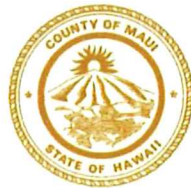


MICHAEL P. VICTORINO
Mayor

MICHELE CHOUTEAU MCLEAN, AICP
Director

JORDAN E. HART
Deputy Director



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



January 5, 2022

Mr. Scott Derrickson, Planner
State Land Use Commission
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96804

Dear Mr. Derrickson:

SUBJECT: DEPARTMENT COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE PROPOSED KANAHA HOTEL AT KAHULUI AIRPORT ON APPROXIMATELY 5.2 ACRES, LOCATED AT 0 LAUO LOOP, KAHULUI, MAUI, HAWAII; TMK: (2) 3-8-103:014 (POR.), 015 (POR.), 016, 017, AND 018 (EAC 2020/0007)

The Department of Planning (Department) has reviewed the Draft EIS for the proposed Kanaha Hotel, formerly referred to as the Windward Hotel that was published in the November 23, 2021 issue of *The Environmental Notice*. The Department has the following comments:

1. Throughout the Draft EIS, it says that the hotel will be geared to kama'aina; but, realistically, hotel service will not be limited to just local residents. So, the Department does not think this is an accurate representation of who the hotel is intended to serve. For the Final EIS, please clearly state that the hotel will be open to all.
2. As indicated in a meeting held over the summer, the sentiment toward the development of new hotels is negative at this time. There was a moratorium on new transient accommodations passed by Council and vetoed by the Mayor, which will be heard at the Maui County Council meeting on January 7, 2022. Because of the negative community feedback, and the timing, the Department has said that it cannot support this new hotel. We reiterate that stance.
3. On page 61, it says that the subdivision will result in 5.2 acres for the project and 1.1 acres for future development. For the Final EIS, please discuss this further and state whether the 1.1 acres will be for future hotel use.
4. On pages 72-73 and 132-133, visual resources are discussed; but, the view impacts from the surrounding roadways were not mentioned. For the Final EIS, please mention whether there will be any impacts to views toward the ocean.
5. On page 77, it says that the average daily visitor census has exceeded the three-to-one visitor to resident metric called for in the Maui Island Plan; but, there is no explanation on where this metric is from. For the Final EIS, please cite the source of this metric.

6. In various locations throughout the document, specifically on pages 78, 93 and 107, the State and County tax amounts are discrepant. For the Final EIS, please provide a better explanation for the information provided.
7. Throughout the document, it states that the proposed use is consistent with the adjacent Airport District, where hotels are a permitted use. In Ordinance 5274, which was enacted in October 2021, transient hotels were deleted as a permitted use. For the Final EIS, this should be mentioned.
8. On page 97, Implementing Action 6.11.3-Action 3 of the Maui Island Plan is called out, which says to “Study the feasibility of developing an Airport District for Kahului Airport that intentionally agglomerates uses that support the airport such as business hotel(s), gas stations, parcel delivery services, and freight forwarding.” It should be noted that this does not mean to support the opportunity to develop a hotel for business travelers. This is meant to study the area, define the area to be included in this district, perform an economic and social forecast, determine infrastructure requirements, create a District Development Plan for that area with identified uses and create or amend a district, if necessary.
9. In the table on page 198, out-of-state residents are mentioned; but, there is no call out of in-state resident numbers. For the Final EIS, it would be interesting to see how many visitors are in-state residents.
10. On pages 368-369, the Costco gas expansion is mentioned for assessment of cumulative impacts; but, it should be noted that it is no longer proposed. Also, the Maui County Service Center is already built.
11. In the Cultural Impact Assessment, a discussion on the rename of the proposed hotel is mentioned, and this is appreciated. The Assessment recommends future continued coordination with the community and cultural consultants for proper naming and marketing materials, and the Department supports this suggestion.
12. In the Draft EIS, it says that for the north central portion of the project area, known as the former agricultural dump site, no further action is recommended; but, that future excavation activities should be monitored for evidence of potential buried waste materials. The Department supports monitoring during construction, and supports a commitment to this by the developer as proposed hazardous substance mitigation in the Final EIS.
13. It should be articulated next to “Surrounding Land Uses” that “Impacts” include being physically land-locked (e.g., surrounded) by major roadways that service those land uses, and that do not accommodate pedestrians or bicycle use; and “Mitigation” measures should be provided (such as pedestrian and bicycle access additions and/or shuttle service to and from the airport).

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14. It should be articulated next to “Greenhouse Gas Emissions” that the “Impacts” of this site being purely auto-dependent is that there will be higher amounts of GHG emissions than if there were “complete streets” as required by the Maui County Code; and, “Mitigation” measures should be provided (such as pedestrian and bicycle access additions and/or shuttle service to and from the airport).

Should you require further clarification, please contact Staff Planner Tara Furukawa at tara.furukawa@mauicounty.gov or at (808) 270-7520.

Sincerely,



MICHELE MCLEAN, AICP
Planning Director

xc: Clayton Yoshida, Planning Program Administrator, Current Division (PDF)
Kathleen Aoki, Planning Program Administrator, Plan Implementation Division (PDF)
Jacky Takakura, Acting Planning Program Administrator, Zoning Division (PDF)
Pam Eaton, Planning Program Administrator, Long-Range Division (PDF)
Jennifer Maydan, Supervising Planner, Long-Range Division (PDF)
Tara K. Furukawa, Staff Planner (PDF)
Anthony Wrzosek, R.D. Olson Development (PDF)
Brett Davis, Planning Consultant, Chris Hart & Partners (PDF)
Project File

MCM:TKF:lp

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