS, the Proposed Project includes evaluation of the short-term and long-term impacts on land, air, and other physical environments. BMPs and mitigation measures are detailed on each section of the potentially impacted environment, as well as in the following Section 4.6, Table 19, of this DEIS.

B. Preserve Local Cultures and Traditions*Objective:*

1. ***Perpetuate the Hawaiian culture as a vital force in the lives of residents.***

Policy:

- b. *Prohibit inappropriate development of cultural lands and sites that are important for traditional Hawaiian cultural practices and establish mandates for the special protection of these lands in perpetuity.*

Objective:

4. ***Preserve and restore significant historic architecture, structures, cultural sites, cultural districts, and cultural landscapes.***

Policies:

- b. *Promote the rehabilitation and adaptive reuse of historic sites, buildings, and structures to perpetuate a traditional sense of place.*
- d. *Protect and preserve lands that are culturally or historically*

significant.

Analysis. As discussed in Section 2.2.3 of the DEIS (Cultural Resources), the project area was utilized for industrial uses, including plantation activities during the 19th century. With regards to the interrelationship between natural and cultural resources, the Cultural Impact Assessment (CIA) prepared for the Proposed Project concludes that the Project Site bears no apparent signs of current cultural practices or gatherings — and the development of the Project Site will not significantly impact any flora, fauna, cultural resources, beliefs, or practices on the property or within its immediate vicinity.

F. Strengthen the Local Economy

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

Objective:

1. *Promote an economic climate that will encourage diversification of the County's economic base and a sustainable rate of economic growth.*

Policies:

- a.** *Support economic decisions that create long-term benefits.*
- c.** *Invest in infrastructure, facilities, and programs that foster economic diversification.*
- d.** *Support and promote locally produced products and locally owned operations and business that benefit local communities and meet local demand.*
- e.** *Support programs that assist industries to retain and attract more local labor and facilitate the creation of jobs that offer a living wage.*
- f.** *Encourage work environments that are safe, rewarding, and fulfilling to employees.*
- j.** *Support efforts to improve conditions that foster economic vitality in our historic small towns.*
- l.** *Support public and private entities that assist entrepreneurs in establishing locally operated businesses.*

Objective:

3. *Support a visitor industry that respects the resident culture and the environment.*

Policy:

- c. *Encourage a spirit of welcome for residents at visitor facilities, such as by offering kama'āina incentives and discount programs.*
- f. *Encourage resident ownership of visitor-related businesses and facilities.*
- i. *Support the diversification, development, evolution, and integration of the visitor industry in a way that is compatible with the traditional, social, economic, spiritual, and environmental values of island residents.*
- j. *Improve collaboration between the visitor industry and the other sectors of Maui County's economy.*
- n. *Recognize the important contributions that the visitor industry makes to the County's economy, and support a healthy and vibrant visitor industry.*

Objective:

- 4. ***Expand economic sectors that increase living-wage job choices and are compatible with community values.***

Analysis. As discussed throughout the DEIS, the Proposed Project will generate employment opportunities in Kahului. The Proposed Project will also contribute to the diversification of the visitor industry in Maui through the provision of non-resort hotel rooms targeting business travelers and Hawaiian residents. Since existing hotels in Maui generally populate areas within and/or nearby the shorelines, the proposed Kānāhā Hotel offers a more appropriate location for accommodation services adjacent to the Kahului Airport.

H. Diversify Transportation Options*Objective:*

- 2: ***Reduce the reliance of the automobile and fossil fuels by encouraging walking, bicycling, and other energy-efficient and safe alternative modes of transportation.***

Policy:

- b. *Require development to be designed with the pedestrian in mind.*

Analysis: The parcel location is within walking distance of Costco, future developments of the MBPIL. A shuttle will provide free transportation within a 2-mile radius of the hotel, including pick up and drop off to and from the Kahului Airport. In addition, an existing bus

stop is available at Dairy Road/Kele Street for Maui Bus Route 5 and 6 serving Kahului. The bus stop is approximately 0.6 mile from the Project Site.

3.5.2 Maui Island Plan

The Maui Island Plan, December 2012, serves as the regional plan for the Island of Maui. The Plan is comprised of the following ten elements: 1) Population; 2) Heritage Resources; 3) Natural Hazards; 4) Economic Development; 5) Housing; 6) Infrastructure and Public Facilities; 7) Land Use; 8) Directed Growth Plan; 9) Long Range Implementation Plan; and 10) Monitoring and Evaluation. Each element contains goals, objectives, policies and implementing actions. The Directed Growth Plan identifies the location of future development through 2030. The Directed Growth Plan is intended to guide the location and general character of future urban development and will direct future zoning changes and guide the development of the County's short-term and long-term capital improvement plan budgets.

The General Plan of the County of Maui refers to a hierarchy of planning documents that together set forth future growth and policy direction in the County. The General Plan is comprised of the following documents: 1) County-wide Policy Plan; 2) Maui Island Plan; and 3) nine community plans.

The County-wide Policy Plan was adopted in March 2010 and is a broad policy document that identifies a vision for the future of Maui County. It establishes a set of guiding principles and provides comprehensive goals, objectives, policies and implementing actions that portray the desired direction of the County's future. The County-wide Policy Plan provides the policy framework for the development of the Maui Island Plan and nine Community Plans.

The Maui Island Plan functions as a regional plan and addresses the policies and issues that are not confined to just one community plan area, including regional systems such as transportation, utilities and growth management, for the Island of Maui. Together, the Island and Community Plans develop strategies 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.

The Maui Island Plan is approved it will be used to guide the growth and development of Maui County. As indicated by the Planning Department's proposed Directed Growth Maps, the Kānāhā Hotel lies within the limits of the proposed Urban Growth Boundary for Kahului. (See: Figure 14, "Maui Island Plan – Speckelsville/Paia")

The 2030 update to the General Plan of the County of Maui was approved by the Maui County Council and signed into law by the Mayor of Maui County on December 28, 2012. The Maui Island Plan determines the appropriateness of discretionary development proposals. The following Goals, Objectives and Policies of the Maui Island Plan are applicable to the Proposed Project:

HERITAGE RESOURCES

Scenic Resources

Objective:

2.5.1 *A greater level of protection for scenic resources.*

Policy:

2.5.1.a *Protect views to include, but not be limited to, Haleakalā, ʻĪao Valley, the Mauna Kahalawai (West Maui Mountains), Puʻu Ōʻlaʻi, Kahoʻolawe, Molokini, Molokaʻi, and Lānaʻi, Mauna Kea, Mauna Loa, sea stacks, the Pacific Ocean, and significant water features, ridgelines, and landforms.*

Analysis. Siting and massing of the proposed structure seek to limit impacts to the scenic resources. As discussed throughout the DEIS, the proposed Kānāhā Hotel will be constructed with generous setbacks on all sides and building height limits to help maintain views towards the summit of Haleakalā.

ECONOMIC DEVELOPMENT

Economic Diversification

Goal:

4.1 *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.*

Objective:

4.1.1 *A more diversified economy.*

Policies:

4.1.1.b *Support the creation of new jobs and industries that provide a living wage.*

4.1.2.b *Encourage and support local businesses.*

Analysis. The Proposed Project strongly supports the creation of new jobs both short- and long-term through the construction and operation of the Kahahā Hotel. The Project Site is situated at the business hub of the Maui Island, i.e., Kahului, where surrounding businesses include but not limited to retail, warehouse, office, and eating and drinking establishment. Therefore, the Proposed Project will also contribute to the existing local businesses by allowing visitors to access goods and services in proximity with their accommodation.

ECONOMIC DEVELOPMENT

Tourism

Goal:

4.2 *A healthy visitor industry that provides economic well-being with stable and divers employment opportunities.*

Objective:

4.2.1 *Increase the economic contribution of the visitor industry to the island's environmental well-being for the island's residents' quality of life.*

Policy:

4.2.1.f *Recognize the important economic contributions that the visitor industry makes and support a healthy and vibrant visitor industry.*

4.1.2.b *Support the increased availability of Kama'aina discount programs.*

Objective:

4.2.3 *Maximize residents' benefits from the visitor industry.*

Analysis. The Proposed Project will provide additional accommodations, i.e., non-resort hotel rooms in Central Maui — which is an area of local interest and use. Conveniently located accommodations will be a resource for interisland clubs, teams, hālau, as well as governmental services and the business community.

Policy:

4.2.3.a *Promote a desirable island population by striving to not exceed an island-wide visitor population of roughly 33 percent of the resident population.*

Analysis. Based on the HTA ADC data and an estimated 2019 Maui Island population of

about 157,000, the average number of visitors on the island was about 42% during 2019, well in excess of the Maui Island Plan policy metric of 33.33%. (See: Appendix 22 of the DEIS, Tourism Study)

During 2020, Maui Island's ADC was 20,591, far below prior years due to the COVID-19 pandemic. The resulting mandatory 14-day quarantine for trans-Pacific travelers arriving in Hawai'i was in effect until October, followed by a pre-departure testing program that allowed arriving travelers to bypass quarantine. Maui Island's 2020 population was 154,100. During 2020, the ADC on the island was about 13%, far below the Maui Island Plan policy metric of 33.33%. (See: Appendix 22 of the DEIS, Tourism Study)

Year-to-date July 2021, Maui Island's ADC was 52,769. Maui Island's 2020 population according to the 2020 Census was 154,100, meaning that through July, the average number of Maui visitors on the island equaled 34.2% of the resident population, slightly higher than the Maui Island Plan policy metric of 33.33%. Based on the seasonality of Maui tourism, which typically slows down during the fall before picking up around Christmas, we have estimated Maui's year end 2021 ADC at 50,829, equal to 33.33% of the island's population.

The proposed Kānāhā Hotel is anticipated to contain 200 hotel rooms with an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, and with 2.3 individuals per room. Kānāhā Hotel is anticipated to accommodate an average of 138 out-of state visitors per night. This translates to a contribution of 0.27% of the 33% ADC policy metric. Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kānāhā Hotel on an average night would equal 0.09% of the island's resident population of 154,100. An increase of approximately 0.09% (less than one-tenth of one percent) to the visitor to resident ratio is an insignificant increase (See: Appendix 22 of the DEIS, Tourism Study). Table 5 from Section 2.2.2 (Economy) of this Draft EIS is excerpted as follows.

Table 5. Estimated Contribution of Kahahā Hotel to Policy Metric of 33.33% ADC

<i>Kahahā Hotel Room Count</i>	200	<i>Rooms</i>
<i>Estimated Occupancy</i>	80.0%	<i>Occupancy</i>
<i>Estimated Nightly Occupied Rooms</i>	160	<i>Occupied Rooms</i>
<i>Estimated Share Kahahā Hotel Guests from Out of State</i>	37.5%	<i>Share</i>
<i>Estimated Nightly Rooms Occupied by Out-of-State Visitors</i>	60	<i>Occupied Visitor Rooms</i>
<i>Maui Average Visitor Party Size</i>	2.3	<i>Visitors</i>
<i>Estimated Nightly Out-of-State Visitors Staying in Kahahā Hotel</i>	138	<i>Visitors</i>
<i>Maui ADC Based on Population of 154,100 and Policy Metric of 33.33%</i>	50,853	<i>Visitors</i>
<i>Estimated Contribution of Kahahā Hotel to Policy Metric of 33.33% ADC</i>	0.27%	<i>Contribution</i>

Source: Kloninger & Sims

We have applied an occupancy rate of 80% in the analysis, higher than the 2019 Maui County hotel occupancy rate of 77.7%. Based on 200 total rooms, an average of 160 rooms would be occupied nightly at the hotel. Our market interviews indicate that most of the room demand in the Kahului area is generated by interisland travel, not out-of-state visitors. We have applied a 37.5% share of occupancy to out-of-state visitors or 60 occupied rooms on an average night. According to HTA statistics, the average visitor party to Maui in 2019 consisted of 2.3 travelers, meaning an estimated 138 out-of-state visitors each night staying in Kahahā Hotel. Applying the 33.33% ADC metric to the 2020 Maui Island population of 154,100 results in an ADC of 50,853 visitors. The estimated 138 visitors accommodated at the Kahahā Hotel represent 0.27% of the policy target number of 50,853 visitors on the island. This results in an insignificant impact to the ADC.

Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kahahā Hotel on an average night would equal 0.09% of the island's resident population of 154,100.

We also note that Maui's 2021 ADC could decrease further if the number of vacation rentals on the island continues to decrease, as it has in recent months. In July, Maui County entered into agreements with Expedia (VRBO) and Airbnb, under which the vacation rental platforms will display the tax map key ("TMK") for each listing on the platforms. This will greatly enhance the county's ability to enforce laws against illegal vacation rentals. In July, the number of vacation rentals in Maui County decreased 22.2% compared to July 2019,

suggesting that the TMK requirement is contributing to a decrease in the supply of vacation rentals on the island. If this trend continues for the balance of the year, Maui's ADC will likely fall below the 33.33% policy metric. (See: Appendix 22 of the DEIS, Tourism Study)

Policy 4.2.3.a addresses Objective 4.2.3 which is to, "Maximize residents' benefits from the visitor industry." The proposed Kānahā Hotel will benefit Maui County residents by serving as a critical infrastructure piece in the diversification of Maui's economy by providing business traveler accommodations, and by creating a non-resort hotel that is centrally located where family and friends visiting residents can stay, reducing the impact and congestion on Maui's roads.

It is also important to stress that the proposed Kānahā Hotel furthers other areas of the Maui Island Plan (MIP). On 4-9, the MIP recognized that, "significant care must be taken to nurture a healthy and vibrant visitor industry." The proposed Kānahā Hotel does "provide an alternative to the large-scale, coastal resort experience[.]" which is a benefit of "alternative tourism accommodations" discussed on 4-12 of the MIP.

Objective 4.2.2 of the MIP which is to "Comprehensively manage future visitor-unit expansion", contains the following policies:

"4.2.2.d Discourage supplanting of existing island housing to visitor accommodations that may have a negative impact on long-term rental housing, price of housing, and price of land."

The proposed Kānahā Hotel will not supplant existing island housing to accommodate the needs of business travelers to Maui.

The proposed Kānahā Hotel will help to support Economic Diversification on Maui by improving the island's business climate, as promoted in Goal 4.1 of the MIP. A business traveler hotel will help to support new, emerging industries on Maui by having a centrally located, business traveler-oriented hotel, for off-island support services to utilize when working on Maui.

The proposed Kānahā Hotel respects the characteristic of expected development within UGB. Section 3.5.2 of the forthcoming DEIS (Maui Island Plan) acknowledges ten (10)

elements discussed in the MIP, i.e., 1) Population; 2) Heritage Resources; 3) Natural Hazards; 4) Economic Development; 5) Housing; 6) Infrastructure and Public Facilities; 7) Land Use; 8) Directed Growth Plan; 9) Long Range Implementation Plan; and 10) Monitoring and Evaluation. Each element contains goals, objectives, policies and implementing actions.

While the proposed hotel project recognizes the importance of each element of the MIP, it is also necessary to note that the proposed project will only be able to satisfy some of the elements. This response aligns with the statement written in MIP Page 1-2 as follows.

“It is not intended that ministerial permits be reviewed for consistency with all of the MIP goals, objectives, policies, diagrams and maps.”

One of the elements that is particularly related to this comment is the Tourism aspect under the Economic Development section of the MIP. As highlighted in the forthcoming DEIS (Section 3.4.2), the following is the discussion about how the proposed project supports the MIP on its own capacity by utilizing available urban land and locating the proposed development within an established urban community.

ECONOMIC DEVELOPMENT

Small Business Development

Goal:

4.5 Small business will play a key role in Maui’s Economy.

Objective:

4.5.1 Increase the number of and revenue generated by small businesses and decrease the percentage of small business failures.

Policy:

4.5.1.c Reduce barriers to small business development.

Analysis. There are a variety of small businesses within 5-mile radius from the Project Site, such as local food trucks, restaurants, cafes, car rentals, automobile services, and retails. Improving the synergistic function of the Kahului Airport contributes to small business development by increasing the convenience of interisland commerce and group travel for local events.

LAND USE

Urban Areas*Goal:*

7.3 *Maui will have livable human scale urban communities, and efficient and sustainable land use pattern, and sufficient housing and services for Maui residents.*

Objective:

7.3.1 *Facilitate and support a more compact, efficient, human-scale urban development pattern.*

Policy:

7.3.1.a *Ensure higher-density compact urban communities, infill, and redevelopment of underutilized urban lots within Urban Growth Boundaries.*

Objective:

7.3.4 *Strengthen planning and management for the visitor industry to protect resident quality of life and enhance the visitor experience.*

Policy:

7.3.4.d *Limit large-scale resort development to the four existing resort destination areas of Wailea, Mākena, Kapalua, and Kā`anapali. “Large Scale Resort” is defined as complexes that include multiple accommodation facilities, activity businesses, retail complexes, and other amenities.*

Analysis. The Project Site is located within the State Urban District and the Urban Growth Boundaries. The lots including within the Project Site are underutilized urban lots with readily available utilities and roadway services. The proposed non-resort hotel rooms will be situated within approximately 5-minute drive to the Kahului Airport and approximately 10-minute drive to the Paia business district — enhancing visitor experience by providing accommodations at the heart of the Maui business hub and in close proximity to the Maui air transit hub.

DIRECTED GROWTH PLAN**Urban and Small-Town Growth Area Goal and Policies***Goal:*

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

Policies:

- 8.1.d *The unique character and function of existing small towns shall be protected to retain and preserve their sense of place.*
- 8.1.e *New development shall be consistent with the UGBs, STBs, and all other applicable policies of the MIP. New urban-density development shall not be allowed outside of a UGB or STB.*

Analysis. The Proposed Project is a new development allowable within the State Urban District and the Urban Growth Boundaries. The Proposed Project is compatible with the existing development pattern in the immediate environs of the Project Site. The Proposed Project is consistent with the designated urban growth in Kahului.

3.6 Wailuku-Kahului Community Plan

Within Maui County, there are nine (9) community plan regions. From a General Plan implementation standpoint, each region is governed by a Community Plan which sets forth desired land use patterns, as well as goals, objectives, policies, and implementing actions for a number of functional areas including infrastructure-related parameters.

Nine community plan regions have been established in Maui County. Each region's growth and development are guided by a community plan, which contains objectives and policies in accordance with the Maui County General Plan. The purpose of the community plan is to outline a relatively detailed agenda for carrying out these objectives.

The subject property is located within the Wailuku-Kahului Community Plan. The Community Plan was first adopted in 1987, updated in 1992, and currently adopted through Ordinance No. 3061 in 2002.

The current Wailuku-Kahului Community Plan (WKCP) identifies major problems and opportunities within the region. Problem 1.a "Airport and Harbor facilities and other public facilities" states that the Kahului airport is underutilized and should be improved to meet the needs over the next 20 years including the expansion of facilities to accommodate air cargo and passenger services, including extension of the runway.

The Applicant is proposing a Community Plan Amendment (CPA) for the subject property from "LI" Light Industrial to "H" Hotel and the concurrent processing of a Change in Zoning

application from “M-1” Light Industrial to “H-M” Hotel District in order to maintain consistency with the proposed use and the land use designations. Approval of these entitlements would allow development of the proposed 200-unit hotel.

“Hotel (H)” Land Use Category is defined as:

This applies to transient accommodations which do not contain kitchens within individual units. Such hotel facilities may include permissible accessory uses primarily intended to serve hotel guests.

ECONOMIC ACTIVITY

Goal: A stable and viable economy that provides opportunities for growth and diversification to meet long-term community and regional needs and in a manner that promotes agricultural activity and preserves agricultural lands and open space resources.

Objective and

Policy:

3. *Allow opportunities for hotel accommodations within the region at Kahului and Wailuku--at the existing hotel district by Kahului Harbor; near the Kahului Airport; and within the Wailuku Town core.*

Analysis: The Proposed Project will add non-resort hotel accommodations near the Kahului Airport — approximately 5-minute drive. The proposed hotel will supplement the limited visitor industry and business traveler opportunities within the community plan area.

LAND USE

Goal: An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of residents and visitors in a manner that provides for the social and economic well-being of residents and the preservation and enhancement of the region’s environmental resources and traditional towns and villages.

Objective and

Policy:

6. *Establish an adequate supply of urban land use designations to meet the needs of the community over the next 20 years.*

Analysis: The Proposed Project is situated in an appropriate location where the land is designated

urban both by the State Land Use District and the Maui Island Plan; where access to the Kahului Airport is within a short drive; and where the surrounding environment has been heavily built with urban infrastructure. In addition, the Proposed Project is within the improved MBP2 — a subdivision that was approved for future urban development. The project will accommodate future needs of visitors as well as residents by providing non-resort accommodations and generating jobs in Central Maui in close proximity to where the employees live.

3.7 County Zoning

The comprehensive zoning provisions for the County of Maui are set forth in Article II of Title 19 of the Maui County Code. The purpose and intent of comprehensive zoning is to regulate the utilization of land in a manner encouraging orderly development in accordance with the land use directives of the Hawai'i Revised Statutes, the charter of the County of Maui, and the general plan and community plans of the County, as well as to promote and protect the health, safety, and welfare of the people of the County.

The Applicant is requesting a Change in Zoning (CIZ) from Conditional “M-1” Light Industrial District (Ordinance 3559) to MCC 19.14 H-M Hotel Zoning:

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

Analysis: As described in Sections 3.2 and 3.3 of the DEIS, the Proposed Action meets the intent of the general plan and the objectives and policies of the Wailuku-Kahului Community Plan.

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

Analysis: The Applicant proposes a Community Plan Amendment in order to establish compliance with the Wailuku-Kahului Community Plan land use map.

3. *The proposed request meets the intent and purpose of the district being requested;*

Analysis: MCC Section 19.14.010, “Purpose and intent” states:

“A hotel district is a high density multiple-family area bordering business districts or ocean fronts, or both. This district includes public and semi-public institutional and accessory uses.”

Analysis. The Proposed Action meets the County's stated Purpose and Intent for the Hotel District. The land uses and immediate environs are specifically discussed in Section 2.1.1 of the DEIS.

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

Analysis: As described in Sections 2.3 and 2.4 of the DEIS, the proposed Change in Zoning will not impact schools, parks, playgrounds, water systems, sewage and solid waste disposal, drainage, traffic, or other public infrastructure and services.

5. *The application, if granted would not adversely impact the social, cultural, economic, environmental, and ecological character and quality of the surrounding area.*
6. ...

Analysis: As discussed in Chapter 2 of the DEIS, the Proposed Action will not adversely impact the social, cultural, economic, environmental, and ecological character and quality of the surrounding area;

7. *If the application change in zoning involves the establishment of an agricultural district with a minimum lot size of two acres, an agricultural feasibility study shall be required and reviewed by the Department of Agriculture and the U.S. Soil Conservation Service.*

Analysis: Not applicable to the Proposed Project.

The Project Site is located adjacent to the Kahului Airport property which is zoned Airport District by Maui County Code Chapter 19.28 and states the following:

Section 19.28.010 Permitted Uses: Within an area designated as an airport district no land, building, structure or any portion thereof shall be used, and no building or structure shall be erected, constructed, enlarged or altered, except for the following uses:

- A. *Runways, taxiways, cleared safety areas, aircraft parking and loading aprons, terminal buildings, control towers, fire stations, airport maintenance shops and warehouses,*

*landscaped areas, vehicular roads, auto parking lots, service stations, transient auto garages, airport post offices, restaurants and cocktail lounges, soda fountains, flower shops, gift shops, bootblack stands, photo shops, lei stands, newsstands, haberdasheries, drug stores, banks, wireless offices, **transient hotels**, miscellaneous concessions to serve the traveling public, postal transfer stations and bases of operations for airport ground transportation;*

The Project Site is adjacent to the Kahului Airport and therefore a hotel is a compatible use in close proximity to the airport. Hotels near airports exist on Oahu near HNL and on Maui the Courtyard Hotel is another example.

As noted, the WKCP “Allow opportunities for hotel accommodations within the region at Kahului and Wailuku – at the existing hotel district by Kahului Harbor, near the Kahului Airport; and within the Wailuku Town core.

3.8 Coastal Zone Management

The Federal Coastal Zone Management Act of 1972 was adopted in response to competing development and preservation interests in U.S. coastal areas. Population growth and development in coastal areas were impacting marine resources, open space, view sheds, wildlife, and other important ecological, cultural, and historic resources. In response to this concern, Congress created a framework for managing and regulating the coastal zone and appropriated funds for State-run coastal zone management programs (CZMP). The State’s acceptance of the Federal funds necessitated compliance with federal CZMP standards.

The boundaries of Hawai’i’s coastal zone management program are defined by coastal waters and adjacent coastlands that are strongly influenced by each other. Coastal areas which require special consideration due to their unique values or characteristics are called Special Management Areas (SMA) and must be designated by a management plan. Special Management Area includes areas extend inland from and along the shoreline. Any development within these areas is subject to an SMA assessment process. This protocol provides a means to preserve, protect, and when possible, restore the natural resources of the coastal zone by controlling development within and around shoreline areas to avoid the permanent loss of valuable resources. As required by State law, maps showing the limits of the SMA have been prepared by each County.

This section about the coastal zone management is included within the DEIS because the Project Site is located within the Special Management Area (SMA) for the island of Maui. (See: Figure

20, “Special Management Area Map”)

Assuming the Motion to Amend the State Land Use Commission’s Decision & Order designating the Project Site as Urban, the Community Plan Amendment and Change in Zoning for the subject parcel are granted, the Applicant would proceed to the Maui Planning Commission for decision on the SMA Major Use Permit.

The following section discusses the relationship of the Proposed Project to the objectives and policies of the coastal zone management area pursuant to Chapter 205A, HRS and the SMA Rules and Regulations of the Maui Planning Commission.

1. Recreational Resources

Objective:

- (A) *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;*

Analysis. The property is not located on the shoreline. The Project Site is approximately 0.66 miles away from the shoreline; hence, the Proposed Project will result in no impact to the shoreline or shoreline access. A swimming pool will be provided on-site, which may reduce impacts of additional visitors utilizing the regions shorelines and parks. During and after construction, mitigation measures will be taken to reduce the effect of water runoff on the surrounding properties and ocean.

2. Historic Resources

Objectives:

- (A) *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;*

Analysis. As discussed in Section 2.1.9 of the DEIS, SHPD had previously determined that the Project Site has been adequately assessed, and that no further work is warranted. However, in response to comments on the Archaeological Assessment from the SHPD, the Applicant retained ‘Āina Archaeology to prepare a Proposed Supplemental Archaeological Inventory Survey Subsurface Testing Plan for the Proposed Project. The proposed testing strategy will provide adequate information to characterize the upper 2 feet of the overall project area stratigraphy — also to identify the presence or absence of historically significant subsurface cultural deposits within the construction footprint of the Proposed Project.

Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021), SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

3. *Scenic and Open Space Resources*

Objective:

- (A) *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;*

Analysis. As discussed in Sections 1.5 and 2.1.10 of the DEIS, the proposed hotel building sections vary from one (1), two (2), and four (4) stories in height and will be massed towards the center of the Project Site with generous setbacks on all sides accommodating the width of a landscape buffer, the width of two parking stalls and a parking lot drive isle. Landscape planting will be used to screen the building where possible and to provide visual context in blending the massing of the building to the site and surrounding environs.

At the request of the Maui County Planning Department a view analysis was prepared (See: Appendix 16). While the proposed development will have an impact on views across the site, in the context of its undeveloped condition, the visual impacts are not anticipated to be significant in the context of existing visual resources in the vicinity.

The project will set forth building height limits and setbacks in order to help maintain views

towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kānāhā Hotel will provide view corridors in between buildings toward Haleakalā.

4. Coastal Ecosystems

Objectives:

- (A) *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;*

Analysis. As described in Section 2.4.4 of the DEIS, the project will not have a significant direct impact on the region's coastal ecosystem. In addition, with the incorporation of appropriate measures during construction, there is no anticipated significant adverse impacts to near shore waters from point and non-point sources of pollution.

5. Economic Uses

Objectives:

- (A) *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;*

Analysis. The proposed non-resort hotel development is situated within the MBP II and is an appropriate location for a new hotel with regards to the surrounding development and infrastructure. The development will be located on property that is adjacent to the Kahului Airport and will provide additional hotel rooms to accommodate current demand.

6. Coastal Hazards

Objectives:

- (A) *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;*

Analysis. As discussed in Section 2.1.3 of the DEIS, the project is located within Flood Zone “X” — representing areas of minimal flooding; hence, the Proposed Project is not anticipated to be impacted by flood related hazards. However, the Project Site is situated within Tsunami Evacuation Zone. Proper emergency and tsunami evacuation procedures will be adhered to.

7. Managing Development

Objectives:

- (A) *Improve the development review process, communication, and public participation in the management of coastal resources and hazards.*

Policies:

- (A) *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;*

Analysis. Pre-consultation has been conducted with various governmental agencies. These activities will include mail-outs and informational meetings to describe the Proposed Project and solicit issues that need to be addressed through the EIS and SMA permitting process. During the scheduled public hearings, the public will have an opportunity to review and comment on the Proposed Project. Landowners located within 500 feet of the project will be notified of the scheduled public hearing dates. Public hearing dates and location maps will also be published in the Maui News on two separate occasions. The public will be allowed to participate in the public hearing portion of the Maui Planning Commission's review process.

8. Public Participation

Objectives:

- (A) *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;*

Analysis. Neighboring Property Owners within 500 feet will be notified of the Special Management Area Permit Application, and will also receive certified notices of Public Hearing, for participation in a Public Hearing before the Maui Planning Commission.

Prior to the public hearing, pre-consultation will have been conducted with the adjacent property owners and governmental agencies. These activities will include personnel meetings, mail-outs, and informational meetings to describe the Proposed Project and solicit issues that need to be addressed through the Special Management Area permitting process. During the scheduled public hearings, the public will have an opportunity to review and comment on the Proposed Project. Landowners located within 500 feet of the project will be

notified of the scheduled public hearing dates. Public hearing dates and location maps will also be published in the Maui News on two separate occasions. The public will be allowed to participate in the public hearing portion of the Maui Planning Commission's review process.

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;*

Analysis. As discussed throughout the DEIS, the Proposed Project is not situated within the coastline. The Project Site is approximately 0.66 miles away from the coastline. Therefore, the project will not involve construction of any structures within the shoreline area and the subject property will not have a direct physical impact upon any public beaches — due to its separation from the coastline.

10. Marine and Coastal Resources

Objectives:

- (A) *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.*

Analysis. The Proposed Project does not involve the direct use or development of marine resources. The project will produce no direct impact on the region's coastal or marine resources, and with the incorporation of erosion and drainage control measures during construction and after construction as identified in this report, there should not be significant adverse impacts to near shore waters from point and non-point sources of pollution. Therefore, the subject project is not anticipated to produce a significant impact on a coastal or marine resource.

Maui Planning Commission Special Management Area Rules 12-202-12 (e)

1. The environmental setting of the subject property.

The Proposed Project is located within Kahului — in a development known as Maui Business Park Phase II (MBPII) and adjacent to the Kahului Airport — approximately 5-minute drive.

2. A description of anticipated impacts of the Proposed Project:

(A) *Affects natural or cultural resources (i.e., historic site, excavation on vacant land).*

The Proposed Action is not expected to have any adverse impact or destruction upon any natural, historical, or cultural resources as indicated in the Archaeological Assessment and the Cultural Impact Assessment (**See:** Appendices 14, 15.1, and 23). As discussed in Section 2.1.9 of this Draft EIS (Historical and Archaeological Resources), the Proposed Action involves a

supplemental document, i.e., the Supplemental Archaeological Inventory Survey Subsurface Testing Plan. Based on the results of the SAIS, Ruberti et al. (September 2021) recommend no further archaeological work for the project. Based on the information provided in the SAIS (Ruberti et al. April 2021), SHPD has determined that no historic properties affected for the current project permits. Pursuant to HAR §13-284-7(e), when the SHPD agrees that the action will not affect any significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS 6E historic preservation review process is ended and the permit issuance process may proceed. (See: Appendix 15.2, "SHPD Letter dated October 12, 2021).

(B) Curtails the range of beneficial uses of the environment.

The Project Site is graded with infrastructure including roads, water, sewer, and utilities located within the MBPIL. The Courtyard by Marriott hotel is located on the same street as the Proposed Project and does not introduce a new use to the area. The project will not curtail the range of beneficial uses of the environment in the project vicinity.

(C) Conflicts with the County's or the state's long-term environmental policies or goals (i.e. State Plan, County General Plan, and Community Plan).

While the Project requires Land Use Designation Changes, it is in compliance with the state's long term environmental goals. Adequate mitigation measures will be implemented to minimize the potential for negative impacts to the environment. In the context of the Wailuku-Kahului Community Plan and Maui County Zoning Designation, the Proposed Project will require a CPA and a CIZ.

Prior to the Maui Planning Commission's review and decision on an SMA Major Permit Application, the Project Site will have the appropriate Land Use Designations.

(D) Affects the economic or social welfare and activities of the community, county, or state.

The proposed hotel will have a positive impact on the economy by creating construction jobs and full-time operations employment after construction. In addition, the project will contribute towards the Maui County affordable housing fund — as discussed in Section 2.2.1 of this Draft EIS (Population and Housing). As infill development within the State Urban District, and as a proposed use that operates in support of the Kahului Airport, it is anticipated that the Proposed Action will not have a negative effect.

(E) Involves secondary impacts, such as population changes (i.e., increase/decrease) and increased effects on public facilities, streets, drainage, sewage, and water systems, and pedestrian walkways (i.e., increased demands and deficiencies).

All anticipated impacts will be addressed with mitigation measures as have been presented in this Draft Environmental Impact Statement (DEIS). The Applicant will work with the community, Federal, State & County Agencies including the Maui County Urban Design Review Board and seek conditional approval of the State Land Use Commission, Maui County Council and Maui Planning Commission in order to identify requirements and mitigation measures for the proposed Action.

(F) By itself has no significant adverse effects but cumulatively has considerable effect upon the environment (i.e., increased traffic and deficiencies in services) or involves a commitment for larger actions (i.e. more public infrastructure, such as roads, waterlines, sewers, etc.).

Any cumulative increases in impacts will be addressed with appropriate mitigation measures, as discussed in Chapter 4 of this Draft EIS.

(G) Affects a rare, threatened, or endangered species of animal or plant, or its habitat (i.e. wetlands, natural area reserves, refuge).

There are no known rare, threatened, or endangered species of animal or plant, or associated habitat on the property. A full discussion about the flora and fauna is discussed in Section 2.1.6 of this Draft EIS including the recommended avoidance and minimization measures from the USFWS.

(H) Is contrary to the state plan, county's general plan, appropriate community plans, zoning and subdivisions ordinances.

The property is currently not zoned or designated for hotel use in the Wailuku-Kahului Community Plan; however, there is an operating hotel on the same street making the proposed use compatible with the existing surrounding uses. Provided land use designation changes are obtained to achieve consistency of the Proposed Project with State plan, County's general plan, community plan, zoning, and subdivisions ordinances.

(I) Affects air or water quality or ambient noise levels (i.e. construction impacts).

The Proposed Action is not anticipated to result in any long-term impacts to air or water quality or noise levels. Ambient noise levels during construction will be mitigated by limiting construction during daylight hours and ensuring the application of BMPs during the

construction process.

(J) Located in or does affect an environmentally sensitive area, such as flood plain, shoreline, dunes, tsunami-zone, erosion-prone area, geologically hazardous land, estuary, fresh waters, or coastal waters.

The Proposed Project is situated approximately 0.66 mile from the shoreline. The entire project area is located within Flood Zone “X” — outside the 0.2% annual change floodplain (See: Figure 16, “Flood Map”). The subject property does not abut the shoreline; however, the property lies within the Tsunami Evacuation Zone (See: Figure 5, “Tsunami Evacuation Zone Map”). There are no anticipated impacts to any environmentally sensitive areas with implementation of BMPs. Emergency tsunami evacuation procedures will be adhered to during any tsunami occurrences.

(K) Alters natural land forms (i.e. cut and fill, retaining walls) and existing public views to and along the shoreline.

The Project Site has already been graded and improved with roads, sidewalks, water meters, sewer, and utilities — following the previously approved MBPIL. The Project Site is located approximately 0.66 miles from the ocean and will not impact views to and along the shoreline.

(L) Is contrary to the objectives and policies of Chapter 205A, HRS.

In light of the foregoing, the Proposed Action is not contrary to the objectives and policies of HRS chapter 205A.

3.9 Entitlements and Approvals

Table 15. Anticipated Entitlement and Permit Approvals	
Permit / Approval	Responsible Authority
Federal	
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration Hawai'i District Office
State	
Amendment of Decisions & Order (D&O) Docket No. A03-739	State of Hawai'i Land Use Commission
Hawai'i Revised Statute (HRS) Chapter 343 Compliance	State of Hawai'i Land Use Commission
HRS Chapter 6E Compliance (Historic Preservation Review)	State of Hawai'i, State Historic Preservation Division (SHPD)
National Pollutant Discharge Elimination System (NPDES) Permit	State of Hawai'i, Department of Health, Clean Water Branch
Permit to Perform Work within the State Right-of-Way (ROW)	State of Hawai'i, Department of Transportation (DOT)
Air Pollution Control Permit	State of Hawai'i, Department of Health (DOH)
Community Noise Permit	State of Hawai'i, DOH
Well Construction/Pump Installation Permit	State of Hawai'i, Department of Land and Natural Resources (DLNR), Commission on Water Resource Management (CWRM)
County	
Change in Zoning (CIZ)	Maui Planning Commission and Maui County Council
Community Plan Amendment (CPA)	Maui Planning Commission and Maui County Council
Project Design Review	Maui Urban Design Review Board
Special Management Area (SMA) Use Permit	Maui Planning Commission
Subdivision	County of Maui, Department of Public Works, Development Services Administration
Grading and Grubbing Permit	County of Maui, Department of Public Works, Development Services

Table 15. Anticipated Entitlement and Permit Approvals	
Permit / Approval	Responsible Authority
	Administration
Driveway Permit	County of Maui, Department of Public Works, Development Services Administration
Building Permits	County of Maui, Department of Public Works, Development Services Administration
Wastewater Discharge Permit	County of Maui, Department of Environmental Management, Wastewater Reclamation Division

4. CONTEXTUAL ISSUES

4.1 Relationship between Local Short-term Uses of Humanity's Environment and Enhancement of Long-term Productivity

This section discusses the relationship between the short-term uses of humanity's environment and how those uses may compromise or enhance the long-term productivity of that environment. Short-term uses refer to the temporary phase of project construction during the Hotel's build-out. Long-term productivity refers to the environmental trade-offs related to the Hotel operations in perpetuity.

4.1.1. Trade-offs Among Short-Term and Long-Term Gains and Losses

Short-term uses of the site for construction of the Kahahā Hotel would result in temporary impacts on the environment because of construction-related activities. These impacts include localized degradation of water quality, air quality and increased noise levels in the project vicinity. Solid waste generated during construction is also a short-term impact. Many short-term impacts can be avoided or mitigated by implementation of construction BMPs.

Applicable water quality BMPs include implementing erosion control measures, directing storm water run-off to detention/retention basins, and preventing the release of fuel or other contaminants.

Air quality mitigation measures include dust fences, frequent watering of bare dirt areas for dust control, limiting the area that can be disturbed at any given time, applying chemical soil stabilizers, and mulching and/or using wind screens. Road cleaning, tire washing and requiring all trucks hauling materials that can become airborne to have covered beds are also mitigation measures used to limit and eliminate possible impacts to air quality. Paving of parking areas and/or establishment of landscaping as early in the construction schedule as possible can also lower the potential for fugitive dust emissions. Further, the promoting of energy conservation programs and recycling programs during the operations of the Proposed Action may also serve as mitigation.

Audible construction noise will probably be unavoidable during the entire project construction period. Deleterious short-term impacts will be mitigated by; the use of properly muffled construction equipment being required on the job site, the incorporation of State Department of Health construction noise limits and curfew times — applicable on the island of Maui. The project will comply with State Department of Health noise regulations for construction activities. As stipulated by DOH permit requirements, noise-generating construction activities are not allowed on Sundays and holidays, during the early morning, and during the late evening and nighttime periods.

Short-term solid waste mitigation measures will include but are not limited to preparation of a solid waste management plan during construction as required by County regulations, construction and demolition waste will be properly disposed, green waste will be mulched on-site when practicable, and on-site recycling opportunities can be implemented to reduce solid waste entering the landfill.

The Project Site is located in the State Land Use Urban District, County-Zoned M-1 Light Industrial Conditional Zoning (Ordinance 3559), designated as Light Industrial (LI) in the Wailuku-Kahului Community Plan and located within the Urban Growth Boundary of the Maui Island Plan. It is within the Maui Business Park II, and as such, short-term impacts of development would be considered inevitable for the area in question. These lots would experience construction development at some point in time and incur the short-term impacts associated with such action.

The tradeoffs among these short-term impacts are the increase in employment and immediate economic benefits of construction-related activities. These short-term impacts and benefits are documented in this Draft EIS.

In the long-term, the operation and building construction associated with the Kahahā Hotel will create employment and would contribute towards Maui's economy. Economic diversification and the creation of "living wage jobs" are key objectives of the Maui Island Plan and County-wide Policy Plan. These long-term benefits far outweigh the short-term losses associated with construction.

4.1.2. Extent to Which Proposed Action Forecloses Future Options

It is not anticipated that the construction and operation of the proposed Kahahā Hotel would result in foreclosure of future options. Ultimately, the long-term build-out of the Kahahā Hotel will produce impacts that must be weighed against the project's benefits. Increased development will lead to an increase in traffic in immediate area, whether in the form of guests staying at the Kahahā Hotel or employees commuting to the Kahahā Hotel during regular business hours. With the project, the volume of traffic coming in and out of the Kahahā Hotel will increase. This will affect regional traffic conditions by increasing volumes on the region's existing roadway network. As documented in Section 2.4.1 of the DEIS.

Likewise, a hotel will produce demands upon the island's drinking water resources and public services such as police and fire. These impacts and the necessary mitigation measures are documented in Chapter 2 of the DEIS.

4.1.3. Narrows the Range of Beneficial Uses

It is not anticipated that the construction and operation of the proposed Kahahā Hotel would narrow the range of beneficial uses of the environment. The Project Site is in a highly developed area that completely avoids loss of undisturbed, forest, and agricultural land. Instead, the Proposed Project utilizes the existing conditions that support urban land uses equipped with infrastructure and within an established region. With regard to long-term productivity, this proposed hotel project is expected to be heavily utilized by business travelers and others wanting to stay in Central Maui. The proposed Kahahā Hotel project will create jobs both temporary construction jobs and permanent long-term employment. The economic impacts associated with the short and long-term implementation of the Kahahā Hotel are thoroughly documented in Chapter 2 of the DEIS.

4.1.4. Long-term Risks to Public Health and Safety

It is not anticipated that the Proposed Project would result in long-term risks to public health and safety. This Draft EIS includes studies and assessments to help analyzing potential impacts to public health and safety, including but not limited to, Environmental Impact Assessment (ESA), climate change assessment, air quality study, noise quality study, traffic study, groundwater resources, and preliminary engineering and drainage study.

The short-term and long-term impacts that could result from the Proposed Action are documented in Chapter 2 of the DEIS.

As documented in Chapter 2 of the DEIS, Phase I and II of the ESA for the Proposed Project found no evidence of recognized environmental conditions in connection with the subject property. The Phase II ESA concluded that soil surfaces at the Project Site do not appear to be impacted with chemicals of potential concern (COPC). No impacts from hazardous substances are anticipated at the site based on the conclusions of the Phase I and II ESA reports.

As documented in Chapter 2 of the DEIS, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal requirements. These long-term impacts on air quality depend on the demand levels. Renewable energy sources, if developed, could reduce these emissions substantially. Incorporating energy conservation design features and promoting energy conservation programs within the proposed hotel could also serve to reduce any associated emissions.

Presently, all solid waste on Maui is landfilled, and any associated air pollution emissions are relatively negligible. Nevertheless, promoting conservation and recycling programs within the proposed hotel could serve to further reduce any associated impacts.

As discussed in Chapter 2 of the DEIS, future traffic noise levels at the proposed hotel should not exceed 61 DNL by 2025. For these reasons, traffic noise impacts resulting from project traffic are not expected — and traffic noise mitigation measures should not be required.

Cumulatively, the project will contribute to the total GHG emissions for the State. However, these increases are anticipated to be negligible relative to overall emissions. Moreover, increases in the commercial sector have already been anticipated in emission inventories for the State and are expected to be offset by even greater reductions in emissions produced by the energy industries. As documented in Chapter 2 of the DEIS.

Also discussed in Chapter 2 of the DEIS, the results of the present survey indicate that water quality within the survey area downslope from the Kānāhā Hotel Project Site are near, or within the appropriate Department of Health Water Quality Standards — indicating that at present there are no significant factors from land influencing water quality. The

small amount of groundwater input at the shoreline is rapidly mixed to background coastal oceanic values through wave action and other physical processes.

4.2 Irreversible and Irretrievable Commitments of Resources

4.2.1. Use of Non-Renewable Resources

Implementation of the development will result in the irreversible and irretrievable commitment of certain natural and fiscal resources. Major resource commitments include the land and capital, construction materials, non-renewable resources, labor, and energy required for the Plan's implementation. Impacts represented by the commitment of these resources must be weighed against the positive socio-economic benefits that could be derived from the project versus the consequences of either taking no action or pursuing another less beneficial use of the area.

When fully built out, the development will be updated into an integrated and vibrant mixed-use community focused on a regional employment base.

As with any construction activity, nonrenewable resources such as fossil fuel and construction material will be irrevocably committed. Labor will be required for planning, engineering, and construction. New hotel uses will generate increases in the demand for water, electricity, and sewer services. Similar types of developments proposed on other parts of Maui will also generate demand for these resources. Chapter 2 of the EIS documents the Project's short- and long-term impacts.

4.2.2. Irreversible Curtailment of the Range of Beneficial Uses of the Environment

As discussed in Chapter 2 of the DEIS, the Project Site is currently vacant and improved with roadways and utility services. The Project Site is located in the State Land Use Urban District, County-Zoned M-1 Light Industrial Conditional Zoning (Ordinance 3559), designated as Light Industrial (LI) in the Wailuku-Kahului Community Plan and located within the Urban Growth Boundary of the Maui Island Plan. The Project Site is situated within the Maui Business Park Phase II (MBPII) which includes approximately 179 acres of land designated for light industrial development in Kahului and adjacent to the Kahului Airport and Kahului Harbor.

Kahului has been known as the Maui's commercial and business hub, home for a variety of businesses including but not limited to retail, car rentals, visitor accommodations, warehouses, and eating and drinking establishments.

The proposed hotel site is located within an urban area adjacent to other urban developed lands. There are no adjacent farms or active agricultural uses. In addition, the Project Site is not situated within the shoreline nor in close proximity to the shoreline. Based on the foregoing, it is not anticipated that the Proposed Project will involve irreversible curtailment of the range of beneficial uses of the environment.

4.2.3. Possibility of Environmental Accidents

The Proposed Project will implement Best Management Practices (BMPs) to ensure that adequate protective measures are in place to prevent and minimize possible adverse impacts on the environment and public health, safety, and welfare. The BMPs will include but not limited to the following:

- Monitoring Procedures and Protocols
- Structure, Authority, and Responsibilities
- Training
- Health and Safety
- Inspection and Monitoring
- Emergency Procedures, Spill Response Plan, and Contacts
- Vehicle, Equipment, and Materials Management
- Noise Control
- Dust Control
- Air Pollution Control
- Waste Management
- Oil and Spill Containment
- Operational Controls
- Contingency Plan
- Suspension of Work
- Record Keeping and Documentation

More BMPs and mitigation measures are discussed in Sections 2.1, 2.3, and 2.4 of the DEIS. To mitigate accidental release of construction equipment fluids contaminating nearby surface and coastal waters, construction controls required by NPDES permits and

compliance with the County of Maui's Rules Relating to Water Quality would reduce the risk of sediment and construction-related contaminants reaching nearby surface and coastal waters. Any discharges related to project construction or operation activities will be required to comply with applicable State water quality standards as specified in HAR, Chapter 11-54 "Water Quality Standards" and HAR, Chapter 11-55 "Water Pollution Control." In addition, to mitigate accidental release of construction equipment to the air, the Proposed Project will ensure coordination with the State DOH, Clean Water Branch and compliance with HAR, Chapter 60.1 "Air Pollution Control".

4.3 Cumulative and Secondary Impacts

Cumulative impacts are defined 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.

Secondary impacts are those impacts that are caused by the project but occur later in time or farther in distance, but which are reasonably foreseeable. They can be viewed as actions of others that are taken because of the presence of the project. For example, a new highway may serve to improve access or increase capacity in a region thereby resulting in secondary impacts such as induced development or changes to land use patterns.

The build-out of the Kahahā Hotel is likely anticipated to mainly result in minor cumulative and secondary impacts that affect the businesses and residents of Kahului. Implementation of the project, when added to other adopted and proposed projects, although the project may have a significant effect some cumulative effects on a regional or island-wide scale.

The scope of the cumulative and secondary impacts analysis involves the geographic extent of the effects and the time frame in which the effects could be expected to occur. For this Draft EIS, the geographic extent was defined as the projects occurring within a 1-mile radius of the project site of the proposed Kahahā Hotel. A 1-mile radius was used because it is considered an appropriate distance at which other projects would be close enough to the project site to reasonably result in cumulative or secondary impacts on the environment. Any projects beyond that geographical area are only included due to their potential to generate broader regional or island-wide environmental impacts that may also result in cumulative impacts.

Table 16 presents projects situated within the 1-mile radius of the project site of the proposed Kānāhā Hotel and considered in the cumulative and secondary impacts analysis. (See: Figure 22, “Other Projects Within 1-Mile and Beyond”)

Table 16. List of Other Projects Within The 1-Mile Radius of the Kānāhā Hotel Project Site			
No.*	Project	Location	Proposed Project
1	Maui Business Park Phase II	Kahului, Maui	Proposed commercial development as a part of the Maui Business Park Phase II on the following TMK nos. <ul style="list-style-type: none"> • (2) 3-8-101:001-047, • (2) 3-8-102:001-010, and • (2) 3-8-101:26x-27x.
2	Skyline Eco-Adventures	Kahului, Maui	The project proposes to build a 7,000 square foot corporate office building and a 5,900 square foot vehicle maintenance building and baseyard. Proposed to be located within the Maui Business Park North Project Area (MBPII).
3	Keolani Triangle Retail Center	Kahului, Maui	The Keolani Triangle Retail Center proposes an approximate 1,800 square foot drive-through restaurant and approximately 3,000 square feet of retail space. Proposed retail center to be located on the vacant parcel of land bound by Keolani Place to the north, Haleakalā Highway to the south and the existing Courtyard Marriott Hotel to the east.
4	Costco Gas Expansion	Kahului, Maui	Proposed installation of 10 new fuel dispensers at the existing Costco Gas Station located at the southwest corner of the Haleakalā Highway/Lauo Loop West

Table 16. List of Other Projects Within The 1-Mile Radius of the Kahahā Hotel Project Site			
No.*	Project	Location	Proposed Project
			intersection. However, SMA permit for this project was withdrawn.
5	Lot 38 Shopping Center	Kahului, Maui	Proposed development of Lot 38 Shopping Center at TMK no. (2) 3-8-001:269. This development is situated within the Maui Business Park South Project Area. (MBP II)
6	Kihei Auto Sales	Kahului, Maui	Proposed Car Dealership at TMK no. (2) 3-8-101:029. (MBP II)
7	Maui County Service Center	Kahului, Maui	Completed and currently used as Maui County Service Center, i.e., Maui County Government Offices and Division of Motor Vehicles (DMV) at TMK no. (2) 3-8-101:001. (MBP II)

**Numbering follows the project identifier on Figure 22, "Other Projects Within One Mile and Beyond".*

The above table includes several project sites within the Maui Business Park Phase II. Impacts and mitigation measures for the development were assessed and discussed in the December 2004 Maui Business Park Phase II Final Environmental Impact Statement (2004 MBP II FEIS) as noted herein: it should be noted that mitigation measures as conditions of approval have and are being complied with as discussed in annual Compliance Reports for the MBP II (See: Appendix 25).

"Land uses within MBP II will be consistent with the M-1 Light Industrial District (Ch. 19.24, Maui County Code) and may include warehousing and distribution businesses as well as retailing, light manufacturing, research facilities, offices and other uses. Both project areas [North & South] will contain a variety of lot sizes to serve the needs of various types of businesses allowed within the Light Industrial District." Maui Business Park Phase II Final Environmental Impact Statement (FEIS) December 2004, Section 1.2.1.

“Development of the Maui Business Park Phase II will transform fields that are currently fallow or used for sugar cultivation into a business park providing light industrial and commercial space. For areas of environmental concern, appropriate mitigation measures have been planned as part of the project... For areas of particular concern, the following summarizes the associated mitigation measures that are either recommended or planned to ensure that potential adverse impacts are minimized or mitigated.” Maui Business Park Phase II Final Environmental Impact Statement (FEIS) December 2004, Section 1.2.2.

The impacts in the 2004 MBP II FEIS are consistent with development of MBP II for Light Industrial uses. The 2004 MBP II FEIS proposed mitigation measures for potential impacts consistent with Light Industrial use [updated language in parentheses], as summarized in Table 17 below. It should be noted that mitigation measures as conditions of approval have and are being complied with as discussed in annual Compliance Reports for the MBP II (See: Appendix 25). No impacts are anticipated as a result of the proposed Hotel use that would add to the cumulative impacts already accounted for within MBP II, as identified in Table 17.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
Botanical Resources	The majority of vegetation is [was] found to be introduced species, with ilima, popolo and uhaloa being native Hawaiian plants. Design standards for the MBP II includes a unified streetscape design theme and program. Landscaped medians and berms will be [are] incorporated in the primary collector road, Ho’okele Street. Landscape plants will include drought	None See Kahahā Hotel DEIS Section 2.1.6	Light industrial development impacts would likely be similar with the Proposed Project, which does not warrant mitigation measures for botanical resources.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
	tolerant species and xeriscaping. Parking areas will be landscaped.		
Wildlife Resources	No threatened or endangered species were recorded. Larvae of the Blackburn's sphinx moth were sometimes found on tree tobacco plants, which were identified during the botanical survey. A&B properties, Inc. in coordination with the U.S. Fish and Wildlife Service has developed a program for tree removal without harming the Blackburn's sphinx moth. The business park will involve the clearing of sugar cane and scrub vegetation, which will alter existing habitats. New landscaping will be developed throughout the business park project to provide new habitats.	None See Kanahā Hotel DEIS Section 2.1.6	Impacts to wildlife resources from light industrial or the proposed hotel development would likely be similar. Landscaping would be maintained, and wildlife hazards would be mitigated.
Agricultural Impact	Development of MBP II will require [required] the withdrawal of the site from agricultural use. However, it is [was] anticipated that MBP II would not contribute to a significant reduction in HC&S revenues or any reduction of sugar plantation employment due to	None See Kanahā Hotel DEIS Section 2.1.11	Light Industrial development would result in similar urban development as the Proposed Project.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
	technological advancements to yields per acre [and currently due to the cessation of HC&S operations]. In addition, given the large supply of land in other areas on Maui available for agriculture due to the decline of plantation agriculture, use of the 179 acres for MBP II is not anticipated to affect statewide growth of diversified agriculture.		
Archaeological Resources	Although it is not anticipated that there are any archaeological or historic resources on the Maui Business Park Phase II site, should any sites be found during construction, A&B Properties, Inc. and its contractors will comply with all state and county laws and rules regarding the preservation of archaeological and historic sites.	None See Kanahā Hotel DEIS Section 2.1.9	SHPD has determined that no historic properties affected for the current property, therefore Light industrial development impacts would be similar to a hotel.
Cultural Impacts	A cultural impact assessment, conducted for the site by Aki Sinoto Consulting, included researching historical records and interviewing individuals knowledgeable with the area. Based on these sources, the report	None See Kanahā Hotel DEIS Section 2.2.3	The CIA concludes that no historic properties affected for the current property, therefore Light industrial development impacts

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
	concluded that the Maui Business Park Phase II is not expected to affect cultural resources of the area. In fact, individuals felt that growth and expansion was necessary for Kahului.		would be similar to a hotel.
Access and Trails	The site of Maui Business Park Phase II is not along the shoreline, nor does it provide primary access to the mountains. There are no known traditional trails through the property... Relative to the existing agricultural use of the site, the establishment of Maui Business Park Phase II will make the area more accessible.	None See Kanahā Hotel DEIS Section 2.1.9	Not applicable, the site of Maui Business Park Phase II is not along the shoreline, nor does it provide primary access to the mountains.
Traffic	The traffic impact analysis report prepared for Maui Business Park Phase II... concludes that with an equal proportion of light industrial/warehouse use and retail/office use within Maui Business Park Phase II, and with the recommended mitigation measures, the roadway network can accommodate traffic generated by Maui Business Park Phase II.	None See Kanahā Hotel DEIS Section 2.4.1	Both uses would benefit the Maui economy. long-term impacts would generate slightly different results depending on the type and size of the light industrial development.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
Population	Maui Business Park Phase II is not expected to generate a significant increase in resident population as it is anticipated the majority of persons to be employed at Maui Business Park Phase II will be current Maui residents. These would include the employees of existing businesses relocations to Maui Business Park Phase II as well as new business that would employ Maui residents.	None See Kānāhā Hotel DEIS Section 2.2.1	The impact to population for light industrial and hotel uses are not expected to generate an increase in resident population, therefore light industrial uses would result in similar population impacts as the project.
Public Services	Because Maui Business Park Phase II is not expected to generate a significant increase in resident population, a minimal need for public services is anticipated. Tax revenues generated from Maui Business Park Phase II are expected to contribute to State and County revenues in excess of the public expenditures necessary to support the development. Net benefits to the State of between \$44 to \$51.4 million annually are anticipated. Net benefits to the County of between \$1.7 to \$3 million annually are projected.	None See Kānāhā Hotel DEIS Section 2.3	The light industrial and hotel uses are not expected to generate a significant increase in population therefore significant demands upon public services, and utilities and service systems are not anticipated.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
Economic Impacts	Maui Business Park Phase II will provide opportunities for economic growth diversification to meet long-term community and regional needs relative to the present [past] agricultural use of the property.	None See Kanahā Hotel DEIS Section 2.2.12	Both uses would benefit the Maui economy. long-term impacts would generate slightly different results depending on the type and size of the light industrial development.
Water	A&B Properties, Inc. will participate in the funding and construction of adequate water source, storage, and transmission facilities and improvements to accommodate water use generated by Maui Business Park Phase II. A&B Properties, Inc. has substantial rights to the surface water flowing in the Waihe'e and Spreckels Ditches. Sufficient flow from either or both ditches could be appropriately treated at an off-site surface water treatment plant and delivered to the County Department of Water Supply's (DWS) Central Maui System to produce a potable supply for Maui Business Park Phase II. Once in the Central Maui	None See Kanahā Hotel DEIS Section 2.4.3	The light industrial use would have less impact regarding groundwater resources because a new water well would not be required to withdraw additional water from the Kahului Aquifer, therefore more water would naturally remain in the aquifer. The property has an existing adequate private water source for future light industrial development.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
	System, water could then be conveyed via existing transmission line through Kahului to the site.		
Wastewater	The County of Maui's existing wastewater system services the Kahului industrial area. A&B Properties, Inc. will design and construct a sewage system in accordance with County of Maui standards to carry wastewater from Maui Business Park Phase II site to the existing wastewater system. Sewage will eventually flow through a force main to the Wailuku-Kahului Wastewater Reclamation Facility (WWRF).	None See Kahahā Hotel DEIS Section 2.4.4	Both uses would utilize the existing wastewater system. Adequate capacity is available currently.
Solid Waste	To the extent practical, solid waste will be minimized and recycled. It will be recommended to contractors that a job-site recycling plan should be developed and, as much as possible, construction and demolition waste should be recycled. Solid waste generated at Maui Business Park Phase II that cannot be recycled will be collected by private waste collection companies or by the	None See Kahahā Hotel DEIS Section 2.3.5	Both uses will generate solid waste. long-term impacts would generate slightly different results depending on the type and size of the light industrial development.

Table 17. Summary of Mitigation Measures Proposed Within the 2004 MBP II FEIS			
2004 MBP II FEIS Category	2004 MBP II FEIS Mitigation Summary	Cumulative Effect After Proposed Hotel Use Mitigation	Comparison Statement of Light Industrial Impacts Versus Hotel Impacts
	County's Solid Waste Division and hauled to the Central Maui Landfill for disposal. Green waste from grubbing will either be chipped into mulch for use on site or will be taken to the green waste recycling centers. Following construction, recycling will be encouraged to provide for individual dumpsters to separate recyclable materials such as cardboard, from municipal solid waste.		
Drainage	A&B Properties, Inc. has already constructed two drainage basins on approximately 33 acres of land adjacent to the Maui Business Park Phase II. These currently serve Maui Business Park Phase II and have the capacity to also serve the South Area of Maui Business Park Phase II. Additional improvements will be made to ensure that Maui Business Park Phase II complies with all County drainage requirements and standards.	None See Kahahā Hotel DEIS Section 2.4.2	Both uses would utilize the existing drainage system. Adequate capacity is available currently. long-term impacts would generate slightly different results depending on the type and size of the light industrial development.

In addition to project sites within a 1-mile radius (Table 16), despite their distance from the proposed project site, the table below summarizes additional projects in the vicinity that are also considered relative to cumulative effects, given their potential regional impacts.

Table 18 summarizes the projects situated beyond the 1-mile radius of the project site of the proposed Kahahā Hotel. (See: Figure 22, “Other Projects Within 1-Mile and Beyond”)

Table 18. List of Other Projects Beyond The 1-Mile Radius of the Kahahā Hotel Project Site			
No.	Project	Location	Proposed Project
8	Hawaiian Cement Facility Relocation at Kahului Harbor	101 E Kaahumanu Ave., Kahului, Maui	Proposed relocation of Hawaiian Cement’s existing trans-shipment cement facility at Kahului Harbor as required by HDOT-H to implement the 2012 Kahului Harbor Development Plan.
9	Central Maui Senior Housing	Kahului, Maui	Proposed Central Maui Senior Housing by DHHC (conceptual) at the currently vacant lot, however, also used temporarily as Kahului Swap Meet site situated at Puunene Avenue (Ordinance 3329), TMK no. (2) 3-7-103:026.
10	Kahului Lani Senior Affordable Housing	Kahului, Maui	Kahului Lani senior affordable rental project at TMK (2) 3-7-005:003 by A&B KANE LLC / Catholic Charities Housing Development Corp (CCHDC).
11	Maui Transit Hub	Kahului, Maui	Proposed to relocate the Maui Bus Transit hub from its existing location at Queen Kaahumanu Center (QKC) to a portion of land fronting Vevau Street, on the northwest quadrant of the Vevau Street/School Street intersection, i.e., TMK no. (2) 3-7-004:003. The Vevau Street Bus Hub location will provide a canopy for shade, ticket booth,

Table 18. List of Other Projects Beyond The 1-Mile Radius of the Kahahā Hotel Project Site			
No.	Project	Location	Proposed Project
			restrooms, storage of six (6) buses and six (6) parking stalls for the transit hub employees.
12	Maui Beach Hotel Addition	Kahului, Maui	Proposed Maui Beach Hotel Addition at the former site of the Maui Palms Hotel, TMK no. (2) 3-7-003:007.
13	Central Maui Landfill Future Phase	138 Walker Street, Kula, Maui	Proposed future phase of the Central Maui Landfill expansion at TMK nos. (2) 3-8-003:004 (por), 019 (por), and 025 (por). In addition, proposed Material Recycling Facility (MRF) as a part of future phase of the Central Maui Landfill expansion at TMK nos. (2) 3-8-003:021 (por) and 025 (por).
14	Maui Lani The Fairways	Kahului, Maui	Proposed 50 single-family homes at multiple TMKs situated south of Hospice Maui.
15	Maui Lani The Parkways	Kahului, Maui	Proposed development of 210 single family homes at multiple TMKs situated south of the Dunes at Maui Lani Golf Course.
16	Greenway Project in Lieu of Vehicular Road Connection	Kuikahi Drive to Onehee Ave	Proposed Greenway Project, i.e., a multimodal transportation greenway corridor in lieu of the vehicular road connection identified as Subdivision Roadway Improvement Phase C2 of the Master Roadway Agreement between the County of Maui and Maui Lani Partners.

Table 18. List of Other Projects Beyond The 1-Mile Radius of the Kahahā Hotel Project Site			
No.	Project	Location	Proposed Project
17	Maui Lani Gentry	Kahului, Maui	Proposed housing development containing 385 units on a 47-acre property. Proposed development includes single-family, multi-family, and condos.
18	Maui Lani Village Commercial	Kahului, Maui	Mixed-use project on designated lots within Maui Lani Project District 1.
19	Wai'ale Affordable Homes	Kahului, Maui	Proposed development of Affordable housing component to satisfy Maui Business Park Phase II (MBPII), 50 acres of 100 units. TMK no. (2) 3-8-007:101.
20	Waikapu Light Industrial Park	Waikapu, Maui	Proposed Waikapu Light Industrial Park (conceptual) at the Old Maui Scrap Metals Facility.
21	Waikapu Country Town Wastewater Reclamation Facility	1670 Honoapiilani Hwy, Waikapu, Maui	Proposed development of an Aerobic Granular Sludge Technology (AGS) Water Reclamation Facility (WRF) to process and reuse wastewater from the Waikapū Country Town (WCT) development.
22	Hotel Wailuku	Wailuku, Maui	Proposed demolition of existing structures on the project parcels to enable the construction of a new select service, business focused hotel. The hotel will also have functional spaces and parking lot.

**Numbering follows the project identifier on Figure 22, "Other Projects Within One Mile and Beyond".*

The following section identifies secondary and cumulative impacts that may result from the development of the Kahahā Hotel.

4.3.1. Impacts to Surrounding Land Uses

As described in the DEIS, the entire property is designated Light Industrial (LI) by the Wailuku-Kahului Community Plan. The entire project area is located within the Maui Island Plan's Urban Growth Boundary. The Kahului area is expected to receive a portion of the island's population and employment over the next 20 years.

To better manage the island's growth and its related impacts, the County's Maui Island Plan identifies appropriate locations for development to occur. The project site is located in the Maui Island Plan Urban Growth Boundary.

4.3.2. Impacts to Natural and Environmental Resources

Assuming all BMPs and mitigation measures documented in this DEIS are implemented and all permit-induced requirements are complied with; no cumulative or secondary impacts are anticipated on the natural environment including no anticipated impacts to the Topography and Soils (Section 2.1.2 of this DEIS), Natural Hazards (Section 2.1.3), Climate Change (Section 2.1.4), and Hazardous Substances (Section 2.1.5).

4.3.3. Impacts to Flora and Fauna

Development of the Kahahā Hotel, together with other area projects, could have cumulative and/or secondary impacts on rare or endangered species of flora and fauna if natural habitats and/or species are directly or indirectly disturbed. As documented in Section 2.1.6 of the DEIS, the Project will not impact rare or endangered flora and fauna species. Adjacent proposed developments are likely to be required to conduct flora and fauna surveys prior to development. These surveys will be reviewed by the U.S. Fish and Wildlife Service and minimization measures will be required if warranted. In consideration of existing State and Federal regulations to protect rare and endangered species, there should be no significant cumulative and/or secondary impacts to flora and fauna resources arising from planned growth in the MBPIL.

4.3.4. Impacts to Air Quality

The cumulative impact of the build-out of the Kahahā Hotel, together with other development as previously described, will increase the amount pollutants entering the atmosphere. These pollutants will be generated temporarily during construction and in the long-term by an increase in demand for energy in the form of transportation fuels for automobiles and carbon-based fuels to power the Ma'alaea Power Plant. The construction- and operation-related air quality impacts are considered less than significant.

In the short-term, construction-related air quality impacts would result from airborne dust and exhaust emissions from internal combustion engines during site preparation and earth moving activities, the movement of construction vehicles on unpaved areas of the site, and from construction equipment. The construction contractor will be responsible for complying with State DOH regulations, which prohibit visible dust emissions at property boundaries thereby minimizing adverse impacts on air quality. In the long-term, the Proposed Action is not anticipated to result in a cumulatively substantial increase in emissions that would exceed national ambient air quality standards.

4.3.5. Impacts to Noise Quality

Similar with the impacts to air quality, the cumulative impact of the build-out of the Kahahā Hotel, together with other development as previously described, will increase the background noise within the immediate environs. These background noise will be generated from the short-term construction work, operation of the hotel and other nearby development, as well as traffic. Cumulative construction noise impacts are considered less than significant.

Short-term increases in noise levels will result from the use of construction equipment and vehicle movements on public roads and at the Project Site. The use of muffle equipment, noise barriers, and restrictions on construction hours, as well as adherence to State DOH regulations on noise mitigation will minimize construction equipment and vehicle noise, which would be rapidly attenuated in an urban environment. In the long-term, even with the project increases in future traffic noise levels along Lauo Loop—the 65 DNL contour should not extend beyond 23 feet from the centerline of Lauo Loop. Future traffic noise levels from the Proposed Action should not exceed 61 DNL by 2025. Therefore, vehicular noise emissions should not cause significant adverse impacts on existing noise sensitive noise receptors.

4.3.6. Impacts to Agricultural Resources

As documented in Section 2.1.11 of the DEIS, the Kahahā Hotel is located on State designated Urban land, therefore, the project is not expected to have a significant cumulative impact upon the long-term viability or growth of agriculture on Maui.

In regard to secondary impacts, urban development can impact agricultural land uses. In certain circumstances, urbanization of agricultural lands can cause agricultural lands prices to go higher making it more cost prohibitive for farmers to buy or lease land to farm. Second, urban development can create use conflicts between farmers and urban residents. The establishment of Urban Growth Boundaries in the Maui Island Plan create more predictable development patterns, and this will create more certainty in the urban and agricultural land markets; thereby, mitigating the escalation of agricultural land values. The Project Site is located within Maui's Urban Growth Boundary. Therefore, the Proposed Action is not anticipated to result in significant adverse impacts to agricultural land uses. In addition, the Kahahā Hotel will establish landscape planting around the perimeter of the property with a buffer to mitigate potential agricultural use conflicts.

4.3.7. Impacts to Surface Water Resources

The development of the Kahahā Hotel, together with other area projects, will increase the demand for drinking water. However, water supply for the project will be provided by the separate and private potable and non-potable water systems constructed to supply the Maui Business Park Phase II (MBPII). Irrigation water for the project's landscaped areas will be provided from this private water source. It should be emphasized that the project will not use DWS water.

With the private water system in place, significant cumulative and/or secondary impacts are not anticipated to threaten the long-term sustainability of the County's water resources.

4.3.8. Impacts to Coastal Water Resources

Development of the Hotel, together with other area projects, could have significant cumulative impacts to coastal water quality if BMPs are not strictly adhered to. During the construction phase, BMPs must be implemented to mitigate runoff of bare soils and other

construction contaminants into drainageways and culverts. If not properly mitigated, the cumulative impact of these contaminants could impact coastal water quality.

During the Project's operation phase, any increase in runoff will be maintained on site as required by the County's drainage rules and discussed in Section 2.4.2 of this DEIS. Maintaining runoff on-site, together with filtration of contaminants from runoff, will mitigate the Project's impact to coastal waters. Likewise, future developments in the area will be required to implement similar mitigation measures as part of their operation phase BMPs. Therefore, the Project, together with other planned projects in the area, should not have a significant cumulative impact on coastal water quality if construction and operation phase BMPs are strictly adhered to.

4.3.9. Impacts to Groundwater Resources

Development of the Hotel, together with other area projects, could have significant cumulative impacts to groundwater resources if BMPs are not strictly adhered to. During the construction phase and after the development, BMPs must be implemented to prevent material input to groundwater discharge by the development. If not properly mitigated, the cumulative impact of the contaminants could impact groundwater quality. Future developments in the area will be required to implement similar mitigation measures as part of their operation phase BMPs to prevent contamination to groundwater resources. Therefore, the Project, together with other planned projects in the area, should not have a significant cumulative impact on groundwater water quality if construction and operation phase BMPs are strictly adhered to.

Water supply for the project would be provided by the separate and private potable and non-potable water systems constructed to supply MBPIL. The impact to the Kahului Aquifer of supplying water for the Kahahā Hotel project is not considered to be significant for reasons detailed in Appendix 17: *Potential Impacts on Water Resources*. Wells would ultimately draw 0.0339 million gallons per day (MGD) from the Kahului Aquifer System, an increase of less than one (1) percent of current pumpage from the Aquifer and not considered to be a significant impact. Cumulative impacts of supplying water for the Hotel and MBPIL, likewise, are not considered to be significant. At full build out and occupancy of the MBPIL, the average use is projected to be 0.32 MGD. Full occupancy of the Kahahā Hotel will increase the projected ultimate use of 0.32 MGD to 0.35 MGD, a relatively modest increase that could likely be supplied by the two existing wells. Water supply for

other future projects, not including MBPIL, would likely utilize County of Maui water resources thereby not increasing the Proposed Project water supply cumulative impacts.

4.3.10. Impacts to Socio-Economic Environment

The development of the Kahahā Hotel, together with other developments as previously described, will increase population, create jobs, and generate tax revenues. Together, these projects will also increase the demand for housing and place increasing demands on infrastructure and public facility systems both locally and island wide.

The continued build-out of Kahului will also change the area's urban design character and sense of place. Today, Kahului is the commercial and transportation hub of the island however there are number of undeveloped infill parcels intermixed with lower and medium-density residential, strip commercial, industrial, hotel and public facility uses. In the coming years, pursuant to the land-use policies contained in the Maui Island Plan and Wailuku-Kahului Community Plan, Kahului will evolve to become a more unified and cohesive urban settlement. Urban development will likely become more compact, mixed-use and interconnected.

4.3.11. Impacts to Public Services and Infrastructure

As a precursor to preparing the Maui Island Plan, the County of Maui prepared the following infrastructure and public facility technical studies: Infrastructure and Public Facilities Issue Paper (September 2007), Public Facilities Assessment Update (March 2007) and Infrastructure Assessment Update (May 2003). These studies assess the impact of population growth on the island's infrastructure and public facility systems. In general, the studies conclude that on-going public and private sector investment will be necessary to accommodate growth through 2030.

The build-out of the Kahahā Hotel, together with other development as previously described, will increase the demand for infrastructure and public facility systems. These would include increased demand on water, wastewater, and roadways. The Applicant will continue to consult and coordinate with the appropriate agencies regarding capacity and improvements needed to accommodate the project.

The project proposes to use — potable and non-potable water — from the Maui Business Park II water system. As previously discussed, the system is privately owned A&B Properties and operated by Pural Water Specialty Company Inc. The project's onsite water distribution systems will be designed and constructed to provide water for domestic consumption, fire protection and irrigation. The project Applicant is working with A&B Properties in consultation with the Department of Water Supply to drill a third potable water well, in the vicinity of the two existing Waiale Wells, to provide an additional source of water for the MBP II and the proposed Kahanā Hotel.

The cumulative impact of hotel use wastewater is discussed as follows: According to Maui County Code 20.28.040 - Wastewater treatment facility expansion — Allocation of capacity, the expansion capacity of the Wailuku/Kahului treatment facility shall include 70,000 GPD for Hotel use. The Proposed 200-room Kahanā Hotel would contribute 30,000 GPD of wastewater (assuming 150 GPD per room). During the proposed Hotel Wailuku's public hearing on June 1, 2020, Maui County Urban Design Review Board made recommendations, including scaling back the hotel from six to four stories and revisiting traffic flow and the parking location. In its recommendation to scale back the hotel height, the board urged that the project comply with the current four-story limit in the Wailuku Redevelopment Area Zoning and Development Code. A four-story Hotel Wailuku would consist of 94-rooms. On June 9, 2020, the proposed Maui Palms Hotel received a 5-year extension of its Special Management Area (SMA) Permit for a 136 room, four-story structure. Given potential future hotel projects in the Wailuku/Kahului area totaling an additional 34,500 GPD (136-room Maui Palms Hotel and 94-room Hotel Wailuku), the total Hotel use wastewater quantity would total 64,500 GPD. Capacity and improvement requirements will be coordinated with the Department of Environmental Management.

By the year 2025, traffic without the project will have increased over existing conditions due to ambient growth and various developments. Based on zoning conditions, Costco is required to monitor the Haleakalā Highway/Costco Main Access/Courtyard by Marriott Driveway and design and construct a traffic signal if warranted. Based a traffic signal warrant analysis for the Haleakalā Highway/Lauo Loop West intersection, a traffic signal is not anticipated to be warranted by 2025 even with project volumes. The intersection is expected to operate similar to existing conditions with gaps in traffic generated by nearby traffic signals. Cumulative traffic impacts are not anticipated significant as study intersections are anticipated to experience minimal increases in overall delay ranging from 1-5 seconds. Additionally, the majority of intersection movements are expected to

experience minimal increases in delay from 1-7 seconds. The Applicant will continue to coordinate with the State and County Departments of Transportation regarding roadway improvements.

In addition to the foregoing, Table 4.1 and Figure 4.1 of the TIAR dated April 30, 2021 (See: Appendix 24) — identifies all of the background developments in the area that was included in the TIAR calculations, which is consistent with Table 16 of the DEIS. Maui Business Park (MBP) is a large master planned commercial/industrial subdivision that includes many unidentified parcels yet to be developed. Within the MBP South area, the TIAR includes remaining infill for the Puunene Shopping Center (Target) and the Hookele Shopping Center (Safeway), in addition to the Maui County Service Center and Kihei Auto Sales. Within the MBP North area, the Skyline Eco-Adventures parcel and Costco Gas Expansion were included in the TIAR; however, it is understood that Costco is not proceeding with their planned gas expansion. Therefore, the TIAR is conservative. The TIAR concludes that the Project will minimally increase the majority of vehicular movement delays by 1-2 seconds and all study intersection movements will operate below capacity, therefore no improvements are recommended.

Together with other development, the project would additionally increase demand on the public services including solid waste, schools, parks, medical facilities, emergency management agency, and public transit. Property taxes generated by the development, together with other planned projects in the area, will help fund County operations and capital improvement projects.

Together with other development, the Project, which due to its limited size is not expected to have a great impact on the average daily census of Maui Island, will result in an increase in demand on public services including solid waste, schools, parks, medical facilities, emergency management agency, and public transit. As described above the proposed infrastructure improvements for the Project are intended to mitigate the insignificant increase in demand on certain public services resulting from the project. Residential projects are typically required to pay school impact fees to mitigate the increase in the demand for schools, this project is not anticipated to have a significant impact on the schools. The proximity of the project to the Kahului Airport conceptually will result in a reduction of traffic from the airport area to the resort areas. The public transit system is fee based, the income generate from fees should serve to mitigate any impacts from increased use of the system. Property taxes generated by the development, together with other

planned projects in the area, will help fund County operations and capital improvement projects to accommodate and offset the increase in demand for all public services.

4.3.12. Impacts to Tourism

Overtourism is the cumulative impact of the overall industry that is primarily focused in West and South Maui on the island. The Maui County Council's Planning and Sustainable Land Use Committee recommended passage of a bill relating to a moratorium on new transient accommodations on Maui. The bill will require two (2) readings by the Maui County Council in order to be adopted. As proposed, the moratorium is for a two-year period or until the council enacts legislation implementing appropriate recommendations from its investigative group, whichever is sooner. The bill also contains various project dependent exceptions to the moratorium.

The proposed Kahahā Hotel will comply with the requirements of Chapter 2.96, Maui County Code, the County's Residential Workforce Housing Policy. The creation of additional hotel units will address tourist needs, reducing the need to convert dwellings in residential neighborhoods into short term rentals. The proposed Kahahā Hotel is intended to cater to the needs of business/non-leisure travelers, to support new, emerging business sectors which will diversify Maui's economy, eventually leading to a decrease in Maui's dependence on tourism, potentially reducing and/or eliminating "overtourism".

During preparation of the DEIS, Resolution 21-98 was adopted by the County Council thereby transmitting to the Maui Planning Commission a proposed bill to amend the Maui County Code (MCC) to establish a moratorium on new transient accommodations on the island of Maui. New transient accommodations have been defined as any structure intended to be used for transient accommodation, including hotels, timeshares, short-term rental homes, and transient vacation rental units, that is not in operation as a transient accommodation as of the effective date of this ordinance, but excluding bed and breakfast homes.

The Moratorium focuses solely on the Maui Island Plan's policy to, "[p]romote desirable island population by striving to not exceed an island-wide visitor population of roughly 33 percent of the resident population[.]" failing to address other portions of the Maui Island Plan which recognize the importance of supporting the visitor industry and provide other policies to maintain residents' quality of life.

Kloninger & Sims Consulting, LLC. prepared a Maui Lodging Market Analysis dated September 15, 2021. This report analyzes the Maui lodging market and evaluates the impact of the development of the proposed Kānahā Hotel within Maui's mix of lodging inventory. The report also provides direct commentary on the issue of overtourism and the policy that aims to limit the number of visitors on the island. The report produced the following findings.

Maui arrivals and Maui Island's Average Daily Visitor Census ("ADC") have increased in recent years, driven by the growth in supply of vacation rentals.

The ADC for Maui has exceeded the 33.33% visitor to resident metric on an island-wide basis on recent years. In Central Maui, where the proposed Kānahā Hotel would be built, the estimated visitor ratio is below 10%.

Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-Term Rental Homes and Bed & Breakfasts (collectively referred to as "vacation rentals" in the report) providing an alternative to Maui's high-priced hotel rooms.

Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.

The proposed Kānahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

The report also finds that an increase in Maui's visitor arrivals and ADC coinciding with a decrease in the number of hotel rooms suggests that the growing supply of other accommodation types, particularly vacation rentals, has driven Maui's tourism growth in recent years. As such, a moratorium on new hotel construction would likely not address concerns about overtourism on Maui.

The report indicates that the number of vacation rentals has declined since Maui County entered into agreements with Expedia (VRBO) and Airbnb, to enhance the County's ability to enforce laws against illegal TVRs. The reduction in illegal TVRs is expected to lead to a reduction in Maui Island's ADC.

Citing data from the Hawaii Tourism Authority (“HTA”), the report identifies a Year-to-date 2021 ADC for Maui Island of 52,769 and based on the 2020 Census the population of Maui Island was 154,100, which shows a visitor ratio of 34.2%, which is only slightly higher than the desired Maui Island Plan metric of 33.33%. The report also indicates that the seasonality of Maui tourism typically results in a slow down during fall before picking up near Christmas, estimates show a Maui Island ADC of approximately 50,289 which would result in a visitor ratio of an acceptable 32.66%. The proposed Kahahā Hotel is anticipated to contain 200 hotel rooms with an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, and with 2.3 individuals per room. Kahahā Hotel is anticipated to accommodate an average of 138 visitors per night. This translates to a contribution of 0.27% of the 33.33% ADC policy metric. Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kahahā Hotel on an average night would equal 0.09% of the island’s resident population of 154,100.

The Maui Island Plan functions as a regional plan and addresses the policies and issues that are not confined to just one community plan area, including regional systems such as transportation, utilities, and growth management, for the Island of Maui. Related to the impacts of future hotel development, it is important to consider the potential island-wide cumulative impact of all known future hotel expansion and additions. In the context of the above discussion, several proposed Hotel projects, if completed, would add to the island-wide Hotel room inventory, and have the potential to create cumulative impacts with respect to ‘overtourism’.

Potential known future hotel room additions total 898 rooms on the Island of Maui. The breakdown of individual Hotel contribution is: Maui Palms Hotel 136 rooms, revised 4-story Hotel Wailuku 94 rooms, Maui Coast Hotel 170 rooms, AC Hotel Wailea 110 rooms (opened May 2021), Hilton Grand Vacations (former Maui Lu) 388 rooms. From 2010 to 2019, the total supply of hotel and condo hotel units on Maui Island decreased from 13,070 to 11,629, according to the HTA Visitor Plant Inventory. Over this nine-year period, the island lost an average of about 160 hotel and condo hotel rooms each year. The decreases were due to both hotel closures and condominium unit owners withdrawing their units from condo hotel rental programs. Given this, it can be assumed that an annual average room reduction of 160 is reasonable. During the next four years, a total room reduction of 640 from the overall total is also a reasonable assumption. Kahahā Hotel is anticipated to open in less than five years. Therefore, the total additional room count would be 258 during the

next four years. The visitor to resident ratio would increase by 0.31% (approximately three-tenths of one percent) [258 rooms multiplied by an 80% occupancy rate, multiplied by 2.3 visitors per room and divided by 154,100 population = 0.0031]. Therefore, it is estimated that the 0.09% visitor to resident ratio increase of the proposed Kahahā Hotel and the ratio increase of these possible future Hotel expansions/additions would have a negligible cumulative impact with respect to ‘overtourism’ on the Island of Maui. Overall, this translates to a cumulative contribution of less than half of one percent increase to the visitor to resident ratio (0.40%).

In addition to the foregoing study, a Market Study for the proposed Kahahā Hotel at Kahului Airport was prepared by CBRE, Inc. dated May 19, 2021. The field work for the study was undertaken in February 2019, and the updates reflect data compiled and market conditions as of April 2021. The purpose of the study was to estimate the size and value of the intended market, review visitor trends, identify existing and future competition, analyze historical and current key performance indicators for the competitive hotel market, and summarize other factors that could influence the demand for the proposed Kahahā Hotel. As it relates to the moratorium on new transient accommodations, the market study finds that there is no correlation between visitor growth and the supply of hotel rooms. This finding is evidently supported in the market study by the fact that the number of visitors has increased at a compounded average annual rate of 4.8 percent between 2015 and 2019 (excluding the impact of COVID-19) while the number of hotel rooms have declined at the compounded average annual rate of -2.7 percent over the same time period. Thus, a moratorium on new hotels is unlikely to curb visitor volume.

While both studies make clear that the moratorium is unlikely to reduce tourism on Maui, the Kloninger Report shows that Kahului area hotels primarily serve the interisland market and non-leisure travelers. While there is no denying that there will be some leisure traveler demand for the proposed Kahahā Hotel, based on existing data from the other hotels in the area, it is likely that the majority of the guests will be non-leisure travelers. Due to its close proximity to the Kahului Airport the proposed Kahahā Hotel is in an ideal location for business travelers, helping to promote the diversification of Maui’s economy by providing additional, centrally located, non-resort accommodations for off-island support services to utilize when working on Maui.

4.3.13. Impacts to Greenhouse Gas Emissions

It is anticipated that the Proposed Project individually will not result in a significant impact on GHG concentrations in the atmosphere.

In the short-term, increases in GHG emissions are anticipated to be negligible due to the scale and scope of the project and the temporary nature of construction activities. In the long-term, the Proposed Project will incorporate green building objectives and implement best management practices to ensure emissions are minimized. Traffic increases are not anticipated to significantly increase GHG emissions.

Cumulatively, the project will contribute to the total GHG emissions for the State. However, these increases are anticipated to be negligible relative to overall emissions. Moreover, increases in the commercial sector have already been anticipated in emission inventories for the State and are expected to be offset by the Hawaii Clean Energy Initiative which aims to achieve 100% clean energy by 2045.

4.3.14. Impacts to Cultural and Historical Resources

While the impacts of the Kahahā Hotel project are foreseen to have no significant impacts upon cultural and historical resources (see Sections 2.1.9 and 2.2.3), the potential cumulative impacts of other future projects in the Kahului-Wailuku area may contribute to significant impacts to such resources. However, all developments in the State of Hawai'i are subject to strict standards of review and mitigation. While it is difficult to predict the cultural and historical significance of other future project sites and their impacts, assuming all such future projects in the Kahului-Wailuku area complete and comply with governing laws and rules, including HRS Chapter 6E, cumulative impacts would be assumed to be less than significant once fully mitigated.

4.3.15. Impacts to Hazardous Substances

The Phase II ESA concluded that soil surfaces at the Project Site do not appear to be impacted with chemicals of potential concern (COPC). No impacts from hazardous substances are anticipated at the site based on the conclusions of the Phase I and II ESA reports. Additionally, impacts associated with hazards and the use of hazardous materials on site would be controlled through application of regulatory measures.

Implementation of the proposed project would not result in an incremental contribution to cumulative impacts related to hazards and hazardous material. Therefore, cumulative hazards and hazardous materials impacts are considered less than significant.

4.3.16. Impacts to Visual Resources

The Proposed Project will set forth building height limits and setbacks to help maintain views towards the summit of Haleakalā. In addition, the open space areas incorporated into the Kānahā Hotel will provide view corridors in between buildings toward Haleakalā.

The Kānahā Hotel is being designed to control the density, architectural design, and variation of all buildings in the project without sacrificing views or the aesthetic character of the Proposed Project.

Portions of the hotel are one-story, two-story, and four-story with elevator towers that will be setback from Haleakalā Highway to maintain public views towards the summit of Haleakalā from Haleakalā Highway and views of the West Maui Mountains from the Airport Access Road and Haleakalā Highway. Overall urban design of the project will position buildings fronting landscaped roadways to screen the massing of the buildings.

As noted, design and orientation of the Hotel building will mitigate visual impacts at the project location. Within the vicinity of the project, MBPPI controls the visual impact of its built environment by adherence to its Design Guidelines. All projects in MBPPI mitigate visual impacts via Site Planning Standards, Architectural Standards, Landscape Standards, and Signage & Lighting Standards. The cumulative impact to visual resources with respect to projects greater than 1-mile from the project site (outside MBPPI) are considered less than significant due their distance from the project site, their assumed physical properties, and the distance between each future project. Therefore, cumulative impacts to visual resources of the Kānahā Hotel and future projects in the vicinity are considered less than significant.

4.4 Probable Adverse Impacts That Cannot Be Avoided

Chapter 2 of the EIS discusses both the direct and indirect effects of the proposed project on the existing environment, and mitigation measures to avoid or minimize any adverse effects. These

effects can occur in the short- and long-term relative to construction and implementation of the proposed use. In some cases, project impacts can be mitigated to completely avoid any adverse effects. In other cases, project impacts can only be minimized to the extent at which adverse effects on the environment would not be significant. This section summarizes those adverse impacts that cannot be avoided in both the short- and long-term.

4.4.1. Short-Term Effects

Unavoidable short-term impacts include those related to noise and air quality, water quality, and traffic anticipated as the result of construction activities.

Air Quality: Construction-related air quality impacts would result from airborne dust and exhaust emissions from internal combustion engines during site preparation and earth moving activities, the movement of construction vehicles on unpaved areas of the site, and from construction equipment. The construction contractor will be responsible for complying with State DOH regulations, which prohibit visible dust emissions at property boundaries. With adherence to regulations and mitigation measures, it was concluded that construction-related activities would not cause significant impacts to air quality.

Noise Quality: Construction noise will be unavoidable during project construction. Short-term increases in noise levels will result from the use of construction equipment and vehicle movements on public roads and at the Project Site. Despite compliance with Chapter 46, Title 11, Community Noise Control, DOH, HAR, noise generated by construction activities may adversely impact nearby land uses. The use of muffled equipment, noise barriers, and restrictions on construction hours, as well as adherence to State DOH regulations on noise mitigation, will minimize construction equipment and vehicle noise. For construction work to be performed at night or on weekends and holidays, a Community Noise Variance permit from the DOH will be required if it exceeds regulatory noise levels. With adherence to regulations and mitigation measures, it was concluded that construction-related activities would not cause significant impacts to noise quality.

Water Quality: No significant impacts on coastal waters are anticipated as a result of constructing and operating the Proposed Action. Construction activities will involve land-disturbing activities that may result in some short-term surface runoff and soil erosion. Associated construction plans will account for erosion control measures for all work

proposed. Construction controls required by National Pollutant Discharge Elimination System (NPDES) permits and compliance with the County of Maui's Rules Relating to Water Quality would reduce the risk of sediment and construction-related contaminants reaching nearby surface and coastal waters. In addition, any discharges related to project construction or operation activities will be required to comply with applicable State water quality standards as specified in HAR, Chapter 11-54 "Water Quality Standards" and HAR, Chapter 11-55 "Water Pollution Control."

During construction of the Proposed Action, any soil disturbances in excess of one acre would require a NPDES permit administered by HDOH for storm water discharges associated with construction activities. This permit requires the completion of a SWPPP that will describe BMPs for the project in order to properly manage storm water runoff.

Traffic: During construction, traffic near the Project Site will be impacted for the period of the construction activity. For example, during construction, heavy equipment and trucks will be traveling along existing roadways within the vicinity of the Project Site.

Where construction impacts may affect the traveling public along area roadways, traffic control plans will be prepared to ensure safe passage of passenger and commercial vehicles, bicycles and pedestrians. Mitigation measures that may be considered include use of traffic control signage, temporary vehicle diversion barriers, flag persons or use of off-duty police officers. With adherence to regulations and mitigation measures, it was concluded that construction-related activities would not cause significant impacts to traffic.

The foregoing unavoidable effects are temporary in nature and associated with project construction. Mitigation measures may include, among others, the BMPs cited above, which are anticipated to provide the necessary environmental protections, and appropriately address public safety and welfare considerations to ensure implementation with the least amount of inconvenience, nuisance, and detriment. With implementation of mitigation measures, any adverse impacts are not anticipated to be significant.

As noted previously, the Proposed Action will, in the long run, serve as a source of revenue for the State and County of Maui, supporting programs that are covered as part of both governments' mandates.

4.4.2. Long-Term Effects

Unavoidable long-term impacts include those related to topography and soils, noise quality, visual resources, solid waste, and infrastructure and utilities anticipated as a result of operation of the hotel.

Topography and Soils: Although no significant adverse impacts on Project Site topography are anticipated to result from the implementation of the Proposed Action, it would nonetheless result in the unavoidable alteration of site topography. Specifically, the proposed grading plan will require both excavation and embankment, with attempts to balance “cuts” and “fills”, to the best extent feasible to accommodate drainage and service utilities, and to minimize the import and/or export of earthwork materials. Nevertheless, the existing site is already heavily altered and there are no natural features that would be affected by the development of the Proposed Action.

Noise Quality: Ambient noise levels in the vicinity will increase slightly as a result of the associated increase in vehicular traffic generated by the Proposed Action. It is acknowledged that use of the Proposed Action will generate increased noise emissions through vehicular traffic, however, even with the projected increases in future traffic noise levels along Lauo Loop — the 65 DNL contour should not extend beyond 23 feet from the centerline of Lauo Loop. Future traffic noise levels at the Proposed Action should not exceed 61 DNL by 2025. Consequently, it was concluded that the future vehicular noise emissions should not cause significant adverse impacts on existing noise sensitive receptors.

To mitigate noise impacts from Kahului Airport operations, the following acoustical treatments are recommended to the exterior envelope of the Kahahā Hotel building adjoining the guest suites. The use of 1" laminated, insulating glass (1/4" laminated glass + 1/2" air + 3/16" glass) with STC 39 rating; the use of a roof assembly with minimum STC 42 rating; and EFS exterior walls with minimum STC 47 rating are the recommended acoustical properties of these major exterior components. The exterior glazed areas should be limited to not exceed 25 percent of the exterior wall area — unless the use of glazing with higher STC ratings is possible. If a metal deck roof is used, additional construction elements (drywall furring, resilient clips, plus insulation) will be required — due to the lower surface weight of the metal roof panels. Commercial or common areas of the hotel should not require special noise attenuation measures other than those typically available from closure and air conditioning.

Visual Resources: It is anticipated that the full build of the Proposed Action would result in the unavoidable transformation of the visual and aesthetic character of the Project Site. All new above-grade facilities are anticipated to follow design guidelines that would emphasize aesthetic themes and landscaping compatible with the character of the surrounding natural and built-up environment and, therefore, would not be expected to substantially affect scenic vistas and view planes in the area.

Solid Waste: It is anticipated the project will generate an increase of solid waste through the construction and operation of the Proposed Action. Despite this expected increase, it is not expected that the additional waste generated will overtax the current capacity of solid waste facilities as operations of all of the proposed elements of the Proposed Action will incorporate recycling and waste management strategies into the design.

Infrastructure and Utilities: Proposed Action operations are anticipated to generate a greater demand for infrastructure and utilities with regard to electrical and wastewater service. The Proposed Action will be a modern facility that is resource efficient. It is anticipated that adverse impacts would be appropriately mitigated through adherence to State, and County of Maui regulatory requirements and the implementation of applicable BMPs and no significant adverse impacts are anticipated as a result.

4.5 Unresolved Issues

Unresolved issues are invariably associated with projects in the planning and conceptual design stages, as is the case for the Proposed Action in consideration under this EIS process. Consequently, the various planning processes being pursued by the Applicant, including preparation of this Draft EIS and community outreach efforts, have been conducted on the basis of best available information and expertise of those knowledgeable in the design and construction of the types of facilities associated with the proposed Kānāhā Hotel at Kahului Airport. Unresolved issues for the Proposed Project at the time of filing this Draft EIS by the Applicant are summarized below along with a discussion of how the issues will be resolved prior to commencement of project construction and/or operation.

4.5.1 Project-Specific Land Use Entitlements and Permitting

The Project Site located within the Maui Business Park Phase II (MBPII) is subject to a March 25, 2004, Findings of Fact, Conclusions of Law, and Decision and Order (D&O) identified as Docket No. A03-739 for the development of a Light Industrial development, MBPII. Following the acceptance of a Final Environmental Impact Statement (FEIS), a Motion to Amend (MTA) the State Land Use Commission's (SLUC) Decision & Order will be processed in order to request the necessary amendment to allow for the development of the proposed Hotel project.

The subject property is designated for (LI) Light Industrial uses by the Wailuku-Kahului Community Plan (WKCP). The WKCP defines "Light Industrial (LI)" as follows: "This is for warehousing, light assembly, service and craft-type industrial operations." The Applicant has requested an Amendment to the WKCP in order for the Proposed Project to be consistent and in conformance with the WKCP. A Community Plan Amendment is processed through the appropriate Planning Commission and adopted through ordinance by the Maui County Council and Mayor. The Proposed Project would be subject to the conditions of the approval, i.e., Maui County Code (MCC) Sections 19.510.010 and 19.510.020.

The subject property zoning is M-1 Light Industrial. The Applicant has requested a change to H-M Hotel zoning in order to develop the Proposed Project. A Change of Zoning is processed through the appropriate Planning Commission and adopted through ordinance by the Maui County Council and Mayor. The Proposed Project would be subject to the conditions of the approval, i.e., Maui County Code (MCC) Sections 19.510 and 19.510.040.

The project applicant is working with A&B Properties to drill a third potable water well, in the vicinity of the two existing Waiale Wells, to provide an additional source of water for the MBPII and the proposed Kahahā Hotel. An application for a Well Construction / Pump Installation Permit has been submitted and is currently under review by the Department of Land and Natural Resources (DLNR) Commission on Water Resource Management (CWRM). Construction and operation of the well would be subject to any conditions of approval and would need to comply with prevailing rules and regulations.

In addition, when sufficient design details are available, separate, and specific permit approvals such as those discussed within Section 3.9 (Entitlements and Approvals) of this

Draft EIS may need to be obtained by the Applicant. Approval of any applicable permits is required prior to the start of construction and/or operation of the project.

4.5.2 COVID-19 Pandemic Conditions

Pandemic conditions due to the unprecedented spread of the novel COVID-19 virus have continued to impact the functions of daily life on a global level since 2020. The pandemic has had far-reaching consequences beyond efforts to stop the spread of the disease itself and to isolate it. Pandemic conditions have significantly contributed to the global economic recession due to the strict policy to control the spread of the virus.

The State of Hawai'i's economy which has long been critically supported by tourism, has been impacted by the COVID-19 pandemic conditions which includes record lows in visitor counts and spending. One of the backbones of tourism is the hospitality industry which has been severely impacted by the pandemic with drastic decreases in reservations, events, customers, and revenue. It has been projected by many of the State's top economists that the revival of our overall economy will not be possible without tourism being able to welcome back trans-pacific travelers to the Hawaiian Islands in numbers reflective of those before the advent of the COVID-19 pandemic.

Despite the vaccination progress and every policy to control the spreading of the COVID-19 virus, the pandemic conditions continue to affect the ways to keep the economy moving. While the economy has reopened and restrictions have been slowly lifted, the new variant of the virus such as the Delta variant has started to threaten the progress adding more unpredictable situation of the future economy.

However, the pandemic conditions have taught us to do our part to ensure that the residents and communities of Hawai'i remain safe while we all work together to put Hawai'i back on track towards economic prosperity. In alignment with this vision, the Proposed Project is anticipated to serve as a major stimulus of economic activity during this interim period of recovery.

At the time of the preparation of this Draft EIS, there is no consensus or prognosis for when global pandemic conditions will subside. Nonetheless, it is anticipated that the County and the project developer will need to consider the implications of changing

pandemic conditions on labor markets, supply chains, and the travel industry relative to the construction, and operation of the proposed Kānāhā Hotel at Kahului Airport.

4.5.3 Construction Time for Airport On-Ramp

As discussed in Section 1.5 of this Draft EIS, anticipated future offsite infrastructure improvements to be provided by the State of Hawai'i, Department of Transportation include construction of a new on-ramp to the Airport Access Road located on the eastern corner of the Project Site. Land costs relating to the onramp were to be charged against the Previous Petitioner's (A&B) documented fair share contribution; however, in January 2020 the DOT instead requested full payment of the Previous Petitioner's fair share contribution. Pursuant to that request the Previous Petitioners remitted the amount of \$4,601,026.00 to the DOT in February 2020 in full payment of its fair share contribution. The State's timing of the future on-ramp construction is unknown at this time.

During a May 2021 meeting between the State of Hawaii, Department of Transportation, Highways Division, and the Petitioner — it was clarified that DOT does not have a timeline for the construction of the on-ramp and that DOT will approach Petitioner or future landowner at the appropriate time to purchase the necessary land area at fair market value. Section 1.5 of the DEIS provides further detail on the background of the onramp.

4.5.4 Proposed Moratorium on New Transient Accommodations on Maui

During preparation of this Draft EIS, the Maui County Council's Planning and Sustainable Land Use Committee recommended passage of a bill relating to a moratorium on new transient accommodations on Maui. The bill will require two (2) readings by the Maui County Council in order to be adopted. As proposed, the moratorium is for a two-year period or until the council enacts legislation implementing appropriate recommendations from its investigative group, whichever is sooner. The bill also contains various project dependent exceptions to the moratorium.

The Moratorium focuses solely on the Maui Island Plan's policy to, "[p]romote desirable island population by striving to not exceed an island-wide visitor population of roughly 33 percent of the resident population[.]" failing to address other portions of the Maui Island Plan which recognize the importance of supporting the visitor industry and provide other policies to maintain residents' quality of life.

Kloninger & Sims Consulting, LLC. prepared a Maui Lodging Market Analysis dated September 15, 2021. This report analyzes the Maui lodging market and evaluates the impact of the development of the proposed Kānahā Hotel within Maui's mix of lodging inventory. The report also provides direct commentary on the issue of overtourism and the policy that aims to limit the number of visitors on the island. The report produced the following findings:

1. Maui arrivals and ADC have increased in recent years, driven by growth in the supply of vacation rentals.
2. In recent years prior to 2019 the ADC for Maui has exceeded the 33.33% visitor to resident metric on an island wide basis in recent years. In 2020 visitor arrival declined substantially due to COVID-19 and is anticipated to be below 33.33% in 2021. In Central Maui, where the proposed Kānahā Hotel would be built, the estimated visitor ratio is below 10%.
3. The proposed Kānahā Hotel is expected to primarily serve the kama'āina market, with only a marginal contribution to the island's average daily census of visitors.
4. Some of the popularity of vacation rentals on Maui is likely price-driven, with Short-Term Rental Homes and Bed & Breakfasts (collectively referred to as "vacation rentals" in this report) providing an alternative to Maui's high-priced hotel rooms.
5. Hotels in the Kahului area primarily serve the interisland market and area non-leisure demand generators but also a segment of the mainland leisure market.
6. The proposed Kānahā Hotel will provide a legal alternative to vacation rentals, increasing the supply of business-traveler hotel rooms in an under-served segment of the market. The supply of resort hotel rooms has decreased in recent years, in response to market conditions.

The report also finds that an increase in Maui's visitor arrivals and ADC coinciding with a decrease in the number of hotel rooms — suggesting that the growing supply of other accommodation types, particularly vacation rentals, has driven Maui's tourism growth in recent years. As such, a moratorium on new hotel construction would likely not address concerns about overtourism on Maui.

The report indicates that the number of vacation rentals has declined since Maui County entered into agreements with Expedia (VRBO) and Airbnb, to enhance the County's ability

to enforce laws against illegal TVRs. The reduction in illegal TVRs is expected to lead to a reduction in Maui Island's ADC.

Citing data from the Hawaii Tourism Authority (HTA), the report identifies a Year-to-date 2021 ADC for Maui Island of 52,769 and based on the 2020 Census the population of Maui Island was 154,100 — which shows a visitor ratio of 34.2%, which is only slightly higher than the desired Maui Island Plan metric of 33.33%. The report also indicates that the seasonality of Maui tourism typically results in a slow down during fall before picking up near Christmas, estimates show a Maui Island year end 2021 ADC of approximately 50,829 which would result in a visitor ratio of an acceptable 33.33%.

The proposed Kānāhā Hotel is anticipated to contain 200 hotel rooms with an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, and with 2.3 individuals per room. Kānāhā Hotel is anticipated to accommodate an average of 138 out-of state visitors per night. This translates to a contribution of 0.27% of the 33% ADC policy metric. Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kānāhā Hotel on an average night would equal 0.09% of the island's resident population of 154,100. An increase of approximately 0.09% (less than one-tenth of one percent) to the visitor to resident ratio is an insignificant increase.

In addition to the foregoing study, a Market Study for the proposed Kānāhā Hotel at Kahului Airport was prepared by CBRE, Inc. dated May 19, 2021. The field work for the study was undertaken in February 2019, and the updates reflect data compiled and market conditions as of April 2021. The purpose of the study was to estimate the size and value of the intended market, review visitor trends, identify existing and future competition, analyze historical and current key performance indicators for the competitive hotel market, and summarize other factors that could influence the demand for the proposed Kānāhā Hotel.

As it relates to the moratorium on new transient accommodations, the market study finds that there is no correlation between visitor growth and the supply of hotel rooms. This finding is evidently supported in the market study by the fact that the number of visitors has increased at a compounded average annual rate of 4.8% between 2015 and 2019 (excluding the impact of COVID-19) while the number of hotel rooms have declined at the compounded average annual rate of -2.7% over the same time period. Thus, a moratorium on new hotels is unlikely to curb visitor volume.

While both studies make clear that the moratorium is unlikely to reduce tourism on Maui, the Kloninger Report shows that Kahului area hotels primarily serve the interisland market and non-leisure travelers. While there is no denying that there will be some leisure traveler demand for the proposed Kānāhā Hotel, based on existing data from the other hotels in the area, it is likely that the majority of the guests will be non-leisure travelers. Due to its close proximity to the Kahului Airport and the island's government, business, and medical facilities — the proposed Kānāhā Hotel is in an ideal location for business travelers, helping to promote the diversification of Maui's economy by providing additional, centrally located, non-resort accommodations for off-island support services to utilize when working on Maui.

In addition to the foregoing, this moratorium would take effect on the date of the ordinance and be repealed when the Maui County Council enacts legislation implementing recommendations intended to manage tourism or two years from the effective date of the ordinance, whichever is sooner. Upon action from the Maui Planning Commission, the proposed bill would go to the Maui County Council for further action. At this time, it is uncertain whether the proposed Kānāhā Hotel project may or may not be impacted by the moratorium.

4.6 Mitigation and Monitoring Reporting Program

Table 19 lists each of the mitigation measures specified in this Draft EIS and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 19. Mitigation and Monitoring Reporting Program			
Condition	Mitigation	Responsible Party	Mitigation Timing
Surrounding Land Uses	The proposed hotel is compatible with surrounding uses and will provide accommodations in close proximity to the Kahului Airport. No mitigation measures warranted.	N/A	N/A
Topography and Soils	BMPs: <ul style="list-style-type: none"> During site preparation, storm runoff from the site will be 	Contractor	Prior to and During Construction

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	<p>controlled in accordance with the County's "Soil Erosion and Sediment Control Standards".</p> <ul style="list-style-type: none"> • Minimizing the time of construction; • Retaining existing ground cover as long as possible; • Constructing drainage control features early; • Using temporary area sprinklers in non-active construction areas when ground cover is removed; • Providing a water truck on-site during the construction period to provide for immediate sprinkling as needed; • Using temporary berms and cut-off ditches, where needed, for control of erosion; • Watering graded areas when construction activity for each day has ceased; • Grassing or planting all cut and fill slopes immediately after grading work has been completed; and • Installing silt screens where appropriate. 		
	Compliance with all applicable Federal, State and County regulations and rules for erosion and sediment control.	Contractor	During construction
	LID Strategies	Architect/Engineer	Design Phase

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	Grading Permit – Final erosion control plan and BMPs		
		Architect/Engineer	Design Phase
		County of Maui – Department of Public Works	Grading Permit Review
Natural Hazards	Coordinate with Maui Emergency Management Agency (MEMA) to understand procedures in the event of a tsunami evacuation.	Applicant and Operations Manager	Following approval of entitlements and prior to hotel opening
	No adverse flood hazards impacting the site or the properties in the immediate vicinity are anticipated.	Architect/Engineer	Design Phase
	The Proposed Action will be constructed in accordance with the Building Code adopted by the County of Maui.	County of Maui – Planning Department	Building Permit Review
Climate Change Assessment			
Temperature	<p>The Following mitigation measures will include but are not limited to:</p> <ul style="list-style-type: none"> • Utilizing a passive solar design; • Applying a low emissivity glazing on glass; • Insulating and sealing the exterior building envelope; and • Installing high-efficiency cooling systems, and commissioning and testing of HVAC systems. • The Proposed Project will incorporate a “cool roof” that reflects heat and solar energy away 	Architect/Engineer	Design Phase
		Contractor	During Construction

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	from the building using a TPO single-ply roofing membrane in a light color.		
Rainfall	No mitigation measures warranted.	N/A	N/A
Greenhouse Gas Emissions	<p>In the long-term, the Proposed Action will incorporate green building objectives and implement Best Management Practices (BMPs) to ensure emissions are minimized. These include but are not limited to the following recommendations:</p> <ul style="list-style-type: none"> • Improve fuel efficiency from construction equipment by minimizing idle time either by shutting equipment off when not in use or reducing the time of idling; • Provide clear signage that posts this requirement for workers at the entrances to the site; • Maintain all construction equipment in proper working condition according to manufacturer's specifications and prior to operation — ensure equipment is being checked by a certified mechanic; • Train equipment operators in proper use of equipment; • Use appropriately sized equipment for the job; • Use equipment with high-efficiency technologies (e.g. repowered 	Contractor	Prior to and during construction

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	engines, electric drive trains); <ul style="list-style-type: none"> • Perform on-site material hauling with trucks equipped with on-road engines (if determined to be less emissive than the off-road engines); • Encourage and provide incentives for carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes; • Reduce electricity use in the construction office or trailer by using LED bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones; • Recycle or salvage non-hazardous construction and demolition debris; • Use locally sourced or recycled materials for construction materials and ensure the wood products utilized in the project should be certified through a sustainable forestry program; • Avoid road closures during peak traffic hours; • Move heavy construction equipment and workers to and from construction areas during periods of low traffic volume; 		
	<ul style="list-style-type: none"> • Install high-efficiency equipment or energy-saving technologies throughout the facility; 	Architect/Engineer	Design Phase

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	<ul style="list-style-type: none"> • Install high-efficiency equipment or energy-saving technologies throughout the facility; 		
	<ul style="list-style-type: none"> • Ensure structures and facilities are properly maintained; and • Develop programs that encourage guests to be green and promote alternative transportation options. 	Operations Manager	During hotel operations
Hazardous substances	No mitigation measures are warranted. However, it is recommended that future excavation activities should be monitored for evidence of potential buried waste materials.	Contractor	During ground disturbing activities.
Flora and Fauna	No mitigation measures are warranted.		
	However, in the event that any of the nine federally listed animal species — i.e., the federally threatened Newell's shearwater (<i>Puffinus auricularis newelli</i>), and endangered Hawaiian hoary bat (<i>Lasiurus cinereus semotus</i>), Hawaiian petrel (<i>Pterodroma sandwichensis</i>), Band-rumped storm-petrel (<i>Oceanodroma castro</i>), Hawaiian stilt (<i>Himantopus mexicanus knudseni</i>), Hawaiian coot (<i>Fulica alai</i>), Hawaiian common gallinule (<i>Gallinula galeata sandvicensis</i>), Hawaiian duck (<i>Anas wyvilliana</i>), and Blackburn's sphinx moth (<i>Manduca blackburni</i>) — the Proposed Project will comply with any avoidance and minimization	Contractor Operations Manager	During Construction During hotel operations

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	measures recommended by the USFWS on a letter dated October 15, 2019, for the Proposed Project — as detailed in Section 2.1.6 of this Draft EIS.		
Air Quality	<ul style="list-style-type: none"> • Erecting a dust fence to shield the adjacent Project Sites; • Establishment of a frequent watering program to keep bare-dirt surfaces in construction areas from becoming significant sources of dust; • In dust-prone or dust-sensitive areas, measures include limiting the area that can be disturbed at any given time, applying chemical soil stabilizers, and mulching and/or using wind screens; • Open-bodied trucks to be always covered during the transportation of materials that could become airborne; • Road cleaning or tire washing as a form of dust control since the haul trucks tracking dirt onto paved streets from unpaved areas; and • Paving of parking areas and/or establishment of landscaping as early in the construction schedule as possible can also lower the potential for fugitive dust emissions. 	Contractor	Prior to and during construction

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	Promote energy conservation programs and recycling programs.	Operations Manager	During hotel operations
Noise Quality	<ul style="list-style-type: none"> The use of properly muffled construction equipment should be required on the job site. The incorporation of State Department of Health construction noise limits and curfew times — applicable on the island of Maui — is another noise mitigation measure which will be applied to this project. The project will comply with State Department of Health noise regulations for construction activities. As stipulated by DOH permit requirements, noise-generating construction activities are not allowed on Sundays and holidays, during the early morning, and during the late evening and nighttime periods. 	Contractor	Prior to and during construction
	<p>Acoustical treatments recommended to the exterior envelope of the building adjoining the guest suites include the following:</p> <ul style="list-style-type: none"> Using 1" laminated, insulated glass (1/4" laminated glass + 1/2" air + 3/16" glass) with STC 39 rating. Using Roof assembly with minimum STC 42 rating. EFS exterior walls with minimum STC 47 rating. 	Architect/Engineer	Design Phase

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	<ul style="list-style-type: none"> Exterior glazed areas should be limited not to exceed 25 percent of the exterior wall area-unless the use of glazing with a higher STC rating is possible. 		
Historical Archaeological Resources	No mitigation measures warranted.	N/A	N/A
Visual Resources	Landscape planting will be used to screen the building where possible and to provide visual context in blending the massing of the building to the site and surrounding environs.	Architect/Engineer	Design Phase
	All buildings within the Proposed Action will be designed in accordance with the applicable Maui County building code standards.	Architect/Engineer County of Maui – Planning Department	Design Phase Building Permit Review
Agricultural Resources	No mitigation measures warranted.	N/A	N/A
Hydrology			
Surface Water Resources	As discussed in Section 2.1.2 (Topography and Soils) of this Draft EIS and as documented within the Preliminary Engineering and Drainage Report (See: Appendix 5), temporary erosion control measures will be incorporated during construction to minimize soil loss and erosion hazards. Best management practices will include but are not limited to:	Contractor	During construction

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	<ul style="list-style-type: none"> Temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, inlet protection, slope protection, stabilized construction entrances and truck wash-down areas. Periodic water spraying of loose soils will be implemented to minimize air-borne dirt particles from reaching adjacent properties. 		
	<ul style="list-style-type: none"> Additionally, the Proposed Action will submit an application for a National Pollution Discharge Elimination System. 	Contractor or Architect/Engineer and DOH	NPDES Permit approval prior to construction
Coastal Water Resources	As a result of the conclusion made from the Baseline Assessment of Water chemistry for the Proposed Action, no mitigation measures are warranted.	N/A	N/A
Groundwater Resources	As discussed in Section 2.1.14 of this Draft EIS, it can be concluded that with proper management practices to prevent material input to groundwater discharge by the proposed Kahahā Hotel — there is little or no potential for the project to provide any affects to the marine environment that differs substantially from the present condition	Contractor	Prior to and during Construction
Socio-Economic Environment			
Population and	The Proposed Action is subject to	Applicant	Following approval of

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
Housing	Maui County Code, Chapter 2.96 (Residential Workforce Housing Policy). Workforce homes will be subject to the requirements of Chapter 2.96, MCC to ensure that affordable homes are available for full-time Maui residents.		entitlements and prior to construction.
Economy	No mitigation measures are warranted.	N/A	N/A
Cultural Resources	<p>It is recommended that some mitigations measures are implemented such as:</p> <ul style="list-style-type: none"> • Integrate cultural elements into the design of the hotel to support increasing awareness about Maui's cultural history among hotel guests. • Utilize patterns inspired by the Kahului cultural landscape, the nearby Kanahā pond, the lokelani rose, and other culturally inspired patterns and designs. • Incorporate a māla (traditional Hawaiian garden) that features native flora with accompanying identification signage. • Water conservation measures. • Partnerships with community and cultural practitioners to develop educational interpretive materials and cultural programming. • Utilization of native flora throughout the property. 	<p>Operations Manager</p> <p>Architect/Engineer</p>	<p>During hotel operations</p> <p>Design phase</p>

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
Public Services			
Recreational Facilities	No mitigation measures are warranted.	N/A	N/A
Medical Facilities	No mitigation measures are warranted.	N/A	N/A
Police and Fire Protection Services	No mitigation measures are warranted. However, the Proposed Action will comply with any impact fee ordinances for police and fire that may be adopted.	Applicant	Following approval of entitlements and prior to construction should impact fee ordinances be adopted.
Schools	No mitigation measures are warranted.	N/A	N/A
Solid Waste	The following mitigation measures will include but are not limited to: <ul style="list-style-type: none"> • Prepare a solid waste management plan 	Contractor and DEM	Prior to construction
	<ul style="list-style-type: none"> • During construction, as required by County regulations, construction and demolition waste will be properly disposed. 	Contractor	During construction
	<ul style="list-style-type: none"> • Green waste will be mulched onsite when practicable. • On-site recycling opportunities to reduce solid waste entering the landfill. 	Operations Manager	During hotel operations
Infrastructure			
Roadways	No improvements are recommended for the Future Year 2025 (completion year of project) conditions with the	N/A	N/A

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	Project.		
Drainage	<ul style="list-style-type: none"> • Design all drainage improvements to conform to Maui County Standards. • Minimize import and/or export of earthwork materials to the extent feasible. 	Architect/Engineer	Design Phase
	<ul style="list-style-type: none"> • Provide temporary sediment basins, temporary diversion berms, and swales to intercept runoff; • Install silt fences to detain sediment-laden stormwater runoff; • Install dust fences to control dust generated from construction; • Provide inlet protection to prevent sediment in stormwater runoff entering drain inlets; • Provide slope protection to help control erosion and stabilize slopes; and • Stabilize construction entrances and truck wash-down areas. 	Contractor	Prior to and during construction
	<ul style="list-style-type: none"> • NPDES permit for construction will be submitted to DOH for review and approval. 	Contractor or Architect/Engineer and DOH	NPDES Permit approval prior to construction
Water	The project proposes to use Maui Business Park's privately owned water systems for the Proposed Action's potable and non-potable water demands.	Architect/Engineer and DWS	Design Phase

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
Wastewater	In compliance with the requirements from the County of Maui, Department of Environmental Management (DEM), the Proposed Action will involve installation of a new sewer service property manhole on the sewer lateral.	Architect/Engineer and DEM	Design Phase
Electrical	<p>The Applicant is proposing the energy-saving features will be incorporated to minimize electrical demand for the Proposed Action. The following list includes but not limited to:</p> <ul style="list-style-type: none"> • Installation of Photovoltaic Solar Panels on the roof. • Use of energy efficient and/or Energy Star labeled appliances and fixtures; • Use of passive solar cooling; • Use of natural lighting; • Use of energy efficient lighting; • Use of lighting controls in storage areas, closets, stairwells, and other low use areas; • Use of window tinting film that filters glare (white light) and UV while allowing in all the “useable light”; • Use of variable frequency drives on pumps (pool, water features); • Use of electronically commutated motors and controls in walk in refrigeration units; 	<p>Architect/Engineer</p> <p>Operations Manager</p>	<p>Design Phase</p> <p>During hotel operations</p>

Table 19. Mitigation and Monitoring Reporting Program

Condition	Mitigation	Responsible Party	Mitigation Timing
	<ul style="list-style-type: none">• Use of low flow water fixtures;• Use of smart thermostats in units; and• Use of appropriate landscaping to shade buildings and parking lots.		

5. CONSULTATION AND REVIEW

5.1 Early Consultation

Prior to the preparation of the DEIS, a DEA was prepared and consultation on the project was undertaken with the following agencies:

2017-2019	Consultation meetings with Maui County Department of Water Supply to discuss water source and demand.
2018	Project review and comment by Maui Planning Department and Maui Planning Commission
2018- 2019	Consultation meetings with Maui County Department of Environmental Management to discuss location of a future wastewater pump station and associated easement.

The Early Consultation letter dated July 05, 2017, for the Proposed Project — named Windward Hotel project at the time of the Early Consultation process — was transmitted to the following agencies and organizations for review and comment. The Agencies and individuals with an asterisk (*) provided comments (**See:** Appendix 3.3)

Federal Agencies

U.S. Army Corp. of Engineer

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Department of the Interior – U.S. Geological Survey Pacific Islands Water Science Center*

U.S. Fish and Wildlife Service

State Agencies

DBEDT – Office of Planning*

Department of Accounting and General Services

Department of Agriculture

Department of Business, Economic Development & Tourism (DBEDT)

Department of Defense, Office of the Adjutant General*

Department of Education

Department of Hawaiian Home Lands

Department of Health – Clean Air Branch

Department of Health – Clean Water Branch*

Department of Health – Environmental Planning Office
Department of Health – Maui District*
Department of Health – Safe Drinking Water Branch
Department of Health – Wastewater Branch*
Department of Human Services
Department of Labor and Industrial Relations
Department of Land and Natural Resources (DLNR) – Land Division*
Department of Transportation
DLNR – Commission on Water Resource Management*
DLNR – Engineering Division*
DLNR – Forestry and Wildlife*
DLNR – Maui Land Agent
DLNR – State Historic Preservation Division (SHPD)
Hawai'i Housing Financing and Development Corporation
Office of Hawaiian Affairs
Office of Planning*
University of Hawai'i, Environmental Center

Maui County Agencies

Department of Environmental Management
Department of Fire and Public Safety
Department of Housing and Human Concerns
Department of Parks and Recreation*
Department of Planning*
Department of Public Works*
Department of Transportation*
Department of Water Supply
Police Department*

Comment on key issues include request on the contents to be included in the DEA, confirmation about the agencies with regard to permits and approvals, suggestion on design process, confirmation about LUC as the accepting authority, existing information, potential environmental impacts, additional individuals and organizations to be contacted due to possible interest in the Proposed Project, as well as recommended BMPs, mitigation measures, and environmental guidelines.

A total of fifteen (15) written comments were received during the Early Consultation period. Four (4) agencies informed through their letters about the inability to offer any comments with regard to the Proposed Project at that time. Nonetheless, written response was provided for each agency that provided written comment. For more details, response letters along with the written comments are attached as Appendix 3.3 of this Draft EIS.

5.2 DEA Distribution

The DEA for the Proposed Project — named Windward Hotel project at the time of the DEA distribution — was transmitted to the following agencies and organizations for review and comment on July 31, 2018. The Agencies and individuals with an asterisk (*) provided comments (See: Appendix 3.4)

Federal Agencies

EPA – Pacific Islands (Region 9)

FAA

FEMA

National Marine Fisheries

NRCS – Honolulu

NRCS – USDA – Maui

U.S. Army Corp. of Engineers

U.S. Coast Guard

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Fish and Wildlife Service*

State Agencies

DBEDT – Land Use Commission*

Department of Accounting and General Services*

Department of Agriculture

Department of Business, Economic Development & Tourism (DBEDT)

Department of Education – Maui

Department of Education*

Department of Hawaiian Home Lands*

Department of Health – Clean Air Branch

Department of Health – Clean Water Branch*

Department of Health – Environmental Planning Office

Department of Health – Maui District*
Department of Health – Safe Drinking Water Branch
Department of Health – Wastewater Branch
Department of Human Services
Department of Labor and Industrial Relations
Department of Land and Natural Resources (DLNR) – Land Division*
Department of Transportation – Maui
Department of Transportation – Statewide Planning Office
Department of Transportation*
DLNR – Commission on Water Resource Management
DLNR – Engineering Division*
DLNR – Forestry and Wildlife
DLNR – Maui Land Agent
DLNR – State Historic Preservation Division (SHPD)
Hawai'i Emergency Management Agency
Hawai'i Housing Financing and Development Corporation
OEQC
Office of Hawaiian Affairs
Office of Planning*
University of Hawai'i – Environmental Center

Maui County Agencies

Department of Environmental Management*
Department of Fire and Public Safety*
Department of Housing and Human Concerns*
Department of Parks and Recreation*
Department of Planning*
Department of Public Works*
Department of Transportation*
Department of Water Supply*
Maui Emergency Management Agency
Maui Planning Commission*
Police Department*

Others

Hawai'i Construction Alliance*
Hawaiian Telcom

Kahului Library
Maui Electric Company*
Richard “Dick” Mayer*
Tara Miller Owens, SeaGrant Extension

A total of twenty-four (24) written comments were received during the distribution of the DEA. Ten (10) agencies informed through their letters about the inability to offer any comments with regard to the Proposed Project at that time. Comments on key issues include but not limited to the guidelines on infrastructure, flora and fauna, required improvements, mitigation measures, suggested agencies or individuals to coordinate with — such as Alexander & Baldwin and DHHC — as well as contents requested to be expanded or added within the assessment.

In addition to the comment letters, public testimony from Richard “Dick” Mayer was received during the Maui Planning Commission meeting dated August 28, 2018, with regards to the publication of DEA for the Windward Hotel Project. Mr. Mayer’s comment was about the concern on the potential impacts of the proposed hotel development and that an EIS should be prepared. Mr. Mayer also provided a written comment. The response to Mr. Mayer’s comments are included along with other response and comment letters within Appendix 3.4 of this Draft EIS.

5.3 EIS Preparation Notice Distribution

The EIS Preparation Notice (EISPN) for the Proposed Project — named Windward Hotel project at the time of the EISPN distribution — was transmitted to the following agencies and organizations for review and comment on January 03, 2019. The Agencies and individuals with an asterisk (*) provided comments (**See:** Appendix 3.5) The EISPN was transmitted to the Kahului Public Library for public review. No public comments were received.

Federal Agencies

EPA – Pacific Islands (Region 9)
FAA
FEMA
National Marine Fisheries
NRCS – Honolulu
NRCS – USDA – Maui
U.S. Army Corp. of Engineers

U.S. Coast Guard

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Fish and Wildlife Service

State Agencies

DBEDT – Hawai'i Housing Finance and Development Corporation*

DBEDT – Land Use Commission*

Department of Accounting and General Services*

Department of Agriculture*

Department of Business, Economic Development & Tourism (DBEDT)

Department of Education

Department of Education – Maui

Department of Hawaiian Home Lands

Department of Health – Clean Air Branch

Department of Health – Clean Water Branch*

Department of Health – Environmental Planning Office

Department of Health – Maui District

Department of Health – Safe Drinking Water Branch

Department of Health – Wastewater Branch

Department of Human Services

Department of Labor and Industrial Relations

Department of Land and Natural Resources (DLNR) – Land Division*

Department of Transportation – Statewide Planning Office*

Department of Transportation*

DLNR – Commission on Water Resource Management

DLNR – Engineering Division*

DLNR – Forestry and Wildlife*

DLNR – Maui Land Agent*

DLNR – State Historic Preservation Division (SHPD)

Hawai'i Emergency Management Agency

Hawai'i Housing Financing and Development Corporation*

OEQC*

Office of Hawaiian Affairs

Office of Planning*

University of Hawai'i – Environmental Center

Maui County Agencies

Department of Environmental Management*
Department of Fire and Public Safety
Department of Housing and Human Concerns*
Department of Parks and Recreation*
Department of Planning*
Department of Public Works*
Department of Transportation*
Department of Water Supply*
Maui Emergency Management Agency
Maui Planning Commission*
Police Department*

Others

David Williams*
Debra Greene*
Irene Newhouse*
Joe Dandrea*
Justin Kekiwi*
Paula Alcosseba*
Susan Wener*

A total of twenty-nine (29) written comments were received during the EISPN period. Seven (7) agencies informed through their letters about the inability to offer any comments with regard to the Proposed Project at that time. Comments with key issues include discussion about sea level rise, suggestions on the appropriate placement of discussions regarding significance criteria within the DEIS — and request on specific topics to discuss within the DEIS including but not limited to the LUC Docket No. A03-739, Climate Change, Cultural Impact Assessment (CIA), Special Management Area (SMA), runoff controls, Low Impact Development (LID), and consistency with Hawai'i State Planning Act and Coastal Zone Management (CZM) Program. Written comments from individuals primarily discussed the concerns on infrastructure, traffic, building height, affordable housing, too much development, and opposition against the Proposed Project. Response letters along with the comment letters are provided within Appendix 3.5 for more details.

5.4 DEIS Distribution

This Draft EIS for the Proposed Project — named Windward Hotel project at the time of the DEIS distribution — was transmitted to the following agencies and organizations for review and comment on October 08, 2019. The Agencies and individuals with an asterisk (*) provided comments. (See: Appendix 3.6)

Federal Agencies

EPA – Pacific Islands (Region 9)

FAA

FEMA

National Marine Fisheries

NRCS – Honolulu

NRCS – USDA – Maui

U.S. Army Corp. of Engineers

U.S. Coast Guard

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Fish and Wildlife Service*

State Agencies

DBEDT – Hawai'i Housing Finance and Development Corporation

DBEDT – Land Use Commission

Department of Accounting and General Services*

Department of Agriculture

Department of Business, Economic Development & Tourism (DBEDT)

Department of Education – Maui

Department of Education*

Department of Hawaiian Home Lands

Department of Health – Clean Air Branch

Department of Health – Clean Water Branch

Department of Health – Environmental Planning Office

Department of Health – Maui District

Department of Health – Safe Drinking Water Branch

Department of Health – Wastewater Branch

Department of Human Services

Department of Labor and Industrial Relations

Department of Land and Natural Resources (DLNR) – Land Division*

Department of Transportation – Statewide Planning Office
Department of Transportation*
DLNR – Commission on Water Resource Management*
DLNR – Engineering Division*
DLNR – Forestry and Wildlife
DLNR – Maui Land Agent
DLNR – State Historic Preservation Division (SHPD)
Hawai'i Emergency Management Agency
Hawai'i Housing Financing and Development Corporation
OEQC
Office of Hawaiian Affairs
Office of Planning*
University of Hawai'i – Environmental Center*
University of Hawai'i – Institute for Astronomy*

Maui County Agencies

Department of Environmental Management*
Department of Fire and Public Safety*
Department of Housing and Human Concerns*
Department of Parks and Recreation*
Department of Planning*
Department of Public Works*
Department of Transportation*
Department of Water Supply*
Maui Emergency Management Agency
Maui Planning Commission*
Police Department

Others

Maui Tomorrow Foundation*
Richard “Dick” Mayer*
Sabrina Bence*
Trinette Furtado*

A total of twenty-three (23) written comments were received during the period of DEIS distribution. Six (6) agencies informed through their letters about the inability to offer any comments with regard to the Proposed Project at that time. Apart from standard mitigation

measures, some key issues provided within the written comments include but not limited to the discussion of Title 44 of the Code of Federal Regulations (CFR), recommendation on guidelines with regard to development nearby the Airport, concerns and suggestions with regard to the use of lightings within the development, required compliance with Chapter 2.96 of the Workforce Housing Policy, as well various written comments provided by individuals primarily informing their opposition against the Proposed Project. As previously discussed, every written comment has been provided with a response letter included within Appendix 3.6.

5.5 First EIS Preparation Notice Distribution

The first EIS Preparation Notice (EISPN) for the proposed Kahahā Hotel project was transmitted to the following agencies and organizations for review and comment on June 23, 2020. The Agencies and individuals with an asterisk * provided comments (**See:** Appendix 3.7). The EISPN was transmitted to the Kahului Public Library for public review. No public comments were received.

Federal Agencies

EPA – Pacific Islands (Region 9)

FAA

FEMA

National Marine Fisheries

NRCS – Honolulu

NRCS – USDA – Maui

U.S. Army Corp. of Engineers

U.S. Coast Guard

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Fish and Wildlife Service

State Agencies

DBEDT – Hawai'i Housing Finance and Development Corporation

DBEDT – Land Use Commission

Department of Accounting and General Services*

Department of Agriculture

Department of Business, Economic Development & Tourism (DBEDT)

Department of Education

Department of Education – Maui

Department of Hawaiian Home Lands
Department of Health – Clean Air Branch*
Department of Health – Clean Water Branch
Department of Health – Environmental Planning Office
Department of Health – Maui District
Department of Health – Safe Drinking Water Branch
Department of Health – Wastewater Branch
Department of Human Services
Department of Labor and Industrial Relations
Department of Land and Natural Resources (DLNR) – Land Division*
Department of Transportation – Statewide Planning Office*
Department of Transportation*
DLNR – Commission on Water Resource Management*
DLNR – Engineering Division*
DLNR – Forestry and Wildlife*
DLNR – Maui Land Agent
DLNR – State Historic Preservation Division (SHPD)
Hawai'i Emergency Management Agency
Hawai'i Housing Financing and Development Corporation
OEQC
Office of Hawaiian Affairs
Office of Planning
University of Hawai'i – Environmental Center
University of Hawai'i – Institute for Astronomy*

Maui County Agencies

Department of Environmental Management
Department of Fire and Public Safety*
Department of Housing and Human Concerns*
Department of Parks and Recreation*
Department of Planning*
Department of Public Works
Department of Transportation
Department of Water Supply
Maui Emergency Management Agency
Maui Planning Commission

Police Department

Others

De Austin*

Joe Dandrea*

Pacific Resource Partnership*

Richard “Dick” Mayer*

A total of twenty (20) written comments were received during the first EISPN period for the proposed Kahahā Hotel. Key comments primarily include but not limited to the standard mitigation measures, concerns on wildlife hazards, guidelines to follow with regard to development nearby the Airport, suggestions on the use of lightings within the development, recommendation on landscape buffer, compliance with Chapter 2.96 of the Maui County Code, and discussion on the land use designations and the proposed amendments.

The first EISPN scoping meeting for the proposed Kahahā Hotel was conducted online via Zoom on July 20, 2020, due to the COVID-19 pandemic safety protocol for the public event. The following attendees were recorded as attending the meeting — listed names below are based on the Zoom list of attendees at the time of the meeting. The attendees with an asterisk (*) provided comments.

Scoping Meeting Attendees

ALBUT

Amelia Lim

Antonia Agbannawag

BD Neal 3

Curtis Tabata

De Austin*

Dick Mayer*

Ebisu

Erik Kloninger

Erin

John Knox

Kaiani Kiahā

Katie

Kehau Cerizo

Lehua

Leilani Pulmano
M. Kimo Unten
Matt
Randy Itaya
Ronald Tran
SP
Tanya Lee-Greig

Key comments from individuals who provided testimony include but not limited to the opposition against the Proposed Project and request on the inclusion of all testimony and comments from the previous Windward Hotel project into the current document. In addition, testimony also includes request for clarification on the decision of SLUC as the accepting authority, the reason behind changing the name of the project, concerns about overtourism. The two individuals who provided testimony, also provided written comments. Therefore, responses to their comments have been incorporated in Appendix 3.7 of this Draft EIS.

5.6 Second EIS Preparation Notice Distribution

The second EIS Preparation Notice (EISPN) was transmitted to the following agencies and organizations for review and comment on August 08, 2020. The Agencies and individuals with an asterisk (*) provided comments (**See:** Appendix 3.8) The EISPN was transmitted to the Kahului Public Library for public review. No public comments were received.

Federal Agencies

U.S. Army Corp. of Engineer
U.S. Department of Agriculture – Natural Resources Conservation Service
U.S. Fish and Wildlife Service

State Agencies

DBEDT – Office of Planning
Department of Accounting and General Services
Department of Agriculture
Department of Business, Economic Development & Tourism (DBEDT)
Department of Education
Department of Hawaiian Home Lands
Department of Health – Clean Air Branch

Department of Health – Clean Water Branch
Department of Health – Environmental Planning Office
Department of Health – Maui District*
Department of Health – Safe Drinking Water Branch
Department of Health – Wastewater Branch
Department of Human Services
Department of Labor and Industrial Relations
Department of Land and Natural Resources (DLNR) – Land Division
Department of Transportation*
DLNR – Commission on Water Resource Management
DLNR – Engineering Division
DLNR – Forestry and Wildlife
DLNR – Maui Land Agent
DLNR – State Historic Preservation Division (SHPD)
Hawai'i Housing Financing and Development Corporation
Office of Hawaiian Affairs
University of Hawai'i, Environmental Center

Maui County Agencies

Department of Environmental Management
Department of Fire and Public Safety*
Department of Housing and Human Concerns*
Department of Parks and Recreation*
Department of Planning
Department of Public Works*
Department of Transportation
Department of Water Supply
Police Department*

Others

David Williams*
Debra Greene*
Irene Newhouse*
Joe Dandrea*
Justin Kekiwi*
Paula Alcosseba*
Susan Wener*

A total of thirteen (13) written comments were received during the second EISPN period. Key comments include standard mitigation measures and the previously written comments that were delivered during the first EISPN period.

The second EISPN scoping meeting for the proposed Kahahā Hotel was conducted online via Zoom on August 20, 2020, due to the COVID-19 pandemic safety protocol for the public event. A video and audio recording of the meeting can be found at the following link, please note you will need to open the zip folder to view the file.

https://www.dropbox.com/s/9cc3zclrrpxpx2l/OneDrive_1_11-1-2021.zip?dl=0

The following attendees were recorded as attending the meeting — listed names below are based on the Zoom list of attendees at the time of the meeting. The agencies and individuals with an asterisk (*) provided comments.

Scoping Meeting Attendees

Katie Schulenebrg

Stephen Goldsmith

19492855390

Antonia Agbannawag

Rita Ryan*

Key comments from the only individual who provided testimony during public scoping meeting include questions regarding a family of Nēnē living in the property, the availability of EV charging ports in the parking lot of the Proposed Project, onsite renewable energy, green building objectives, solar panels, LEED certification, local labor force, study of the prospective customers, and request on addressing the impacts on traffic and other environmental aspects within the DEIS.

Written responses are provided for written comments and the oral testimony during the public scoping meeting. For more details, please see Appendix 3.8 of this Draft EIS.

5.7 Kanahā Hotel DEIS Early Consultation

Prior to the preparation of this Draft EIS, consultation on the proposed Kanahā Hotel was undertaken with the following agencies or individuals.

March 24, 2021	Council Member Kama
March 31, 2021	Marvin Moniz, Airport District Manager, Kahului Airport
April 1, 2021	Council Member Paltin
April 1, 2021	Council Member Sugimura
April 1, 2021	Council Member Molina
April 1, 2021	Council Member Sinenci
April 7, 2021	Council Chair Lee
April 29, 2021	Mayor Victorino
May 12, 2021	State Office of Planning
May 13, 2021	Dick Mayer
May 14, 2021	State DOT, Highways Planning
May 19, 2021	State Office of Planning
June 2, 2021	Maui County Department of Environmental Management
June 2, 2021	Maui County Department of Public Works
June 3, 2021	State DOT, Airports Planning
June 3, 2021	Maui County Department of Housing and Human Concerns
June 7, 2021	Maui County Planning Department
June 9, 2021	Council Member Rawlins Fernandez
July 20, 2021	Rita Ryan, Mark Deacos, Darla Palmer Ellingson
July 20, 2021	De Austin and Sherilyn Moore
July 20, 2021	Kai Nishiki
July 21, 2021	State Office of Planning
July 23, 2021	State Land Use Commission
July 26, 2021	Maui Tomorrow Foundation, Albert Perez
July 28, 2021	Sabrina Bence
August 10, 2021	Council Member King

Prior to the preparation of this Draft EIS, a Draft Environmental Assessment (DEA) and DEIS were prepared with the Maui Planning Commission (MPC) initially identified as the Accepting Authority. Both prior DEA and DEIS did not complete the draft stage of the process. During the preparation of the DEA and DEIS for the MPC, and in response to the EIS Preparation Notice for the current DEIS, comments were received from citizen groups and individuals. Applicant

reached out the individuals/groups, as shown on the attached consultation list, to provide them with an update on the project as they had previously shown an interest in the project.

Applicant also contacted the members of the Maui County Council to introduce each member to the project as the Council, through Resolution 21-18, had expressed its concerns over the current status of the visitor industry on Maui.

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Figures

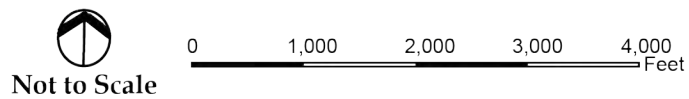


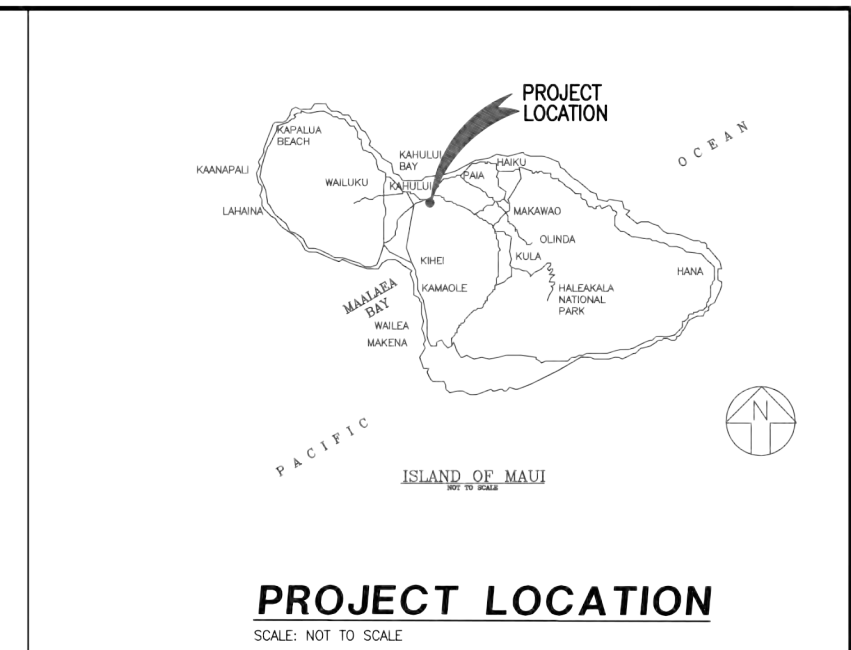
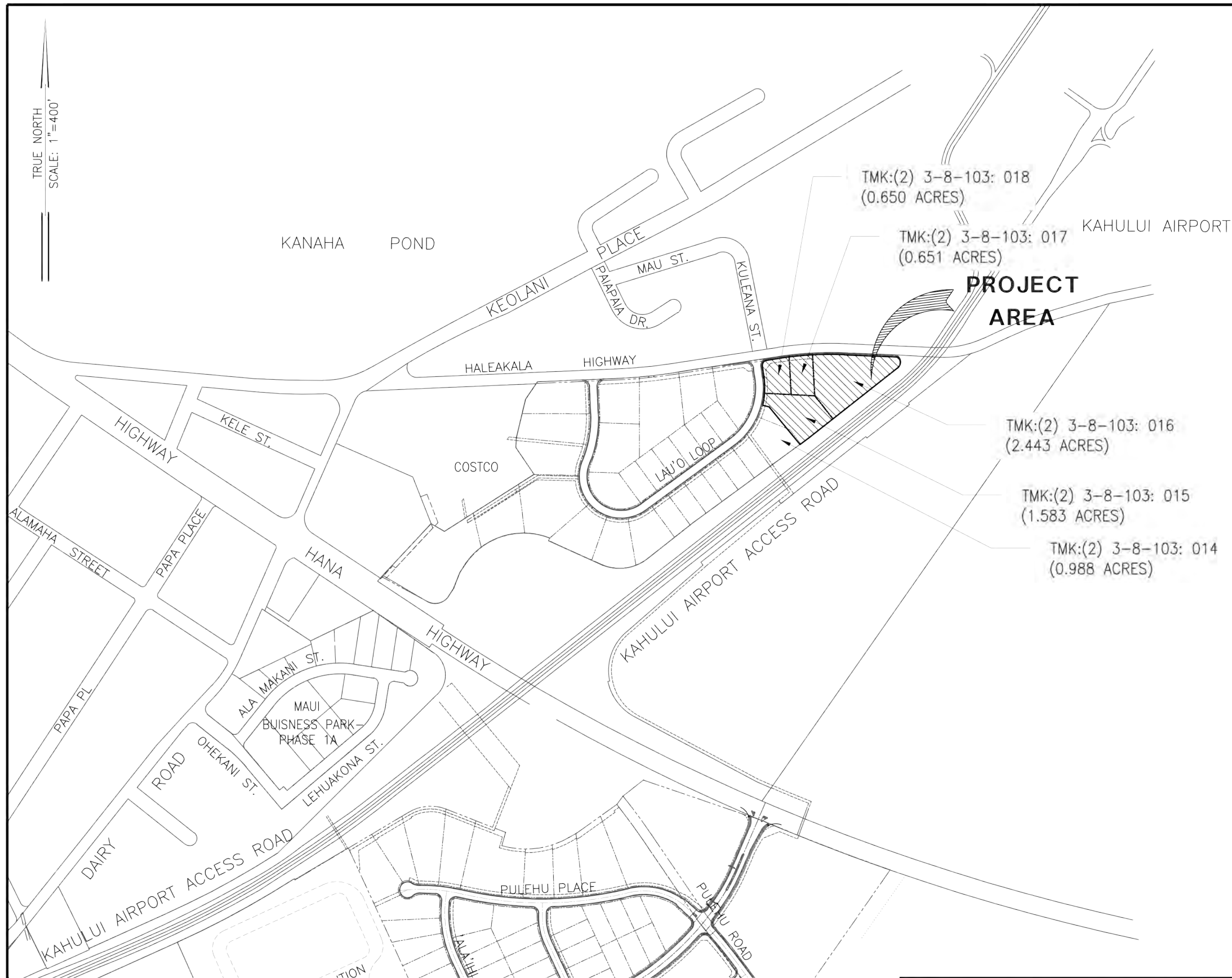
FIGURE 2

Surrounding Uses Map

Kanahā Hotel at Kahului Airport

Source: Google Earth et al.





PRELIMINARY ENGINEERING AND DRAINAGE REPORT

KANAHĀ HOTEL AT KAHULUI AIRPORT

KAHULUI, MAUI, HAWAII

FIGURE 3

Tax Map Key

Source: **ATA** AUSTIN, TSUTSUMI & ASSOCIATES, INC.
ENGINEERS/ARCHITECTS • HONOLULU, WAIALEA, HILO, HAWAII





1 VIEW FROM EAST CORNER OF THE SITE LOOKING WEST



2 VIEW FROM KAHULUI AIRPORT LOOKING NORTHWEST



3 VIEW FROM KAHULUI AIRPORT LOOKING NORTHWEST



4 VIEW FROM KAHULUI AIRPORT LOOKING NORTHEAST




5 VIEW FROM HALEAKALA HWY SIDE OF THE SITE LOOKING WEST



6 VIEW FROM HALEAKALA HWY SIDE OF THE SITE LOOKING SOUTHWEST



EXISTING PLAN VIEW

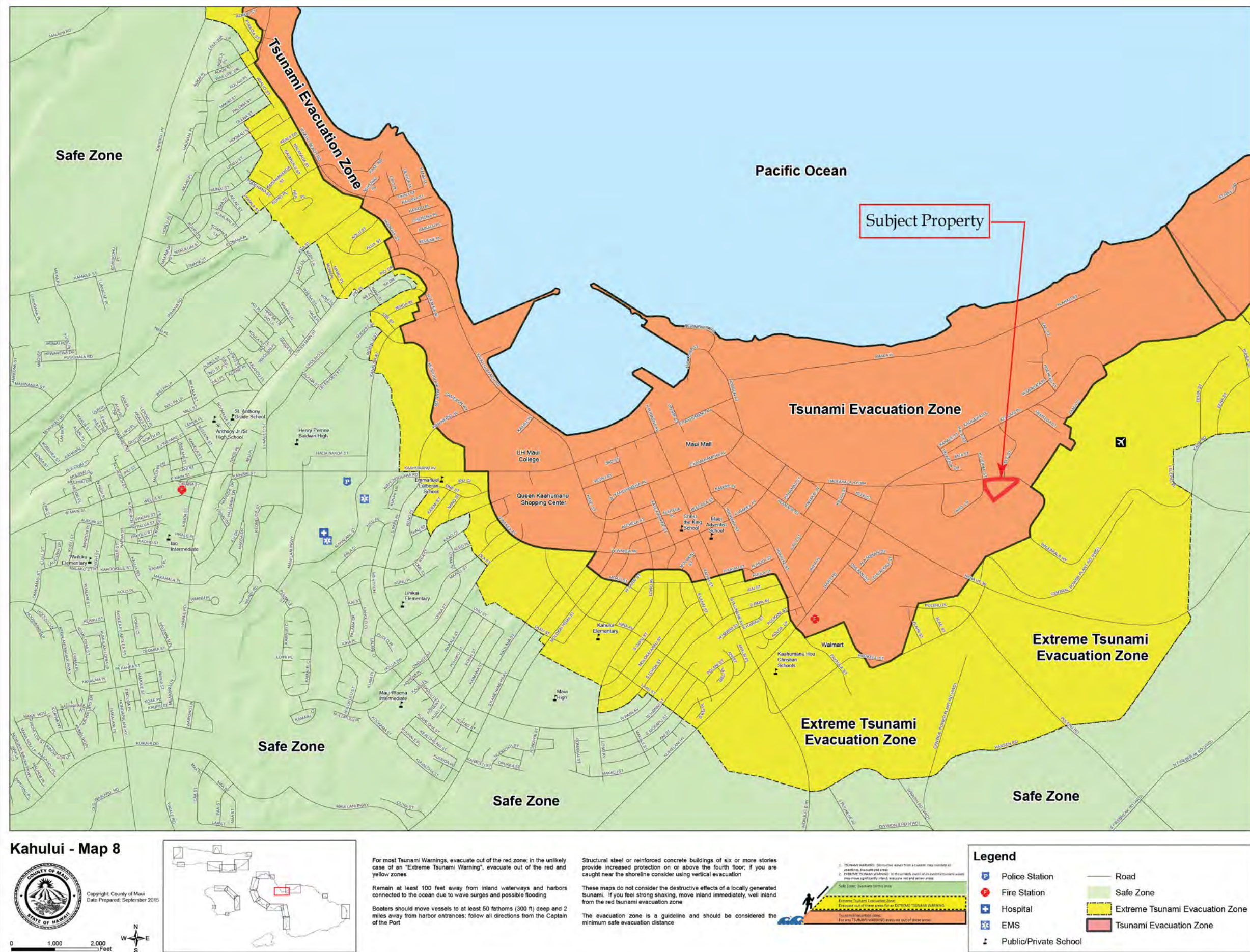
	FIGURE 4 Site Photographs
	Source: AXIS/GFA et al.

KANAHĀ HOTEL AT KAHULUI AIRPORT KAHULUI, MAUI, HAWAI'I

EXISTING CONDITIONS



04/16/2021
 JOB NO.: 1710
 SHEET NO.: 03



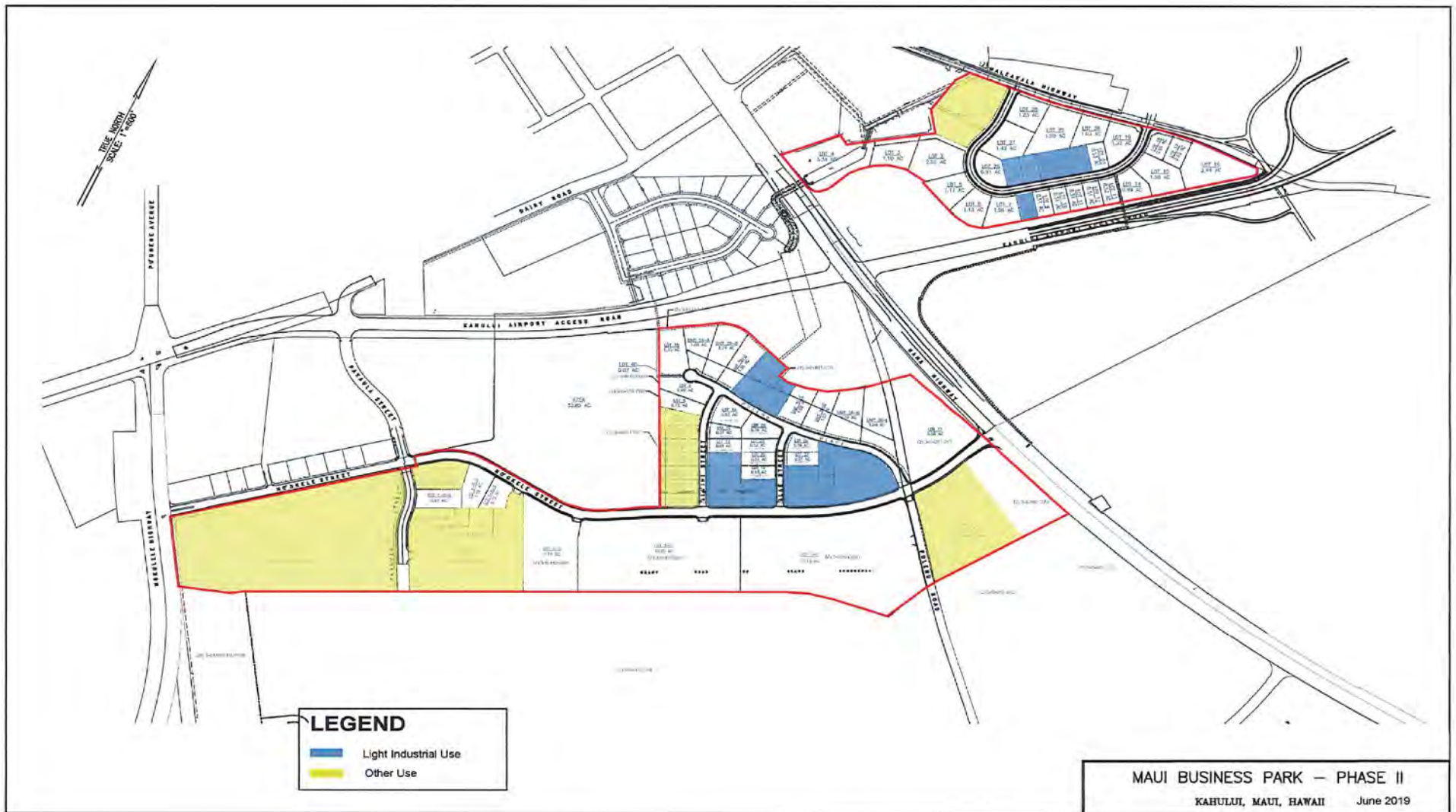


FIGURE 6

Maui Business Park II Land Use Plan

Kanahā Hotel at Kahului Airport

Source: Alexander & Baldwin, LLC



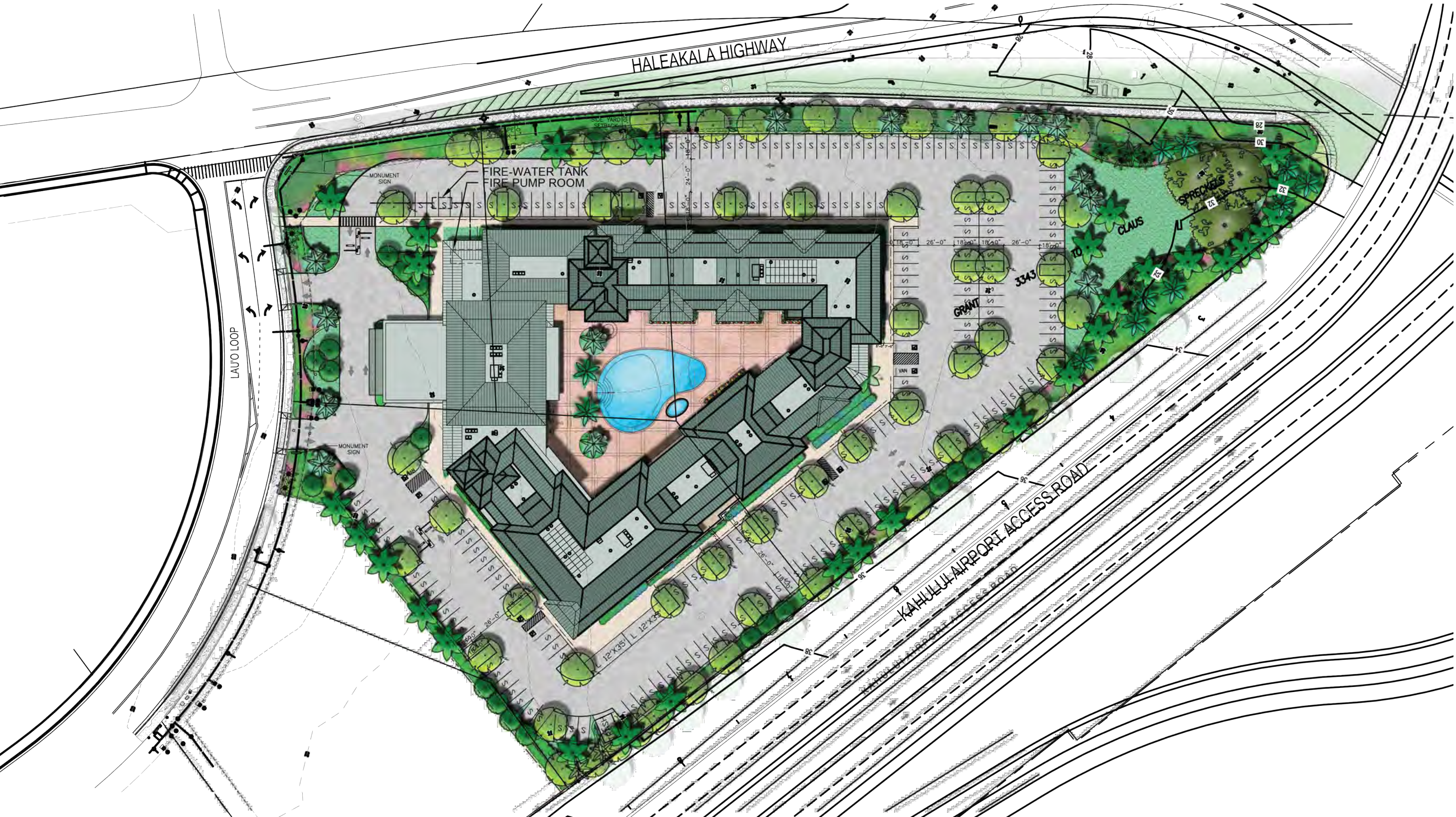


FIGURE 7
Conceptual Site Plan

**KANAHĀ HOTEL AT KAHULUI AIRPORT
KAHULUI, MAUI, HAWAI'I**

OVERALL SITE PLAN - OPT. 1

04/16/2021

JOB NO.: 1710
SHEET NO.: 06

SCALE: 1/64" = 1'-0"



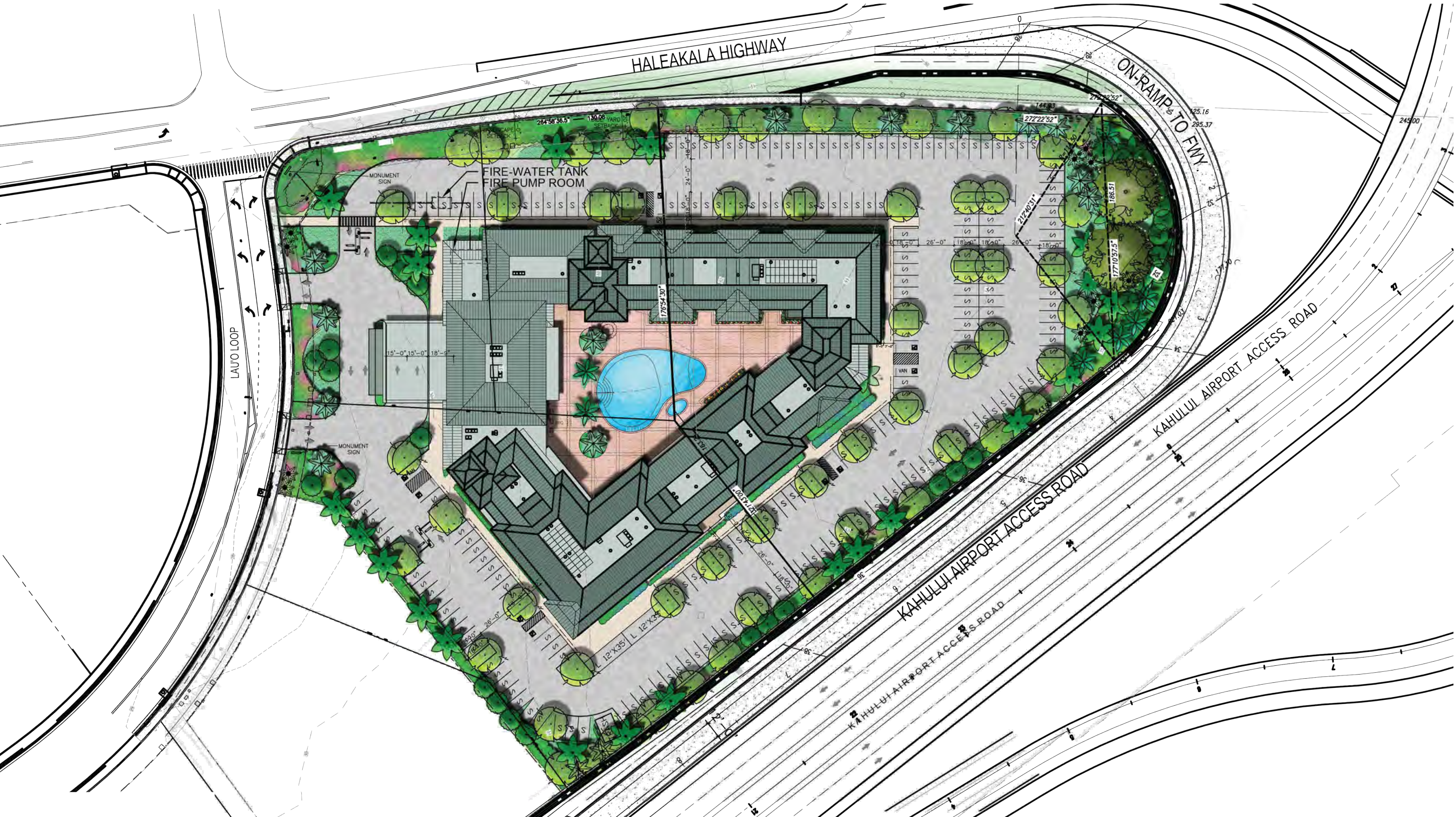


FIGURE 8
 Conceptual Site Plan with Future
 Airport Access Road on Ramp Plan

**KANAHĀ HOTEL AT KAHULUI AIRPORT
 KAHULUI, MAUI, HAWAI'I**

OVERALL SITE PLAN - OPT. 2

04/16/2021
 JOB NO.: 1710
 SHEET NO.: 07

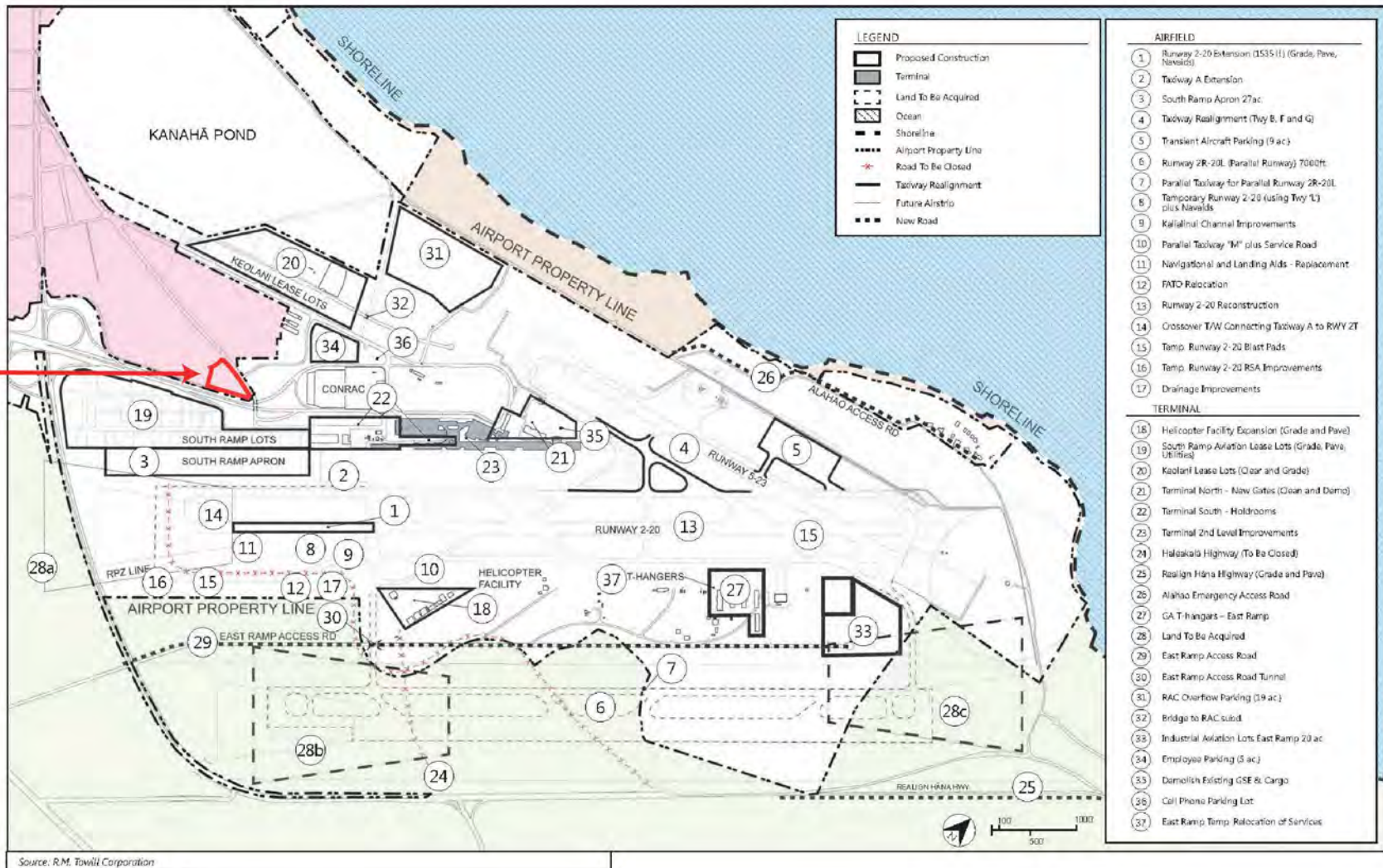


Figure 6-1 Preferred Plan

Kahului Airport Master Plan Update

6-3

Subject Project



Not to Scale

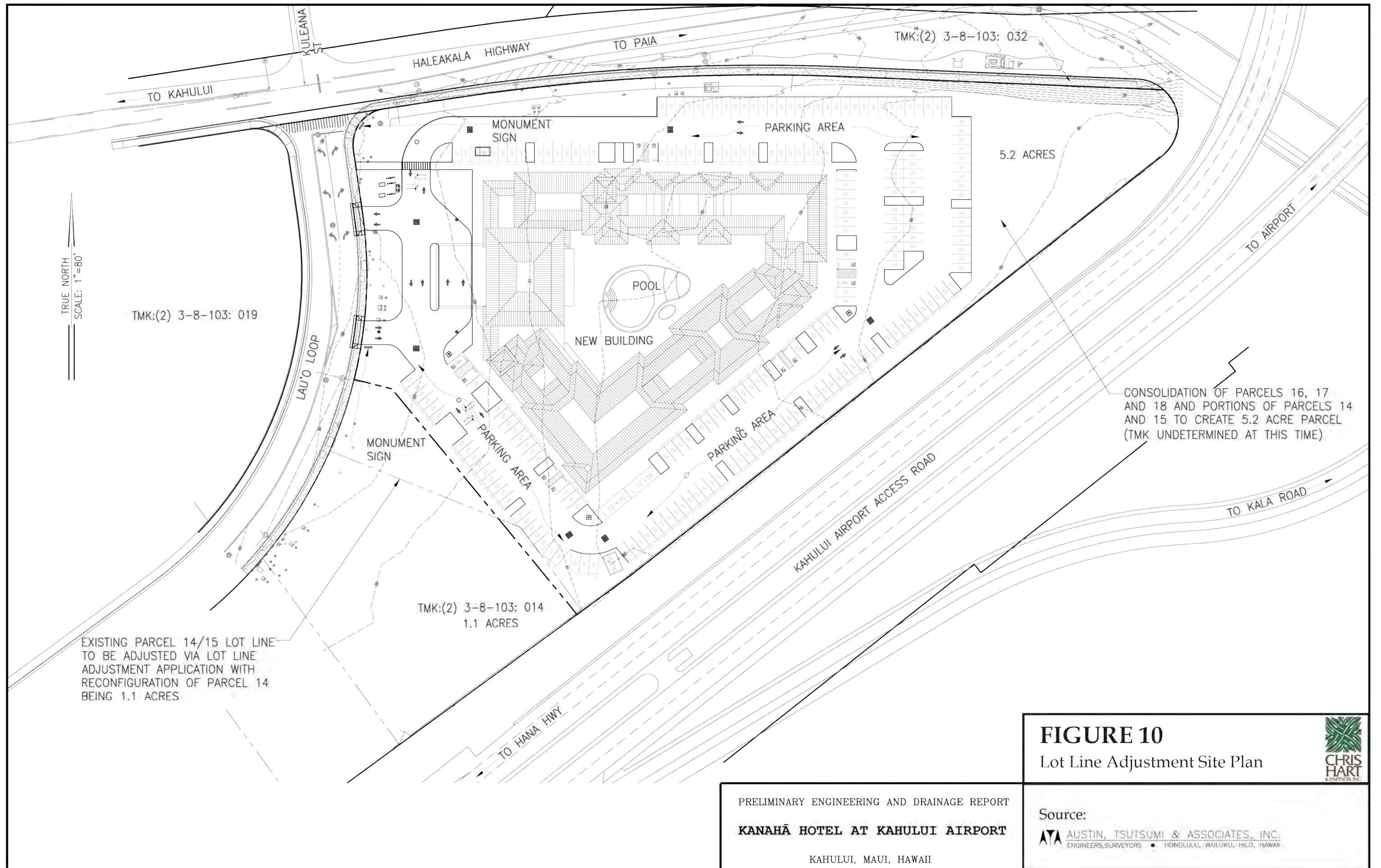
FIGURE 9

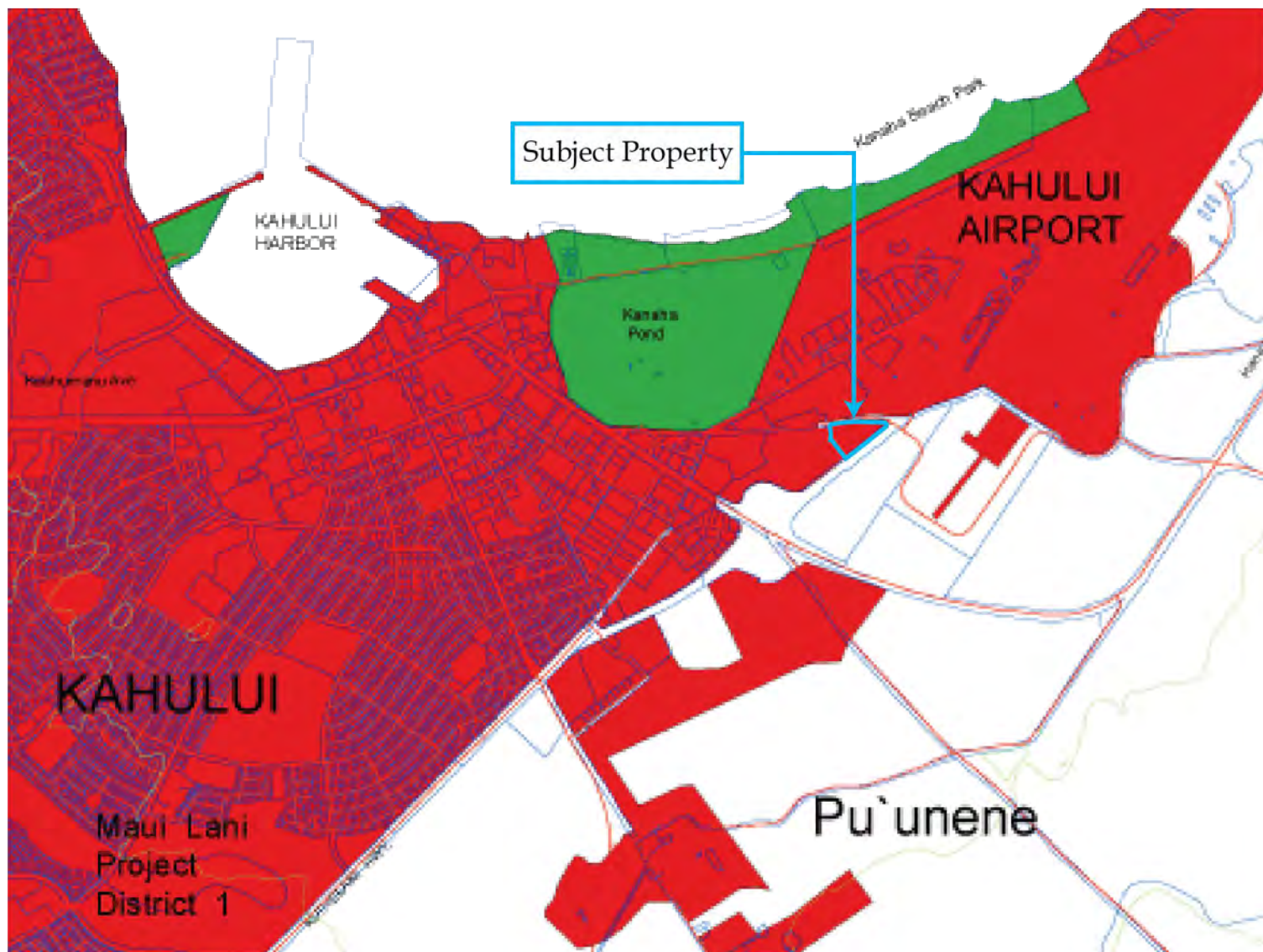
Kahului Airport Master Plan Map

Kanahā Hotel at Kahului Airport

Source: HDOT, Airports Division











Legend

-  Special Permit
-  Maui Tax Map Key - 2012
-  Major Roads
-  Contour Lines (100-ft.)

State Land Use District

-  URBAN
-  AGRICULTURAL
-  RURAL
-  CONSERVATION



Not to Scale

FIGURE 11

State Land Use Map

Kanahā Hotel at Kahului Airport

Source: State of Hawaii

