



## **Appendix 3.7 (continued)**

Comment Letters Received for the 2020 EISPN No. 1  
and Response Letters

# **WAILUKU-KAHULUI COMMUNITY PLAN (2002)**

**MAUI COUNTY COUNCIL**

EXHIBIT "1"

### C. The 1992 Community Plan Update

The update process was driven by the work of the Wailuku-Kahului Citizens Advisory Committee (CAC). The committee met a total of 19 times during the 225-day deliberation process to identify, formulate and recommend appropriate revisions to the Wailuku-Kahului Community Plan. The CAC carefully reviewed the 1987 version of the Community Plan, reshaping the plan to create a viable document which will serve the Wailuku-Kahului region through the turn of the century.

The update process incorporated technical studies and assessments. The results of these four (4) studies were used by the Department of Planning and CAC to understand possible future conditions and needs. The technical studies consisted of the following:

1. A Socio-Economic Forecast which projects population, employment and housing characteristics through the year 2010 for each Community Plan region;
2. A Land Use Forecast which provides a measure of existing and future vacant and undeveloped lands (by Community Plan land use designation) for each Community Plan region;
3. An Infrastructure Assessment which identifies infrastructure (e.g., roadways, drainage, water, wastewater, telephone and electrical systems) limits and opportunities in high-growth Community Plan regions; and
4. A Public Facilities and Service Assessment which identifies public facilities and services (e.g., schools, parks, police and fire protection, hospital and solid waste disposal services) limits and opportunities in high-growth Community Plan regions.

Following the 225-day CAC process, the CAC's recommendations were submitted to the Planning Department. The Planning Department prepared the revised Community Plan, based on the work of the CAC. The revised Community Plan was forwarded to the Maui Planning Commission for public hearing and review, and then sent to the County Council for further review and adoption by ordinance. This process is summarized graphically in Exhibit "B".

preservation of scenic vistas and shoreline resources and the expansion of public recreational opportunities is also emphasized in the Wailuku-Kahului Community Plan. The protection and recognition of historic, archaeological and cultural resources in the region is another intended effect of the plan. And, the protection of agricultural lands is an inherent part of the plan.

Finally, public facility and infrastructure improvements should not lag behind development in the region. Upon adoption of this plan, it shall be required that adequate facilities and infrastructure will be concurrent with future development. The land use designations on the community plan land use map are not an assertion that infrastructure will be provided to these areas, but merely that it would be appropriate to develop these areas as designated on the maps--if the necessary infrastructure and services are available.

## **C. Goals, Objectives, Policies and Implementing Actions**

### **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.

#### **Objectives and Policies**

1. Support agricultural production so agriculture can continue to provide employment and contribute to the region's economic well-being.
2. Support the revitalization of the Wailuku commercial core and adjacent areas by expanding the range of commercial services; improving circulation and parking; enhancing and maintaining the town's existing character through the establishment of a Wailuku Town design district; redevelopment of the Wailuku Municipal Parking Lot with emphasis on additional public parking; establishing urban design guidelines; and providing opportunities for new residential uses. Improve Wailuku's image and level of service as a commercial center for the region's population. A combination of redevelopment and rehabilitation actions is necessary to meet the needs of a growing center.
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.
4. Provide industrial growth opportunities through the expansion of existing industrial centers associated with the airport and harbor, and in Wailuku and



Kahului. Encourage the fee simple ownership of lots provided by private developers.

5. Recognize the importance of small businesses to the region's economy.
6. Encourage the development of affordable business incubator spaces with public subsidies or incentives, as necessary, similar in concept to that of the Maui Research and Technology Park.
7. Provide for the establishment of centralized business districts within the region, in order to minimize the extensive migration of commercial projects into light industrial developments.
8. Accommodate mixed use residential/commercial development as a "transition" between residential districts and the civic center and business/commercial districts compatible with a residential scale and character and subject to a new zoning classification. Lands intended for this use shall be designated Service Business/Residential (SBR) on the Community Plan land use map.
9. Support the establishment of agricultural parks for truck farming, piggery operations, bee keeping and other diversified agricultural operations within larger unsubdivided agricultural parcels and in locations that are compatible with residential uses.

### **Implementing Actions**

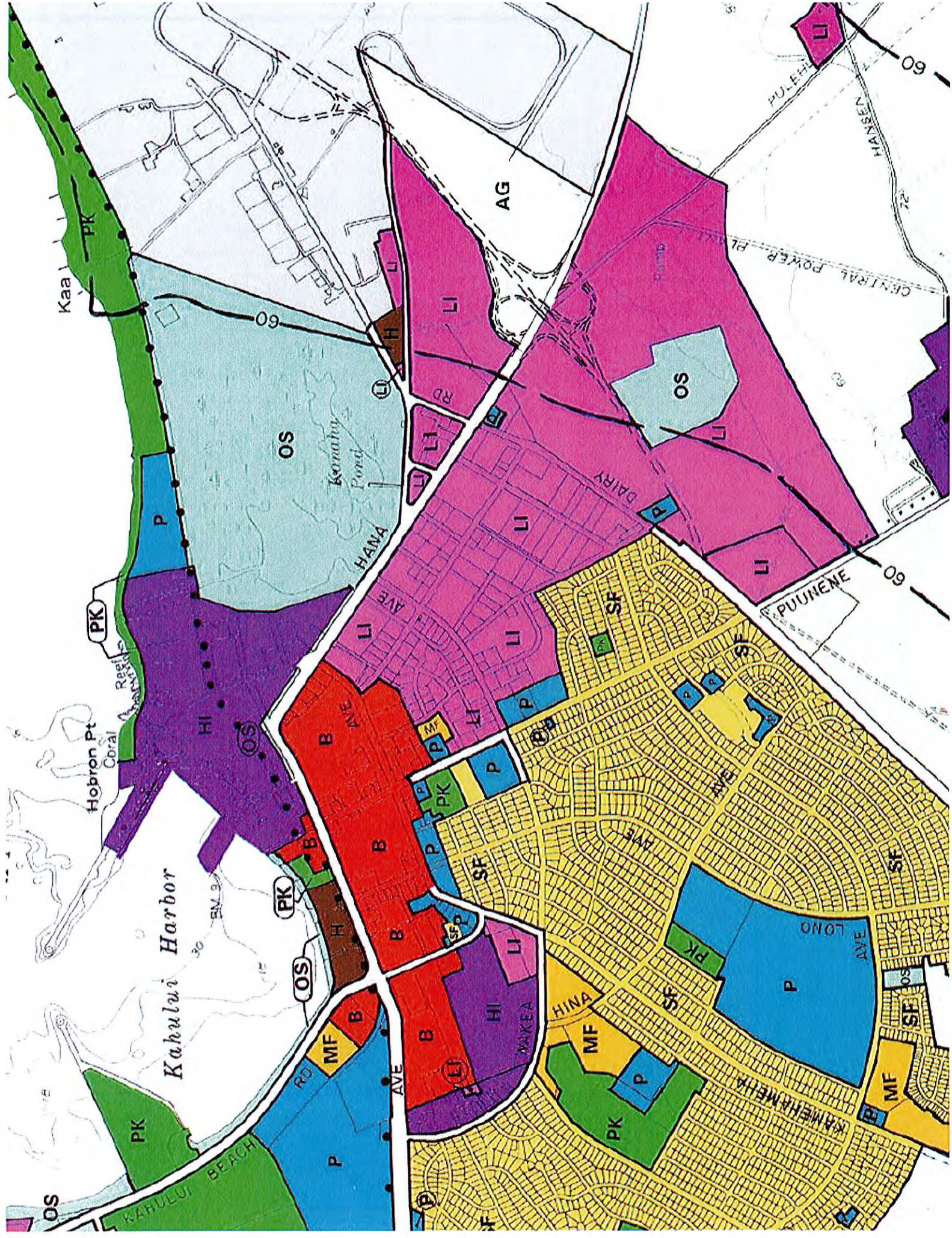
1. Place a high priority on the planning, design and construction of a multi-level parking facility at the Wailuku Municipal Parking Lot with potential opportunities for mixed use development, such as residential, commercial, park and other public uses.
2. Establish zoning regulations to implement a Service Business/Residential (SBR) land use designation provided for in the Community Plan policies.

## **ENVIRONMENT**

### **Goal**

A clean and attractive physical and natural environment in which man-made developments or alterations to the natural environment relate to sound environmental and ecological practices, and important scenic and open space resources are maintained for public use and enjoyment.







ORDINANCE NO. 3045

BILL NO. 11 (2002)

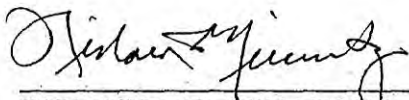
A BILL FOR AN ORDINANCE TO AMEND  
THE WAILUKU-KAHULUI COMMUNITY PLAN AND LAND USE MAP  
FROM LIGHT INDUSTRIAL TO HOTEL FOR PROPERTY SITUATED AT  
KAHULUI, MAUI, HAWAII

BE IT ORDAINED BY THE PEOPLE OF THE COUNTY OF MAUI:

SECTION 1. Pursuant to Chapter 2.80A, Maui County Code, the Wailuku-Kahului Community Plan and Land Use Map is hereby amended from Light Industrial to Hotel for property situated at Kahului, Maui, Hawaii, and identified for real property tax purposes by Tax Map Key Nos. 3-8-079:016 and 017, comprising approximately 3.345 acres, and more particularly described in Exhibit "A", attached hereto and made a part hereof, and in Community Plan Map No. CP- 413, which is on file in the Office of the County Clerk of the County of Maui, and which is by this reference made a part hereof.

SECTION 2. This ordinance shall take effect upon its approval.

APPROVED AS TO FORM  
AND LEGALITY:



RICHARD K. MINATOYA  
Deputy Corporation Counsel  
County of Maui

S:\CLERICAL\TLL\ORDS\Planning\CPA Kahului Airport.wpd

## EXHIBIT "A"

## DESCRIPTION

PORTION OF PARCEL 16  
AND ALL OF PARCEL 17  
OF  
TAX MAP KEY: (2) 3-8-79

All of that certain parcel of land, being a portion of Lot 2-A of the Airport Industrial Subdivision, Unit 3A [per Civil No. 92-0885(2)] and a portion of Grant 3343 to Claus Spreckels situated at Kahului, Wailuku, Island and County of Maui, State of Hawaii.

Beginning at a ½-inch pipe at the northwesterly corner of this parcel of land, on the southeasterly side of Keolani Place, the coordinates of said point of beginning referred to Government Survey Triangulation Station "LUKE" being 2,960.30 feet North and 15,689.14 feet East and running by azimuths measured clockwise from True South:

1.	241° 22' 52"	90.76 feet	along the southeasterly side of Keolani Place to a ½-inch pipe;
2.	245° 34' 52"	300.39 feet	along same to a ½-inch pipe;
3.	241° 22' 52"	75.00 feet	along same to a ½-inch pipe;
4.	329° 41'	139.51 feet	along the remainder of Grant 3343 to Claus Spreckels [being along TMK: (2)3-8-79:18]; to a ½-inch pipe;
5.	331° 00' 22"	170.80 feet	along the remainder of Grant 3343 to Claus Spreckels [being along TMK: (2) 3-8-79: 18 and 19 to a ½-inch pipe;
6.	338° 57' 52"	97.70 feet	along the remainder of Grant 3343 to Claus Spreckels [being along TMK: (2)3-8-79:20] to a ½-inch pipe;
7.	87° 32' 52"	526.04 feet	along the northerly side of Haleakala Highway (F.A.P. 5-C) to a ½-inch pipe;

WE HEREBY CERTIFY that the foregoing BILL NO. 11 (2002)

1. Passed FINAL READING at the meeting of the Council of the County of Maui, State of Hawaii, he on the 15th day of March, 2002, by the following votes:

Patrick S. KAWANO Chair	Dain P. KANE Vice-Chair	Alan M. ARAKAWA	Robert CARROLL	G. Riki HOKAMA	Jo Anne JOHNSON	Michael J. MOLINA	Wayne K. NISHIKI	Charmaine TAVARES
Excused	Aye	Aye	Aye	Aye	No	Aye	No	Aye


2. Was transmitted to the Mayor of the County of Maui, State of Hawaii, on the 15th day of March, 2002.  
DATED AT WAILUKU, MAUI, HAWAII, this 15th day of March, 2002.

RECEIVED  
2002 MAR 15 PM 3:21  
OFFICE OF THE MAYOR

  
\_\_\_\_\_  
DAIN P. KANE, VICE-CHAIR  
Council of the County of Maui

  
\_\_\_\_\_  
ROY T. HIRAGA, COUNTY CLERK  
County of Maui

THE FOREGOING BILL IS HEREBY APPROVED THIS 15th DAY OF March, 2002.

  
\_\_\_\_\_  
JAMES H. APANA JR., MAYOR  
County of Maui

I HEREBY CERTIFY that upon approval of the foregoing BILL by the Mayor of the County of Maui, the said BILL was designated as ORDINANCE NO. 3045 of the County of Maui, State of Hawaii.

  
\_\_\_\_\_  
ROY T. HIRAGA, COUNTY CLERK  
County of Maui

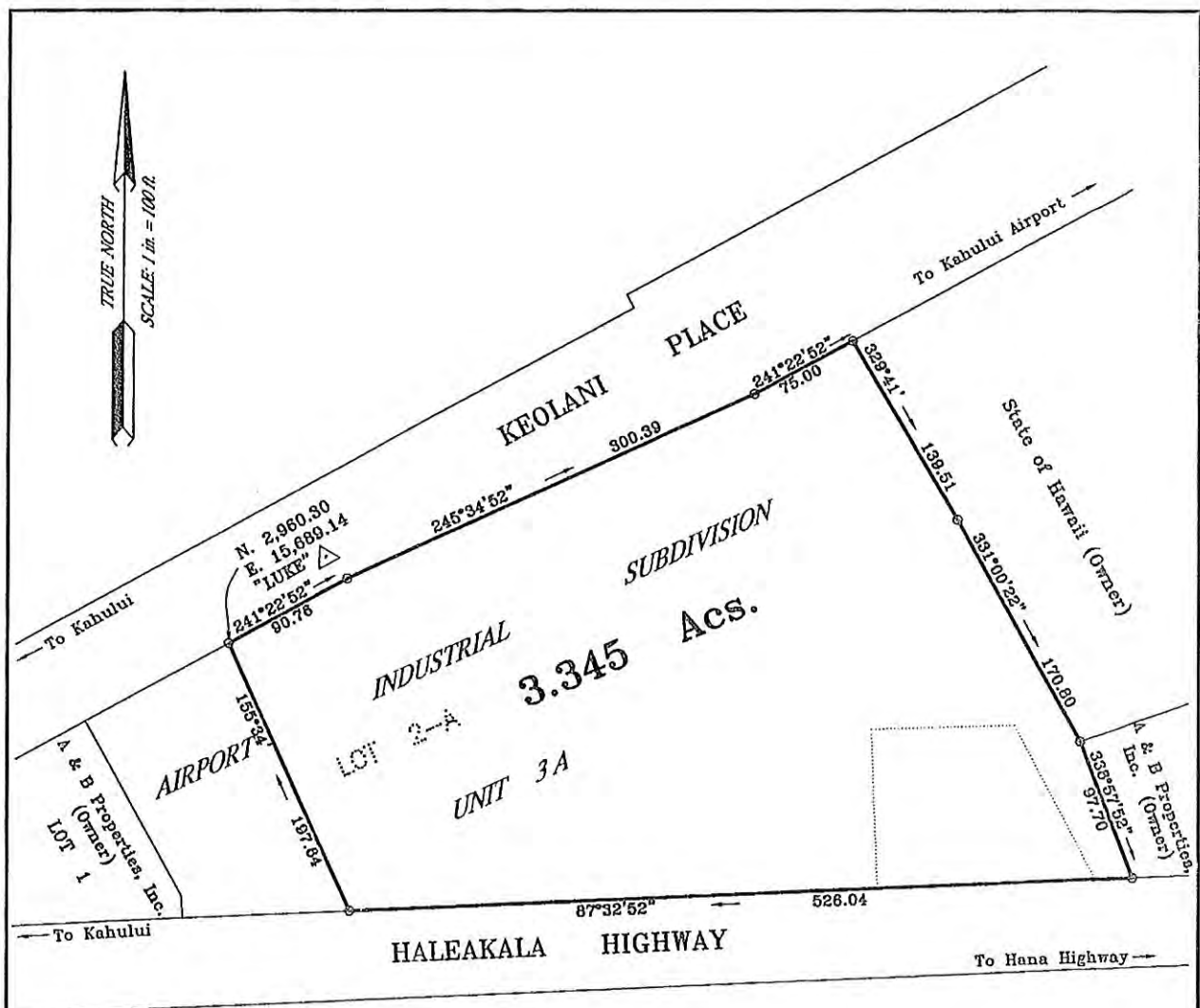
Passed First Reading on February 15, 2002.  
Effective date of Ordinance March 19, 2002.

RECEIVED  
2002 MAR 19 AM 11:50  
OFFICE OF THE  
COUNTY CLERK

I HEREBY CERTIFY that the foregoing is a true and correct copy of Ordinance No. 3045, the original of which is on file in the Office of the County Clerk, County of Maui, State of Hawaii.

Dated at Wailuku, Hawaii, on

\_\_\_\_\_  
County Clerk, County of Maui



TAX MAP KEY: (2) 3-8-79: 16 & 17

AREA: = 3.345 Acs.

## COMMUNITY PLAN MAP NO. 413

COMMUNITY PLAN AMENDMENT - KAHULUI, MAUI, HAWAII  
FROM LIGHT INDUSTRIAL TO HOTEL

APPROVED: \_\_\_\_\_

COUNTY CLERK

APPROVED: \_\_\_\_\_

PLANNING DIRECTOR

PUBLIC HEARING: September 25, 2001

ADOPTED - COUNCIL: MAY 19, 2000

ADOPTED - MAYOR: MAY 23, 2000

ORDINANCE NO.: 2864 3045

DATE: \_\_\_\_\_

SCALE: 1 in. = 100 ft.

OFFICE OF THE COUNTY CLERK  
200 S. HIGH STREET WAILUKU, HAWAII 96793

CP-413

19.14.010 - Purpose and intent.

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.

(Ord. No. 4103, § 1, 2014)



November 10, 2021

Christopher Delaunay  
Government Relations Manager  
Pacific Resource Partnership  
1100 Alakea Street, 4<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Delaunay,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter dated July 21, 2020. We have prepared the following responses to your comments.

**Comment 1:** *R.D. Olson's proposed Amendment to The Wailuku-Kahului Community Plan is contrary to the The Wailuku-Kahului Community Plan Review Process and Community Preference for Light Industrial (LI) Development in the Maui Business Park Phase II.*

**Response 1:** The proposed Amendment to the Wailuku-Kahului Community Plan (the "Community Plan") will go through public process as established by Chapter 2.80B, Maui County Code. The Community will have an opportunity to review and comment on the proposed amendments. The community plan process contemplated nondecennial amendments to the various plans and established a process. The Maui County Council will have the opportunity to determine whether amendment reflects the priorities, needs and desires of the greater community.

As stated in your letter the Community Plan states as an objective and policy, "[a]llow 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. While the Courtyard by Marriott property at TMK (2) 3-8-076:016 obtained its community plan amendment prior to the effective date of the Community Plan, the Wailuku-Kahului



Advisory Committee (“CAC”) still stated that opportunities for hotel accommodations near the Kahului Airport should be allowed, showing the CAC’s support for this amendment in concept.

The remaining areas of the Maui Business Park Phase II will remain to “provide industrial growth opportunities” as recommended by the Community Plan.

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 “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.

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.” The proposed project site is adjacent to the Kahului Airport. Due to the close proximity to the airport the subject property is an appropriate location for future hotel accommodations.

The Kahului Airport Master Plan update dated December 2016 identifies that future commercial lots for lease for companies such as UPS, FedEx, USPS, Cargo companies and other aviation related uses.

2-21: the policy of DOTA has been to allow tenants to lease OGG land when it is not in conflict with aviation use requirements or airport operations. As a result, there are a number of tenants whose activities are classified as non-aviation related.

- *(reference Oahu hotels near HNL)*

On Oahu at the Daniel K International Airport (HNL) currently there are no airports located within the Airport property, however there are a variety of accommodations available within less than 2 miles from the airport.

Airport Honolulu Hotel is 1 mile away from HNL  
Best Western, the Plaza Hotel is 1.1 mile away from HNL  
Pacific Marina Inn, 1.7 miles from HNL

**Comment 2:** *R.D. Olson’s proposed Change in Zoning of the project site from M-1 Light Industrial to Hotel conflicts with the purpose and intent of hotel districts.*

**Response 2:** Kahului is the business center of Maui with a majority of commerce taking place in the area. The permitted uses with the M-1 Light Industrial District include any use permitted in the B-1, B-2, or B-3 business district per Section 19.24.020, MCC. The change in zoning would place the proposed hotel property on the border of an area where business uses are permitted.

The location of the proposed hotel is adjacent to the Airport District, where “transient hotels” are a permitted use per Section 19.28.010(B), MCC. This change in zoning would be allowing hotel use in an area adjacent to the Airport where hotel use is already permitted.

In addition, Section 19.14.010 state that 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.

At this time due to sea-level rise concerns construction of oceanfront structures should not be promoted.

The Kahului Airport is designated Airport District by Maui County Code Chapter 19.28 which 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 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.

A Community Plan Amendment to from light Industrial to Airport would accomplish the objective 3 of the WKCP to allow opportunities for hotel accommodations near the Kahului Airport.

It is anticipated that a change in zoning from LI to Airport would be granted to create consistency with the Airport Community plan designation.

***Comment 3:** R.D. Olson’s proposed development of a Hotel on lands designated Light Industrial precludes planned economic stimulus opportunities, including the opportunity to create diversified jobs associated with the growth and development of Maui’s industrial base proximal to the Airport.*

**Response 3:** The permitted used in the M-1 Light Industrial District are very broad per Section 19.24.020, MCC. The uses are not limited to industrial so the opportunities could vary regardless of the proposed development.

Maui is looking at opportunities to diversify its economy. Businesses or industries entering the Maui market will need convenient places in central Maui to house their business travelers. A hotel near the Kahului Airport would also support the existing businesses on Maui by providing a place to stay near the business center. The resorts are not necessarily conducive to business travel and the need for the business travelers to go from the business center to the resort district will add unnecessary strain on Maui's already overtaxed roadways.

The existing Light Industrial designation would permit a variety of very different development scenarios – including retail or light industrial activities. It is uncertain what would occur under that designation, and demand for this use has been limited for these activities. It is unlikely that most actual development under these scenarios would generate substantial export activities (i.e., bringing in outside dollars to the Hawai'i and Maui economies). Without those outside dollars, there is likely no expansion of the economy resulting in demand for retail or light industry.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your participation in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

## Brett Davis

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**From:** De Austin <dezireenaustin@gmail.com>  
**Sent:** Tuesday, July 14, 2020 9:12 AM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** anthony.wrzosek@rdodevelopment.com; Brett Davis  
**Subject:** Kanaha Hotel plans for Kahului, Maui

Respected Land Use Commissioners, R.D. Olson Development, Chris Hart and Partners:

I strongly feel that the proposal for establishing yet another hotel on Maui is not well-planned and is a detriment to our island community.

It will take a few to several years before Maui will see its transient travelers return to the heights it once had a year ago. There is also another proposed hotel in a nearby city, and that hotel is being challenged by the local community.

Kahului already has existing, long-established for over 50 years, local hotels, the Maui Beach and the Maui Seaside. These hotels are under three miles from the airport. A newer hotel is The Courtyard by Marriot, which caters to business and families and is under two miles from the airport.

The proposed Kanaha hotel purports to cater to the business traveler, but I do not know of any business traveler who will come to Maui, just stay in their hotel, and then go home - just on business.

*Any person* who travels to Maui, business, traveler, solo or family, will want to be near the beach and/or within the vicinity of the classic destination points of Wailea or Lahaina. They will want to travel around the island. They may prefer to check into a hotel closer to their sightseeing needs.

So, having a fourth hotel under three miles from the airport isn't necessary.

Although Maui has its luxury properties, they do negotiate rates for companies. We also have a Residence Inn by Marriott in Wailea, with rates reportedly half the cost of it's sister hotel, the Wailea Beach Resort. Further, Maui has an existing system of private residences who rent out rooms or homes.

So, I ask, do we really need another hotel?

Further, in order to complete the process, there has to be a change in the Wailuku-Kahului Community plan, zoning, AND a special management area use permit, among other stipulations.

With all the changes that need to be made, that would suggest that Maui's long-range vision for this area did not include additional transient lodging.

Although I respect the potential work this construction would provide, it would do so, but at what cost? We lose more open space, potential agricultural land or potential land for affordable housing.

Also, there is the cost drawn from neighborhood culture. Building a new hotel would draw business away (and work) away from existing hotel operations. When active businesses leave an area, neighborhood blight grows. Did you see what happened when the new Safeway was built, and the old one was closed down? We have empty stores, like the old Barnes and Noble, then Sports Chalet; we have multiple shopping centers which are not filled with businesses. It creates a disharmonious, deserted feel on this island.

The Maui General Plan 2030 has goals, among others, of the protection of community character and the preservation of agriculture.

I respectfully ask that you withdraw your plans for a hotel, and see what the community actually wants according to the Community Plan or what their community needs, as those needs may have changed since the establishment of the Community Plan in the 90's.

The Community Plan is available on the Maui County website.

Very sincerely,

D Austin



November 16, 2021

Ms. Dezireen Austin  
dezireenaustin@gmail.com

Dear Ms. Austin,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your e-mail of July 14, 2020, providing your comments on the proposed hotel project at this time. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*Comments: I strongly feel that the proposal for establishing yet another hotel on Maui is not well-planned and is a detriment to our island community.*

*It will take a few to several years before Maui will see its transient travelers return to the heights it once had a year ago. There is also another proposed hotel in a nearby city, and that hotel is being challenged by the local community.*

*Kahului already has existing, long-established for over 50 years, local hotels, the Maui Beach and the Maui Seaside. These hotels are under three miles from the airport. A newer hotel is The Courtyard by Marriot, which caters to business and families and is under two miles from the airport.*

*The proposed Kanahā hotel purports to cater to the business traveler, but I do not know of any business traveler who will come to Maui, just stay in their hotel, and then go home - just on business.*

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*So, having a fourth hotel under three miles from the airport isn't necessary.*

*Although Maui has its luxury properties, they do negotiate rates for companies. We also have a Residence Inn by Marriott in Wailea, with rates reportedly half the cost of it's sister hotel, the Wailea Beach Resort. Further, Maui has an existing system of private residences who rent out rooms or homes.*

*So, I ask, do we really need another hotel?*

*Further, in order to complete the process, there has to be a change in the Wailuku-Kahului Community plan, zoning, AND a special management area use permit, among other stipulations.*

*With all the changes that need to be made, that would suggest that Maui's long-range vision for this area did not include additional transient lodging.*

*Although I respect the potential work this construction would provide, it would do so, but at what cost? We lose more open space, potential agricultural land or potential land for affordable housing.*

*Also, there is the cost drawn from neighborhood culture. Building a new hotel would draw business away (and work) away from existing hotel operations. When active businesses leave an area, neighborhood blight grows. Did you see what happened when the new Safeway was built, and the old one was closed down? We have empty stores, like the old Barnes and Noble, then Sports Chalet; we have multiple shopping centers which are not filled with businesses. It creates a disharmonious, deserted feel on this island.*

*The Maui General Plan 2030 has goals, among others, of the protection of community character and the preservation of agriculture.*

*I respectfully ask that you withdraw your plans for a hotel, and see what the community actually wants according to the Community Plan or what their community needs, as those needs may have changed since the establishment of the Community Plan in the 90's.*

*The Community Plan is available on the Maui County website.*

**Responses.** The DEIS contains an analysis of the Maui Island Plan including visitor accommodations. The proposed hotel project is located in Kahului adjacent to the airport and will provide additional hotel rooms in the central valley for visitors that are not staying in resort destination areas located in West and South Maui.

**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 Kanahā 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 Kanahā 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 Kanahā 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. Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 summarizes our analysis.

<b>Estimated Contribution of Kanahā Hotel to Policy Metric of 33.33% ADC</b>		
Kanahā Hotel Room Count	200	Rooms
Estimated Occupancy	80.0%	Occupancy
Estimated Nightly Occupied Rooms	160	Occupied Rooms
Estimated Share Kanahā 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 Kanahā Hotel	138	Visitors
Maui ADC Based on Population of 154,100 and Policy Metric of 33.33%	50,853	Visitors
Estimated Contribution of Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā Hotel will have a higher quality physical product than the older harbor-front hotels, making it directly competitive with the Courtyard.

The Kanahā 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 Kanahā 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, Kihei, 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā Hotel will capture market share from vacation rentals. Rather than attracting additional visitors to Maui, the proposed Kanahā Hotel will likely displace demand currently accommodated by vacation rentals, many of which are unlicensed. As such the Kanahā 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, Kanahā 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 140 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 Kanahā 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 Kanahā 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 Kanahā 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'aina* travelers as well as recent residents.



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.

Please refer to the following sections and appendices within the forthcoming DEIS for more details:

- Section 2.2.2 (Economy)
- Section 4.3.12 (Impacts to Tourism)
- Appendix 20 (Economic Impact Analysis and Public Fiscal Assessment)
- Appendix 21 (Market Study)
- Appendix 22 (Tourism Study)

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

July 21, 2020

**TO:** **Approving** Land Use Commission, State of Hawai'i

**Agency:** Mr. Daniel E. Orodener, Executive Officer, (808) 587-3822,  
**dbedt.luc.web@hawaii.gov** P.O. Box 2359, Honolulu, HI 96804-2359

**Applicant:** R.D. Olson Development; 520 Newport Center Dr., Suite 600,  
Newport Beach, CA 92660

Mr. Anthony Wrzosek, Vice Pres., (949) 271-1109,  
**anthony.wrzosek@rdodevelopment.com**

**Consultant:** Chris Hart & Partners, Inc.; 115 North Market St., Wailuku, HI 96793  
Mr. Brett A. Davis, Sr. Planner, 808-242-1955; **bdavis@chpmaui.com**

**FROM:** **Prof. Richard "Dick" Mayer, 1111 Lower Kimo Dr. Kula, Maui, HI 96790**  
**dickmayer@earthlink.net**

**RE:** **Part #2 PROPOSED KANAHA HOTEL AT KAHULUI AIRPORT**  
**EIS PREP NOTICE**

Aloha,

I wish to add one additional comment to the testimony which I submitted earlier today with regard to the preparation notice for an EIS for the Kanaha hotel.

Since the Kanaha Hotel is merely a new name for the previously named Windward Hotel, and also needs an environmental review, I request that all of the testimony which was previously submitted by both the general public and the various government agencies for the Windward Hotel environmental document be now included in the Kanaha Hotel draft EIS.

This is important because the general public, and maybe some of the agencies, do not realize that this is the same project and that their comments would be exactly the same. I expect the Draft-EIS to not only include all those submitted comments, but also that the mitigation measures which would normally be done in a Draft-EIS be included in the Kanaha EIS.

Mahalo for accepting these additional comments.



November 10, 2021

Professor Richard "Dick" Mayer  
1111 Lower Kimo Dr.  
Kula, Maui, HI 96790

Dear Professor Mayer,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018

Thank you for your letter of July 21, 2020, providing the department's comments on the proposed hotel project at this time. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*I wish to add one additional comment to the testimony which I submitted earlier today with regard to the preparation notice for an EIS for the Kanaha hotel.*

*Since the Kanaha Hotel is merely a new name for the previously named Windward Hotel, and also needs an environmental review, I request that all of the testimony which was previously submitted by both the general public and the various government agencies for the Windward Hotel environmental document be now included in the Kanaha Hotel draft EIS.*

*This is important because the general public, and maybe some of the agencies, do not realize that this is the same project and that their comments would be exactly the same. I expect the Draft-EIS to not only include all those submitted comments, but also that the mitigation measures which would normally be done in a Draft-EIS be included in the Kanaha EIS.*

**Response.** The Applicant acknowledges this comment. The forthcoming Draft EIS for the proposed Kanahā Hotel at Kahului Airport will include all of the testimony and comment letters from both the general public and the various government agencies — that were previously addressed for the Windward Hotel project. The Draft EIS will also include the mitigation measures following the guidelines in the Hawaii Administrative Rules (HAR) Chapter 11-200.1 about Environmental Impact Statement Rules.

In addition, the decision to rename the project from Windward Hotel to Kanahā Hotel at Kahului Airport was inspired by the input from one of the interviewees — during the interview conducted for the Cultural Impact Assessment report. The interviewee suggested to incorporate traditional name practices that are of great importance to the Hawaiian community. The proposed hotel project is situated inland of the Kanahā Ponds State Wildlife Sanctuary; hence, the current name of the project is the Kanahā Hotel at Kahului Airport.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you again for providing us with your letter. If you have any questions, please contact me at 808-242-1955 or [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com).

Sincerely,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

July 14, 2020

**TO: Approving** Land Use Commission, State of Hawai'i

**Agency:** Mr. Daniel E. Orodener, Executive Officer, (808) 587-3822,  
[dbedt.luc.web@hawaii.gov](mailto:dbedt.luc.web@hawaii.gov) P.O. Box 2359, Honolulu, HI 96804-2359

**Applicant:** R.D. Olson Development; 520 Newport Center Dr., Suite 600,  
Newport Beach, CA 92660  
Mr. Anthony Wrzosek, Vice Pres., (949) 271-1109,  
[anthony.wrzosek@rdodevelopment.com](mailto:anthony.wrzosek@rdodevelopment.com)

**Consultant:** Chris Hart & Partners, Inc.; 115 North Market St., Wailuku, HI 96793  
Mr. Brett A. Davis, Sr. Planner, 808-242-1955; [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com)

**FROM:** Prof. Richard "Dick" Mayer, 1111 Lower Kimo Dr. Kula, Maui, HI 96790  
[dickmayer@earthlink.net](mailto:dickmayer@earthlink.net)

**RE: PROPOSED KANAHA HOTEL AT KAHULUI AIRPORT - EIS PREP NOTICE**

**IMPORTANT GENERAL CONCERNS:**

1. It seems that the applicant made an effort to get this hotel's environmental documents approved by the Maui Planning Commission in 2018-2019. However, having run into difficulties at the County level, the applicant changed the hotel name from the "Windward Hotel" to the "Kanaha Hotel", and has gone to the State Land Use Commission. The applicant now seeks to get approval of its EIS from the State Land Use Commission.
2. The proposed, renamed KANAHA HOTEL is trying to circumvent a very important element of Maui General Plan's Maui Island Plan. **The Maui Island Plan calls for no more than one tourist for every three residents. (Policy 2.2.3.a on Page 4-14).** Prior to the Covid-19 crisis, Maui had already exceeded its tourism saturation level. As the Maui Planning Director pointed out, the EIS must address this violation of the Maui Island Plan.
3. Major reasons for the strict limits on the number of tourists in the Maui Island Plan which is a key component of the County's General Plan are fears that Maui is already too dependent on tourism and that Maui's infrastructure and culture was being overwhelmed.
4. During the Covid-19 crisis Maui's workers have suffered more than any other Hawai'i island because of our existing dependence on the tourism sector. Maui political leaders and most residents now desire to reduce our dependence on visitors and tourism, and certainly do not wish to add even more visitor accommodations!

The earlier Windward Hotel's DRAFT-EA calculations on page 154 (PDF 161) had totally misrepresented the necessary calculation in several critical ways. The Kanaha Hotel Draft EIS must make proper, accurate calculations of Maui Island's tourism numbers and population, as they were prior to the Covid-19 crisis. After all, we must assume a return to normal tourism, and if present Summer-2020 tourism numbers were to be used, then there would be absolutely no reason at all to change the land-use designation, zoning, and/or build this hotel.

**SPECIFIC CONCERNS AND ISSUES:**

5. **Housing issues.** Because Maui Island already has a shortage of housing, how will the housing needs of the hotel’s workers be satisfied?
6. **Tsunami Evacuation Zone.** The hotel is in the Tsunami Zone. If a tsunami was generated, **describe escape routes, and methods to warn hotel guests**, especially if the tsunami is generated locally around the Hawaiian Islands.
7. **Violation of County Zoning Code.** A&B “Maui Business Park 2” is 11% industrial and 89% **NON**-industrial. The requirement in the Maui County Code **19.24.010 - Purpose and intent** is that **“mostly” (at least half)** of light-industrial zoned area must be “light-industrial”. The proposed Kanaha Hotel land is not “light Industrial”.

**19.24.010 - Purpose and intent.** 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 above or below the first floor and apartments.

By removing the proposed hotel’s land from the A&B Maui Business Park 2, It will not change the fact that the A&B Business Park 2 remains non-conforming to Maui County Code Title 19.

8. **Many other hotels planned and under construction.** The DRAFT-EIS needs to acknowledge that there are presently many other hotels being planned on Maui Island, including others in the Kahului/Wailuku district, and even one by the DRAFT-EIS applicant’s company in Wailea. The DRAFT-EIS needs to describe the cumulative impacts of adding their hotel to all these other developments.

These new additional hotels, several already having their needed entitlements, and some under construction, include:

**A. Maui Beach Hotel (Peter Savio) (140 rooms)**

<https://www.mauinews.com/news/local-news/2019/02/plans-move-ahead-for-new-hotel-on-old-maui-palms-site/>

**B. Hilton Garden Inn - Wailuku (Jonathon Starr) (156 rooms)**

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**C. Wailuku Hotel (Takitani) (? Rooms)**

**D. Grand Wailea Expansion (224 rooms)**

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**E. Maui Coast Hotel (150 Rooms)**

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**F. AC Hotel Wailea** (Olsen, the same company proposing this Windward Hotel) (**110** rooms)  
[https://www.hotel-online.com/press\\_releases/release/r-d-olson-breaks-ground-on-ac-hotel-wailea-on-the-southside-of-maui-county/](https://www.hotel-online.com/press_releases/release/r-d-olson-breaks-ground-on-ac-hotel-wailea-on-the-southside-of-maui-county/)

**G. Hilton Grand Vacations** (on the former Maui Lu Property) (**388** multi-room suites)  
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**H. Kaanapali Infill** (State Employee Retirement System) (**100+** rooms)  
<http://lahainanews.com/page/content.detail/id/543282/State-ERS-plans-to-bring-new-uses--vitality-to-Kaanapali-Golf-Courses.html>

9. **Overtourism on Maui.** Please include in the FINAL-EIS an analysis of the overtourism impacts made in the attached viewpoint below.

**MAUI ISLAND VISITORS 2008 - 2018 from the Hawaii Tourism Authority**

**The Maui Island Plan calls for no more than one tourist for every three residents. (Policy 2.2.3.a on Page 4-14)**  
**We are now way over the desired number of tourists with only 2.42 residents for each visitor.**



THE MAUI NEWS – Sunday, September 9, 2018 – C3

## opinion

# Has Maui reached its tourism limit?

When the plantations mechanized in the 1950s, there were no jobs and Maui's workers had to leave to find employment elsewhere. Elected officials, government agencies and appointed commissioners facilitated tourist projects by minimally enforcing regulations. They entitled vacant plantation and ranch land for hotels, condominiums, golf courses and shopping centers.

Both unemployed agricultural workers, and recent graduates found on-island jobs. Construction companies benefited, while growing numbers of Realtors made money selling properties to tourists. The growing tourist industry saved Maui's economy.

However, the biggest beneficiaries were off-island investors. They exported their profits, instead of providing promised affordable workforce housing and paying higher salaries. Investors loved Maui's low property tax assessments with Hawaii's lowest hotel property tax rate.

Economic prosperity disguised negative and often unwelcome impacts to the environment, local traditions and culture. Tourists, not Maui residents, selected Maui as the "top tourist-destination island!"

Locals find that the quiet beaches that families previously enjoyed are congested with tourists, kayak rentals, scuba operations, weddings and beach chairs. Beaches lack parking and access. Tourist guidebooks and social media highlight our "special secret places."

Tourist spots are overburdened. Twin Falls has hundreds of parked cars with visitors streaming to waterfalls. Helicopters fly over residential areas. Downhill bikers



**VIEWPOINT**  
**DICK**  
**MAYER**

endanger local traffic. Hana residents cannot deal with the Hana Highway traffic. Haleakala National Park requires advance permits for sunrise viewing.

Overtourism results in long commutes, day and night shifts with unattended children, multiple jobs, overcrowded schools, a shortage of doctors, dangerous intersections, wastewater finding its way into the coral reefs, lost views, pesticides draining from golf courses, brown-water advisories, etc.

Tourist industry salaries do not keep up with housing costs; families have to co-habit residences. Second home "McMansions" are built for part-time tourists, while needed affordable units are neglected. Infrastructure for a quality community is not built because tourist facilities do not have to pay needed impact fees.

State bureaucrats and tourism champions advocate shifting Oahu's tourism onto Maui by increasing Kahului Airport capacity, increasing short-term visitor rentals in residential neighborhoods, and constructing even more hotels. Local residents suffer as off-island investors convert potential housing into vacation rentals.

Unfortunately, as Maui's quality of life deteriorates, political leaders do not acknowledge or even address the situation. Many politicians are stuck in the past thinking that they must promote a bigger tourist industry. Those days are over. Maui now has a mature tourist industry that needs to protect itself from overtourism. We need political leaders who will assist residents, not corporate investors, and who will enable affordable housing, not more hotels and gated communities.

The Hawai'i Tourism Strategic Plan recognized the change from 50 years ago when it warned, "The relationship between the number of residents and visitors on the island at any given time cannot be overlooked as an important public policy discussion point. Resort communities ...

have grappled with the "golden goose" debate, whereby the tourism experience may be compromised by the very nature of the area's popularity."

Fortunately, Maui's legal tools can promote a tourist industry that will protect jobs, and not disappoint future tourists with a deteriorating visitor experience. Our County Council in 2012 passed the Maui Island Plan (part of the General Plan), a legally binding county ordinance. The plan makes tourist industry regulation an important requirement to preserve and protect Maui's quality of life.

The Maui Island Plan (Pages 4-14) states: "Maximize residents' benefits from the visitor industry" and "Promote a desirable island population by striving to not exceed an islandwide visitor population of roughly 33 percent of the resident population."

That means that if Maui island has 156,000 residents, as we now have, then we should not have more than 52,000 tourists on an average day. However, in July 2018, we had an average of 75,000 tourists each day! Obviously, we already have too many tourist accommodations, most legal, but enough illegal, to reduce housing availability for residents.

The plan (Pages 4-12) states: "Increase the economic contribution of the visitor industry to the island's environmental well-being and for the island's residents' quality of life."

We must elect leaders in November who will restore and preserve the high quality of life that Maui residents deserve, while carefully protecting our existing tourist industry from overtourism and killing itself.

■ Dick Mayer is a retired, 34-year Maui Community College economics and geography professor, former vice-chair of the Maui General Plan Advisory Committee and former member of the Maui Planning Commission. He lives in Kula.



## Honolulu Star-Advertiser Many more hotels being planned for Maui

### HOTEL CONSTRUCTION BOOM

Maui's historically high-performing hotel market coupled with demand from leisure and business travelers for more diverse products has sparked interest from investors and developers. At least 10 hotels and timeshare projects are in various phases of development from early discussions to planning and entitlements to construction. Here's a rough list of what's in the works:



#### 1 Former Maui Palms Hotel

Future site of a new 140 or so unit hotel spread across three low-rise buildings.

#### 2 Windward Hotel

The 200-room hotel is an R.D. Olson project. It's slated for a 2023 opening.

#### 3 AC Hotel Wailea

The 110-room hotel is under construction by R.D. Olson Construction on a three-acre lot.

#### 4 Hilton Garden Inn Wailuku

Supreme Bright Wailuku LLC proposes to develop a 156-room kamaaina business hotel on land owned by Jonathan Starr of Market & Main LLC, in Wailuku. The hotel, which borders Market Street, Main Street and Maluhia Drive, could begin construction next year and open as early as 2021.

#### 5 Kahului Shopping Center Hotel

In early concept stages, is an internationally-branded 150 to 200 room hotel with an opening target of 2025.

#### 6 Maui Coast Hotel

The existing 265-room hotel, which opened in the 1990s, plans to add 150 rooms to a neighboring lot and develop a new pool and retail and parking structure. WCME LLC, the company that owns the vacant parcel, is expected to apply for a special management area use permit by year's end.

#### 7 Maui Bay Villas by Hilton Grand Vacation

The resort will offer 388 units. Ground work for the initial phase of the project, which includes 115 units, began in March. The timeshare project is for completion in the second quarter of 2021.

#### 8 Grand Wailea Maui, A Waldorf Astoria Resort

Planning a nearly \$92 million expansion that would add a 224-unit tower to the existing 776-unit property. It would also increase the height of its parking structure and expand its swimming pool and restaurants.

#### 9 Hotel in the Maui Research Technology park

A business hotel is part of the master plan that would also add a mixed-use village center, residential areas, additional industry space, civic uses, open green spaces and parks. The area near the Ellear Golf Club is going through a master plan update.

#### 10 Downtown Kihei hotel project

Krausz Companies Inc. received land-use approvals in 2015 from Maui County Council to develop a hotel as part of its mixed use Downtown Kihei project between the Piilani Village Shopping Center and the Kihei Longs Drugs. Also slated for the 27-acre site, is a village square, promenade, restaurants, shops, medical offices and a movie theatre.

Source: Star-Advertiser research

November 10, 2019

STAR-ADVERTISER



November 16, 2021

Professor Richard "Dick" Mayer  
1111 Lower Kimo Dr.  
Kula, Maui, HI 96790

Dear Professor Mayer,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawai'i;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of July 14, 2020, providing the department's comments on the proposed hotel project at this time. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

**IMPORTANT GENERAL CONCERNS:**

1. *It seems that the applicant made an effort to get this hotel's environmental documents approved by the Maui Planning Commission in 2018-2019. However, having run into difficulties at the County level, the applicant changed the hotel name from the "Windward Hotel" to the "Kanahā Hotel", and has gone to the State Land Use Commission. The applicant now seeks to get approval of its EIS from the State Land Use Commission.*

**Response.** 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 decision to rename the project from Windward Hotel to Kanahā Hotel at Kahului Airport was inspired by the input from one of the interviewees — during the interview conducted for the Cultural Impact Assessment report. The interviewee suggested to incorporate traditional name practices that are of great importance to the Hawaiian community. The proposed hotel project is situated inland of the Kanahā Ponds State Wildlife Sanctuary; hence, the current name of the project is the Kanahā Hotel at Kahului Airport.

2. *The proposed, renamed KANAHĀ HOTEL is trying to circumvent a very important element of Maui General Plan’s Maui Island Plan. The Maui Island Plan calls for no more than one tourist for every three residents. (Policy 4.2.3.a on Page 4-14). Prior to the Covid-19 crisis, Maui had already exceeded its tourism saturation level. As the Maui Planning Director pointed out, the EIS must address this violation of the Maui Island Plan.*

**Response.** Policy 4.2.3.a of the Maui Island Plan, states:

*Promote a desirable island population **by striving to not exceed** an island-wide visitor population of roughly 33 percent of the resident population. (emphasis added)*

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 Kanahā Hotel is anticipated to contain 200 hotel rooms which assuming an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, with 2.3 individuals per room would increase the visitor ratio by two-tenths of a percent (0.27%). Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kanahā Hotel on an average night would equal 0.09% of the island’s resident population of 154,100 (**See:** Appendix 22 of the DEIS, Tourism Study). The table below summarizes our analysis:

**Estimated Contribution of Kanahā Hotel to Policy Metric of 33.33% ADC**

Kanahā Hotel Room Count	200	Rooms
Estimated Occupancy	80.0%	Occupancy
Estimated Nightly Occupied Rooms	160	Occupied Rooms
Estimated Share Kanahā 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 Kanahā Hotel	138	Visitors
Maui ADC Based on Population of 154,100 and Policy Metric of 33.33%	50,853	Visitors
Estimated Contribution of Kanahā Hotel to Policy Metric of 33.33% ADC	0.27%	Contribution

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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā Hotel will not supplant existing island housing to accommodate the needs of business travelers to Maui.

The proposed Kanahā 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 Kanahā 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.

### **Tourism**

#### **Goal:**

4.2

*A healthy visitor industry that provides economic well-being with stable and diverse 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.

3. *Major reasons for the strict limits on the number of tourists in the Maui Island Plan which is a key component of the County's General Plan are fears that Maui is already too dependent on tourism and that Maui's infrastructure and culture was being overwhelmed.*

**Response.** Policy 4.2.3.a of the MIP does not create a strict limit on the number of visitors to the island of Maui. While the MIP recognizes Maui's dependence on tourism the MIP also states that, "significant care must be taken to nurture a healthy and vibrant visitor industry." The visitor to resident ratio in the MIP is intended to further objective of maximizing resident's benefit from the visitor industry, the proposed Kanahā Hotel will benefit residents by supporting economic diversification.

4. *During the Covid-19 crisis Maui's workers have suffered more than any other Hawai'i island because of our existing dependence on the tourism sector. Maui political leaders and most residents now desire to reduce our dependence on visitors and tourism, and certainly do not wish to add even more visitor accommodations!*

**Response.** The proposed Kanahā Hotel is intended to be a business traveler hotel, and is not a large-scale, coastal resort. The proposed Kanahā Hotel is intended to support business travelers to Maui and not cater to tourists. New emerging business sectors on Maui will need hotel accommodations for support services, staff, and clients from off-island. The proposed hotel project will eventually contribute to the increasing government revenue through tax and provision of accommodations near the Kahului Airport.

*The earlier Windward Hotel's DRAFT-EA calculations on page 154 (PDF 161) had totally misrepresented the necessary calculation in several critical ways. The Kanahā Hotel Draft EIS must make proper, accurate calculations of Maui Island's tourism numbers and population, as they were prior to the Covid-19 crisis. After all, we must assume a return to normal tourism, and if present Summer-2020 tourism numbers were to be used, then there would be absolutely no reason at all to change the land-use designation, zoning, and/or build this hotel.*

**Response.** The forthcoming DEIS includes a full report of tourism study prepared by Kloninger and Sims Consulting, LLC (Appendix 22 of the forthcoming DEIS). In addition, a full report of market study prepared by CBRE is also available within the forthcoming DEIS as Appendix 21.

### **Specific Concerns and Issues**

5. **Housing issues.** *Because Maui Island already has a shortage of housing, how will the housing needs of the hotel's workers be satisfied?*

**Response.** The proposed hotel project is required to participate in the affordable housing program on Maui. The project site is in Kahului near the airport and will provide additional hotel rooms in the central valley for visitors that are not staying in resort destination areas located in West and South Maui. The increase in available hotel rooms in the central valley area could lead to a reduction in transient vacation rentals creating additional long term rental opportunities for the residents of Maui. The Applicant will coordinate with County DHHC to comply with MCC Chapter 2.96 of the Residential Workforce Housing Policy.

6. **Tsunami Evacuation Zone.** *The hotel is in the Tsunami Zone. If a tsunami was generated, describe escape routes, and methods to warn hotel guests, especially if the tsunami is generated locally around the Hawaiian Islands.*

**Response.** The Applicant acknowledges this comment. There will be a Tsunami Evacuation Plan for the management and operation of the Kanahā Hotel.

7. **Violation of County Zoning Code.** *A&B "Maui Business Park 2" is 11% industrial and 89% NON-industrial. The requirement in the Maui County Code 19.24.010 - Purpose and intent is that "mostly" (at least half) of light-industrial zoned area must be "light-industrial". The proposed Kanahā Hotel land is not "light Industrial".*

*19.24.010 - Purpose and intent. 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 above or below the first floor and apartments.*

*By removing the proposed hotel's land from the A&B Maui Business Park 2, It will not change the fact that the A&B Business Park 2 remains non-conforming to Maui County Code Title 19.*

**Response.** The forthcoming DEIS is limited to the proposed Kanahā Hotel. While the project site is within MBPIL, the MBPIL property is zoned Light Industrial and in compliance with Maui County Code Chapter 19. The Applicant is proposing to change the zoning of the project parcels from Light Industrial to Hotel, subject to Maui County Council approval. In addition, A&B (Petitioner) is currently in compliance with ordinances as they relate to MBPIL.

8. **Many other hotels planned and under construction.** *The DRAFT-EIS needs to acknowledge that there are presently many other hotels being planned on Maui Island, including others in the*



*Kahului/Wailuku district, and even one by the DRAFT-EIS applicant's company in Wailea. The DRAFT-EIS needs to describe the cumulative impacts of adding their hotel to all these other developments.*

*These new additional hotels, several already having their needed entitlements, and some under construction, include:*

*A. Maui Beach Hotel (Peter Savio) (140 rooms)*

*<https://www.mauinews.com/news/local-news/2019/02/plans-move-ahead-for-new-hotel-on-old-maui-palms-site/>*

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*F. AC Hotel Wailea (Olsen, the same company proposing this Windward Hotel) (110 rooms)*

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*G. Hilton Grand Vacations (on the former Maui Lu Property) (388 multi-room suites)*

*<https://www.businesswire.com/news/home/20190125005033/en/Hilton-Grand-Vacations-Expand-Hawaii-Portfolio-Offer>*

*H. Kaanapali Infill (State Employee Retirement System) (100+ rooms)*

*<http://lahainanews.com/page/content.detail/id/543282/State-ERS-plans-to-bring-new-uses--vitality-to-Kaanapali-Golf-Courses.html>*

**Response.** A cumulative impacts assessment is provided in Section 4.3 of the DEIS. The proposed Kanahā Hotel is situated at Kahului directly adjacent to the Kahului Airport and within the planned Maui Business Park Phase II development. Cumulative impacts of the project were determined by considering the potential impacts of the proposed project together with the incremental impacts of other past, present, and reasonably foreseeable future actions at the project site and within the vicinity of the project site up to a one-mile radius. 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 DEIS, the geographic extent was defined as the projects occurring within a 1-mile radius of the project site of the proposed Kanahā 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.

Please refer to Section 4.3 of the forthcoming DEIS, Table 17 for the projects included within the 1-mile radius of the project site.

Projects situated beyond 1-mile radius of the project site are discussed in Section 4.3 of the forthcoming DEIS. Two (2) proposed hotel projects mentioned in the above comment are included within Table 18 of the forthcoming DEIS, i.e., Maui Beach Hotel Addition and Hotel Wailuku. It should be noted that Hotel Wailuku or Wailuku Hotel is seemingly the same project as the Hilton Garden Inn Wailuku considering the property is owned by the same owners\*. However, Market study prepared by CBRE for the DEIS concludes that the Maui Beach Hotel and the Hilton Garden Inn are indefinitely on hold due to financing concerns.

*\*References:*

<https://www.mauinews.com/news/local-news/2019/11/wailuku-town-hotel-project-unveiled/>  
<https://mauinow.com/2020/06/01/county-to-accept-public-testimony-on-proposed-wailuku-hotel/>

Other hotel developments mentioned in the above comment were not included in Table 18 due to the geographic location of the developments — that are situated further away from the project site and Central Maui where the proposed Kanahā Hotel is situated. However, the following is discussion of cumulative impacts of the proposed project and the other hotels as referenced in your comment — to the tourism in Maui.

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 Kanahā 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. Kanahā 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 Kanahā 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 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: the 4-story Hotel Wailuku 94 rooms, Maui Palms Hotel 136 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. Kanahā Hotel is anticipated to open in less than five years. Therefore, the total additional room count would be 258 during the next four years.

Using the ADC metric calculation discussed above and in other sections of this DEIS, the visitor to resident ratio would increase by 0.27% (approximately three-tenths of one percent) [258 rooms multiplied by an 80% occupancy rate, multiplied by 2 visitors per room and divided by 154,100 population = 0.0027]. Therefore, it is estimated that the visitor to resident ratio increase of the proposed Kanahā 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 contribution of less than one-half of one percent increase to the visitor to resident ratio.

For more detailed discussion, please see our response to the following comment No. 9 about Overtourism on Maui.

9. ***Overtourism on Maui.*** Please include in the FINAL-EIS an analysis of the overtourism impacts made in the attached viewpoint below.

**Response.** The Applicant acknowledges this comment; however, overtourism is the cumulative impact of the overall industry that is primarily focused in West and South Maui on the island. Please refer to Section 4.3.12 (Impacts to Tourism) of the forthcoming DEIS. 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 Kanahā 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 Kanahā 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 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā Hotel is anticipated to contain 200 hotel rooms which assuming an estimated 80% occupancy rate, 37.5% of guests being out-of-state visitors, with 2.3 individuals per room would increase the visitor ratio by two-tenths of a percent (0.27%). Stated another way, the estimated 138 out-of-state visitors accommodated by the proposed Kanahā 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. Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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 Kanahā 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.

Please refer to the following sections and appendices within the forthcoming DEIS for more details:

- Section 2.2.2 (Economy)
- Section 4.3.12 (Impacts to Tourism)
- Appendix 20 (Economic Impact Analysis and Public Fiscal Assessment)
- Appendix 21 (Market Study)
- Appendix 22 (Tourism Study)

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you again for providing us with your letter. If you have any questions, please contact me at 808-242-1955 or [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Brett Davis". The signature is fluid and cursive, with the first name "Brett" and last name "Davis" clearly distinguishable.

Brett Davis, Senior Planner

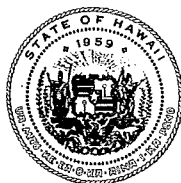
Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

## **Appendix 3.8**

Comment Letters Received for the 2020 EISPN No. 2  
and Response Letters



DAVID Y. IGE  
GOVERNOR OF HAWAII



BRUCE S. ANDERSON, Ph.D.  
DIRECTOR OF HEALTH

LORRIN W. PANG, M.D., M.P.H.  
DISTRICT HEALTH OFFICER

**STATE OF HAWAII**  
**DEPARTMENT OF HEALTH**  
**MAUI DISTRICT HEALTH OFFICE**  
54 HIGH STREET  
WAILUKU, HAWAII 96793-3378

August 27, 2020

Mr. Daniel Orodener  
Executive Officer  
Hawaii State Land Use Commission  
Department of Business, Economic  
Development & Tourism  
State of Hawaii  
P. O. Box 2359  
Honolulu, Hawaii 96804

Dear Mr. Orodener:

**Subject: KANAHA HOTEL AT KAHULUI AIRPORT**  
**Applicant: R.D. Olson Development**  
**TMK: (2) 3-8-103:014 (por.), 015 (por.), 016, 017, 018**  
**Location: Kahului, Maui**  
**Description: Construct 200 Room Hotel Near Kahului Airport**

Thank you for the opportunity to review this project. We have the following comments to offer:

1. National Pollutant Discharge Elimination System (NPDES) permit coverage may be required for this project. The Clean Water Branch should be contacted at 808 586-4309.
2. The proposed subdivision was formally sugarcane fields. All lands formerly in the production of sugarcane should be characterized for arsenic contamination. Please contact the Hazard Evaluation and Emergency Response (HEER) Office of the State Department of Health for approval. Please contact them at 808 586-4249.

**RECEIVED**

AUG 31 2020

CHRIS HART & PARTNERS, INC.  
Landscape Architecture and Planning

CL: Brett

19/014

3. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules, Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. Please call the Indoor & Radiological Health Branch at 808 586-4700.

It is strongly recommended that you review the department's website at <https://health.hawaii.gov/epo/files/2018/05/DOHEHA.LandUseContactList.20180502.pdf> and any comments specifically applicable to this project should be adhered to.

Should you have any questions, please contact me at 808 984-8230 or email me at [patricia.kitkowski@doh.hawaii.gov](mailto:patricia.kitkowski@doh.hawaii.gov).

Sincerely,



Patti Kitkowski  
District Environmental Health Program Chief

- c Sina Pruder, Acting EMD Administrator  
Brett A. Davis, Chris Hart & Partners, Inc.  
Anthony Wrzosek, R.D. Olson Development



November 10, 2021

Ms. Patti Kitkowski, District Environmental Health Program Chief  
State of Hawaii, Department of Health  
Maui District Health Office  
State Office Building  
54 South High Street Rm. #301  
Wailuku, Maui, HI 96793

Dear Ms. Kitkowski,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of August 27, 2020, providing the department's comments on the proposed hotel project. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*1. National Pollutant Discharge Elimination System (NPDES) permit coverage may be required for this project. The Clean Water Branch should be contacted at 808 586-4309.*

**Response.** The Applicant will obtain National Pollutant Discharge Elimination System (NPDES) permit for the proposed hotel project. Clean Water Branch will be contacted.

*2. The proposed subdivision was formally sugarcane fields. All lands formerly in the production of sugarcane should be characterized for arsenic contamination. Please contact the Hazard Evaluation and Emergency Response (HEER) Office of State Department of Health for approval. Please contact them at 808 586-4249.*

**Response.** The Applicant is aware of the former use of the property and the consultant team will contact the Department of Health, Hazard Evaluation and Emergency Response office.

Environmental Site Assessments (ESA) were conducted by Ford Canty & Associates, Inc. on May 30, 2017, and July 17, 2017. Two reports, i.e., ESA Phase 1 and ESA Phase 2, were produced for the proposed project.

According to the ESA Phase 2 report, the HDOH Hazard Evaluation and Emergency Response (HEER) Office issued a "No Further Action" determination for the north-central portion of the site formerly occupied by the MPC Seed Treatment Plant. The HDOH HEER Office also subsequently issued a "No Further Action" determination for the north-central portion of the site that was formerly used as an agricultural dump site. Furthermore, results from the ESA Phase 2 show that the surface soils at the site do not appear to be impacted with Chemicals of Potential Concern (COPC).

The upcoming DEIS will include a section about Hazardous Substances and incorporate both ESA reports as the appendices.

*3. The noise created during the construction phase of the project may exceed the maximum allowable levels as set forth in Hawaii Administrative Rules (HAR), Chapter 11-46, "Community Noise Control." A noise permit may be required and should be obtained before the commencement of work. Please call the Indoor & Radiological Health Branch at 808 586-4700.*

**Response.** Acoustic Study was conducted by the Y. Ebisu & Associates for the proposed project. The upcoming DEIS will include a section about Noise Quality and incorporate the report of the Acoustic Study as the appendix.

The Applicant is aware of the potential noise impact during construction phase of the project. Therefore, should a noise permit be required, the permit will be obtained prior to the commencement of work.

*It is strongly recommended that you review the department's website at <https://health.hawaii.gov/epo/files/2018/05/DOHEHA.LandUseContactList.20180502.pdf> and any comments specifically applicable to this project should be adhered to.*

**Response.** The Applicant has reviewed the above-referenced website and any comments applicable to the proposed project.

Your comments, along with this response, will be reproduced and included in the forthcoming DEIS. The DEIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Brett Davis". The signature is fluid and cursive, with the first name "Brett" and last name "Davis" clearly distinguishable.

Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

DAVID Y. IGE  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

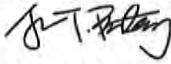
JADE T. BUTAY  
DIRECTOR

Deputy Directors  
LYNN A.S. ARAKI-REGAN  
DEREK J. CHOW  
ROSS M. HIGASHI  
EDWIN H. SNIFFEN

IN REPLY REFER TO:  
DIR 0746  
STP 8.3002

August 19, 2020

TO: MR. DANIEL ORODENKER, EXECUTIVE OFFICER  
HAWAII STATE LAND USE COMMISSION (LUC)  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

FROM: JADE T. BUTAY, DIRECTOR   
DEPARTMENT OF TRANSPORTATION

SUBJECT: SECOND ENVIRONMENTAL IMPACT STATEMENT PREPARATION  
NOTICE (EISPN)  
KANAHA HOTEL AT KAHULUI AIRPORT  
KAHULUI, MAUI, HAWAII  
TAX MAP KEY: (2) 3-8-103: 014 (POR), 015 (POR), 016, 017, 018

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject EISPN and understands that the applicant, R.D. Olson Development, through its consultant, has submitted a second EISPN due to an error with the previous EISPN dated June 2020. The proposed Kanaha Hotel at Kahului Airport (formerly known as Windward Hotel) will include the construction of a 200-room hotel with supporting amenities on 5.17 acres of land within the Maui Business Park Phase II, North Project Area.

HDOT's previous comments in letter STP 8.2969 dated July 20, 2020 (attached) regarding the June 2020 EISPN remains valid. HDOT has no additional comments to provide at this time.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Attachment

c: Mr. Brett A. Davis – Senior Planner, Chris Hart & Partners, Inc.

RECEIVED

AUG 26 2020

CHRIS HART & PARTNERS, INC.  
Landscape Architecture and Planning

CC: Brett 191014



DAVID Y. IGE  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

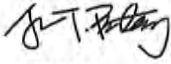
JADE T. BUTAY  
DIRECTOR

Deputy Directors  
LYNN A.S. ARAKI-REGAN  
DEREK J. CHOW  
ROSS M. HIGASHI  
EDWIN H. SNIFFEN

IN REPLY REFER TO:  
DIR 0607  
STP 8.2969

July 20, 2020

TO: MR. DANIEL ORODENKER, EXECUTIVE OFFICER  
HAWAII STATE LAND USE COMMISSION (LUC)  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

FROM: JADE T. BUTAY, DIRECTOR   
DEPARTMENT OF TRANSPORTATION

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE  
(EISPN)  
KANAHA HOTEL AT KAHULUI AIRPORT  
KAHULUI, MAUI, HAWAII  
TAX MAP KEY: (2) 3-8-103: 014 (POR), 015 (POR), 016, 017, 018

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject EISPN and understands that the applicant, R.D. Olson Development, through its consultant, has submitted the new EISPN as a result of a determination by the LUC that the project impacts would trigger Hawaii Revised Statutes Chapter 343 review and that the LUC would now be the accepting authority. The proposed Kanaha Hotel at Kahului Airport (formerly known as Windward Hotel) will include the construction of a 200-room hotel with supporting amenities on 5.17 acres of land within the Maui Business Park Phase II, North Project Area (MBPNPA).

HDOT has the following comments:

Airports Division (HDOT-A)

1. The proposed Kanaha Hotel at Kahului Airport (OGG) is approximately 0.45 miles from the end of Runway 2 at OGG. All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: [http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports\\_08-01-2016.pdf](http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf).
2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations (CFR), Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes

need to be included in the submittal. The form and criteria for submittal can be found at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

3. The proposed project site is also within the 65-70 Day-Night Average Noise Level (DNL) contours on the Kahului Airport Five-Year (1998) Noise Exposure Map. The hotel project is considered an incompatible use according to the CFR Title 14, Part 150, Airport Noise Compatibility Planning guidelines. Accordingly, the developer shall incorporate sound attenuation measures to achieve interior levels of 45 DNL in the proposed hotel.
4. The proximity of the airport will subject the hotel project to multiple noise events daily from aircraft operations. There is a potential for fumes, smoke, vibrations, odors, etc., that may result from aircraft flight operations over existing uses and the proposed future developments at the project site.
5. The Airport Zoning Act, Hawaii Revised Statutes, Chapter 262, requires HDOT-A to prevent hazards and non-conforming uses that conflict with the FAA Hazardous Wildlife Attractants requirements. HDOTA recommends that the proposed development's construction and operation does not create a wildlife attractant. Please review the FAA Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants On Or Near Airports* for guidance

#### Highways Division (HDOT-HWY)

1. The Draft Environmental Impact Statement (DEIS) should reference the compliance/status of all land use conditions.
2. The DEIS should mention Hawaii Department of Transportation's future plan to construct a proposed slip ramp located between the Haleakala Highway and Airport Access Road. The DEIS should include a site plan outlining the necessary roadway setback to be reserved, which should be provided along the southeast boundary of the site.
3. A Traffic Impact Analysis Report (TIAR) shall be prepared by a State of Hawaii licensed Professional Engineer with qualified traffic experience.
  - a. The MBPNPA's TIAR dated June 2010, was based on general land use designated for shopping center and light industrial. The proposed project TIAR and the DEIS should provide an analysis to demonstrate whether the trips to be generated by the proposed hotel as a new land use will be consistent with the conclusions of the MBPNPA's TIAR.
  - b. The TIAR shall propose improvements to mitigate any direct impacts identified and required improvements shall be provided at no cost to the State.
  - c. The TIAR should include the Hana Highway/Haleakala Highway intersection, west (Wailuku) of the project site.



Mr. Daniel Orodener  
July 20, 2020  
Page 3

STP 8.2969

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

c: Mr. Brett A. Davis - Senior Planner, Chris Hart & Partners, Inc.



November 10, 2021

Mr. Jade T. Butay, Director of Transportation  
State of Hawaii, Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Dear Mr. Butay,

Subject: Response to Comments for the Draft Environmental Impact Statement (DEIS)  
for the Windward Hotel, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015, 016, 017, 018 (EIS 2018/0001)

Thank you for your letter of August 19, 2020, enclosing the department's previous comment letter (i.e., letter dated July 20, 2020) on the proposed hotel project. The proposed Kanahā Hotel project was previously named the Windward Hotel and we want to inform you that your Windward Hotel comments with responses are included in the forthcoming DEIS for the Kanahā Hotel. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

Airports Division (DOT-AIR)

1. *Condition 3, Aircraft Operations, Page 91 (PDF Reader p. 100) acknowledges the project's proximity to Kahului Airport. Accordingly, the section includes covenant language that states, "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 Hawaii 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 Hawaii'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 Hawaii will be inapplicable.*

*Page 92 (PDF Reader, p. 101) validates the above passage by stating that "In accordance with this condition, the above language has been incorporated into the Declaration of Covenants and Restrictions for the Project."*

**Response.** The Applicant acknowledges that property owners near the airport assume 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. The Applicant be responsible for appropriate mitigation measures to address the abovementioned potential adverse impacts.

2. *Condition 4, also on Page 92 acknowledges the Federal Aviation Administration Form 7460-1 Notice of Proposed Construction or Alteration, by inclusion of the following language 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 Hawaii Districts Office and will submit the same when or if required under FAA Regulations with a copy to DOT's Airports Division."*

**Response.** The Applicant acknowledges that the above-referenced language has been included to the Declaration of Covenants and Restrictions recorded at the Bureau of Conveyances.

3. *Condition 5 on pages 92-93 (PDF Reader, pp. 102-103) recognizes the Runway Protection Zone for potential runway extension in the future. This concern has been resolved by the DOT-AIR acquisition of 3.7 acres of the proposed development area in 2016.*

**Response.** The Applicant acknowledges the above confirmation.

4. *Condition 12, Aircraft Operation Hazards, pages 95-96 (PDF Reader, pp. 104-105) addresses DOT-AIR's concern about wildlife. Accordingly, the development will ensure that drainage basins are properly maintained to avoid a wildlife attractant.*

**Response.** The Applicant confirms that the proposed project stormwater drainage system is contained underground beneath the parking lot, therefore no surface drainage basin is proposed as part of this project.

5. *To address DOT-AIR's concern about the potential hazard of glint and glare from photovoltaic systems, PDF Reader page 323 states that "No rooftop photovoltaic system is proposed for the hotel."*

**Response.** Since the date of this letter, the proposed project includes the installation of photovoltaic systems. The roof plan containing this proposed system is provided within Appendix 2 of the forthcoming DEIS (Kānaha Hotel Design Document). The Applicant will comply with any requirements to avoid and/or mitigate any potential hazards of glint and glare from the proposed system. As shown within the Roof Plan of the proposed project (Appendix 2, page 11 of 30), the project includes installation of 66 REC Solar 360 Watt Panels for 23,760 Watts and 66 Enphase IQ7+ Inverters — approximately producing 100 kWh/day.

### Highways Division (DOT-HWY)

1. *We acknowledge the discussion made on page 12 of the DEIS, which relates to the future slip-ramp to the Airport Access Road. The Property for the on-ramp will be located on the eastern corner of the project site, which is to be transferred to DOT-HWY.*

**Response.** The Applicant acknowledges this comment. The forthcoming DEIS includes the alternative site plan that depicts the on-ramp between Haleakala Highway and Airport Access Road.

As discussed in Section 1.5 of forthcoming DEIS, under the “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 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. Pursuit 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 market value share contribution. The State's timing of the future on-ramp construction is unknown at this time.

In 2021, the Applicant consulted with DOT-HWY and when asked to clarify DOT-HWY's understanding of the terms of the “transfer”, Mr. Jeyan Thirugnanam (DOT, Highways Division, Planning Branch) stated that DOT-HWY will pay fair market value to the owner of the on-ramp property for the transfer of the property to the State.

2. *We have reviewed the Traffic Impact Analysis Report (TIAR) dated May 9, 2019 and offer the following comments:*
  - a. *Should the anticipated build-out year of 2023 be delayed for five or more years with the hotel construction, we may require an updated TIAR.*
  - b. *Based on the proposed hotel use and its trip generation, compared to the currently allowed use for light industrial, within the Maui Business Park as shown in the Appendix E, this may incur an increase to the pro-rata share for regional transportation improvements related to the hotel. Therefore, the Applicant should meet with the DOT-HWY Planning staff to discuss the determination of the pro-rata share.*

**Response.**

- a. The updated TIAR dated April 30, 2021, is available as Appendix 24 within the forthcoming DEIS. The new Base Year and Future Year use the year 2025 for the updated analysis.
- b. The Applicant will meet with the DOT-HWY Planning Staff to discuss the above-referenced determination.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you again for providing us with your email. If you have any questions, please contact me at 808-242-1955 or bdavis@chpmaui.com.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Brett Davis". The signature is fluid and cursive, with the first name "Brett" being more prominent than the last name "Davis".

Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

DAVID Y. IGE  
GOVERNOR



CURT T. OTAGURO  
COMPTROLLER  
  
AUDREY HIDANO  
DEPUTY COMPTROLLER

STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)20.140

AUG 13 2020



MEMORANDUM

TO: Daniel Orodener, Executive Officer  
Hawaii State Land Use Commission  
Department of Business, Economic Development & Tourism

FROM: Christine L. Kinimaka  
Public Works Administrator

SUBJECT: Environmental Impact Statement Preparation Notice  
Kanaha Hotel at Kahului Airport, Maui, Hawaii  
TMK# (2) 3-8-103:014 (por.), 015 (por.), 016, 017, 018

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Ms. Dora Choy of the Planning Branch at 586-0488.

Sincerely,

A handwritten signature in blue ink, appearing to be "CLK", written over the printed name and title.

CHRISTINE L. KINIMAKA  
Public Works Administrator

DC:mo

c: Brett A. Davis, Chris Hart Partners, Inc.  
Anthony Wrzosek, R.D. Olson Dev  
Wade Shimabukuro, DAGS MDO



November 10, 2021

Ms. Christine L. Kinimaka, Public Works Administrator  
State of Hawaii, Department of Accounting and General Services  
P.O. Box 119, Honolulu, Hawaii 96810-0119

Dear Ms. Kinimaka,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter dated August 13, 2020, indicating that your department has no comments or recommendations to offer at this time due to the proposed project having no impact to any of the Department of Accounting and General Services' projects or existing facilities.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the DEIS review process. If you have any questions, please contact me at 808-242-1955 or [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com).

Sincerely yours,

Brett Davis, Senior Planner

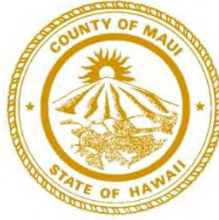
Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014



**MICHAEL P. VICTORINO**  
Mayor

**DAVID C. THYNE**  
Fire Chief

**BRADFORD K. VENTURA**  
Deputy Fire Chief



**DEPARTMENT OF FIRE & PUBLIC SAFETY**  
FIRE PREVENTION BUREAU  
COUNTY OF MAUI  
313 MANEA PL.  
WAILUKU, HI 96793

July 14, 2020

Hawaii State Land Use Commission  
Department of Business, Economic Development & Tourism  
Attn: Daniel Orodener, Executive Officer  
P.O. Box 2359  
Honolulu, HI 96804

**SUBJECT:** Environmental Impact Statement Preparation Notice (EISPN)  
Kanaha Hotel at Kahului Airport  
TMK: (2) 3-8-103:014 (por), 015 (por), 016, 017, 018

Dear Daniel Orodener,

Thank you for allowing our office to provide comment on the proposed project. As per your request, comments are provided below:

- There are no objections in regards to the information provided as part of Environmental Impact Statement Preparation Notice (EISPN).
- This project shall incorporate fire prevention measures to address the concern of wildland fires posed by vacant lands abutting the project. At a minimum, 30 feet of defensible space shall be provided between the proposed structures associated with this project and undeveloped lands abutting the project. Our office is willing to assist on this matter.
- Our office does reserve the right to comment on the proposed project during the building permit review process when detailed plans for this project are routed to our office for review. At that time, fire apparatus access, water supply for fire protection, and life safety requirements associated with the subject project will be formally reviewed.

Daniel Orodenker  
July 14, 2020  
Page 2

If there are any questions or comments, please feel free to contact me at (808) 876-4693 or by email at [paul.haake@mauicounty.gov](mailto:paul.haake@mauicounty.gov).

Sincerely,

A handwritten signature in cursive script that reads "Paul Haake".

Paul Haake, Captain - Fire Prevention Bureau



November 10, 2021

Captain Ryan Otsubo  
County of Maui, Department of Fire and Public Safety  
Fire Prevention Bureau  
200 Dairy Road  
Kahului, HI 96732-2978

Dear Captain Otsubo,

Subject: Response to Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of July 14, 2020, providing the department's comments on the proposed hotel project at this time. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

- *There are no objections in regards to the information provided as part of Environmental Impact Statement Preparation Notice (EISPN).*
- *This project shall incorporate fire prevention measures to address the concern of wildland fires posed by vacant lands abutting the project. At a minimum, 30 feet of defensible space shall be provided between the proposed structures associated with this project and undeveloped lands abutting the project. Our office is willing to assist on this matter.*
- *Our office does reserve the right to comment on the proposed project during the building permit review process when detailed plans for this project are routed to our office for review. At that time, fire apparatus access, water supply for fire protection, and life safety requirements associated with the subject project will be formally reviewed.*

**Responses.** The Applicant will comply with the fire protection requirements as provided above and appreciate the willingness to assistance. As the land use entitlement process moves forward, the Applicant will continue to coordinate with the department on fire prevention measures appropriate for the project site. The Applicant also acknowledges that the department may comment on future building permits in the future and a copy of the forthcoming DEIS.

Your comments, along with this response, will be reproduced and included in the forthcoming DEIS. The DEIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

RECEIVED

AUG 24 2020

MICHAEL P. VICTORINO  
Mayor

LORI TSUHAKE  
Director

LINDA R. MUNSELL  
Deputy Director



DEPARTMENT OF HOUSING  
& HUMAN CONCERNS  
COUNTY OF MAUI  
2200 MAIN STREET, SUITE 546  
WAILUKU, MAUI, HAWAII 96793  
PHONE: (808) 270-7805

CHRIS HART & PARTNERS, INC.  
Landscape Architecture and Planning

CC: Brett  
10/014

July 15, 2020

Daniel Orodener, Executive Officer  
Hawaii State Land Use Commission  
Department of Business, Economic Development &  
Tourism, State of Hawaii  
Post Office Box 2359  
Honolulu, Hawaii 96804

Dear Mr. Orodener:

**Subject: Environmental Impact Statement Preparation Notice (EISP) for  
Proposed Kanaha Hotel at Kahului Airport Project at Kahului, Maui,  
Hawaii (TMK (2) 3-8-103:014 (por.), 015 (por.), 016, 017, and 018.**

The Department has reviewed the EISP for the above subject project. Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code and is required to execute a Residential Workforce Housing Agreement.

Please call Mr. Buddy Almeida of our Housing Division at 270-7355 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "C. BUDDY ALMEIDA".

C. BUDDY ALMEIDA  
Housing Administrator

cc: Lori Tshako, Director of Housing and Human Concerns  
Anthony Wrzosek, Vice President, R.D. Olson Development  
Brent A. Davis, Senior Planner, Chris Hart & Partners, Inc. ✓

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TO SUPPORT AND EMPOWER OUR COMMUNITY TO REACH IT'S FULLEST POTENTIAL  
FOR PERSONAL WELL-BEING AND SELF-RELIANCE

Windward Hotel DEA COMMENT LETTERS LIST	
	Comment Letter DATE
<b>STATE</b>	
USFWS	10/10/18
<b>STATE</b>	
Land Use Commission	9/20/18
Department of Accounting and General Services	8/10/18
Department of Hawaiian Homelands	8/27/18
DLNR, Land Division	9/6/18
DLNR, Engineering Division (memorandum response)	8/29/18
DOE	9/5/18
DOH, Clean Water Branch	5/10/18
DOH, Maui District Office	8/31/18
DOT	9/13/18
State OP	8/29/18
<b>COUNTY</b>	
Dept. of Environmental Management	8/20/18
Dept. of Housing & Human Concerns	8/27/18
Dept. of Water Supply (2 copies of letters)	9/7/18
Dept. of Water Supply (memorandum)	9/18/18
Fire Prevention Bureau	9/13/18
MECO (now Hawaiian Electric) - (2 copies of letters)	8/27/18
Parks & Recreation (transmittal response)	8/3/18
Police (memorandum)	8/10/18
Maui DOT (transmittal response)	8/15/18
Maui Planning Commission	9/17/18
<b>OTHERS</b>	
Prof. Richard "Dick" Mayer (word & pdf)	9/5/18
Hawai'i Construction Alliance	9/6/18



November 10, 2021

Mr. C. Buddy Almeida, Housing Administrator  
County of Maui, Department of Housing and Human Concerns  
200 S. High Street  
Wailuku, HI 96793

Dear Mr. Almeida,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of July 15, 2020, providing the department's comment on the proposed hotel project at this time. Your letter confirms our understanding that the project will need to comply with Chapter 2.96 of the Maui County Code and that prior to the issuance of a building permit an executed Residential Work Force Housing agreement will be required. The Applicant will work with the department to complete the Residential Work Force Housing agreement upon approval of the project's SMA permit.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely,

Brett Davis, Senior Planner

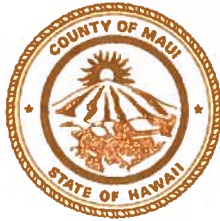


Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

**MICHAEL P. VICTORINO**  
Mayor

**KARLA H. PETERS**  
Director

**JOHN L. BUCK III**  
Deputy Director



## **DEPARTMENT OF PARKS AND RECREATION**

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793  
Main Line (808) 270-7230 / Facsimile (808) 270-7942

July 9, 2020

Daniel Orodener, Executive Officer  
Hawaii State Land Use Commission  
Department of Business, Economic Development  
& Tourism, State of Hawaii  
P.O. Box 2359  
Honolulu, Hawaii 96804

Dear Mr. Orodener:

**SUBJECT: Environmental Impact Statement Preparation Notice (EISP) for the Proposed Kanaha Hotel at Kahului Airport; TMK Nos: (2) 3-8-103:014 (por.), 015 (por.), 016, 017 & 018; Kahului, Maui, Hawaii**

Thank you for the opportunity to review and comment on the subject project. The Department of Parks and Recreation has no comment at this time.

Should you have any questions, please feel free to contact me or April Shiotani, Acting Chief of Planning and Development at [april.shiotani@co.maui.hi.us](mailto:april.shiotani@co.maui.hi.us) or (808) 270-8017.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Peters", written over a horizontal line.

**KARLA H. PETERS**  
Director of Parks and Recreation

c: Brett David, Chris Hart & Partners, Inc.  
Anthony Wrzosek, R.D. Olson Development  
April Shiotani, Acting Chief of Planning and Development

KHP:AS:csa



November 10, 2021

Ms. Karla Peters, Director  
County of Maui, Department of Parks & Recreation  
700 Halia Nakoa Street, Unit 2  
Wailuku, HI 96793

Dear Ms. Peters,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your comment letter of July 09, 2020, indicating that the department does not have any comments on the proposed hotel project at this time.

Your comments, along with this response, will be reproduced and included in the forthcoming DEIS. The DEIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely,

Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014



MICHAEL P. VICTORINO  
MAYOR

OUR REFERENCE  
YOUR REFERENCE

# POLICE DEPARTMENT

## COUNTY OF MAUI

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

August 20, 2020



TIVOLI S. FAAUMU  
CHIEF OF POLICE

DEAN M. RICKARD  
DEPUTY CHIEF OF POLICE

Mr. Brett A. Davis, Senior Planner  
Chris Hart & Partners, Inc.  
115 North Market Street  
Wailuku, Hawaii 96793

**Re: Kanaha Hotel at Kahului Airport Environmental Impact Statement  
Preparation Notice (EISPN)**

Dear Mr. Davis:

This is in response to your transmittal dated August 8, 2020 requesting comments on the Environmental Impact Statement Preparation Notice (EISPN) for the Kanaha Hotel at Kahului Airport project, formally known as Windward Hotel project.

In review of the submitted documents, we ask the project manager take into account any effects on vehicular and pedestrian movement as the area is very busy throughout the day with vehicular traffic. We request steps be taken to control noise levels, dust, and run off to minimize any inconvenience to neighboring businesses. All individuals involved in this project is urged to remain cognizant in maintaining the safety of the general public.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant Chief John Jakubczak  
for: TIVOLI S. FAAUMU  
Chief of Police

C: Mr. Daniel Orodenker, Hawaii State Land Use Commission  
Mr. Anthony Wrzosek, R.D. Olson Development

**RECEIVED**

AUG 27 2020

CHRIS HART & PARTNERS, INC.  
Landscape Architecture and Planning

CC: Brett 19/10/14



November 10, 2021

Mr. Dean Rickard, Deputy Chief of Police  
County of Maui, Police Department  
55 Mahalani Street  
Wailuku, HI 96793

Dear Mr. Rickard,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of August 20, 2020, providing the department's comments on the proposed hotel project. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*In review of the submitted documents, we ask the project manager take into account any effects on vehicular and pedestrian movement as the area is very busy throughout the day with vehicular traffic. We request steps be taken to control noise levels, dust, and run off to minimize any inconvenience to neighboring businesses. All individuals involved in this project is urged to remain cognizant in maintaining the safety of the general public.*

**Response.** During the process of preparing the Draft EIS for the proposed hotel project, Austin Tsutsumi & Associates (ATA) has been contracted to conduct a traffic study and produce a draft Traffic Impact Assessment Report (TIAR). The TIAR includes an analysis of vehicular movement in the vicinity of the project site. Pedestrian connectivity is provided for on the existing sidewalk network surrounding the project site. The forthcoming Draft EIS (DEIS) will have a section discussing the results of the traffic study and the recommended mitigation measures. In addition, the full draft TIAR will be attached as Appendix 24 within the forthcoming DEIS.

Noise levels, dust, and run off will be minimized during the construction of the proposed project with the necessary Best Management Practices (BMPs). The Applicant will also ensure that BMPs will be applied during the construction work.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014



MICHAEL P. VICTORINO  
Mayor

ROWENA M. DAGDAG-ANDAYA  
Director

JORDAN MOLINA  
Deputy Director

GLEN A. UENO, P.E., L.S.  
Development Services Administration

RODRIGO "CHICO" RABARA, P.E.  
Engineering Division

JOHN R. SMITH, P.E.  
Highways Division

Telephone: (808) 270-7845  
Fax: (808) 270-7955



COUNTY OF MAUI  
**DEPARTMENT OF PUBLIC WORKS**  
200 SOUTH HIGH STREET, ROOM 434  
WAILUKU, MAUI, HAWAII 96793



**RECEIVED**

OCT 19 2020

October 14, 2020

CHRIS HART & PARTNERS, INC.  
Landscape Architecture and Planning

CC: BrHA

19/014

Mr. Daniel Orodenker, Executive Officer  
HAWAII STATE LAND USE COMMISSION  
Department of Business, Economic Development  
& Tourism  
P. O. Box 2359  
Honolulu, Hawai'i 96804

Dear Mr. Orodenker:

**SUBJECT: KANAHA HOTEL AT KAHULUI AIRPORT**  
**TMK: (2) 3-8-103:104 (POR.), 015 (POR.), 016, 017, 018**

We reviewed the subject application and have the same comments that were submitted in response to the June 15, 2020 Environmental Impact Statement Preparation Notice (EISPN). Enclosed for your reference is a copy of the Department's comments dated July 27, 2020.

If you have any questions regarding this memorandum, please call Jordan Molina at (808) 270-7845.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rowena M. Dagdag-Andaya".

ROWENA M. DAGDAG-ANDAYA  
Director of Public Works

RMDA:JM:da

Enclosure

xc: Engineering Division  
Anthony Wrzosek – R.D. Olson Development  
Brett Davis – Chris Hart & Partners, Inc.

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MICHAEL P. VICTORINO  
Mayor

ROWENA M. DAGDAG-ANDAYA  
Director

JORDAN MOLINA  
Deputy Director

GLEN A. UENO, P.E., L.S.  
Development Services Administration

RODRIGO "CHICO" RABARA, P.E.  
Engineering Division

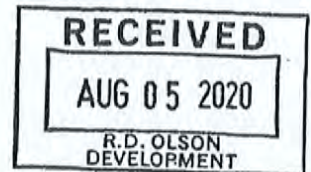
JOHN R. SMITH, P.E.  
Highways Division

Telephone: (808) 270-7845  
Fax: (808) 270-7955



COUNTY OF MAUI  
**DEPARTMENT OF PUBLIC WORKS**  
200 SOUTH HIGH STREET, ROOM 434  
WAILUKU, MAUI, HAWAII 96793

July 27, 2020



Mr. Daniel Orodenker, Executive Officer  
HAWAII STATE LAND USE COMMISSION  
Department of Business, Economic Development &  
Tourism  
P. O. Box 2359  
Honolulu, Hawaii'i 96804

Dear Mr. Orodenker:

**SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION  
NOTICE FOR KANAHA HOTEL AT KAHULUI AIRPORT  
TMK: (2) 3-8-103:014(POR.), 015 (POR.), 016, 017, 018**

We reviewed the subject application and have the following comments:

Comments from the Highways Division:

1. Thank you for the opportunity to review and comment on this preparation notice of the previous Windward Hotel (wo # 25184). We anticipate the same commitment to incorporate Low Impact Design (LID) into their storm water management plan, and the incorporation of construction phase and post-construction Best Management Practices (BMPs). We are glad to see the loop connecting Haleakala Highway to the Airport Access Road southbound being pursued by the State. The project is entering/exiting onto the privately owned Lauo Loop. We offer no additional comments.

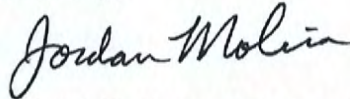
Comments from the Engineering Division:

2. Submit a Traffic Impact Analysis Report (TIAR) for review and approval. Consult with the County of Maui Department of Public Works to confirm the limits and parameters of the study prior to commencing with the TIAR.

Mr. Daniel Orodener, Executive Officer  
July 27, 2020  
Page 2

Please call Jordan Molina at 270-7845 if you have any questions regarding this letter.

Sincerely,



*For* ROWENA M. DAGDAG-ANDAYA  
Director of Public Works

RMDA:JM:da

xc: Highways Division

Engineering Division

Anthony Wrzosek, Vice President, R.D. Olson Development

Brett A. Davis, Chris Hart & Partners, Inc.

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November 10, 2021

Ms. Rowena Dagdag-Andaya, Director  
Department of Public Works  
200 S. High Street  
Kalana O Maui Bldg. 4th Fl  
Wailuku, HI 96793

Dear Ms. Dagdag-Andaya,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your letter of October 14, 2020, enclosing the department's previous comment letter (i.e., letter dated July 27, 2020). Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*Comments from the Highways Division:*

1. *Thank you for the opportunity to review and comment on this preparation notice of the previous Windward Hotel (wo # 25184) . We anticipate the same commitment to incorporate Low Impact Design (LID) into their storm water management plan, and the incorporation of construction phase and post-construction Best Management Practices (BMPs). We are glad to see the loop connecting Haleakala Highway to the Airport Access Road southbound being pursued by the State. The project is entering/exiting onto the privately owned Lauo Loop. We offer no additional comments .*

**Response.** The Applicant confirms the commitment to incorporate LID into the proposed stormwater management plan. Please refer to Section 2.4.2 (Drainage) of the forthcoming Draft EIS that specifically discusses about Water Quality Measures. The Applicant will implement construction phase and post-construction Best Management Practices (BMPs).

*Comments from the Engineering Division:*

2. *Submit a Traffic Impact Analysis Report (TIAR) for review and approval. Consult with the County of Maui Department of Public Works to confirm the limits and parameters of the study prior to commencing with the TIAR.*

**Response.** The Applicant has retained Austin Tsutsumi & Associates (ATA) as the Traffic Consultant to prepare a TIAR for the proposed Kanahā Hotel at Kahului Airport. The Draft EIS will include a section discussing the existing and the future traffic conditions with regards to the proposed development. The full draft TIAR will be available as Appendix 24 within the forthcoming DEIS for your review.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014





November 10, 2021

Ms. Rita Ryan

Dear Ms. Ryan,

Subject: Response to 2<sup>nd</sup> Environmental Impact Statement Preparation Notice (EISPN)  
for the Proposed Kanahā Hotel at Kahului Airport, Kahului, Maui, Hawaii;  
TMK: (2) 3-8-103:014 (portion), 015 (portion), 016, 017, 018  
CPA 2018/0001, CIZ 2018/0001, SM1 2018/0001, EA 2018/0001

Thank you for your oral testimony of August 20, 2020, providing your comments on the proposed hotel project during the public scoping meeting. Chris Hart and Partners, Inc. (CH&P) has provided the following responses to the comments.

*Comments: A family of Nene (Hawaiian Geese) living in that property. What will you do? Remove or relocate them?*

*Are there EV charging Ports in Garage/Parking Lot of the project?*

*Also other renewable energy onsite. Green building objectives.*

*Solar panels? LEED Certification?*

*Labor force. Will you hire locals or bring people outside this community?*

*Study of the prospective customers (business people/tourists/etc)?*

*Please address impacts on traffic, etc.*

**Responses.** On October 16, 2020, the project team's Environmental Consultant visited the Kanahā 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 Kanahā 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 land on the project area is heavily disturbed. The soil is well-drained and does not retain surface water. The Kanahā Pond Wildlife Sanctuary is approximately 2,000 feet from the project area is more likely to attract Nēnē and other wildlife. The report also indicated that 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 Kanahā Hotel Development project area is not the preferred habitat of Nēnē. More details about Flora and Fauna with regard to the proposed project are discussed in Section 2.1.6 of the forthcoming DEIS.

The proposed project is in support of climate change mitigation efforts. As highlighted in Section 2.1.4 of the forthcoming DEIS (Climate Change Assessment), 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 roof plan containing the proposed photovoltaic system is provided within Appendix 2 of the forthcoming DEIS (Kanahā Hotel Design Document). The Applicant will comply with any requirements to avoid and/or mitigate any potential hazards of glint and glare from the proposed system. As shown within the Roof Plan of the proposed project (Appendix 2, page 11 of 30), the project includes installation of 66 REC Solar 360-Watt Panes for 23,760 Watts and 66 Emphase IQ7+ Inverters — approximately producing 100 kWh/day.

The forthcoming DEIS includes Economic Impact Analysis and Public Fiscal Assessment (Appendix 20), Market Study (Appendix 21), and Tourism Study (Appendix 22) for the proposed project to understand the economic impact of the project, the lodging market, and the tourism industry in Maui.



The Applicant projects an onsite workforce of “100 – 125 employees,” drawing primarily on the experienced local labor force. Please refer to Section 3.5 of Appendix 20.

The purpose of the project is to provide a hotel tailored to the needs of the business traveler adjacent to the Kahului airport and in close proximity to the business center of Maui. The proposed hotel intends to best serve business travelers and the Hawai'i resident market by providing high-quality and convenient accommodations. The Wailuku and Kahului areas of Maui are the primary locations where government offices and businesses are located and where most of the island population resides. According to interviews in the Maui Lodging market report for this project, *Kama'aina* corporate demand is the single largest market segment for hotels in Kahului (See: Appendix 22).

With new businesses entering Maui's market, there will be a need for business traveler accommodations, designed to meet the needs of the business traveler, in a central location within the business center of Maui, and this project fills this need. Maui's resorts are excellent for leisure travelers and true tourists; however they are not designed to meet the needs of the business traveler and are not located in an area convenient to Maui's business center. An added benefit of keeping business travelers in close proximity to Maui's business center is the reduced need for travel to and from businesses, reducing the impact on Maui's already overburdened roadways. As such, the proposed Hotel development is well situated to be successfully integrated into and complement the existing urban fabric of Kahului.

Potential impacts to traffic and others are discussed along with the mitigation measures in Chapter 2 of the forthcoming DEIS.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft EIS. The Draft EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

Thank you for participating in the environmental review process. Please feel free to call me at (808) 242-1955 or e-mail me at [bdavis@chpmaui.com](mailto:bdavis@chpmaui.com) should you have any questions.

Sincerely yours,



Brett Davis, Senior Planner

Cc: Mr. Anthony Wrzosek, Owner Representative  
Mr. Scott Derrickson, State Land Use Commission  
Project File 19-014

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# **VOLUME II OF II**

---

## **Draft Environmental Impact Statement**

### **Kanahā Hotel at Kahului Airport**

Kahului, Maui, Hawai'i

**Applicant:**

R.D. Olson Development,  
520 Newport Center Drive, Suite 600  
Newport Beach, CA 92660  
Mr. Anthony Wrzosek, Vice President

**Planning Consultant:**

Chris Hart & Partners, Inc.  
2200 Main Street, Suite 527  
Wailuku, Hawai'i, 96793-1717  
Mr. Brett Davis, Senior Planner

**Accepting Authority:**

State Land Use Commission

**November 2021**



# **Appendix 4**

## **Geotechnical Investigation Report**

**GEOTECHNICAL INVESTIGATION REPORT  
WINDWARD HOTEL  
KAHULUI, MAUI, HAWAII**

A report by:  
**HAWAII GEOTECHNICAL CONSULTING, INC.**

July 23, 2017



THIS WORK WAS PREPARED BY  
ME OR UNDER MY SUPERVISION

A handwritten signature in black ink, appearing to be "R. M. Gibbens", written over a horizontal line.

SIGNATURE

04/30/2018

EXPIRATION DATE  
OF LICENSE

# Hawaii Geotechnical Consulting

- I n c o r p o r a t e d -

P.O. Box 331223 • Kahului, Hawaii 96733 • Phone (808) 205-1727

July 23, 2017  
File No. 17025.01

**Mr. Dustin Schmidt – Vice President of Real Estate**

R.D. Olson Development  
520 Newport Center Drive, Suite 600  
Newport Beach, CA 92660

Subject: **GEOTECHNICAL INVESTIGATION REPORT FOR  
WINDWARD HOTEL  
KAHULUI, MAUI, HAWAII**

Dear Mr. Schmidt:

We are pleased to submit our Geotechnical Investigation Report for the proposed Windward Hotel project in Kahului, Maui, Hawaii. The enclosed report describes our investigation and presents our geotechnical recommendations for earthwork, foundations and pavements.

We appreciate the opportunity to work with you on this project. If you should have any questions or require additional information, please contact us.

Sincerely,

**HAWAII GEOTECHNICAL CONSULTING, INC.**



Robert M. Gibbens, P.E.  
Senior Geotechnical Engineer

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# 1. INTRODUCTION

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## 1.1 Authorization

Hawaii Geotechnical Consulting, Inc. (HGC) was retained by R.D. Olson Development to conduct a geotechnical investigation for the proposed Windward Hotel project in Kahului, Maui, Hawaii. The scope of our services was outlined in our May 31, 2017 proposal No. P-402.

Authorization to proceed was received via a signed agreement.

## 1.2 Purpose and Scope

The purpose of this geotechnical investigation was to explore and evaluate the site's subsurface conditions in order to provide geotechnical recommendations for the proposed project's design and construction. The site's groundwater conditions were also addressed. A description of the scope of work is presented below:

*Phase 1 – Test Pit Field Investigation.* A total of 10 test pits were excavated across the site with a CAT 430F backhoe. Each test pit was excavated to a depth of 4 to 5 feet below the ground surface or until equipment refusal. The cut face of each test pit was then hand logged and disturbed grab and bulk samples were obtained where appropriate. The test pits were excavated to depths between 1.5 and 10 feet below the existing ground surface. An engineer with HGC observed and directed the test pit investigation, maintained a log of the subsurface soils encountered, and collected disturbed grab and bulk samples for laboratory testing. A description of the field investigation, the Logs of Test Pits, and a Unified Soil Classification System (USCS) chart are presented in Appendix A. The test pit locations are presented on the Test Pit Location Plan, Figure 1.

*Phase 2 – Laboratory Testing.* Laboratory tests were performed on disturbed grab and bulk samples obtained during the field investigation. Laboratory tests

were selected to verify field classifications and provide geotechnical parameters for use in design. Due to the onsite soils highly rocky composition, testing was limited to in-place moisture content and gradation tests. The laboratory test methods are described in Appendix B and tabulated on the Logs of Test Pits in Appendix A, where applicable.

*Phase 3 – Rotary Percussion Boring Field Investigation.* A total of 25 rotary percussion borings were performed across the site on roughly a 100 foot grid. The rotary percussion borings were performed using a 4-inch percussion drill bit with a compressed air drive/flush system. The rotary percussion borings were advanced to depths between 18 and 23 feet below the existing ground surface. An engineer with Hawaii Geotechnical Consulting, Inc. observed and directed the boring investigation and maintained a log of drilling advancement rates. A description of the field exploration and the Logs of Borings are presented in Appendix A. The rotary percussion boring locations are presented on the Rotary Percussion Boring Location Plan, Figure 2.

*Phase 4 – Geotechnical Analysis.* The various foundations were analyzed for bearing capacity and settlement using Terzaghi's bearing capacity equation and Peck's settlement equations.

*Phase 5 – Geotechnical Report.* This report was prepared to present our findings, conclusions, and recommendations regarding the geotechnical feasibility for the proposed hotel construction. Our report describes our field investigation and the site's general subsurface conditions. Discussions regarding critical geotechnical design issues and problem areas, if encountered, are presented. The report provides design level recommendations for project foundations as well as construction considerations for grading and pavements.

### 1.3 Site Location

The proposed site is located within the Maui Business Park II/North commercial subdivision in Kahului, Maui, Hawaii. The site is bounded by Airport Road to the east, by Haleakala Highway to the north, by vacant land to the south and by an interior roadway to the west.

### 1.4 Site Description and Conditions

The project was graded to a relatively level pad during the overall regions mass grading. We understand that the entire site was cut as much as 10 to 15 feet to achieve current grades. No topographic map was provided.

The site is covered in grass and brush, with some limited surface rock outcroppings observed.

---

END OF INTRODUCTION

## 2. PROJECT DESIGN CONSIDERATIONS

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The following sections describe our understanding of the relevant project considerations. Our understanding is based on May 8, 2017 Windward Hotel plans by Axis GFA and discussions with Mr. Dustin Schmidt of R.D. Olson Development. We understand that design information is limited at this point and certain assumptions had to be made to complete this report. If final construction plans differ significantly, we should be notified in order to review the applicability of our recommendations.

### 2.1 Proposed Project/Development Plans

We understand that the proposed project will include the construction of a 4 story hotel with a single storied lobby area. In addition the project will include the construction of a pool and courtyard area. We understand that the main hotel structure will be constructed of wood and will be founded on a shallow concrete footing foundation system with a concrete slab on grade lower floor.

In addition to the main structure, we understand that entranceways off of Haleakala Highway and the interior adjacent roadway, driveways and parking lots are planned as well as onsite buried utilities including water, sewer, drain, and electric.

### 2.2 Grading

We understand that the site will be raised about 2 feet below the main hotel structure. No other fills are anticipated. Cuts will be limited to the installation of buried utilities and the pool.

### 2.4 Pavements

Paving will be provided for entranceways, driveways and parking lots. We have assumed that asphaltic concrete pavement (ACP) will be utilized for most site

paving. Portland cement concrete pavement (PCCP) may be required for areas where heavy vehicle traffic is anticipated. No traffic information was made available at this time. We have assumed traffic within the proposed development will include passenger and light to heavy truck traffic.

---

END OF PROJECT DESIGN CONSIDERATIONS

### **3. SUBSURFACE INVESTIGATION**

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On December 7, 2016 a subsurface investigation consisting of rotary percussion borings was performed at the proposed project site. The following sections describe our investigations.

#### **3.1 Test Pits**

A total of 310 test pits were excavated within the proposed site. The test pits were excavated with a CAT 430F backhoe equipped with a 24 inch wide 5 tooth bucket. The test pits were excavated to equipment failure on the underlying boulders/formational basalt to depths between 1.5 and 10.0 feet below the existing ground surface. The cut face of each test pit was hand logged and disturbed grab and bulk samples were obtained where appropriate. An engineer with HGC observed and directed the test pit investigation, maintained a log of the subsurface soils encountered, and collected disturbed grab and bulk samples for laboratory testing. A description of the field exploration, the Logs of Test Pits, and a USCS chart are presented in Appendix A. The test pit locations are presented on the Test Pit Location Plan, Figure 1.

#### **3.2 Laboratory Testing**

Laboratory tests were performed on grab samples obtained during the field investigation. Laboratory tests were limited due to the rocky nature of the subsurface soils. Laboratory tests were selected to verify field classifications and provide geotechnical parameters for use in design. Testing included in-place moisture contents and gradation. The laboratory test methods are described in Appendix B and the results are presented on the Logs of Test Pits in Appendix A.



### 3.3 Rotary Percussion Borings

A total of 25 rotary percussion borings were advanced with a Sandvik Ranger DX800 track mounted drill rig. The borings were spaced across the site in a roughly 100 foot grid. A 4.5-inch carbide bit was used to penetrate the site upper weathered residual soil and its underlying less weathered to fresh basalt. Compressed air was used to advance the drill bit as well as to flush away the rock cutting. An engineer with Hawaii Geotechnical Consulting, Inc. observed and directed the percussion boring investigation and maintained a log of the advancement rates within the underlying rock. The advancement rates are presented in the Logs of Borings in Appendix B. The rotary percussion boring locations are presented on the Rotary Percussion Boring Location Plan, Figure 2.

Rotary percussion drilling rates can be used as an aid in evaluating rock rippability and to estimate the depth at which excavation difficulty will occur. Table 3.1 presents a summary of the estimated rippability of rock based on rotary percussion boring penetration rates. These general guidelines are typically based on drill rates using a rotary percussion drill rig similar to a Sandvik DP 1500i with a 4.5 inch drill bit and a Caterpillar D-9 (or equivalent) bulldozer.

**Table 3.1**  
**Summary of Estimated Rippability from Rotary Percussion Borings**

Drill Penetration Rate (seconds/foot)	Estimated Rippability
0 to 20	Rippable
20 to 30	Marginally Rippable (possible blasting)
Greater than 30	Non-Rippable (blasting likely)

---

END OF SUBSURFACE INVESTIGATION

## 4. SUBSURFACE CONDITIONS

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The following sections describe the subsurface soil and groundwater conditions encountered during our field investigations.

A previous onsite geotechnical investigation indicated that the site was overlain by 3 to 14 feet of hard clayey silt. The silt was underlain by weathered basalt. Previous mass grading across the site removed nearly all the upper silt soils. With the exception of Test Pit 2, weathered formational soils in the form of gravel, cobble and boulders was encountered within the upper 4 foot depths. Much of the weathered formational soil was encountered within the upper 2 foot depths.

### 4.1 Residual Soil

Residual soils were encountered from the ground surface to depths between 4 and 10 feet along the sites western region. The residual soils consisted of dense dry orange brown to brown silty sands and silts with trace gravel. The residual sands and silts were generally dense to hard, with in-place moisture contents ranging from 6 to 35 percent, and a measured in-place dry densities ranging from 78 to 82 pounds per cubic foot (pcf).

### 4.2 Formational Basalt

Formational basalt was encountered from depths of 1.5 feet to the maximum depth of our explorations at 22 feet. The formational basalt ranged from highly weathered cobbles and boulders to fresh hard intact basalt. A majority of the subsurface basalt was encountered in a fresh intact state with limited weaker cobbles and boulders encountered primarily along the sites western region.

The highly weathered cobbles and boulders possessed an average rotary percussion Rate of Penetration (ROP) between 5 and 15 feet per second (fps),

while the fresh intact basalt possessed an average rotary percussion ROP between 30 and more than 60 fps

#### 4.3 Groundwater Conditions

Groundwater was not encountered in our test pits or rotary percussion borings. Groundwater levels within the project area will vary depending on seasonal rainfall and runoff conditions. Therefore, groundwater levels may vary from those presented above at the time of construction.

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END OF SUBSURFACE CONDITIONS

## 5. DISCUSSION

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### 5.1 General

Based on the results of our field exploration and geotechnical analysis, we believe that it is geotechnically feasible to construct the proposed hotel project, provided the recommendations of this report are incorporated into the project's design and construction.

Our analysis indicates that the site is underlain by a 1.5 to 4 foot thick blanket of residual soil underlain primarily by competent fresh basalt. The most significant geotechnical concerns are the excavateability of much of the sites subsurface rock. We understand that only excavations for utility installation and the pool are planned.

### 5.2 Hard Rock Excavation

Fresh basalt was encountered from depths as shallow as 1.5 feet below the existing ground surface for much of the site. An area of deeper upper residual soil was encountered near the sites western region. We believe that excavations deeper than a few feet will encounter unrippable weathered to fresh basalt. This unrippable weathered to fresh basalt will likely require the use of hard rock removal techniques such as hoe ramming or blasting.

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END OF DISCUSSION

## **6. ENGINEERING RECOMMENDATIONS**

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### **6.1 General**

Foundation preparation and site grading can be developed in accordance with the following recommendations. Unless stated otherwise, the maximum dry density (MDD) and optimum moisture content (OMC) of all engineered fill referenced within this report is based on Laboratory Test Method ASTM D1557.

### **6.2 Seismic Design Considerations**

The following sections address what we believe to be the project's major seismic design considerations.

#### **6.2.1 Ground Shaking**

The proposed development is located in an area with some seismic activity and the proposed structures will likely be subjected to seismic shaking during their design life. The primary potential seismic hazard is ground shaking. We recommend that the proposed development be designed in accordance with the requirements of the latest (2006) edition of the International Building Code (IBC). According to Table 1613.52 of the 2006 IBC, the project site can be characterized by a Site Class of A.

#### **6.2.2 Liquefaction**

Liquefaction occurs in loose, saturated sands that are subjected to earthquake type motions. In sands where constant volume conditions are maintained during shaking (i.e., where no immediate drainage path exists), excess pore water pressures build quickly and as a result, soil strength is rapidly reduced and settlement occurs. Neither loose sands nor a shallow groundwater table underlie the site. Therefore no liquefaction-induced settlements are likely.

### 6.2.3 Other Seismic Considerations

The site is not located within an Earthquake Fault Zone. Therefore the likelihood of the ground surface rupturing due to faulting is considered to be low. Based on the materials encountered and the existing and planned topographic conditions, we do not expect seismic slope instability to be a concern. Due to the site's elevation, we do not believe that tsunamis are a potential threat.

### 6.3 Foundations

The hotel structure may be founded on shallow continuous strip or spread footings provided the recommendations for site preparation are followed. We recommend that all foundations founded in engineered fill or residual soil be placed a minimum depth of 12 inches below the lowest adjacent grade for both interior and exterior footings. This embedment depth should provide bearing surfaces consisting of native residual sands and silts or engineered fill.

For a shallow foundation system designed with the recommendations presented above, an allowable bearing pressure of 3,500 pounds per square foot (psf) may be used for foundations founded within native residual soil or engineered fill. This bearing value is for total dead plus sustained live loads and may be increased by one-third for transient loads such as wind or seismic. We estimate that total and differential settlements should be less than ½-inch for foundations designed as described above.

The bottom of all foundations should be cleaned of loose material and should be compacted to at least 95 percent of the materials MDD at a moisture content within 3 percent of optimum.

Lateral resistance may be derived from passive resistance along the footing sides and friction along the footing bottoms. An allowable passive earth pressure of 375 psf per foot of depth may be used for footings founded in either residual

soil or granular engineered fill. Allowable lateral earth pressures should not exceed 3,000 psf. We recommend that the lateral earth pressure of any footing be neglected for the upper 12-inches unless the surface around the footing is protected from erosion or disturbance by a slab, pavement, or some other form of confinement.

A coefficient of friction value of 0.45 may be used between the bottom of concrete footings and the underlying residual soil or granular engineered fill. Sliding resistance should be calculated based on the dead load only.

#### 6.4 Slabs-on Grade Floors

A concrete slab-on-grade floor bearing on engineered fill or residual soil can be used for the hotel structure. If reducing the passage of water vapor through the slab is desired, we recommend that a vapor barrier be placed beneath the slab. In addition, we recommend that 2-inches of clean sand be placed above and below the barrier as a protective measure during construction.

For exterior slabs and slabs designed as rigid pavements, the water vapor barrier should be replaced by 6 inches of Aggregate for Untreated Base (UTB). The UTB should conform to Section 703.06 of the 2005 Hawaii Standard Specifications for Road, Bridge, and Public Works Construction (Standard Specifications). The UTB should be compacted to at least 95 percent of its MDD.

Lateral resistance may be derived from passive resistance along the footing sides and friction along the footing bottoms. An allowable passive earth pressure of 375 psf per foot of depth may be used for footings founded in either residual soil, basalt or granular engineered fill. Allowable lateral earth pressures should not exceed 3,000 psf. We recommend that the lateral earth pressure of any footing be neglected for the upper 12-inches unless the surface around the

footing is protected from erosion or disturbance by a slab, pavement, or some other form of confinement.

A coefficient of friction value of 0.45 may be used between the bottom of concrete footings and the underlying residual soil or granular engineered fill. Sliding resistance should be calculated based on the dead load only.

## 6.5 Pavement Design

Detailed vehicular load and frequency information was not made available to us. We have assumed traffic within the proposed project site will include passenger, and light- to heavy-duty truck type traffic. We have evaluated both asphaltic concrete pavement (ACP) and Portland cement concrete pavement (PCCP) sections using a subgrade CBR value of 40.

### 6.5.1 Flexible Pavement

We believe that a pavement section consisting of 2.0 inches of ACP over 6 inches of UTB will be suitable for the proposed project's traffic. Prior to the placement of UTB, we recommend that the pavement subgrade be moisture conditioned to between 0 and 3 percent of the subgrade soils OMC and compacted to at least 95 percent of the subgrade soils MDD for a depth of at least 12 inches. The UTB should conform to Section 703.06 of the Standard Specifications and should be compacted to at least 95 percent relative compaction as determined by ASTM D1557. All pavement subgrades should be sloped to drain.

After completion of site grading, we recommend that the final subgrade soils be tested for their CBR value to confirm the values used in design. Modified pavement sections may be required if subgrade conditions vary from those assumed in design.



In the event unstable (pumping) subgrades are encountered within the planned pavement areas, we recommend that a heavy rubber tired vehicle (typically a loaded water truck) be used to test the load/deflection characteristics of the finished subgrade. If the tested surface shows a visible deflection, corrective measures should be implemented.

#### 6.5.2 Rigid Pavement

In addition to the flexible ACP section, a rigid PCCP section may be used to support heavier traffic areas and tight turning areas within the project area. We recommend a PCCP section consisting of 6 inches of PCC over 6 inches of UTB.

The UTB should conform to Section 703.06 of the Standard Specifications and should be compacted to at least 95 percent of the materials MDD. The pavement subgrade should be sloped to drain and similarly compacted to at least 90 percent relative compaction for a minimum depth of 12 inches.

After completion of site grading, we recommend that the final subgrade soils be tested for their CBR value to confirm the values used in design. Modified pavement sections may be required if subgrade conditions vary from those assumed in design.

In the event unstable (pumping) subgrades are encountered within the planned pavement areas, we recommend that a heavy rubber tired vehicle (typically a loaded water truck) be used to test the load/deflection characteristics of the finished subgrade. If the tested surface shows a visible deflection, corrective measures should be implemented.

## 6.6 Construction Considerations

The following recommendations are provided for geotechnical earthwork design. All site preparation and earthwork operations should be performed in accordance with the Standard Specifications.

### 6.6.1 Stripping and Grubbing

Prior to commencement of grading, the site should be cleared and grubbed to remove all organics, vegetation, and other deleterious materials in accordance with the Standard Specifications. We anticipate stripping and grubbing will include limited surface vegetation. We believe the stripping and grubbing to depths of as much as 4 inches may be required. Organic material should not be mixed with the underlying soils that may be later used as fill or backfill. Material with organic matter in excess of about 4 percent should not be used as fill or backfill.

The stripping and grubbing work should include the removal of topsoil and native material that, in the judgment of the geotechnical engineer, is uncertified, compressible, collapsible, or contains significant voids. The voids caused by the removal of subsurface features, if encountered, must also be processed and backfilled in accordance with the recommendations presented in this report.

### 6.6.2 Site Preparation

Based on our interpretation of the geotechnical subsurface profile, we anticipate that the soils exposed during construction will consist of a combination of highly weathered basalt and limited residual sands and silts. All areas to receive fill should be stripped and grubbed to expose a firm, non-yielding subgrade, free of large voids, organics, and deleterious materials. The exposed subgrade soils should be compacted to at least 95 percent of their MDD at a moisture content within 3 percent of their OMC prior to the placement of fill. Visual observations of the subgrade may be required if the rock content of the subgrade materials is

excessive. This visual observation should involve proof rolling all subgrade areas with a 10-ton vibratory roller. Personnel with HGC should be present to observe the subgrade deflection characteristics of the subgrade while subject to load.

#### 6.6.3 Excavation Characteristics

The onsite soils consist of a limited area of upper residual soil underlain by competent fresh intact basalt. We believe that excavations deeper than a few feet will encounter unrippable fresh basalt which will require the use of some form of hard rock removal including hoe-ramming and/or blasting to excavate.

#### 6.6.4 Engineered Fill

The onsite soils are minimal in quantity and generally contain primarily oversized rock. In order to utilize the onsite soils we recommend that a crusher be used to crush the onsite soils down to a maximum size of 3 to 6 inches. All onsite crushed engineered fill should possess at least 20 percent fine material (finer than the No. 200 sieve).

Imported fill should consist of fine- or coarse-grained material with a maximum particle size of 6 inches. Additionally, all imported fill should possess a plasticity index less than 20 and should qualify as SW, SP, GP, GM, SM, or ML in accordance with the USCS. The upper 3 feet of fill to be placed in roadway alignments should possess a CBR value of at least 25.

All fill should be placed in successive horizontal lifts of not more than 12 inches in loose thickness for the full width of the area being filled. The fill should be moisture conditioned to within 3 percent of its OMC prior to being compacted to at least 90 percent of its MDD.

Ground surfaces to receive fill with slopes in excess of 5H:1V should be benched with a series of horizontal terraces prior to fill placement. The benches should extend through any disturbed slope materials into the native residual soils.

## **7. ADDITIONAL SERVICES**

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We recommend that a thorough review of the project plans and specifications be conducted before they are finalized to verify that our geotechnical recommendations have been properly interpreted and implemented during the design. If we are not accorded this review, we can assume no responsibility for misinterpretation of our recommendations. The review can be completed on a time-and-expense basis in accordance with our current Fee Schedule.

The construction process is an integral design component with respect to the geotechnical aspects of a project. Because geotechnical engineering is an inexact science due to the variability of natural processes and because we sample only a small portion of the soils affecting the performance of the proposed structures, unanticipated or changed conditions can be disclosed during grading. Proper geotechnical observation and testing during construction is imperative to allow the geotechnical engineer the opportunity to verify assumptions made during the design. Therefore, we recommend that Hawaii Geotechnical Consulting, Inc. be kept apprised of design modifications and construction schedules for the proposed development so that design changes can be made if subsurface field conditions warrant.

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END OF ADDITIONAL SERVICES

## **8. LIMITATIONS**

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This report has been prepared for the exclusive use of R.D. Olson Development, Inc. and their agents for specific application to the proposed Windward Hotel project in Kahului, Maui, Hawaii.

The findings, conclusions, and recommendations presented in this report were prepared in accordance with generally accepted geotechnical engineering practice as it exists in the site area at the time of our study. No warranty is expressed or implied. The recommendations provided in this report are based on the assumption that our firm will conduct an adequate program of tests and observations during the construction phase in order to evaluate compliance with our recommendations. If the scope of the proposed construction, including the proposed loads, grades, or structural locations change from that described in this report, our recommendations should also be reviewed. We have not reviewed a final grading or building plan for the project.

Hazardous materials may have been discovered during the course of Hawaii Geotechnical Consulting, Inc.'s services. Hawaii Geotechnical Consulting, Inc. will assume no responsibility or liability whatsoever for any claim, loss of property value, damage, or injury that results from pre-existing hazardous materials being encountered or present on the project site, or from the discovery of such hazardous materials.

Nothing contained in this scope of work should be construed or interpreted as requiring Hawaii Geotechnical Consulting, Inc. to assume the status of an owner, operator, generator, or person who arranges for disposal, transport, storage, or treatment of hazardous materials within the meaning of any governmental statute, regulation, or order.

The client has the responsibility to see that all parties to the project, including the designer, contractor, subcontractor, etc., are made aware of this report in its entirety. This report contains information that may be useful in the preparation of contract specifications. However, the report is not designed as a specification document and may not contain sufficient information for this use without proper modification.

The recommendations contained in this report are based on our field observations and our present knowledge of the proposed construction. It is possible that soil conditions could vary between or beyond the areas observed. If soil conditions are encountered during construction which differ from those described herein, we should be notified immediately in order that a review may be made and any supplemental recommendations provided.

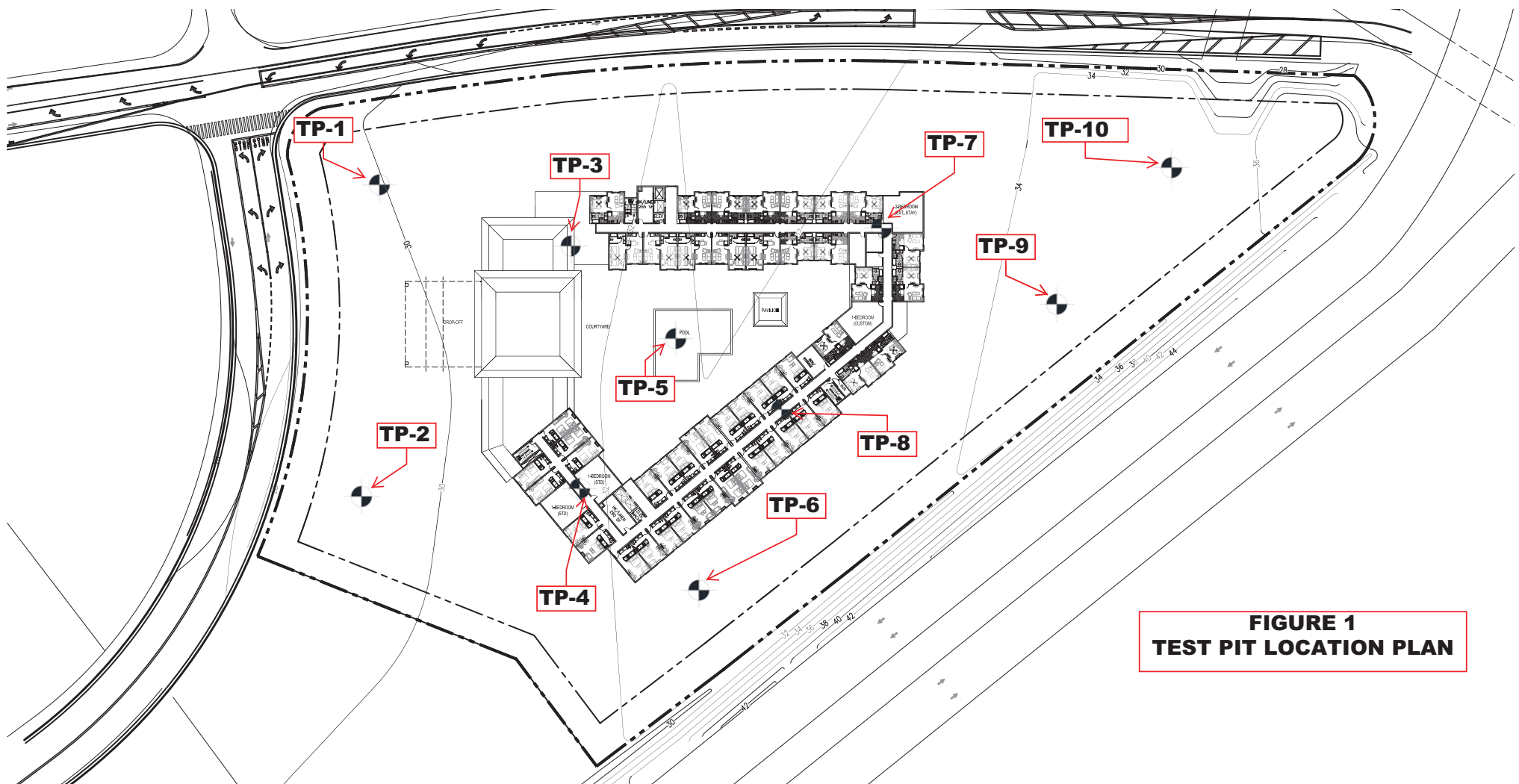
This report may be used only by the client and only for the purpose stated, within a reasonable time from its issuance. Land use, site conditions (both onsite and offsite) or other factors may change over time, and additional work may be required with the passage of time. Any party other than the client who wishes to use this report shall notify Hawaii Geotechnical Consulting, Inc. of such intended use. Based on the intended use of this report, Hawaii Geotechnical Consulting, Inc. may require that additional work be performed and that an updated report be issued. Non-compliance with any of these requirements by the client or anyone else will release Hawaii Geotechnical Consulting, Inc. from any liability resulting from the use of this report by any unauthorized party.

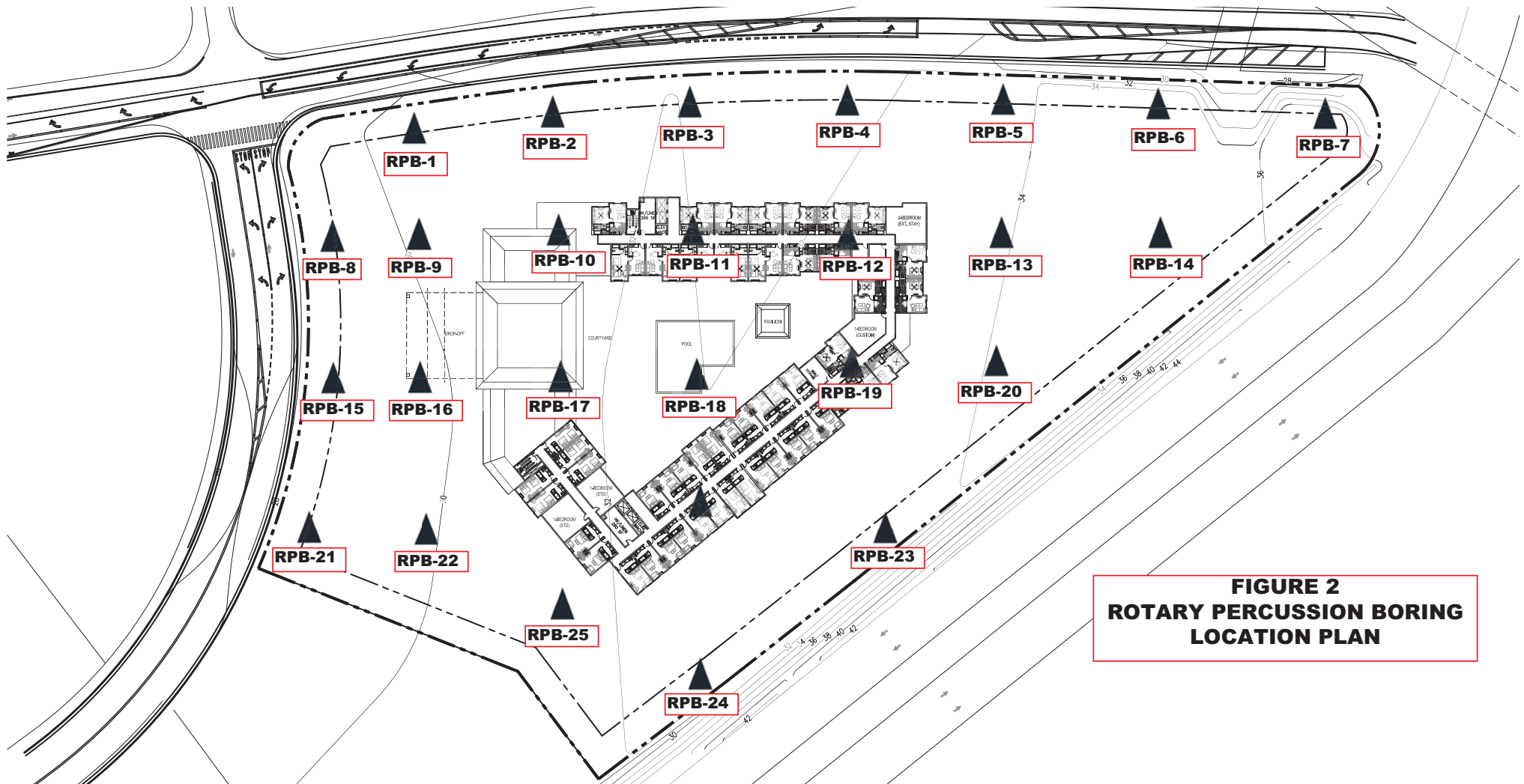
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END OF LIMITATIONS

## FIGURES







**FIGURE 2  
ROTARY PERCUSSION BORING  
LOCATION PLAN**

# **APPENDIX A**

**Test Pit**

**Field Exploration**

## **APPENDIX A TEST PIT FIELD EXPLORATION**

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The subsurface exploration program for the Windward hotel project included excavating and logging a total of 10 test pits. With the exception of Test Pit Nos. 1, 2 and 3, each test pit was excavated to equipment refusal on the underlying weathered basalt at depths between 1.5 and 4 feet below the existing ground surface. Figure 1 presents the test pit locations.

The Logs of Test Pits are presented as Figures A2 through A11. A soil classification chart is presented as Figure A1. The Logs of Test Pits describe the materials encountered, samples obtained, and show field and laboratory tests performed. The logs also show the test pit number, excavation date, name of the logger and excavation subcontractor, and the groundwater level. A staff engineer logged the materials encountered in accordance with the USCS. The boundaries between soil types shown on the logs are approximate because the transition between different soil layers may be gradual. Bulk, drive, and grab samples were obtained at varying intervals.

The test pits were excavated with a CAT 430F backhoe. Each test pit was excavated to an initial depth of 4 to 5 feet unless equipment refusal was reached. The cut face of each test pit was then hand logged and bulk and grab samples were obtained from within each excavation. After initial logging and sample collection, each test pit was excavated further. During the additional excavation, the disturbed soil was observed and sampled when changes were observed.

<p>COARSE GRAINED SOILS</p> <p>MORE THAN HALF OF THE MATERIAL IS LARGER THAN NO. 200 SIEVE SIZE</p>	<p>GRAVELS</p> <p>MORE THAN HALF OF COURSE FRACTION IS LARGER THAN NO. 4 SIEVE SIZE</p>	<p>CLEAN GRAVELS (LITTLE OR NO FINES)</p>	GW	WELL-GRADED GRAVELS, GRAVEL-SAND MIXTURES, LITTLE OR NO FINES
			GP	POORLY GRADED GRAVELS, GRAVEL-SAND MIXTURES, LITTLE OR NO FINES
		<p>GRAVELS WITH FINES (APPRECIABLE AMOUNTS OF FINES)</p>	GM	SILTY GRAVELS, GRAVEL-SAND-SILT MIXTURES
			GC	CLAYEY GRAVELS, GRAVEL-SAND-CLAY MIXTURES
	<p>SANDS</p> <p>MORE THAN HALF OF COURSE FRACTION IS SMALLER THAN NO. 4 SIEVE SIZE</p>	<p>CLEAN SANDS (LITTLE OR NO FINES)</p>	SW	WELL-GRADED SANDS, GRAVELLY SANDS, LITTLE OR NO FINES
			SP	POORLY GRADED SANDS, GRAVELLY SANDS, LITTLE OR NO FINES
		<p>SANDS WITH FINES (APPRECIABLE AMOUNTS OF FINES)</p>	SM	SILTY SANDS, SAND-SILT MIXTURES
			SC	CLAYEY SANDS, SAND-CLAY MIXTURES
<p>FINE GRAINED SOILS</p> <p>MORE THAN HALF OF THE MATERIAL IS SMALLER THAN NO. 200 SIEVE SIZE</p>	<p>SILTS AND CLAYS</p> <p>LIQUID LIMIT LESS THAN 50</p>		ML	INORGANIC SILTSAND VERY FINE SANDS, ROCK FLOUR, SILTY OR CLAYEY FINE SANDS OR CLAYEY SILTS WITH SLIGHT PLASTICITY
			CL	INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS, SILTY CLAYS, LEAN CLAYS
			OL	ORGANIC SILTS AND ORGANIC SILTY CLAYS OF LOW PLASTICITY
	<p>SILTS AND CLAYS</p> <p>LIQUID LIMIT GREATER THAN 50</p>		MH	INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS FINE SANDY OR SILTY SOILS, ELASTIC SOILS
			CH	INORGANIC CLAYS OF HIGH PLASTICITY, FAT CLAYS
			OH	ORGANIC CLAYS OF MEDIUM TO HIGH PLASTICITY, ORGANIC SILTS

USCS SOIL CLASSIFICATION CHART

FIGURE  
A1

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.


Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols:  Bulk Sample  Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1 2 3 4 5 6 7 8 9 10		1	<p>SILTY SAND (SM) and Gravel with some Cobbles and trace Boulders orange brown, dense, dry</p> <p>Refusal on Boulders and Formational Basalt at 3.0 feet No free water observed Test pit backfilled with excavated materials</p>	4.0+	82	14	Gravel = 31% Sand = 38% Silt/Clay = 31%

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WINDWARD HOTEL  
KAHULUI, MAUI, HAWAII

**LOG OF TEST PIT 1**

FIGURE  
**A2**

Date Completed: 06/03/2107  
 Drilled By: Alpha Excavation, Inc.  
 Drilling Method: Backhoe  
 Logged By: R.M. Gibbens, P.E.

Water Depth: Not Encountered  
 Elevation: --  
 Location: --  
 Symbols:  Bulk Sample  Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1		1	SILT (ML) and Sand with trace Gravel orange brown, hard, dry	4.0+	78	35	Gravel = 2% Sand = 46% Silt/Clay = 52%
2							
3							
4		2	SILTY SAND (SM) with some Gravel brown, dense, moist	--	--	34	Gravel = 21% Sand = 38% Silt/Clay = 41%
5							
6		3	GRAVEL (GM) with some Sand, some Silt and trace Cobble brown, dense, moist	--	--	34	Gravel = 44% Sand = 24% Silt/Clay = 32%
7							
8							
9							
10							
			Bottom at 10.0 feet No free water observed Test pit backfilled with excavated materials				

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WINDWARD HOTEL  
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**LOG OF TEST PIT 2**

FIGURE  
**A3**

Water Depth: Not Encountered

Elevation: --

Location: --

Symbols:  Bulk Sample  Drive/Grab Sample

[illegible]

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WINDWARD HOTEL  
KAHULUI, MAUI, HAWAII

## LOG OF TEST PIT 3

FIGURE  
A4



Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.

Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1			SILTY SAND (SM) and Gravel with some Cobbles and Boulders grayish brown, dense, dry				
2			Refusal on Boulders and Formational Basalt at 1.5 feet No free water observed Test pit backfilled with excavated materials				
3							
4							
5							
6							
7							
8							
9							
10							

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WINDWARD HOTEL  
KAHULUI, MAUI, HAWAII

**LOG OF TEST PIT 4**

FIGURE  
**A5**

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.

Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1			SILTY SAND (SM) and Gravel with some Cobbles and Boulders grayish brown, dense, dry				
2			Refusal on Boulders and Formational Basalt at 1.5 feet No free water observed Test pit backfilled with excavated materials				
3							
4							
5							
6							
7							
8							
9							
10							

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**LOG OF TEST PIT 5**

FIGURE  
**A6**

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.

Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1		1	GRAVEL (GM) and Silt with some Sand and some Cobbles and Boulders grayish brown, dense, dry	4.0+	--	21	Gravel = 32% Sand = 29% Silt/Clay = 39%
2			Refusal on Boulders and Formational Basalt at 2.0 feet No free water observed Test pit backfilled with excavated materials				
3							
4							
5							
6							
7							
8							
9							
10							

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**LOG OF TEST PIT 6**

FIGURE  
**A7**

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.

Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1			GRAVEL (GM) and Silt with some Sand and some Cobbles and Boulders light brown, dense, dry				
2			FORMATION				
3			Refusal on Boulders and Formational Basalt at 2.0 feet No free water observed Test pit backfilled with excavated materials				
4							
5							
6							
7							
8							
9							
10							

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**LOG OF TEST PIT 7**

FIGURE  
**A8**

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.

Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1			GRAVEL (GM) and Silt with some Sand and some Cobbles and Boulders grayish brown, dense, dry				
2			FORMATION				
3			Refusal on Boulders and Formational Basalt at 2.0 feet No free water observed Test pit backfilled with excavated materials				
4							
5							
6							
7							
8							
9							
10							

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**LOG OF TEST PIT 8**

FIGURE  
**A9**

Date Completed: 06/03/2107

Water Depth: Not Encountered

Drilled By: Alpha Excavation, Inc.


Elevation: --

Drilling Method: Backhoe

Location: --

Logged By: R.M. Gibbens, P.E.

Symbols: ☒ Bulk Sample ☐ Drive/Grab Sample

Depth (feet)	Sample Type	Sample No.	GEOTECHNICAL DESCRIPTION AND CLASSIFICATION	Penetrometer (tsf)	Dry Density (pcf)	Moisture Content (%)	Additional Tests
1		1	GRAVEL (GP) with some Sand, trace Silt and some Cobbles and Boulders brown, dense, dry  <div>FORMATION</div>	4.0+	--	14	Gravel = 71% Sand = 20% Silt/Clay = 9%
2			Refusal on Boulders and Formational Basalt at 2.0 feet No free water observed Test pit backfilled with excavated materials				
3							
4							
5							
6							
7							
8							
9							
10							

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**LOG OF TEST PIT 9**

FIGURE  
**A10**

## **APPENDIX B**

### **Laboratory Testing**

## **APPENDIX B LABORATORY TESTING**

---

Laboratory tests were performed on selected bulk and drive samples to estimate their pertinent engineering characteristics. Testing was performed in accordance with ASTM Standards for Soil Testing, latest revision.

### **MOISTURE CONTENT AND DRY DENSITY**

Natural moisture content and dry density tests were performed on multiple samples in accordance with ASTM D2216 and D2937, respectively. The results of these tests are presented on the Logs of Test Pits in Appendix A.

### **GRAIN SIZE**

Grain size analyses were performed on select samples in accordance with ASTM D2487. The results are presented on the Logs of Test Pits in Appendix A.