HONOAPIʻILANI HIGHWAY IMPROVEMENTS PROJECT,
WEST MAUI: UKUMEHAME TO LAUNIUPOKO

Appendix 8 – Scoping Report

December 2024

Prepared for

Honoapiʻilani Highway Improvements

Prepared by

wsp

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Contents

WSP USA, Inc .
Scoping Report (May 2023)

Honoapi‘ilani Highway Improvements Project,
West Maui: Ukumehame to Launiupoko

Scoping Report

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Contents

Tables

Figures

Appendices

Acronyms

ACRONYM	DEFINITION
APE	Area of Potential Effect
CEQ	Council on Environmental Quality
CGG	Coastal Geology Group
CRESI	Coastal Road Erosion Susceptibility Index
CWA	Clean Water Act
CZM	Coastal Zone Management
CZMA	Coastal Zone Management Act
DBEDT	Department of Business Economic Development and Tourism
Draft EIS	Draft Environmental Impact Statement
DLNR	Department of Land and Natural Resources
DOT	Department of Transportation
EIS	Environmental Impact Statement
EISPN	EIS Preparation Notice
Final EIS	Final environmental impact statement
FHWA	Federal Highway Administration
HDOH	Hawai‘i Department of Health
HDOT	Hawai‘i Department of Transportation Highways Division
HEPA	Hawai‘i Environmental Policy Act
LEP	Limited English Proficiency
MMPO	Maui Metropolitan Planning Organization
MPO	Metropolitan Planning Organization
NEPA	National Environmental Policy Act
NHO	Native Hawaiian Organizations
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
OHA	Office of Hawaiian Affairs
ROD	Record of Decision
SHPD	State Historic Preservation Division
SMA	Special Management Area
SOEST	School of Ocean and Earth Science and Technology
USACE	U.S. Army Corps of Engineer
USDOT	U.S. Department of Transportation

1. Overview

1.1 INTRODUCTION

This Scoping Report provides a framework for the Environmental Impact Statement (EIS) being prepared for the proposed Honoapiʻilani Highway Improvements Project (the Project). Pursuant to the National Environmental Policy Act (NEPA) and the Hawaiʻi Environmental Policy Act (HEPA), a Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on November 22, 2022, and a Hawaiʻi EIS Preparation Notice (EISPN) was published in the state's Environmental Notice on November 23, 2022. This started a public scoping comment period that closed on December 31, 2022, and included three public scoping meetings: two virtual meetings held on December 14, 2022 (one afternoon and one evening session) and one in-person meeting held on December 15, 2022, at the Lāhainā Civic Center.

The Federal Highway Administration (FHWA) and the Hawaiʻi Department of Transportation (HDOT) reviewed and considered all comments received, with responses to substantive comments provided in this Scoping Report. This report provides updated information related to the Project, addresses public comments, as appropriate, and summarizes the project's EIS process to date.

This proposed scope also incorporates information obtained during the pre-NEPA/HEPA early scoping period from December 2021 to November 2022. Early scoping included news releases, a public project website (www.honoapiilanihwyimprovements.com), pre-NEPA town hall meetings, pre-EISPN scoping letters, and stakeholder meetings with Native Hawaiian Organizations (NHOs), applicable county, state, and federal agencies, and affected landowners. The Coordination Plan for Public and Agency Participation (the Coordination Plan) describes these outreach activities in greater detail. All the referenced documents supporting this Scoping Report can be found on the Info + Documents page of the project website: https://www.honoapiilanihwyimprovements.com/info-plus-docs/.

For describing locations, this report generally uses the standard cardinal direction terms north, south, east, and west. In addition, this report also uses commonly used local conventions such as mauka/makai (toward the mountains/ocean, which correspond to generally easterly/westerly directions), pali (cliff, but also refers to a specific place of steep topography south of the project area), and West Maui place names, such as Lāhainā (a town to the north of the project area). These terms may be used interchangeably in this report, whenever most clear or convenient to describe a direction or location.

1.2 PROJECT AREA

The Project is located in West Maui, in the area served by the existing Honoapiʻilani Highway between milepost 11 and milepost 17. Honoapiʻilani Highway, which is part of Maui's Belt Road system, is a two-lane principal arterial highway that provides the main access between communities along Maui's west coast and the rest of the island. The proposed southeastern terminus at milepost 11 is in Ukumehame near Pāpalaua Beach Park, and the northwestern terminus of the Project is at milepost 17 in Launiupoko, where Honoapiʻilani Highway intersects the southern terminus of the Lāhainā Bypass. Because highway relocation will be among the alternatives considered, the study area extends mauka-makai (from the mountains to the sea) along this highway corridor, from the base of the West Maui Mountains to the existing highway along the coastline (Figure 1). This approximately 6-mile-long and 3/4-mile-wide project area is composed predominantly of a coastal plain that includes the ahupuaʻa (a traditional land district that typically extends from the top of the mountains to the sea and includes a watershed) of Ukumehame, Olowalu, and Launiupoko.

Figure 1. Project Area

2. Purpose and Need

2.1 PROJECT CONTEXT

Honoapiʻilani Highway is the main travel way for people and goods between West Maui and the rest of the island. It connects West Maui to transportation hubs such as Kahului Airport, Kahului Harbor, hospital and medical services, as well as goods and services not readily available in West Maui. The region hosts about 15% of the island's population and is the second-largest employment center (County of Maui, 2022, and 2018 Department of Business Economic Development and Tourism (DBEDT) Data Book, 2019). As the main access to this part of the island, roadway closures and delays create severe consequences to West Maui residents and the economy.

Honoapiʻilani Highway is a part of the National Highway System and Primary Highway Freight System. The *Hawaii Statewide Freight Plan* (2018) identifies the top-ten truck-count locations on each island. On Maui, Honoapiʻilani Highway is one of the highest ranked routes for freight-truck volumes, and it ranks numbers four, five, six, seven, and eight in the island's top-ten truck-count locations. Because this is the main and most direct route, even slowing traffic along this stretch can have significant effects on the movement of people and freight, including access for emergency vehicles, missed flights, and travel-time delays for motorists.

Over the past 10 years, this stretch of highway has been repaired three times after storm and high-wave events have undermined pavement sections and overtopped the roadway, rendering it impassable. Another independent repair project is in development to address erosion where 4,100 feet of highway fronting Ukumehame and 1,000 feet of highway fronting Olowalu will be shifted 8 to 12 feet inland within the existing roadway right-of-way. These projects are short-term fixes because they address only the most severe locations where the road is already undermined. Federal regulations require that state departments of transportation evaluate locations in the transportation network, like this coastal segment of Honoapiʻilani Highway, that are subject to frequent emergency events and address them in their long-term transportation improvements planning (23 CFR Part 667.1). In addition, the current alignment of Honoapiʻilani Highway lies within the projected Sea Level Rise Exposure Area (SLR-XA), as defined by Hawaiʻi Climate Change Mitigation and Adaptation Commission and the Hawaiʻi Department of Land and Natural Resources (DLNR). Therefore, service disruptions and the need for emergency repairs are expected to increase as the frequency and magnitude of these flood occurrences are exacerbated by climate change and sea level rise.

2.2 PROJECT PURPOSE

The primary purpose of the Project is to provide a reliable transportation facility in West Maui and to improve Honoapiʻilani Highway's resilience by reducing the highway's vulnerability to coastal hazards. Specifically, the Project is intended to address existing coastal erosion and flooding, as well as future coastal erosion and flooding caused by anticipated sea level rise, as delineated by the SLR-XA along the stretch of highway from Ukumehame to Launiupoko, approximately milepost 11 to milepost 17. Areas within the SLR-XA boundary, including Honoapiʻilani Highway, are considered exposed and

potentially vulnerable to sea level rise. The 3.2-foot SLR-XA encroaches on roughly 4 miles out of the 6 miles of the existing highway in the study area. Therefore, the primary purpose of the Project is to reduce the highway's exposure to the SLR-XA, where feasible. Strengthening and reinforcing the highway's reliability will improve the efficiency of not only daily travel demands important to island residents, businesses, and visitors, but also critical emergency response services.

2.3 PROJECT NEED

HDOT has prepared recent reports that document the climate hazards to which its facilities are exposed statewide:

- Hawai'i Highways Climate Adaptation Action Plan (HDOT, May 2021)
- Statewide Coastal Highway Program Report (HDOT, 2019)

The Hawai'i Highways Climate Adaptation Action Plan identifies strategies to create a more resilient transportation system. As part of this plan, exposure assessments were conducted to assess highway infrastructure vulnerability to rockfall and landslides, sea level rise (passive flooding, annual high-wave flooding, coastal erosion), storm surge from category 1 through category 4 hurricanes, tsunami, wildfire, and lava flow. Of these potential hazards, the most urgent need in West Maui is sea level rise (combination of passive flooding, annual high-wave flooding, and coastal erosion) based on the history of storm surge as described in Section 1.2 (Project Area) and the remainder of this section.

The University of Hawai'i School of Ocean and Earth Science and Technology (SOEST) Coastal Geology Group (CGG) has studied shoreline erosion trends across the state by evaluating mosaics of aerial photography that date back to 1912 (SOEST CGG, Historical Mosaics[1]). SOEST CGG's study areas relevant to the Project from north to south are named Launiupoko, Awalua, Olowalu, Hekili, Ukumehame, and Pāpalaua. In general, portions of the shoreline areas abutting the highway near Launiupoko and between Ukumehame Park and Pāpalaua Wayside Park are experiencing significant rates of erosion at an average of -1.4 feet/year and -1.9 feet/year, respectively. For comparison, adjacent transects within the same study areas lose roughly -0.3ft/year and -0.7 ft/year. The eastern portion of SOEST CGG's Hekili study area contains segments of Honoapi'ilani Highway that is "threatened by shoreline change." (SOEST CGG).

Recognizing the effects of climate change across the state, HDOT commissioned a Statewide Coastal Highway Program Report to develop a scientifically rigorous methodology to assess and rank the susceptibility of Hawai'i's coastal roads to erosion and structural degradation caused by multiple ocean hazards such as waves, currents, tides, and sea level rise. The report was published in final form on August 21, 2019 (Francis, et al. 2019). One component of this 2019 report evaluated over 300 discrete coastal highway sites across the state that are threatened by coastal hazards and climate change and prioritized them using a new ranking system called the Coastal Road Erosion Susceptibility Index (CRESI). The report ranked a section of Olowalu, known as Mōpua (located in the northwestern portion of SOEST CGG's Hekili study area), as second in priority statewide with the recommendation

[1] http://www.soest.hawaii.edu/crc/index.php/resources-2/historical-mosaics/; last updated July 2021, accessed November 4, 2022

to harden or relocate the highway. Ukumehame is ranked 11th in priority with a recommendation to elevate or relocate that section of road.

Highway service disruptions are expected to increase as climate change and sea level rise exacerbate the frequency and magnitude of flood occurrences. The Hawai'i Climate Change Mitigation and Adaptation Commission SLR-XA boundary delineates the statewide footprint where passive flooding, annual high-wave flooding, and coastal erosion has been modeled for the 0.5-foot, 1.1-foot, 2.0-foot, and 3.2-foot SLR-XA scenarios. Any references to the SLR-XA boundary throughout project documentation assumes the 3.2-foot SLR scenario unless otherwise noted. Areas and assets, including Honoapiʻilani Highway, within the SLR-XA boundary are considered exposed and potentially vulnerable to sea level rise. Because of this relationship between the SLR-XA boundary and highway reliability, the Project is needed to reduce the highway's exposure to the SLR-XA where feasible, as described in Section 1.3.

2.4 SECONDARY OBJECTIVES

2.4.1 Provide Regional Transportation System Linkages that Support Safe Movement of People and Goods

Over the last decade, the transportation network just north of the Project has been undergoing large changes. HDOT improved a portion of Honoapiʻilani Highway passing through the town of Lāhainā and also constructed a portion of the planned Lāhainā Bypass mauka of Lāhainā:

- In 2012, Lāhainā Bypass Phase 1A from the Keawe Street Extension to Lahainaluna Road Project was completed.
- In 2013, Lāhainā Bypass Phase 1B-1 from Lahainaluna Road to Hokiokio Place was completed.
- In 2018, Lāhainā Bypass Phase 1B-2 from Hokiokio Place to the southern terminus of the Lāhainā Bypass was completed.

These improvements are functioning as a two-lane highway, but grading, drainage, and structures were designed to be fully built out to four lanes if the need arises and funding is available. In considering long-term solutions, consistent roadway system linkages are needed to connect with these recent inland highway improvements, located beyond the SLR-XA and north of the project area. These improvements will also ensure that the new facility meets or exceeds current design standards.

2.4.2 Conform with Regional Land Use and Transportation Plans

Regional land use and transportation plans support improvements to Honoapiʻilani Highway as an opportunity to enhance multimodal transportation and access to recreational resources along the coast. The Maui Metropolitan Planning Organization's (MPO) Hele Mai Maui Long-Range Transportation Plan 2040 (2019) identifies the proposed improvements "as critical to preserve the shoreline for public use." The Maui MPO also completed the West Maui Greenway Plan (September 2022), which includes paths for biking and pedestrian use from Ukumehame to Lipoa Point at the northern tip of West Maui. In addition, the County of Maui's West Maui Community Plan Update

(January, 2022), and the Pali to Puamana Parkway Master Plan (2005) envision improvements to Honoapiʻilani Highway that allow "open space and park to buffer against the effects of sea level rise and climate change while providing recreational opportunities." Therefore, to protect the community's critical transportation network, consideration of how the transportation facility interacts with public access to the shoreline and complies with the regional plans for multimodal transportation uses is also needed.

3. Alternatives

3.1 INTRODUCTION

The identification, consideration, and evaluation of reasonable alternatives are central to the EIS process under NEPA and HEPA. Building on nearly 20 years of planning in this corridor, most notably including Maui County's 2005 Pali to Puamana Parkway Master Plan and HDOT's 2007 proposal for Honoapiʻilani Highway improvements between Maalaea and Launiupoko, FHWA and HDOT have considered a range of alternatives. Based on preliminary screening, the NOI identified four alternatives for consideration during the scoping process and for the Draft EIS.

These four alternatives, along with a description of alternatives considered but not further evaluated, are presented in the FHWA Supplementary Notice of Intent (NOI) and the HDOT Environmental Impact Statement Preparation Notice (EISPN) released in November 22 and available on the project website. This information has been available to interested public and agency stakeholders throughout the scoping comment period and was also summarized during the public scoping meetings held on December 14 and 15, 2022. Recordings of the presentation as well as public comments presented at the public meeting are found on the project website and the presentation slides are included as **Appendix 1** of this Scoping Report.

This section of the Scoping Report explains the upcoming process for evaluating the alternatives advancing into the Draft EIS.

3.2 EVALUATION OF ALTERNATIVES LEADING TO DETERMINATION OF A PREFERRED ALTERANTIVE

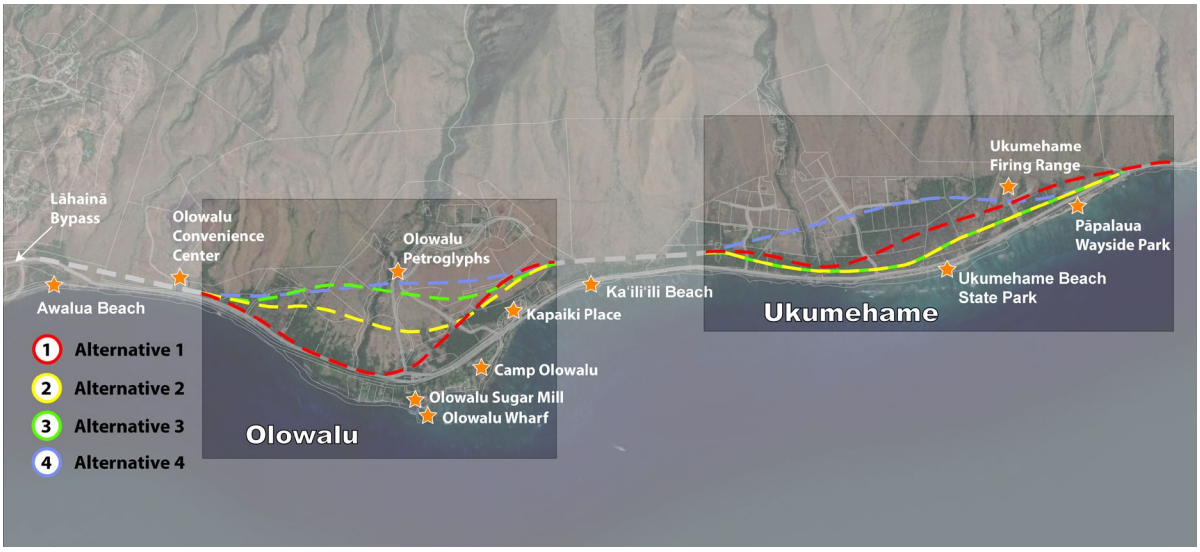
To determine the Preferred Alternative, HDOT and FHWA are using a multiple-phase approach to alternatives development and screening for the Project. The initial steps in this approach facilitate development of the broader concepts for alternatives in the scoping phase of the EIS process and an evaluation to determine whether these alternatives are reasonable. Reasonable alternatives are technically and economically feasible alternatives that meet meet the purpose and need of the Project (see 40 CFR 1508(z)). These steps include:

- *Step 1—Development and Initial Range of Alternatives [COMPLETED]*. As noted above, the initial alternatives were developed based on many years of corridor planning. The preliminary list of potential alternatives developed in Step 1 was screened based on available information. An alternative was advanced for further consideration based primarily on its ability to further the project's purpose and need.
- *Step 2— Scoping Comment Period [COMPLETED]*. The initial screening of the four alternatives anticipated to be carried into the Draft EIS were made public in the NOI and EISPN documents and a summary presentation of the alternatives was included as part of the public scoping meetings.

All documents and presentations were available on the project website throughout the scoping period, which ended on December 31, 2022.

Scoping comments from the public, interested stakeholder organizations, and from cooperating and participating agencies were considered by FHWA and HDOT in determining that all four alternatives would be carried into the Draft EIS with an additional element that the Preferred Alternative could be drawn from a combination of alternative segments on a "mix and match" basis to allow for the optimal single preferred alignment to be established in the Draft EIS and carried into the Final EIS. This is based on the alignments that vary the most in two distinct segments: across Olowalu and across Ukumehame (**Figure 2**). Between these areas and at each end of the project area, the alignments are more tightly defined with less variation.

Figure 2. Alternatives Map



- *Step 3—Refinement of the Alternatives Advanced in the Draft EIS [UNDERWAY]*. The alternatives will be further developed as necessary to allow for evaluation in the Draft EIS. Most broadly, the alternatives will be evaluated based on four high-level or yes/no feasibility considerations:
  - Would the alternative reduce the highway's exposure to the SLR-XA and ocean hazards?
  - Would the alternative meet American Association of State Highway and Transportation Officials design standards?
  - Would the costs for design and construction of this alternative fit within the long-term project funding stream?
  - Would any severe or extraordinary environmental consequences associated with the alternative be mitigated to an extent permissible within regulatory compliance?

  For the alternatives being considered, the potential social, economic, and environmental impacts resulting from implementation of the alternatives, and measures to avoid, minimize, or otherwise mitigate adverse impacts will be presented in the Draft EIS. Agency and stakeholder meetings will continue to be held during preparation of the Draft EIS, and refinements to the alternatives, as

well as the evaluation of the alternatives, potential impacts, and potential mitigation measures, will be presented and discussed at these meetings.

- *Step 4—Evaluation of the Alternatives [UNDERWAY]*. The evaluation of alternatives during development of the Draft EIS will focus on the relative benefits and adverse impacts of each alternative. The analyses conducted during the development of the Draft EIS will consider the social, economic, and environmental impacts that may be realized from the implementation of each alternative, as well as measures to avoid, minimize, or otherwise mitigate adverse effects (see FHWA Supplementary Notice of Intent (NOI): Section 1.6, Alternatives Screening Methodology and Criteria). As noted above, the evaluation will also look specifically at the Olowalu and Ukumehame segments of the four alternatives with the potential to combine segments as part of the Preferred Alternative. Agencies and the public will be provided opportunities to review and comment on the analyses and conclusions presented in the Draft EIS.
- *Step 5—Identification of a Preferred Alternative [TO COME]*. A Preferred Alternative, the alternative that is recommended for construction, will be identified in the Final EIS. In identifying the Preferred Alternative, FHWA and HDOT will consider the social, economic, and environmental benefits, adverse impacts, and mitigation measures, the engineering considerations, and costs identified in the Draft EIS as well as public input received on the information presented in the Draft EIS.

4. Public Involvement and Agency Coordination

As required by NEPA and HEPA, and as established in the project's Coordination Plan, the EIS will be informed and supported by a strategy for communication throughout the preparation of the EIS. The Coordination Plan allows for collaboration with public stakeholders and agencies with the lead agencies, EIS evaluations based on better understanding of specific local needs and concerns that will help to identify and shape alternatives and to avoid or limit adverse effects, and to ensure the Project is compatible and consistent with local and regional plans and policies.

The Coordination Plan also establishes appropriate public and agency outreach and collaboration for additional review and consultation requirements, including the following:

- Section 106 of the National Historic Preservation Act (NHPA) of 1966, which requires that federal agencies carry out consultation with the State Historic Preservation Office, Tribal Nations, and agencies, individuals, and organizations (i.e., Consulting Parties) with a demonstrated interest in a project and its potential effects on properties of historic interest and seek public comment.
- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," which requires targeted outreach to environmental justice communities that may be impacted by a federal undertaking.
- Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)," states that people with LEP should have meaningful access to federally conducted and federally funded programs and activities.
- Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970, which requires public notification of actions that may result in the condemnation and/or acquisition of property, including targeted outreach to affected property owners.
- Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966, which requires coordination with officials of jurisdiction if a transportation project would use properties protected under this act, which include important publicly owned parks, recreation areas, wildlife/waterfowl refuges, and public or private historic resources.

4.1 SUMMARY OF COOPERATING AND PARTICIPATING AGENCIES

Pursuant to Council on Environmental Quality (CEQ) regulations, many federal, state, and county agencies have been invited to participate in the NEPA review of the Project.

4.1.1 Early Coordination

Prior to the NOI publication in November 2022, HDOT and the FHWA conducted early coordination with agency and public stakeholders. In February 2022, the project website was established to begin providing information about the Project and the early outreach effort. A database was developed for stakeholders, partners, and interested parties. Parties were (and continue to be) able to request to be included on the stakeholder list using the "Contact Us" feature of the website, by email, phone request, or in-person at the HDOT Highways Maui District Office.

The initial list contained approximately 334 stakeholders (22 federal, 41 state, 16 county, 26 elected officials, 79 historic and cultural advisers or NHOs, 79 landowners, and 71 other). This list has been updated leading into the formal initiation of NEPA/HEPA and the scoping period. Attendees of scoping meetings, persons submitting their contact information with comments, and individuals requesting to be placed on the mailing list were added to the database for future information updates. The stakeholder database includes the following:

- Elected representatives
- City and county officials
- Community planning groups
- Neighborhood councils
- Residential homeowner and renter associations
- Business organizations
- Developers
- Environmental groups
- Local schools and academic institutions
- Major employers
- Minority organizations
- Accessibility advocates
- Taxpayers groups
- Interested individuals

This list will continue to be updated as the Project proceeds.

In addition to two early scoping meetings (see Section 4.2.2), 12 meetings were held with stakeholders, including NHOs and local ancestral families, Olowalu developers, as well as county, state, and federal agencies. The early involvement with these stakeholders provided FHWA and HDOT with the opportunity to refine proposed alternatives and to understand key environmental and cultural issues of importance for the EIS.

4.1.2 Cooperating Agencies

According to CEQ (40 CFR Part 1508.1(e)), "cooperating agency" means any federal agency, other than a lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. A state or local agency of similar qualifications may, by agreement with the lead agencies, also become a cooperating agency. FHWA

and HDOT have contacted the agencies listed in the following sections. Table 1 through Table 3 summarize the responses received to invitations to the agencies to become cooperating agencies. Please note that FHWA and HDOT will still consult with some agencies regardless of their status as a cooperating agency.

Table 1. Cooperating Federal Agencies

COOPERATING FEDERAL AGENCY	ACCEPTED DECLINED NO RESPONSE	PRIMARY ROLE
U.S. Army Corps of Engineers, Regulatory Branch	Accepted	Wetlands and Water Quality
U.S. Federal Emergency Management Agency (FEMA)	No Response	FEMA and HIEMA will be consulted to confirm flood elevations
U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS)	No Response	NRCS has agreed to provide input on Farmland Preservation assessment
U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service	Accepted	Section 7, Essential Fish Habitat
U.S. Department of Interior, U.S. Fish and Wildlife Service	Accepted	Section 7
U.S. Environmental Protection Agency	Accepted	Clean Air Act, Overall NEPA Coordination, Environmental Justice
Department of Homeland Security, U.S. Coast Guard	Declined	Confirmed no bridge permits would be required

Table 2. Cooperating State Agencies

COOPERATING STATE AGENCY	ACCEPTED DECLINED NO RESPONSE	PRIMARY ROLE
Governor, State of Hawaii	Accepted	HEPA
Department of Business, Economic Development and Tourism, Office of Planning and Sustainable Development, Coastal Zone Management Program	Accepted	Coastal Zone Management
Department of Land and Natural Resources, State Historic Preservation Division and the State Historic Preservation Officer	Accepted	Section 106/HI 6E
Department of Land and Natural Resources, Commission on Water Resource Management	No Response	
Department of Health, Disability and Communication Access Board	Declined	
Department of Health, Indoor and Radiological Health Branch	No Response	
Department of Health, Clean Water Branch	Accepted	

Table 3. Cooperating County Agencies

COOPERATING COUNTY AGENCY	ACCEPTED DECLINED NO RESPONSE	PRIMARY ROLE
Department of Planning	Accepted	SMA

4.1.3 Participating Agencies

A participating agency is a federal, state and Native Hawaiian, regional, or local government agency that has an interest in the Project and has agreed to participate in the NEPA/HEPA and scoping processes (40 CFR 1508.1(w)). The standard for participating agency status is more encompassing than the standard for cooperating agency status described in the previous section. Therefore, cooperating agencies are, by definition, participating agencies, but not all participating agencies are cooperating agencies. Table 4 through Table 6 summarize the responses received to invitations to the agencies to become participating agencies. Please note that FHWA and HDOT will still consult with some agencies regardless of their status as a participating agency.

Table 4. Participating Federal Agencies

FEDERAL PARTICIPATING AGENCY	ACCEPTED DECLINED NO RESPONSE
The Advisory Council on Historic Preservation	No Response
Department of Housing and Urban Development	No Response
Department of the Interior, U.S. Geological Survey	No Response
Department of Transportation, Federal Aviation Administration	No Response

Table 5. Participating State Agencies

AGENCY	ACCEPTED DECLINED NO RESPONSE
Department of Accounting and General Services	Declined
Department of Agriculture	No Response
Department of Budget and Finance	No Response
Department of Business, Economic Development and Tourism	No Response
Department of Defense	Accepted
Department of Education	Declined
Department of Hawaii Home Lands	Declined
Department of Health – Clean Air Branch	No Response
Department of Health – Clean Water Branch	Accepted
Department of Health – Environmental Management Branch	Accepted
Department of Health – Health Administration	Accepted
Department of Health – Maui District Health Office	Declined
Department of Health – Solid and Hazardous Waste Branch	Accepted
Department of Natural and Land Resources – Commission on Water Resource Management	No Response
Department of Natural and Land Resources – Division of State Parks	No Response

AGENCY	ACCEPTED DECLINED NO RESPONSE
Department of Natural and Land Resources – Maui Land Division	Accepted
Department of Natural and Land Resources – Division of Aquatic Resources	Accepted
Department of Natural and Land Resources – Division of Forestry and Wildlife	Accepted
Department of Natural and Land Resources – Na Ala Hele and Trails	No Response
Department of Natural and Land Resources – Engineering Division	Accepted
Department of Natural and Land Resources – Office of Conservation and Coastal Lands	Accepted
Department of Natural and Land Resources – Maui/Lanai Burial Council	No Response
Office of Hawaiian Affairs	No Response

Table 6. Participating Agencies: County of Maui

PARTICIPATING AGENCY	ACCEPTED DECLINED NO RESPONSE
Department of Economic Development	No Response
Maui Emergency Management Agency	Accepted
Department of Environmental Management	Accepted
Department of Environmental Management, Solid Waste Division	Accepted
Department of Environmental Management, Wastewater Reclamation Division	Declined
Department of Environmental Management, Environmental Protection and Sustainability Division	Accepted
Maui Fire and Public Safety	Declined
Department of Housing and Human Concerns	Declined
Maui Metropolitan Planning Organization	No Response
Department of Parks and Recreation	Accepted
Maui Police Department	Accepted
Department of Public Works	Accepted
Department of Public Works - Development Services Administration	No Response
Department of Public Works - Engineering Division	Accepted
Department of Public Works - Highways Division	Accepted
Department of Transportation (Bus System)	Accepted
Department of Planning	Accepted
Maui Planning Commission	Accepted
Maui County Cultural Resources Commission	Accepted
Department of Water Supply	Declined

4.2 ENGAGING WITH THE PUBLIC

4.2.1 Project Website

The project website (www.Honoapiilanihwyimprovements.com) went live before early scoping meetings were held in February 2022. This site contains up-to-date project information, reports and other informational materials, a link to sign up to be included in project notices, and a link to a form for submitting comments as well HDOT and FHWA contacts (see contacts below). The project web site address is identified in all written materials, presentations, and other communications.

4.2.2 Early Scoping Meetings

A pair of virtual early scoping meetings were held on the following dates:

- February 22, 12 p.m. – 2 p.m. (46 attendees)
- February 24, 2022, 6 p.m. – 8 p.m. (43 attendees)

The two meetings provided the same presentation and opportunity to ask questions and provide input. The two separate meetings were held at different times of the day—one during midday and one in the evening—to allow people with varying schedules to have an opportunity to attend one or the other.

Information received during these meetings was used to shape the Purpose and Need Statement and to begin framing the Draft EIS. Since the NOI and EISPN had not yet been submitted, these meetings were not held under NEPA regulations, but rather in preparation for the NEPA/HEPA process. The purpose of these meetings was the following:

- Gather input on the Purpose and Need Statement.
- Inform participants of the project development process.
- Initiate discussions of potential alternatives.
- Receive input on resource concerns.
- Gain input on criteria for design and selecting the Preferred Alternative.

During this initial outreach to both agencies, stakeholders, and the general public, there were about 20 comments or inquiries directed to HDOT about the project and the environmental review process. Certain agencies responded with more information on to formally engage once the process is underway, a few agencies indicated that they did not foresee a role in the EIS review process.

Several comments requested more information on process and requests to remain involved and on project mailing lists. Early participants provided considerable interest and information, which helped to develop and refine the project's Purpose and Need Statement as well as the alternatives established in the NOI and EISPN that will be evaluated in the EIS. In summary, the following issues and concerns were communicated to HDOT and FHWA:

- The area is rich with cultural resources and ancestral histories and this needs to be carefully evaluated in the EIS. Existing families in the immediate project area and organizations active in

West Maui provided information on sensitive locations and context that will help guide the scope of work for ʻĀina Archaeology and project consultant team overall. Additional resources and organizations were recommended for consideration.

- Importance of recognizing that ancestral families continue to live and draw their livelihoods from the project area.
- Importance of the transportation linkages within and to and from West Maui and the need for a solution to the problems of the current highway and the coastal erosion and sea level rise issues that make it a less reliable link for regional mobility. At the same time, comments also reminded HDOT and FHWA that multimodal options and consistency with the Maui MPO Greenway Plan for bikeways and greenways are important considerations.
- Importance of project planning in terms of restoring and not further compromising the coastal environment and wetlands of the project area.
- Importance of understanding if there would be regional growth in traffic (and resulting environmental effects such as greenhouse gas emissions) that would be generated by the Project.

4.2.3 Scoping Meetings

A set of three meetings were held during the scoping period:

- December 14, 2022, 12 p.m. – 2 p.m. – Virtual meeting via Zoom (32 participants)
- December 14, 2022, 6 p.m. – 8 p.m. – Virtual meeting via Zoom (16 participants)
- December 15, 2022, 6 p.m. – 8 p.m. – In-person meeting held at the Lāhainā Civic Center (18 Participants)

These scoping meetings were held after the publication of the NEPA NOI and the state EISPN. This set of meetings is a requirement of both the NEPA and HEPA processes. The purpose of these meetings was to present the conceptual project alternatives based on early coordination and consultation. The meetings provided an opportunity for input on the following:

- The preliminary project Purpose and Need Statement
- The alternatives being considered
- The alternative screening criteria
- The scope of environmental studies
- Other relevant project issues

4.3 CONTACT INFORMATION

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5. Response to Comments

5.1 INTRODUCTION

This section of the scoping document provides responses to substantive comments received during the 30-day scoping comment period, including comments provided during the public scoping meetings, comments submitted by email or through the project website, MetroQuest participation, and by written comments submitted by email directly to FHWA or HDOT. **Appendix 2** provides the detailed transcription of comments and letters received, while the substantive questions and comments are summarized in the following sections along with FHWA and HDOT responses. All scoping meetings with the presentation and public comments were recorded and are posted on the project website.

Similar comments have been aggregated together as described under HEPA HAR Chapter 11-201 for ease of reading. Comments are also organized by key EIS assessment areas,:

- Purpose and Need Statement
- Alternatives
- Technical evaluations:
  - Land Use and Consistency with Related Governmental Plans and Policies
  - Land Acquisition, Displacement, and Relocation
  - Parklands and Recreational Resources/Beach Access
  - Archaeological and Historic Resources
  - Cultural Resources and Practices
  - Visual and Scenic Resources
  - Water Resources, Wetlands, and Floodplains
  - Natural Hazards
  - Traffic, Right-of-Way, Pedestrians, Bicycles
  - Construction Effects
  - Section 4(f)
  - Indirect and Cumulative Impacts

This list of speakers and commenters is presented in the following section. The individuals or organizations that contributed to a comment or aggregated comment are shown at the end of the comment in (parentheses). To cross reference a commenter's specific transcript from Appendix 2, the transcript log number is presented along with the name. For example, in Comment 2, the relevant direct transcript text from Albert Perez can be found by referencing Log Numbers 9 and 19 (Albert Perez 9, 19) and from Mark Deakos by referencing Log Number 39 (Mark Deakos 39).

5.1.1 List of Speakers and Commenters

5.1.1.1 Public and Elected Officials (in Attendance)

1. Senator Angus McKelvey, In-person meeting December 15, 2022
2. Representative Elle Cochran, In-person meeting December 15, 2022

5.1.1.2 Organizations

1. Maui Tomorrow (Albert Perez), email letter and midday virtual meeting December 14, 2022
2. Earth Justice (Mahesh Cleveland), email letter and by website
3. Aha moku o Maui Inc. (Keʻeaumoku Kapi), midday virtual meeting December 14 and in-person meeting December 15, 2022

5.1.1.3 Virtual Public Scoping Meeting December 14, 2022, Afternoon Session

1. Michael Downing, P.E.
2. Lucienne Denaie
3. Doug Ballard
4. Wayne Hedani
5. Bob Pure
6. Keʻeaumoku Kapu [Aha moku o Maui Inc.]
7. Albert Perez
8. Jennifer Maydan

5.1.1.4 Virtual Public Scoping Meeting December 14, 2022, Evening Session

1. William Spence
2. Tiare Lawrence
3. Aja Eyre
4. Kai Nishiki

5.1.1.5 In-Person Public Scoping Meeting December 15, 2022, Evening Session

1. Darren McDaniel
2. Alison Wolferd
3. Mark Deakos
4. Art Palaci
5. Jason Wolferd
6. Chris Brown
7. Kahiki Niles
8. Keʻeaumoku Kapu
9. Nameaaea Hoshino

5.1.1.6 Submitted Comments by Email, Mail, Website, MetroQuest Poll

1. Jennifer Maydan
2. Terry Lewison
3. Carter Barto
4. Nikolaus Nielsen
5. Raymond Ishii
6. Lily Villarin
7. Tracy Samio
8. James Revells
9. Bob Schmidt
10. Richard “Dick” Mayer
11. Charles Augustowski

12. Mahesh Cleveland
13. MetroQuest Poll Participants

5.2 PURPOSE AND NEED, EIS PROCESS, GENERAL

Comment 1: I can't tell you guys how much I really appreciate having you start that project. (Michael Downing 1)

Response 1: Comment noted.

Comment 2: I am concerned by the assumption that there's going to be 3.2 feet of sea level rise because it may be inadequate. We're starting to see data that says that it's gonna be probably surpassed and I'm hearing maximum scenarios of 8 or 9 feet. The EIS needs to consider the possibility of under-design and in terms of not being high enough up mauka for the lifetime of the structure. The EIS needs to consider future costs and impacts if sea level rises more than 3.2 feet. Is the EIS going to show different sea level rise projections that maybe are more updated and is a concern if we are going to be in this situation again in possibly 30 years? (Albert Perez 9 and 19 and 86, Mark Deakos 42, Schmidt 79)

Response 2: HDOT will continue to follow advice and information from the Hawai'i Climate Change Mitigation and Adaptation Commission and the State Department of Land and Natural Resources (DLNR) regarding sea level rise predictions. The predictions used will be clearly stated in the EIS.

Comment 3: We need to have some way for bikeways to be involved and alternative transportation modes. The EIS should weigh the costs and impacts of including a bikeway and beach recreational areas, as well as access to both along the highway. (Albert Perez 12 and 88)

Response 3: As noted in the NOI and EISPN, the objectives of the project are to be consistent with regional land use and transportation plans that support improvements to Honoapi'ilani Highway as an opportunity to enhance multimodal transportation and access to recreational resources along the coast. The Maui MPO's Hele Mai Maui Long-Range Transportation Plan 2040 (2019) identifies the proposed improvements "as critical to preserve the shoreline for public use." Separately, the plan seeks to develop West Maui Greenway, which includes paths for biking and pedestrian use from Ukumehame to Lipoa Point. Consistent with the County's West Maui Community Plan Update (January 2022), and the Pali to Puamana Parkway Master Plan (2005), the Project is important to protect the community's critical transportation network and should consider how the highway improvements interact with public access to the shoreline and complies with the regional plans for multimodal transportation uses.

Comment 4: The Sierra Club Maui would like to be a consulted party on this project. (Lucienne Denaie 13)

Response 4: HDOT and FWHA will reach out to the Sierra Club Maui for consultation during development of the EIS.

Comment 5: How many lanes are being proposed? Is the EIS looking at a two-lane highway or a four lane? Or a two lane with the opportunity to expand into a four lane? The Final EIS should include a right-of-way that would permit a highway with two lanes in each direction. Although one of the EISPN's stated objectives is to have "sufficient right-of-way width to accommodate a future four-lane facility throughout the project limits," the EISPN makes no mention of how any of the realignment routes and road widening under consideration could impact growth and development, including in Olowalu Town (Albert Perez 16, Aja Eyre 26, Richard Mayer 80, Mahesh Cleveland 99)

Response 5: The Project would be with one through lane in each direction, but grading, drainage, and structures will be designed to allow for a four-lane configuration (two moving lanes in each direction) if the need arises and funding is available in the future.

Comment 6: I am the CEO for Aha moku o Maui Inc. and would like to be a consulting party to this project. (Keʻeaumoku Kapu [Aha moku o Maui Inc.] 17)

Response 6: Aha moku o Maui, Inc. has been invited to participate in the Section 106 Consultation process. HDOT and FHWA appreciate the input already provided in developing, refining, and assessing project alternatives.

Comment 7: What will be done/who will be responsible for the old highway after it is relocated? The EIS should address what happens to the existing highway. The EIS should not just assess the impact where the new highway is, it should assess the impact of what's being left. (Jennifer Maydan 20, Aja Eyre 35)

Response 7: It is anticipated that the old highway would be deeded to Maui County, which would give the County jurisdiction to implement the 2022 West Maui Community Plan and 2022 West Maui Greenway Plan. HDOT would work with Maui County to provide access to all existing residents and businesses along the existing highway to and from the new alignment.

In addition, The Nature Conservancy received a Fiscal Year 2023 U.S. Department of Transportation grant to facilitate a planning process to identify nature-based solutions for the existing highway, to undertake engineering studies to understand the impacts of removing hardened structures, and to work with the University of Hawaiʻi School of Landscape Architecture to develop plans and drawings to help visualize existing highway improvements.

Comment 8: Was there any consultation with Ohana Hooikaika, one of the last remaining Hawaiian families that live right there [location of proposed alternative alignment]? (Tiare Lawrence 22)

Response 8: Yes, the family was contacted and met with HDOT early in the development of the project alternatives.

Comment 9: Through emergency proclamations, the shoreline was hardened at Ukumehame and it resulted in extensive beach loss in the area. As part of the project, it seems that the loss of beaches due to shoreline hardening should be considered as far as perhaps removing the hardened shoreline in those areas. I would suggest removal of the shoreline hardening and to look at how we can encourage beaches to come back to those areas. Are we going to keep the sea walls in place that are causing all of the erosion exasperation, or will there be a plan for removal of the walls and or partial of the road so that eventually you only have one route going on the mauka and not have two roads? If it's not, and the lower road would remain, what is the game plan for keeping it in use? Is it going to be more sea walls and hardening? Is there any plan for the lower road that you can discuss here or alternative plans for the lower road? (Kai Nishiki 28, 29, and 30, Sen. McKelvey 63, Mark Deakos 67, Perez 89)

Response 9: It is intended that the existing highway right-of-way would be deeded to Maui County for use as a local roadway providing beach access and to continue to provide access to existing homes and businesses. Future use of the roadway as a key element in Maui County parks planning and the proposed Maui County Greenway are also important planning considerations for the future use of the roadway. These future uses could incorporate hardened shoreline removal and partial decommissioning of the roadway based on additional community planning and input.

Comment 10: There are car fires, trash fires, and all kinds of illegal drug activity in the area of Cut Mountain between the bypass and the low road. All along the existing highway and shoreline there are cars and the houseless. I think that it needs to be a huge priority, that consideration and a plan is in place before we just move the highway. A lot of people would rather use the bottom road and come out where it ties in where it merges again so that's kind of a major concern because along the shoreline over there you get a lot of recreational users that just basically jumping over the railing doing whatever they please to do. The EIS should address impacts on the presence of police and conservation officers in the area makai of the highway (Kai Nishiki 34, Kapu 48, Perez 92)

Response 10: The EIS will assess this area of Cut Mountain area between the bypass and the low road and determine opportunities to avoid this outcome in the project area. HDOT will work with Maui County to improve conditions in the Cut Mountain area as well inform the planning of this project. In Olowalu, the project area is more active with residences and businesses so the remaining roadway would be less isolated and less likely to generate the same level of activity. The roadway in and around Ukumehame provides more direct beach access and is a well-used recreational resource.

Comment 11: Are there other purposes besides the primary purpose of moving this because of sea level rise or are there any other purposes that we are not aware of that are involved with this? (Darren McDaniel 40)

Response 11: The purpose and need and primary objectives as described in Section 2.0 are the stated needs and goals of this project. There are no undisclosed goals.

Comment 12: Is there any way we could have a little more landmarks [graphically depicted] to identify exactly where these roads are? Is there a map that you can provide that shows in more detail the potential routes that the State is considering for the highway realignment? (Alison Wolferd 41, Terry Lewison, 69)

Response 12: The maps presented in the NOI and EISPN and as shared with the public during scoping meetings reflect the proposed routes for the alternatives alignments. The graphic representation of the alternatives as analyzed in the EIS will be more detailed and will include more detailed points of reference.

Comment 13: Are the roads are going to be raised roads like on pillars or are they going to be flat roads like how the bypass is? (Kahiki Niles 47)

Response 13: The EIS will describe the anticipated construction choices for each alignment alternative. It is anticipated that based on the location within the project area, any given alignment will have a mix of raised roadways, bridge structures, and at-grade portions.

Comment 14: Is the road [Project] being built for growth? I would really encourage you to think about this project and say how could we build this to make a sustainable community. We've got to address the population growth. How are we going take care of the shoreline if we are going to allow those things [population growth and new business] to happen? Because you get people who feel they have the public right to do whatever they like commercially, so if you are going to address these kinds of things [shoreline concerns], you'll address the population growth. (Darren McDaniel 51, Keʻeaumoku Kapu 57)

Response 14: As noted in the project's purpose and need (see Section 2), the Project is proposed to create a resilient and reliable transportation connection in the critical Honoapiʻilani Highway corridor. Travel demand will be based on long-term growth forecasts as established by the Maui County MPO. There are no non-transportation development actions associated with the Project. Locally and adjacent to the project area, any known projects currently in development or likely to be built by the Project's impact analysis years will be included in the transportation analyses as well as the assessment of indirect and cumulative impacts.

Comment 15: Is the funding from the bypass going to be diverted to this [proposed Project]? (Jason Wolferd 60)

Response 15: Although the funding of other projects is outside of the scope of this EIS, the U.S. Department of Transprotation's $22 million RAISE grant and the $23 million OMNIBUS earmark are federal funds specifically in place for this Project. The EIS will consider the anticipated timing of construction, including the cumulative impacts of other projects that may occur in West Maui.

Comment 16: I think your timeline is highly unrealistic. I don't think you will be doing construction by 2025. Look at all the agencies that you have to consult with, and you are going to have to coordinate with OHA, there's ceded lands on there [within the project area]. (Sen. McKelvey 61)

Response 16: FHWA and HDOT initiated the NEPA and HEPA processes with publication of the NOI and the EISPN in November 2022. Consistent with NEPA guidance, this established a roughly two-year process for completion of NEPA and obligation of the RAISE grant. As part of the project initiation, the agencies have completed an Agency Coordination Plan and are working with supporting resource agencies at federal, state, and county levels. In addition, a concurrent Section 106 of the NHPA consultation process has been initiated to address the OHA lands as well as the potential for historic and archaeological resources in this area.

Comment 17: Why don't you get rid of the purpose of doing it for sea rise and make it 100% about improving the environmental and cultural impact of the lower road. Do it for the environmental and for the cultural impact, not for the sea level rise. The recommended alignment should not be based solely on avoidance of sea level rise, but should take into account land rights, including the interests of the heirs of allodial title holders; cultural sites, cultural access, and cultural practices; and recreational and residential access. (Darren McDaniel 64, Perez 95)

Response 17: The project's purpose and need is tangible and fact-based evidence that a transportation deficiency exists. The secondary objective of creating a highway alignment is compatible with local plans and policies, including the Maui MPO's Hele Mai Maui Long-Range Transportation Plan 2040 (2019) and the West Maui Greenway Plan (September 2022), which includes paths for biking and pedestrian use from Ukumehame to Lipoa Point at the northern tip of West Maui. In addition, the County's West Maui Community Plan Update (January 2022), and the Pali to Puamana Parkway Master Plan (2005) envision improvements to Honoapiʻilani Highway that allow "open space and park to buffer against the effects of sea level rise and climate change while providing recreational opportunities." In addition, cultural and environmental considerations of the Project are critical factors in the evaluation of project benefits and potential adverse effect of the alternatives (including the No Build Alternative, which assumes the existing roadway remains in its current configuration).

Comment 18: Is the EIS just going to assess the realignment or is it going to include the makai portion, like the P2P plan area? (Mark Deakos 66)

Response 18: The EIS will assess the potential environmental effects of the alignment alternatives, including their compatibility and consistency with local and regional plans such as the 2005 Pali to Puamana Parkway Master Plan.

Comment 19: I suggest one correction related to the West Maui Community Plan. It was adopted by the Maui County Council and finalized in January 2022. (Jennifer Maydan 68)

Response 19: Comment noted.

Comment 20: It is imperative that we take action ASAP to move the portion of the highway inland. And please make it two lanes in each direction from the Pali all the way into Lāhainā town, and extend the Bypass north to Kaanapali at least, ideally all the way to the Kapalua Airport. We need to improve our roadways now before the traffic nightmares ensue from the added traffic of new communities are built. I would prefer to see the Lāhainā Bypass road completed prior to this construction beginning in 2025 (Carter Barto 70, Mayer 84, Augustowski 84)

Response 20: Comment noted.

Comment 21: Could you tell me what alternative is furthest away from my property boundary? (Nikolaus Nielsen 71)

Response 21: The potential proximity and potential incursion of each alignment alternative to adjacent private parcels will be identified in the EIS. Additionally, properties can be identified via the project website map to view approximate location of alternative alignments to individual properties.

Comment 22: I think secondary objectives should include: 1) to help preserve and restore the natural shoreline along this stretch of coastline; 2) to help mitigate brownwater events originating from the mauka side of the new highway to help protect and restore the Olowalu Reef; and 3) to support the availability of alternative modes of transportation. (MetroQuest Comment MQ2)

Response 22: These secondary objectives are consistent with the NOI and EISPN that identifies objectives that the Project be consistent with county and community plans (which include compatibility with multimodal transportation options) and that environmental considerations be important screening elements in evaluating proposed alternative alignments.

Comment 23: Reliable transportation is vital. However, so is preserving our natural environment, including our beaches, oceans, mountains. Please also consider the preservation of the original families who reside in these neighborhoods. (MetroQuest Comment MQ3)

Response 23: The Draft EIS will assess a range of potential environmental and cultural effects resulting from the Project and will be used to evaluate the identified project alternatives. The Draft EIS will identify any private properties that would be adversely affected by an alternative alignment.

Comment 24: It is important to look at multiple functions for the new highway so in addition to moving cars safely, it could also slow/soak/spread stormwater on the mauka side of the highway to recharge the aquifer and protect the reef, it can provide a fire break for fire coming from mauka, maybe with fire proof vegetation such as wiliwili trees, and can also facilitate a means of alternative transportation such as bikes and scooters (working in alignment with the West Maui Greenway Project). (MetroQuest Comment MQ4)

Response 24: See response to Comment 58 regarding stormwater management. Fire break benefits of the new alignment will be evaluated in the EIS including best options for using fire resistant

vegetation. Alternative alignments will be assessed for consistency with the West Maui Greenway Plan and furthering goals of multimodal options within the project area.

5.3 ALTERNATIVES

Comment 25: None of the alternative alignments completely avoid the projected sea level rise inundation zones. Is it mostly in the area of Launiupoko where it is not outside of that area? Is there an alignment that would keep us 100% out of the sea level rise area? (Kai Nishiki 32, Wayne Hedani 4)

Response 25: A portion of the highway segments in Launiupoko as well as in Ukumehame are anticipated to remain within the SLX-RA inundation zone based on the limitations of the alignment options at each end of the project area. Opportunities to raise the roadbed within these areas will be assessed in the Draft EIS.

Comment 26: What criteria does the DOT feel, of those four routes, that they will need to make one of them the priority? Could you explain a little bit about like what the process will be and who will guide the ultimately what the preferred alignment proposal will be? Is it all or nothing which each alternative? Or is there a way to combine segments of the alternatives? The EIS should look at the possibility of using some elements from different alignment alternatives. (Bob Pure 6, Kai Nishiki, 38, Aja Eyre 33, Perez 94).

Response 26: As detailed in the NOI Supplement (Section 1.6, Alternatives Screening Methodology and Criteria), the environmental assessment provided in the Draft EIS will be used to evaluate and compare the potential environmental and cultural effects for each alternative. The comparative analysis across the alternatives will be used to identify the Preferred Alternative. As noted in the comment and as described in Section 3.2, there will be a consideration of picking elements of the alignments, most notably with a specific focus on Olowalu and Ukumehame (see Figure 2).

Comment 27: Alternative A is proposed above Ohana Hoʻoikaika house around that area, was there any consideration to continue that road and then veer off past Olowalu town up above Kapāiki? (Tiare Lawrence 27)

Response 27: The alignments as proposed for evaluation in the EIS are based on planning to date and in consultation with stakeholders early in the process, including the Hooikaika family.

Comment 28: I have a solution to the problem of where the water is coming over the highway by Ukumehame, Olowalu, and Launiupoko. The design would be to install stainless steel pipes on top of the wall which would return water back to the ocean. (Art Palaci 43)

Response 28: The design option is noted and will be shared with Maui County. The anticipated transfer of jurisdiction of the existing highway to Maui will be in keeping with the County's West Maui Community Plan Update (January 2022), and the Pali to Puamana Parkway Master Plan (2005). As

noted in the response to other comments, there is also strong public interest in removing coastal hardening for sections of the existing highway.

Comment 29: Mass transit should be seriously examined since this realignment won't do much to reduce existing traffic issues, addressing ways to reduce the number of cars transiting must be evaluated. The EIS should address the possibility of providing 3 travel lanes, with one lane used for mass transit such as buses, and with mass transit vehicles being given priority signaling through the Pali tunnel. It is highly likely that at some point (sooner rather than later) a major investment will be made in establishing a better bus system between Central Maui and West Maui. (MetroQuest Comment MQ7, Perez 90, Mayer 83)

Response 29: Mass transit requires a regional planning basis beyond the limitations of the Project to improve reliability of Honoapiʻilani Highway in this critical area. The Project does not preclude future public transit planning and implementation in the corridor.

5.4 TECHNICAL EVALUATIONS

Comment 30: I'll say upfront that the EIS needs to consider: impacts on flora and fauna; air quality; noise; archaeological resources; cultural resources; scenic resources; population; housing; economic impacts; fiscal impacts; public facilities; traffic; utilities; energy; climate change; drainage, water resources, and wastewater; storm water; run-off into the ocean from the facility, the highway facility. It would also need to discuss, cumulative and secondary impacts, and would need to examine consistency with state and County plans and policies, which it sounds like you're doing. Also, reasonable alternatives, including a no-action alternative. Alternatives that might enhance the quality of the environment in the project Area. That's a very important one. Secondary population and growth impacts resulting from this action, And of course, unresolved issues. (Albert Perez 8)

Response 30: These identified issues are components of the assessment that will be conducted as part of the EIS and in evaluating Project alternatives to determine the Preferred Alternative for the Project.

Comment 31: MetroQuest pin mapping generated the environmental and cultural concerns as set for in Table 2 and Figure 3 (MetroQuest Comment MQ8)

Response 31: See responses within the table.

Comment 32: We have concerns about historic and cultural sites/ continued public access to the shoreline for recreational and cultural use; impacts on wetland areas and native fauna and flora; impacts on kuleana land owners in Ukumehame and planning for sea level rise. (Lucienne Denaie 14)

Response 32: Comment noted. These are all elements in the scope of work of the EIS.

Figure 3. MetroQuest Dropped Point Map

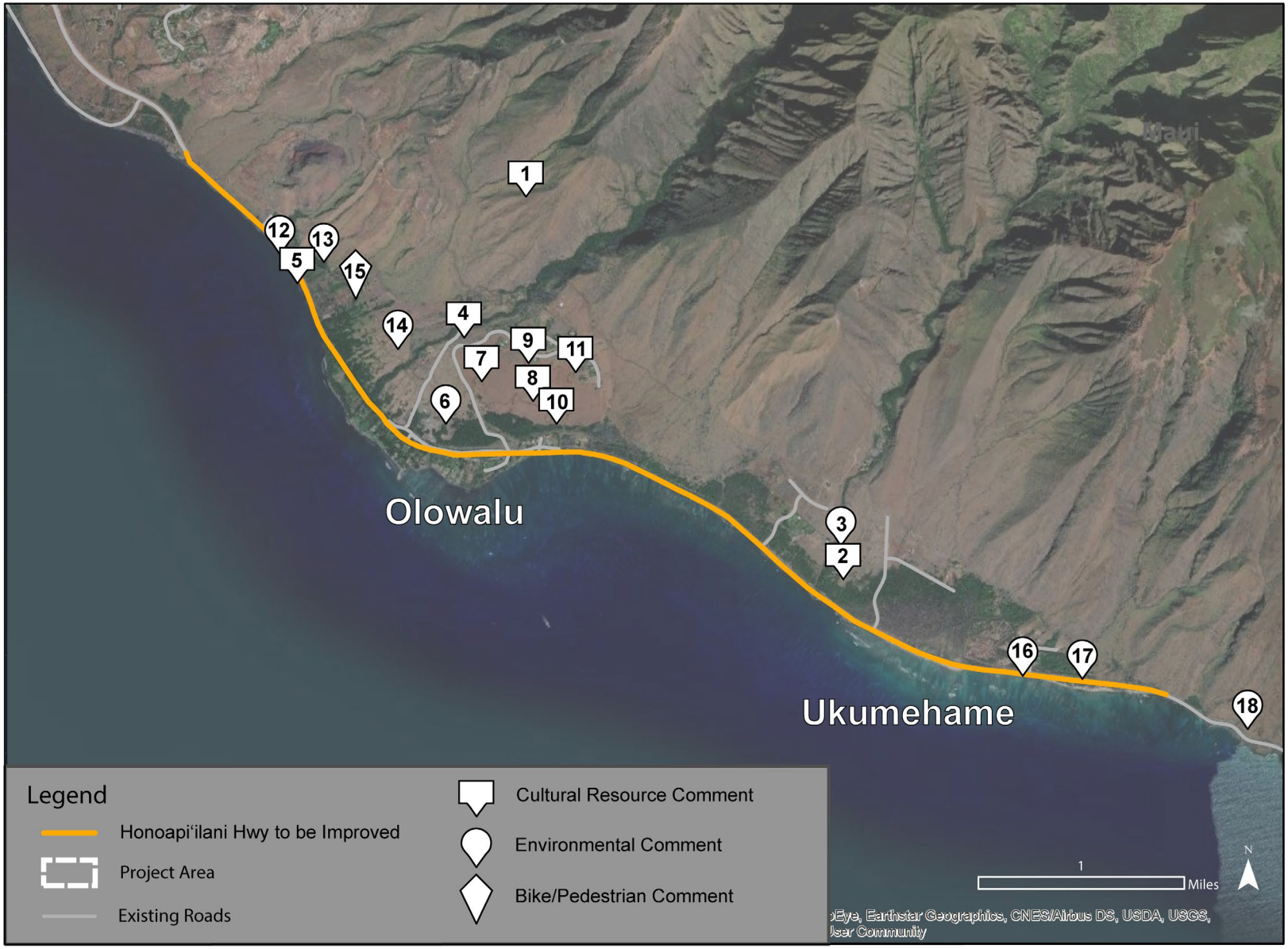


Table 7. MetroQuest Dropped Point Comment List

MAP KEY	MAP TAG	COMMENT	RESPONSE
1	Cultural Resources	Resource noted	This information will be provided to the cultural resource evaluation leads and Section106 participants.
2	Cultural Resources	Existing dwelling and ongoing mauka/makai cultural practice.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
3	Environmental	Ukumehame Stream	Streams and water resources will be identified and included in the EIS.
4	Cultural Resources	Puʻu Kilea. Cultural site with burials.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
5	Cultural Resources	Multiple surf breaks	This information will be provided to the cultural resource evaluation leads and Section106 participants.
6	Environmental	Former streambed is somewhere around here. Floodplain?	Mapped flood plains will be identified and described in the EIS.
7	Cultural Resources	These platforms may contain burials or other cultural material.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
8	Cultural Resources	Resource noted	This information will be provided to the cultural resource evaluation leads and Section106 participants.
9	Cultural Resources	These platforms may contain burials or other cultural material.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
10	Cultural Resources	These platforms may contain burials or other cultural material.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
11	Cultural Resources	These platforms may contain burials or other cultural material.	This information will be provided to the cultural resource evaluation leads and Section106 participants.
12	Environmental	Not much room here in case of sea level rise and/or erosion. Can the road be placed further mauka?	In the Laniaupoko area, the four alternative alignments would merge as they come closer to merging with the existing Lāhainā bypass. The ridgeline of the mountains coming down toward the coast creates considerable constraints further mauka of the existing bypass but opportunities to move the new alignment fartjer above sea level rise elevations will be considered.

MAP KEY	MAP TAG	COMMENT	RESPONSE
13	Environmental	We want to be sure this realignment will be well out of zone of sea level rise. The latest National Oceanic and Atmospheric Administration models predict almost 4 feet of rise as the "moderate" expectation for the end of the century. The worst-case scenario in 2014 was 3.2 feet; today this is 7.9 feet, so we need to be confident another realignment won't be needed for a long time.	See response to Comment 2.
14	Environmental	All the more mauka alignments have the opportunity to capture and move water from the mauka side to that it is slowed and soaked into the ground to prevent brownwater from reaching the ocean while recharging the aquifer. We need to get away from redirecting stormwater into large storm drains that push out into the ocean, smothering the reef, and consider the slow, spread and soak designs.	All alternative alignments will be evaluated for their potential stormwater effects including beneficial opportunities to capture and manage storm flows to avoid and minimize sediment loading to coastal waters.
15	Bike/Ped	The design should always keep in mind alternative modes of transportation—either a much improved mass transit, possibly rail, but most certainly bikes and e-bikes.	See response to Comment 24 and 29.
16	Environmental	Once the new highway is built, there needs to be plans for the eventual removal or all hard armoring along this coastline to allow a natural shoreline to be restored that preserves beaches and natural coastal processes. Who will ultimately be in charge of the old highway and its eventual removal needs to be outlined with a plan of action. Access to the shoreline is critical but people don't need to be able to fish out of their truck window if that is impacting that coastal resource.	See Response to Comment 27.
17	Environmental	There should be a plan for the restoration of wetlands through public/private partnerships. This will greatly enhance the mitigation of brownwater threats to the Olowalu Reef.	See response to Comment 51.
18	Environmental	This is a major source of land-based sediment affecting the reef. If road work is to go this far, there should be some planning around mitigating the sediment in this area.	See response to Comment 51.

5.4.1 Land Use and Consistency with Related Governmental Plans and Policies

Comment 33: Certain developers will be looking to use the infrastructure improvements that are made in the area to push forward development in Olowalu and so I want to know what measures are being taken to disallow development makai of whatever alignment is eventually decided upon. In November 2015, notice of a final environmental impact statement ("FEIS") for the Olowalu Town Master Plan ("Olowalu Plan") was published in The Environmental Notice. The Commission voted 6-to-1 in favor of rejecting the FEIS. The Commission noted that the FEIS's traffic impact assessment report was based on widening the Honoapiʻilani Highway, but it was unclear whether HDOT's and FHWA's highway realignment project would involve widening. (Kai Nishiki 31, Mahesh Cleveland 98)

Response 33: The potential for induced land development will be analyzed in the EIS. However, there are no land use and zoning changes associated with the proposed transportation improvements and much of the land makai of the alignment alternatives is already County-owned.

Comment 34: The hospital should have been talked about because it alleviates all the things that we have here on Maui, we only have one hospital, one hospital, and still, we didn't make the choice of building a hospital in Lāhainā. (Nameaaea Hoshino 53)

Response 34: Hospital services are outside of the scope of this project; however, access to vital services and resources will be considered in the EIS. Improving the reliability of Honoapiʻilani Highway will impove access to such vital services, including medical services.

Comment 35: The impact on land use in the area makai of the new highway needs to be addressed. The degree to which each alternative may induce and/or facilitate development needs to be thoroughly analyzed. The EIS for the Project must analyze the growth-inducing indirect effects of facilitating development or other changes in the pattern of land use caused by increasing traffic capacity through the Project area and realigning the highway mauka. (Perez 91, Cleveland 85).

Response 35: Potential changes in land use and induced growth resulting from the Project will be assessed in the EIS. No non-transportation development actions are associated with the Project.

Comment 36: To what degree are you consulting with the Pali to Puamana plan, it's my understanding that there was a lot of public input given for that plan and it's been there waiting to be enacted for many years. The EIS should address the plan's adherence to the West Maui Community Plan and the Pali-to-Puamana Plan of 2005. (Aja Eyre 23, Perez 97)

Response 36: The Pali to Puamana Parkway Master Plan (2005) was a primary source used in developing the alternatives to be analyzed in the Draft EIS.

5.4.2 Land Acquisition, Displacement, and Relocation

Comment 37: What is the plan for the numerous squatters that have built structures in the right of way? (Nikolaus Nielsen 72)

Response 37: As noted in Section 4.5.2, current activities and users (including potentially illegal users) of land located along the alternative alignments will be identified. Based on the legal status of the activity, acquisition of property and relocation of residents or businesses would be implemented in conformance with the requirements of the Federal Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601) as well as Hawai'i's eminent domain requirements (Hawai'i Revised Statutes Section 101-2).

5.4.3 Parklands and Recreational Resources/Beach Access

Comment 38: Are the study and plans going to include beach access opportunities and open space opportunities? Will the realignment affect beach access in the project area and are there provisions to somehow provide for maybe a major park in the area makai of the Ukumehame portion of the project area or allow for continued public access to the beach at this segment of the project area. There is a great opportunity here to potentially restore approximately 7 miles of shoreline from Puamana to the Pali. (Doug Ballard 3, Wayne Hedani 5, Mark Deakos 45)

Response 38: As noted in the in the Supplementary Notice of Intent, FHWA and HDOT have identified a secondary objective to conform with regional land use and transportation plans. The assessment of parklands and recreational resources will include mapping and describing the current shoreline beach and park resources as well as any short- and long-term planned changes to open space resources in the project area. Several long-term plans, including the 2022 West Maui Community Plan and the 2022 West Maui Greenway Plan, identify objectives to improve recreational access to the shoreline within the project area. The analysis will determine consistency of the Project's alternative alignments with existing and future recreational access.

Comment 39: Will there be beach access during and when the project is finished in 2025? Is the EIS going to address what would be done with the shoreline if the highway moves away? Is there still going to be shoreline access for fisherman? What's going to be done with the old road? There's also the potential for the existing highway to act as a seawall and cause beach loss if is left in place. We want continued to access to our beach, but we don't want the existing road to cause beach loss. How do you take that account in this plan and in the EIS? (Michael S. Downing 15, Albert Perez 11 and 93, Aja Eyre 25)

Response 39: Continued access to the beach and to existing residences and business will be maintained by connections to the new highway alignment and the ultimate configuration and determination of the continued use of the existing roadway.

5.4.4 Archaeological and Historic Resources

Comment 40: Is there going to be additional archaeological survey work? This is a very, very rich area. And although there have been surveys in the past, we have new techniques now, and it would really be good to know more about the areas before we choose the route. (Lucienne Denaie 2)

Response 40: The archaeological and historic resources assessment for the EIS will be conducted in accordance with the requirements of Section 106 and Hawaiʻi Revised Statutes Chapter 6E-8 and will include consultation with the Hawaiʻi State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation, NHOs, and Consulting Parties. The analysis will establish an Area of Potential Effect (APE) for the assessment of potential direct and indirect effects on both archaeological and historic resources. The assessment of the project alternatives will be based on the completion of an Archaeological Literature Review Study, Ethnographic Study, and a surface-level reconnaissance of the alternative alignments identifying and describing known or potential cultural resources and architectural historic resources. As required, additional Archaeological Investigation Studies will be undertaken for the Preferred Alternative when it is identified on publication of the Draft EIS.

Comment 41: Is there going to be another cultural site survey done before the EIS? It would make more sense if the cultural sites surveys that need to be done are archaeological surveys. (Aja Eyre 24)

Response 41: The Draft EIS will present the findings of above-ground reconnaissance combined with Archaeological Literature Review Study and an Ethnographic Study. This information will be used to evaluate the alignment alternatives and help define the Preferred Alternative, which will be established with publication of the Draft EIS. A Programmatic Agreement will be established to guide archaeological investigation studies for the Preferred Alternative that would be conducted as part of the Final EIS or after completion of NEPA but before construction. The Programmatic Agreement would also frame the mitigation standards that could potentially be required based on the investigation studies.

Comment 42: The project area is rich in cultural history, contains many important archaeological sites, and ongoing cultural practice continues. The project needs to carefully consider these factors, and needs to avoid, minimize and/or mitigate impacts to these important resources and practices. Anywhere from Puamana to Olowalu there are archeological and historical concerns. When you do the feasibility study for this whole area you got to kind of brush this with a fine-tooth comb because all the way through Olowalu you're going to discover a lot of archeological sites, possible burials and all those things. You've got to figure out what kind of anomalies [sites of historic or cultural significance] you're going to hit mauka when you start doing the mauka realignment. (MetroQuest Comment MQ1, Keʻeaumoku Kapu 49, 58)

Response 42: HDOT and FHWA appreciate the local knowledge and concern that has been shared and the continued collaboration in evaluating the alternative alignments as part of the EIS.

Comment 43: Is the project going to be compliant with the Section 106 consultation process? (Keʻeaumoku Kapu 65)

Response 43: A Section 106 consultation process has been initiated with coordination between FHWA, HDOT, and SHPD as well as reaching out to numerous potential consulting parties. Interested lineal descendants and those knowledgeable in historic sites and cultural practices can notify HDOT and FHWA of their interest in participating in the Section 106 consultation for the Project. More Section 106 information including the timeline, proposed programmatic agreement, consulting party meeting recordings, and meeting presentations can be found on the project website.

5.4.5 Cultural Resources and Practices

Comment 44: One of the areas of concern for me is Puamana Park, where throughout the past there has been a lot of erosion and from that erosion a lot of bones, or burials, that entered the ocean from 2017. I think right now, it gives us a great opportunity to be involved in a process from the beginning, especially when it comes to the cultural impact assessment that needs to be done. There's another area that is designated as a grave along the shorelines of Launiupoko and I've seen the studies pertaining to the degraded areas that basically will be part of the ocean within the next 20 to 30 years. My bigger concern is also the Olowalu area, I think it's really important that you continue the process of archaeological data recovery. You'll see that the area is largely clustered with cultural overlays. I really hope that being involved in the process and at the same time having what we know about the area is helpful to address those issues. (Keʻeaumoku Kapu [Aha moku o Maui Inc.] 7).

Response 44: HDOT and FHWA appreciate the local knowledge and concern that has been shared, and in turn, the information has been shared with the project team so that it can be further analyzed in the Ethnographic Study to be completed and presented in the Draft EIS.

Comment 45: My concern is that we need to do a cultural overlay of the entire stretch of this corridor from Puamana to Ukumehame. (Ke'eaumoku Kapu [Aha moku o Maui Inc.] 18)

Response 45: An Archaeological Literature Review Study will be prepared and a field survey will be conducted to understand historical sites in the project area. The mapping of historic properties will be a part of this effort.

Comment 46: I'm really concerned about a big highway impeding on Kawailoa Heiau and the petroglyphs. It doesn't sit well with me that we're going to put a highway near these significant cultural sites that area is very special and so I know for myself and our family and Aha Moku and other Hawaiian Organizations, we are very adamantly opposed to the mauka preferred alignments and so I just wanted to put that on record tonight. The further mauka [you locate the proposed project] there are cultural sites not only in Olowalu, but in other areas of the project as well. (Tiare Lawrence 37, Albert Perez, 10)

Response 46: The Section 106 process, undertaken alongside the NEPA process, will ensure that potential impacts to such historic and cultural resources will be included in the analysis of alternatives evaluated for the Project.

Comment 47: Let's talk about history, let's talk about degradation, let's talk about genocide, let's talk about all those kind of things because we can't just wipe this thing clean and not think that this is important because it is still important to us, the lineal descendants that are still here today. (Keʻeaumoku Kapu 50)

Response 47: The Project will include several studies aimed at understanding the history in the area, the cultural and historic properties present, and cultural practices that occur in the area. In addition to having experts looking at these details, this effort will include gathering information from Kanaka Maoli and lineal descendants in the area.

5.4.6 Visual and Scenic Resources

Comment 48: The following should be located and described in the Final EIS: Scenic pull-outs and parking for viewing, some picnic spots, rest spots with bathrooms (which may need a water supply), etc. (Richard Mayer 82)

Response 48: A viewshed analysis will be conducted as a part of the EIS. This analysis will consider the impacts of the Project on important viewsheds in the area.

5.4.7 Water Resources, Wetlands, and Floodplains

Comment 49: The EIS should address drainage issues and wetlands. I know that is not in the purview of the proposed Project, but there's been talk about restoring the wetlands in Olowalu so those become functional again. I hope that is part of the big picture when either part of the EIS or part of the design process, and those stakeholders that have knowledge, you know, perhaps a private-public partnership so that you can leverage funds in the design so that you can achieve multiple benefits. It's maybe not in the wetland inventory right now but if there is potential for wetland restoration, is that going to trigger potentially additional federal permits or lengthening of the time? (Aja Eyre 36, Mark Deakos 56, Sen. McKelvey, 62, Perez 87)

Response 49: Existing wetlands will be mapped and evaluated in the EIS. The new highway alignment will incorporate appropriate best practices for stormwater management along the corridor and this will be described in the EIS. These measures would not preclude and could be integrated with potential

wetland improvement strategies developed as mitigation for impacts of the Project or based on the work of other initiatives such as the current Nature Conservancy study of sedimentation issues in West Maui. The timing of such potential wetland restoration projects and the relationship to NEPA completion for the Project will be identified in the EIS.

Comment 50: Directly beside there [the firing range], there are protected wetlands. How are you going to accomplish being able to build a highway though wetlands? (Jason Wolferd 44)

Response 50: The wetlands in and near the Ukumehame Firing Range will be mapped and assessed as part of the EIS. The potential effects of any alignment alternative on these wetlands will be identified and be part of the evaluation of alternatives leading to the Preferred Alternative. Mitigation to minimize or avoid any identified adverse impacts on wetlands would be undertaken as part of the EIS analyses.

Comment 51: This is going to be detrimental to our resources, especially how much water that should be coming from Olowalu and Ukumehame. We have families like the Palafox, Tosh ohana's that came to Naiakane and mentioned that their ʻāina is going to be in jeopardy. (Nameaaea Hoshino 52)

Response 51: A Cultural Impact Assessment will be included in the EIS, which will look at cultural practices occurring in the area. Impacts to parcels will be taken into account when evaluating the proposed alternative alignments.

Comment 52: The Olowalu reef, which has been slated as the number one priority for restoration and protection, is in close proximity to the project area. Perhaps covered under water resources but want to make sure the this also includes marine water resources (flora, fauna, and coral reefs) since everything mauka affects makai. With the proposed Project there is an opportunity to intercept stormwater and prevent it from reaching the reefs. There are opportunities to design it [the proposed Project] to where you're slowing, spreading, soaking that stormwater so the sediment is trapped, it then recharges the aquifer which is another huge benefit to that. (Mark Deakos 54, MetroQuest Comment MQ6)

Response 52: The Project will be consulting with National Oceanic and Atmospheric Administration-National Marine Fisheries Service and DLNR-Division of Aquatic Resources in regard to impacts to aquatic species and any mitigation measures needed to protect aquatic species protected under the Endangered Species Act or the Magnuson-Stevens Fishery Conservation and Management Act.

Comment 53: The EIS should explore the opportunity to coordinate with mauka landowners on projects that can mitigate drainage impacts from areas mauka of the highway. The EIS should also address the consequences of failing to undertake such coordination. (Perez 96)

Response 53: The Project will consider drainage and sedimentation impacts. The Project will continue to seek input from landowers and stakeholders in the project area.

Comment 54: There needs to be a provision made for connecting roads between the new mauka highway and the coastal highway and coastline every 3 miles. (Mayer 81)

Response 54: Connector roads will be included in the planning and design of the Project. Connector roads will be spaced to ensure continued access to area properties and beach areas.

5.4.8 Natural Hazards

Comment 55: The proposed Project represents an opportunity to possibly create a fire break. (Mark Deakos 55)

Response 55: Fire break benefits of the new alignment will be evaluated in the EIS, including best options for using fire resistant vegetation.

5.4.9 Traffic, Right-of-Way, Pedestrians/Bicycles

Comment 56: [I am] assuming traffic counts will be done for the Olowalu Transfer Station intersection and that merge lanes might be incorporated as deemed appropriate. (Schmidt 78)

Response 56: A traffic study will be conducted as a part of the Project. This traffic study will be used in conjunction with federal and state design guidelines to determine what intersection configurations would be appropriate.

5.4.10 Construction Effects

Comment 57: Looking at the project timeline, construction is slated to start in 2025. Is construction going to be started after the by-pass, the north end of the bypass is finished? Because we're going to have to deal with construction there, which is supposed to be done, or should have been done long ago. Are we going to have to deal with traffic from Ukumehame all the way to the bypass, and then as we go north to our homes again deal with even more construction and more congestion? (Jason Wolferd 59)

Response 57: The EIS will identify other construction projects that could be underway before, after, or concurrent with the Project. It is anticipated that the cumulative effects of multiple projects occurring in a similar time frame will be primarily a qualitative assessment unless there are directly overlapping or adjacent areas of construction that could have a cumulative environmental effect.

Comment 58: The pros and cons of night work should be discussed. (MetroQuest Comment MQ5)

Response 58: The ability to utilize night work will be considered in the development of the EIS and assessment of potential construction effects.

5.4.11 Section 4(f)

Comment 59: The Ukumehame Shooting range is the only public shooting range on the island. We have heard rumors that the plan might move the highway closer to the mountain and shut down the range, will it be able to stay open or will it have to be closed because of the alignment? This would be very unacceptable to all the sportsmen and women who use the range as that is the only legal public shooting range on the island. Please don't make changes that will jeopardize the only existing state shooting range. Please do not shut down the firing range. The police department of the National Guard, the Department of Public Safety, and I'm told that others also use the firing range for training purposes. (Raymond Ishii 73, Chris Brown 46, Tracy Samio 75, Lily Villarin, 74, William Spence 21, Revells 76 and 77)

Response 59: As currently envisioned, no alternative alignment would displace the Ukumehame Shooting Range, although the entrance driveway to the facility would be relocated to intersect with the new highway alignment. As a public recreational facility, Section 4(f) of the USDOT Transportation Act provides additional level of review and alternative assessment should any proposed transportation use adversely affect the future of the firing range.

5.4.12 Indirect and Cumulative Impacts

Comment 60: Federal and state law require that environmental review for the Project analyze the growth-inducing impacts of realigning and widening Honoapiʻilani Highway, including the potential for the Project to facilitate development along the new transportation corridor. Under NEPA and HEPA, the scope of environmental review for the Project should encompass the indirect effects of realigning and widening Honoapiʻilani Highway, including the potential for the Project to induce growth and facilitate development, for each of HDOT's proposed alternatives. (Mahesh Cleveland, 97, 100)

Response 60: Per applicable NEPA and HEPA regulations and guidance, the Draft EIS will include an assessment of indirect and cumulative effects of the Project. While there are no land use or zoning actions associated with the Project, project-generated changes in capacity or accessibility will be analyzed for potential indirect development.

6. Environmental Considerations

6.1 INTRODUCTION

The purpose of the EIS process is to disclose the anticipated impacts of the subject Project and to identify feasible measures that might be taken to mitigate potential impacts that may result from its implementation and operation. This section of the Scoping Report describes the analysis framework for the NEPA and HEPA EIS as well as a description of the environmental review process and anticipated permits and approvals needed for the Project. This is followed by a framework for the analyses to be included in the EIS.

6.2 ENVIRONMENTAL REVIEW PROCESS

The HDOT as the state project sponsor and lead agency, and FHWA, as federal lead agency, will jointly prepare a single EIS. The EIS will be prepared in accordance with the requirements of NEPA, as amended (42 USC 4321, et seq.), with 23 USC 139 regarding efficient environmental reviews for project decision-making, with CEQ regulations implementing NEPA (40 CFR 1500-1508), with FHWA regulations implementing NEPA (23 CFR 771.101-771.139), and with all applicable federal, state, and local laws and regulations. This EIS will also be prepared pursuant to Hawai'i Revised Statutes Chapter 343, the state's law governing the preparation of an EIS.

The steps in this project's NEPA and HEPA process are described below:

- *Early Public and Agency Outreach.* As part of the initial development of the Project in terms of defining its Purpose and Need Statement as well as preliminary alternatives to be considered, HDOT and FHWA held a public information meeting in February 2022 and sought the input from a variety of federal, state, and county agencies.
- *Notice of Intent.* The NEPA Notice of Intent to prepare an EIS was published on November 22, 2022, and the HEPA EISPN was published in the Hawai'i Environmental Bulletin on November 23, 2022.
- *Scoping.* Scoping introduces the public to a project, including its purpose and need, its goals and objectives, alternatives to be considered, the framework of analysis for the EIS, as well as the public and agency Coordination Plan.

  The NEPA Supplementary Notice of Intent Document as well as in the HEPA EISPN (both published in November 2022) included the public scoping comment period and the schedule for three public scoping meetings. Two virtual meetings were held on December 14 (one midday and one evening session) and one in-person scoping meeting was held the evening of December 15 at the Lāhainā Civic Center. These information documents were posted on the project's website (www.Honoapiʻilanihwyimprovements.com) along with project fact sheets and directions for participation in the public scoping process.

In addition to the scoping meetings where the public was afforded an opportunity to provide verbal comments on the Project, a period for submitting comments extended through December 31, 2022. FHWA and HDOT reviewed and considered all comments received, with responses to substantive comments provided in this Scoping Report. This report provides updated information related to the Project and addresses public comments, as appropriate, and summarizes the project EIS process to date.

- *Draft Environmental Impact Statement.* Following publication of this Scoping Report, a Draft EIS will be prepared to assess the environmental effects of the Project in accordance with NEPA, HEPA and other appropriate regulations and requirements. FHWA and HDOT will coordinate review by the project's cooperating agencies during preparation of the Draft EIS. After FHWA and HDOT approve the Draft EIS, a Notice of Availability will be published in the Federal Register and the Draft EIS will be published in the HEPA Environmental Bulletin, which will begin a 45-day comment period for the Draft EIS.

- *Public Review.* The Draft EIS will be made available to the public at local repositories and on the project website and will be distributed to the cooperating and participating agencies and elected officials. FHWA will establish a public comment period for the Draft EIS. The public comment period will be a minimum of 45 days beginning with the Notice of Availability of the Draft EIS, and a public hearing will be held, at which members of the public can offer oral testimony on the findings of the Draft EIS. Comments will also be accepted in writing during the public comment period.

- *Final Environmental Impact Statement.* After the public comment period on the Draft EIS closes, a Final EIS will be prepared. The Final EIS will include the comments and responses on the Draft EIS and any necessary revisions to the Draft EIS based upon consideration of those comments.

- *NEPA Record of Decision and HEPA Acceptance.* Title 23 U.S.C. 139(n)(2) provides for a combined Final EIS and Record of Decision (ROD) document that is the intent for this EIS so long as the Project meets the conditions outlined in FHWA's January 14, 2013, guidance document on MAP-21 Section 1319 Accelerated Decision-making in Environmental Reviews. For HEPA, the Final EIS will be published and noticed in the HEPA Environmental Bulletin followed by acceptance or nonacceptance of a Final EIS for a state agency action, which is determined by the Governor of Hawai'i. Acceptance must occur before the use of state or county lands or funds in implementing the Project.

6.3 PERMITS AND APPROVALS

The permits, reviews, and approvals required for the Project will depend on the features of the Preferred Alternative. The list of anticipated federal, state, and local permits in Table 8 will be refined as the project alternatives are developed. Input on other approvals that may be necessary is requested from government agencies and other participants as part of this environmental review process. An asterisk (*) is noted next to those permits or approvals that may necessitate Chapter 343 environmental review.

Table 8. List of Anticipated Permits and Approvals

PERMIT / APPROVAL		ISSUING / APPROVING AGENCY
Federal	National Environmental Policy Act	Federal Highway Administration
	Department of Army Permit, Clean Water Act (CWA) Section 404 and Rivers and Harbors Act Section 10	U.S. Army Corps of Engineers
	Department of Transportation Act of 1966, Section 4(f) Evaluation	Federal Highway Administration
	Endangered Species Act, Section 7 consultation	U.S. Fish and Wildlife Service; and National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries)
	Farmland and Conversion Impact Rating, pursuant to the Farmland Protection Policy Act	U.S. Department of Agriculture, Natural Resources Conservation Service
	Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat coordination	NOAA Fisheries
	National Historic Preservation Act Section 106 Consultation	State Historic Preservation Officer
State of Hawaiʻi	Hawaiʻi Revised Statutes Chapter 343, Environmental Review Compliance*	Governor, State of Hawaiʻi
	Coastal Zone Management Act Consistency Determination	Office of Planning and Sustainable Development, Coastal Zone Management Program
	CWA Section 401, Water Quality Certification	Hawaiʻi Department of Health (HDOH), Clean Water Branch
	CWA Section 402, National Pollutant Discharge Elimination System Permit	HDOH, Clean Water Branch
	Hawaiʻi Revised Statutes Chapter 6E-8, Historic Preservation Review	Department of Land and Natural Resources (DLNR), State Historic Preservation Division
	Stream Channel Alteration Permit	DLNR, Commission on Water Resource Management (CWRM)
	Conservation District Use Permit*	DLNR, Office of Conservation and Coastal Lands
	Americans with Disabilities Act Accessibility Guidelines	HDOH, Disability and Communication Access Board
	Community Noise Permit/Community Noise Variance	HDOH, Indoor and Radiological Health Branch
County of Maui	Special Management Area Permit*	County of Maui Planning Department
	Building and Grading permits	County of Maui Planning Department

* permits or approvals that may necessitate Chapter 343 environmental review

6.4 ENVIRONMENTAL ANALYSIS FRAMEWORK

6.4.1 Project Area

As set forth in Section 1.2, the proposed project area is defined by the existing Honoapiʻilani Highway between milepost 11 and milepost 17. The proposed southeastern terminus at milepost 11 is in Ukumehame in the vicinity of Pāpalaua Beach Park, and the northwestern terminus of the Project is

at milepost 17 in Launiupoko, where Honoapiʻilani Highway intersects the southern terminus of the Lāhainā Bypass.

6.4.2 Transportation Analysis Year

The EIS will utilize a 2045 analysis year to reflect completion of the Project within the context of the Maui MPO's current Maui Travel Demand Model with growth and travel demand projections through 2045. Time frames for indirect and cumulative assessment could vary based on timelines for other projects identified from resource or planning agencies.

6.4.3 Organization of the Environmental Impact Statement

The EIS will be organized in two volumes.

- Volume 1 will consist of the environmental impact analyses with chapters that describe the purpose and need for the Project, reasonable range of alternatives considered and evaluated, environmental considerations, public involvement activities, and supporting studies as required by NEPA and HEPA.
- Volume 2 will comprise appendices that will consist of technical reports supporting the information provided in Volume 1.

The general format of the EIS chapters provided in Volume 1 will be as follows:

- *Affected Environment*, which will describe existing conditions within the study area, as defined above or as defined specifically for each subject area. This will provide the baseline data on which potential project impacts will be determined. In some circumstances the environmental analysis requires the determination of future baseline conditions to evaluate the impacts of the project alternatives. The future baseline condition reflects anticipated changes in the affected environment independent of the Project. Accepted analytical methodologies are used to project population, employment, traffic conditions, noise levels, and air quality concentrations to forecast future conditions in the study area.
- *Environmental Considerations*, which will provide an analysis of potential adverse and beneficial impacts associated with each project alternative. In addition to the "build" alternatives, this section will consider a "no build" alternative, which describes future conditions without the Project.
- *Mitigation*, which will identify proposed measures that would mitigate any adverse impacts that may be realized by the implementation of that action and identified in the "Environmental Considerations" section of the assessment. Mitigation includes the consideration of the avoidance of the impact(s), the minimizing of the impacts that cannot be avoided, the rectifying of the impact by repairing or restoring the affected environment, the reducing or eliminating of impacts, and the compensation for those impacts that would result as the action is implemented or that which would result from the operation of the action.

6.5 ENVIRONMENTAL ANALYSIS APPROACH AND METHODOLOGY

The environmental review will assess potential direct, indirect, and cumulative effects of the Project on the social, economic, and environmental resources within the study area. FHWA and HDOT will use established methodologies and approaches to the impact assessment for each technical impact assessment area. These are described for the key technical chapters of the Draft EIS in **Appendix 3** of this Scoping Report.

Honoapi‘ilani Highway Improvements Project,
West Maui: Ukumehame to Launiupoko

Scoping Report

Appendix 1:
Scoping Meeting Presentation

May 2023

Prepared For
Honoapi‘ilani Highway Improvements

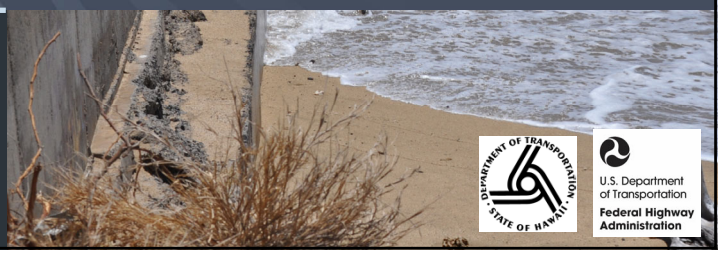
Prepared For
wsp

Welcome

West Maui, Ukumehame
to Launiupoko

December 14, 2022

www.HonoapiilaniHwyImprovements.com



1

Agenda

- **Project Presentation**
  - Meeting Procedures
  - Introductions
  - Purpose of this meeting
  - Project Overview / Timeline
  - EIS Overview
    - Project Purpose and Need
    - Lead/ Cooperating / Participating agencies
    - EIS studies
  - Alternatives Considered
- **Your Comments and Input**

Honoapi'ilani Highway Improvements

2

Meeting Procedures

- Help us reduce background noise
- Please be respectful and courteous
- We will take comments in order and get to as many as possible in the allotted time frame. Please limit comments to 3 minutes each per person
- This meeting is an opportunity to hear from the public

For all attendees

Meeting will be actively facilitated and recorded

Participation is welcomed and encouraged

Treat everyone with kindness and respect

Please minimize background noise

For virtual attendees

For technical assistance, use the Q&A function

If you are experiencing technical issues, leave the meeting and rejoin

Telephone caller dial *9 to raise/lower hand

Honoapi'ilani Highway Improvements

3

Project Team

Ed Sniffen
Acting Executive Director, HDOT

Robin Shishido
Deputy Director of Highways, HDOT

Annette Matsuda
Acting Maui District Engineer, HDOT

Genevieve Sullivan
Project Manager, HDOT

Pua Aiu
Cultural Resource Specialist, HDOT

Ken Tatsuguchi
Planning Program Manager, HDOT

Brian Tyau
Preliminary Engineering, HDOT

Dean Matsui
Preliminary Engineering, HDOT

Richelle Takara
Division Administrator, FHWA

Lisa Powell
Project Manager, FHWA

Wayne Yoshioka
Project Manager, WSP

Dexter Eji
Civil Lead, WSP

Peter Liebowitz
EIS Lead, WSP

Matthew Small
In-person Facilitator/ Environmental Planner, WSP

Scott Keillor
Virtual Facilitator, WSP

Nick Fazio
Meeting Support, WSP

Melissa Uland
Meeting Support, WSP

Honoapi'ilani Highway Improvements

4

Purpose of this EIS Scoping Meeting

To provide an overview of:

- Project background / timeline
- EIS process

To provide an opportunity for comment on the:

- The Purpose and Need for the Project
- The alternatives that are being considered
- Topics proposed for the EIS

Honoapi'ilani Highway Improvements

5

Honoapi'ilani Highway

This project will look at service reliability, resiliency, and safety for roughly 6 miles from Launiupoko to Ukumehame

Project website:

honoapiilanihwyimprovements.com

Honoapi'ilani Highway Improvements

6

Why this project?

Emergency Repairs:

- Over the past 10 years, this stretch of highway has been repaired three times after storms and high waves.
- A fourth project is currently in development to address erosion near Olowalu.

HDOT Vulnerability Assessment Findings:

- 2019 Statewide Coastal Highway Report ranks Honoapi'ilani Highway at Olowalu (#2) and Ukumehame (#12) as most critical out of 300 sites for ocean hazard vulnerability.
- 2021 HDOT Climate Adaptation Action Report Exposure Assessments found 3.2 foot Sea Level Rise Exposure; Vulnerability to hurricane related storm surge; And Hypothetical tsunami scenario identified in the project area.

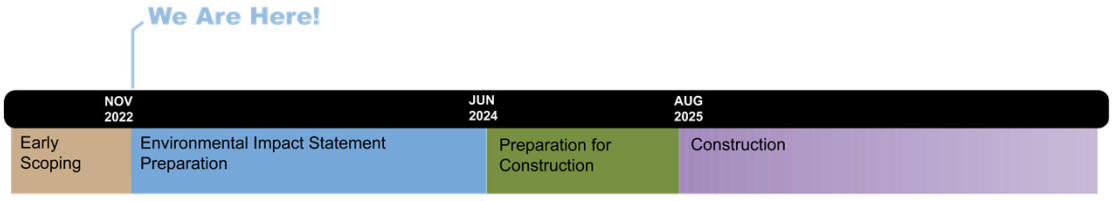
Funding Opportunities:

- HDOT has secured a $22 million federal RAISE grant with the help of our Congressional Delegation, Visitor Industry, FHWA, and Maui County
- Sen. Schatz helped to secure a $23 million earmark in the 2022 OMNIBUS Bill

Honoapi'ilani Highway Improvements

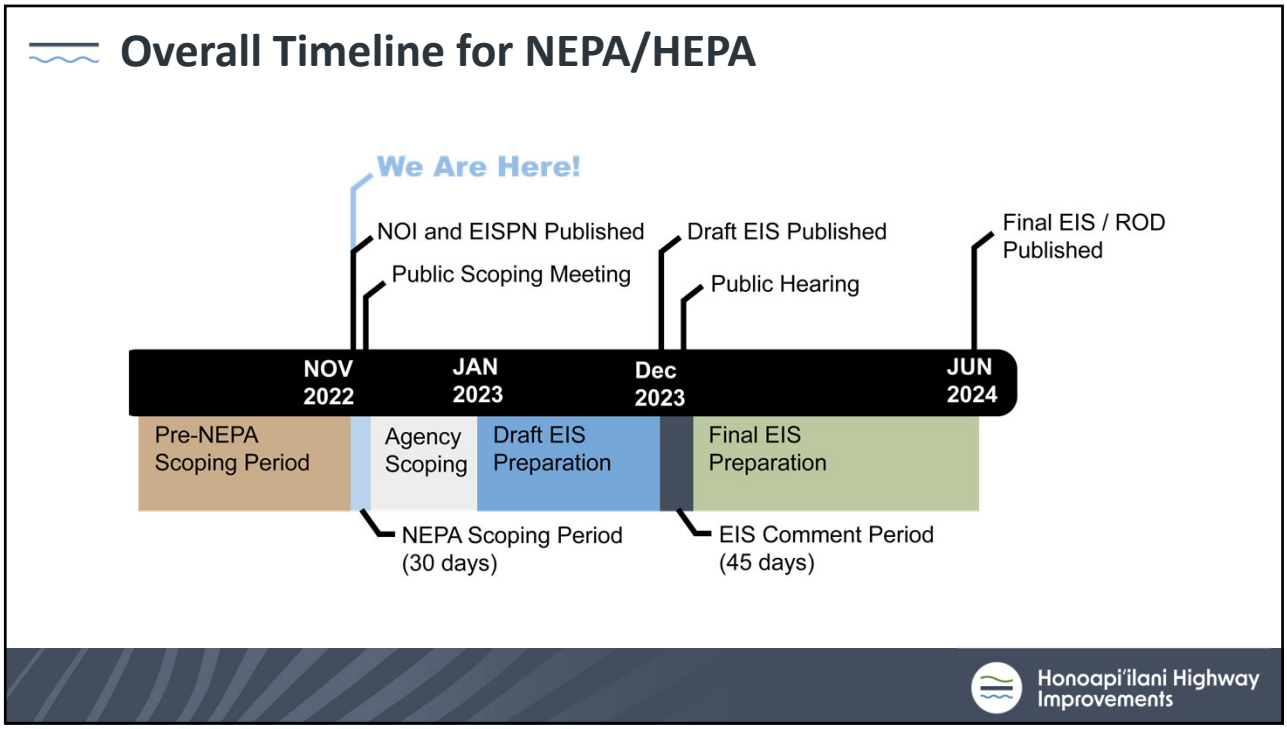
7

Overall Timeline for Project

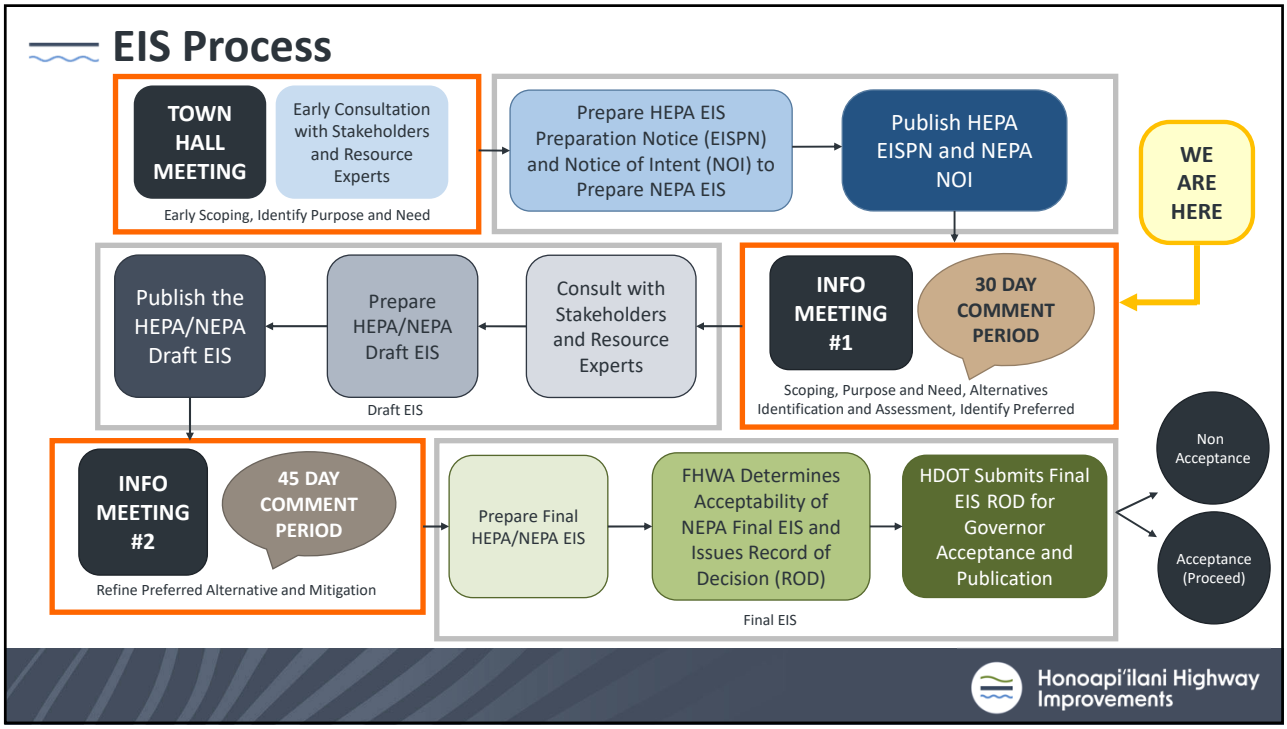


Honoapi'ilani Highway Improvements

8


Overall Timeline for NEPA/HEPA
We Are Here!
NOI and EISPN Published
Public Scoping Meeting
Draft EIS Published
Public Hearing
Final EIS / ROD Published
NOV 2022
JAN 2023
Dec 2023
JUN 2024
Pre-NEPA Scoping Period
Agency Scoping
Draft EIS Preparation
Final EIS Preparation
NEPA Scoping Period (30 days)
EIS Comment Period (45 days)
Honoapi'ilani Highway Improvements

9


EIS Process
TOWN HALL MEETING
Early Consultation with Stakeholders and Resource Experts
Early Scoping, Identify Purpose and Need
Prepare HEPA EIS Preparation Notice (EISPN) and Notice of Intent (NOI) to Prepare NEPA EIS
Publish HEPA EISPN and NEPA NOI
WE ARE HERE
INFO MEETING #1
30 DAY COMMENT PERIOD
Scoping, Purpose and Need, Alternatives Identification and Assessment, Identify Preferred
Consult with Stakeholders and Resource Experts
Prepare HEPA/NEPA Draft EIS
Publish the HEPA/NEPA Draft EIS
Draft EIS
INFO MEETING #2
45 DAY COMMENT PERIOD
Refine Preferred Alternative and Mitigation
Prepare Final HEPA/NEPA EIS
FHWA Determines Acceptability of NEPA Final EIS and Issues Record of Decision (ROD)
HDOT Submits Final EIS ROD for Governor Acceptance and Publication
Final EIS
Non Acceptance
Acceptance (Proceed)
Honoapi'ilani Highway Improvements

10

Project Permits and Approvals

FEDERAL	
National Environmental Policy Act	Federal Highway Administration
Department of Army Permit, Clean Water Act (CWA) Section 404 and Rivers and Harbors Act (RHA) Section 10	U.S. Army Corps of Engineers, Regulatory Branch
Department of Transportation Act of 1966, Section 4(f) Evaluation	FHWA
Federal Emergency Management Agency (FEMA) Floodplain Coordination	FEMA
Endangered Species Act, Section 7 consultation	U.S. Fish and Wildlife Service; and National Marine Fisheries Service
Farmland and Conversion Impact Rating, pursuant to the Farmland Protection Policy Act	U.S. Department of Agriculture, Natural Resources Conservation Service
Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat	NMFS (NOAA Fisheries)
National Historic Preservation Act Section 106 consultation	State Historic Preservation Officer (SHPO)
Clean Air Act, Section 309	U.S. EPA
U.S. Coast Guard (USCG) Bridge Permit Coordination	U.S. Coast Guard

STATE OF HAWAII	
Coastal Zone Management Act Consistency Determination	DBEDT, Office of Planning and Sustainable Development, Coastal Zone Management Program
CWA Section 401, Water Quality Certification	Department of Health, Clean Water Branch
CWA Section 402, National Pollutant Discharge Elimination System (NPDES) Permit	DOH, Clean Water Branch
HRS Chapter 6E-8, historic preservation review	DLNR, State Historic Preservation Division
Stream Channel Alteration Permit	DLNR, Commission on Water Resource Management
Conservation District Use Permit	DLNR, Office of Conservation and Coastal Lands (OCCL)
Americans with Disabilities Act	DOH, Disability and Communication Access Board (DCAB)
Noise Permit / Noise Variance	DOH, Indoor and Radiological Health Branch

COUNTY OF MAUI	
Building and Grading permits	County of Maui Planning Department

Honoapi'ilani Highway Improvements

11

Lead / Cooperating / Participating Agencies

Lead Agencies — The agencies proposing this project: HDOT and FHWA

Cooperating Agencies

Any agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative.

Participating Agencies

Any agency that has an interest in the project and has agreed to participate in the NEPA/HEPA and scoping processes.

Honoapi'ilani Highway Improvements

12

Project Purpose

The primary purpose of this project is to provide a reliable transportation facility in West Maui and improve Honoapi‘ilani Highway’s resilience by reducing the highway’s vulnerability to coastal hazards.

Honoapi‘ilani Highway Improvements

13

Project Need

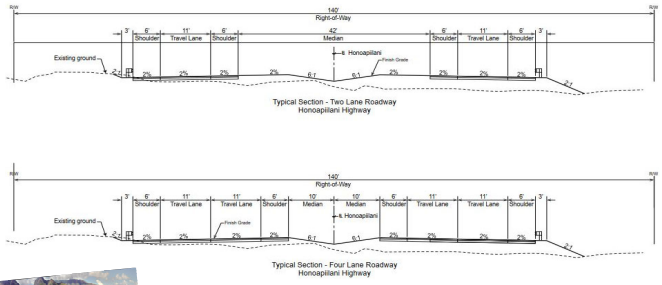
As a coastal highway, Honoapi‘ilani Highway is vulnerable to sea level rise exposure area (SLR-XA), which is a combination of passive flooding, annual high wave flooding, and coastal erosion.

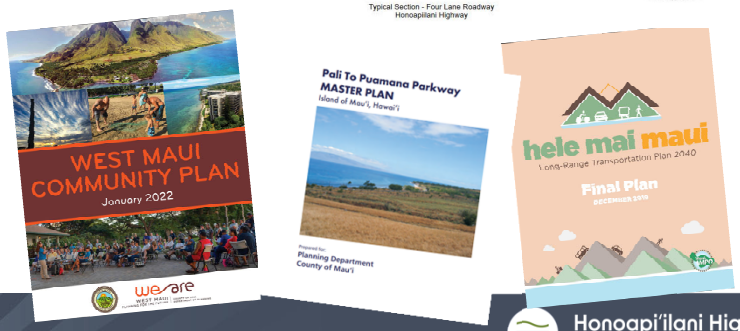
Honoapi‘ilani Highway Improvements

14

Other Project Objectives

- Provide regional transportation system linkages that support the safe movement of people and goods
- Conform with regional land use and transportation plans.





Honoapi'ilani Highway Improvements

15

Topics Included in This Environmental Impact Statement

Social, Economic, and Built Environment

- Land Use
- Land Acquisition, Displacement, and Relocation
- Farmland and Ranching
- Socioeconomic Conditions
- Environmental Justice
- Parklands and Recreational
- Infrastructure and Utilities
- Hazardous Materials and Toxic Substances
- Visual and Scenic Character

Cultural and Historic Resources

- Archaeological and Historic Sites and Resources
- Cultural Resources and Practices

Natural Resources

- Geology and Soils
- Water Resources and Wetlands
- Flora and Fauna / Threatened and Endangered Species
- Natural Hazards
- Coastal Zone Management, Hawai'i Special Management Areas
- Climate Change and Sea Level Rise

Transportation

- Transportation Systems
- Pedestrian/Bicycle Use
- Air Quality
- Noise

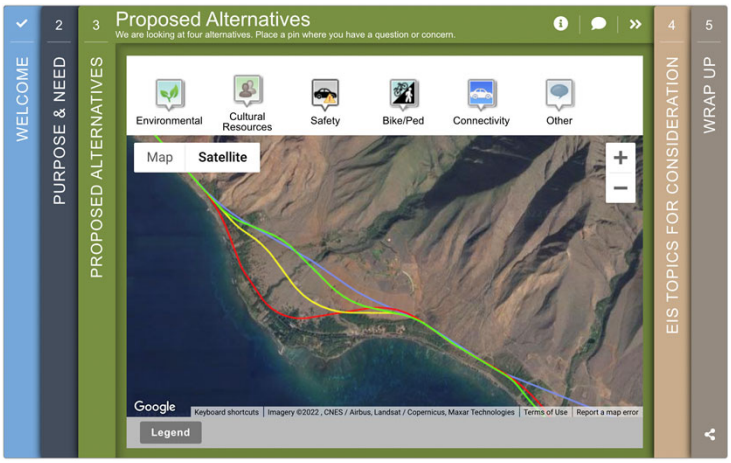
Construction Impacts

Indirect and Cumulative Impacts

Honoapi'ilani Highway Improvements

16

Submit Comments on the MetroQuest Poll!



Access the poll via the project website

www.honoapiilanihwyimprovements.com

Honoapi'ilani Highway Improvements

17

Alternatives Considered

Honoapi'ilani Highway Improvements

18

Alternatives Screening Methodology

A two-step screening process will be used to evaluate the alternatives and select a preferred alternative.

Step 1	Does the alternative meet the purpose and need?
Step 2	Which alternative provides the best balance of project goals and environmental considerations?

Example Alternative Screening	Alt 1	Alt 2	Alt 3	Alt 4
Purpose and Need				
Inundation Avoidance	84%	71%	71%	92%
4-Lane Potential	○	○	○	○
Environmental Impacts				
Traditional Cultural Practices	○	○	○	○
Habitat Loss	○	○	○	○
Constructability				
Meets Design Standards	○	○	○	○
Cost of Construction	○	○	○	○

PERFORMANCE MEASURE INDICATORS
○ TBD ○ Good ○ Moderate ○ Poor

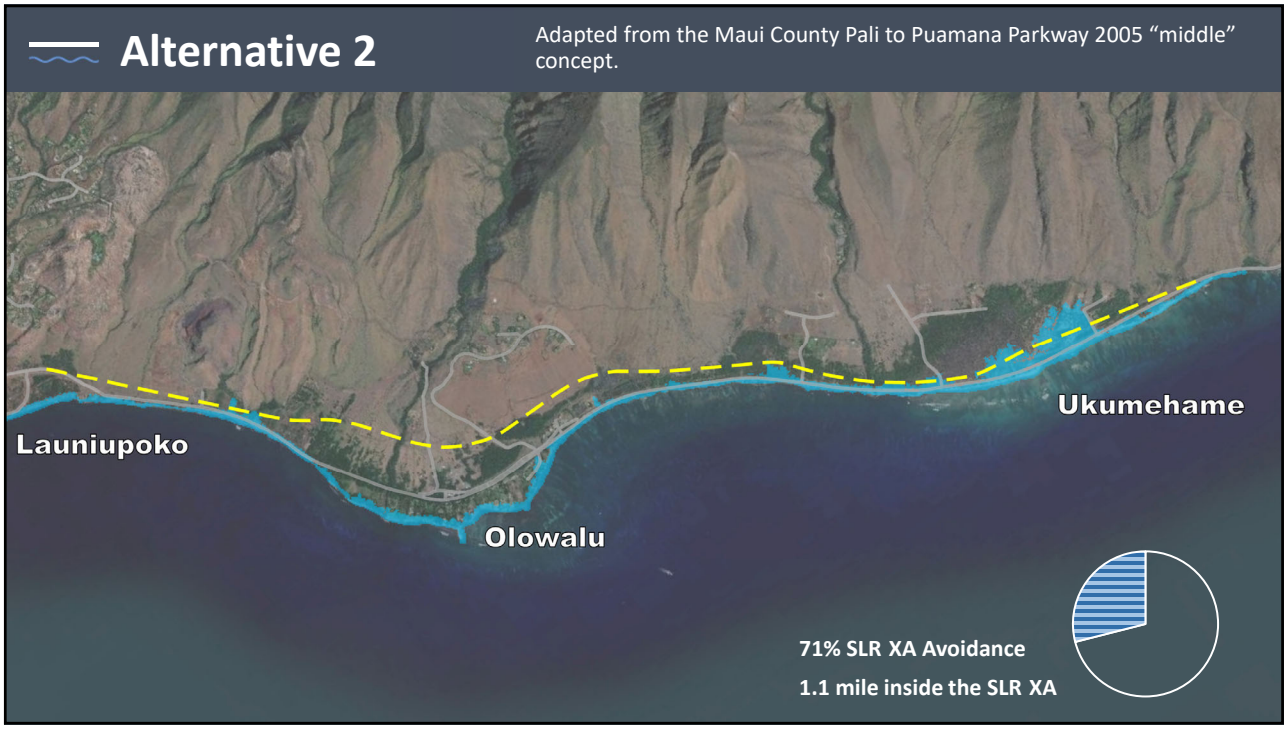
Honoapi'ilani Highway Improvements

19

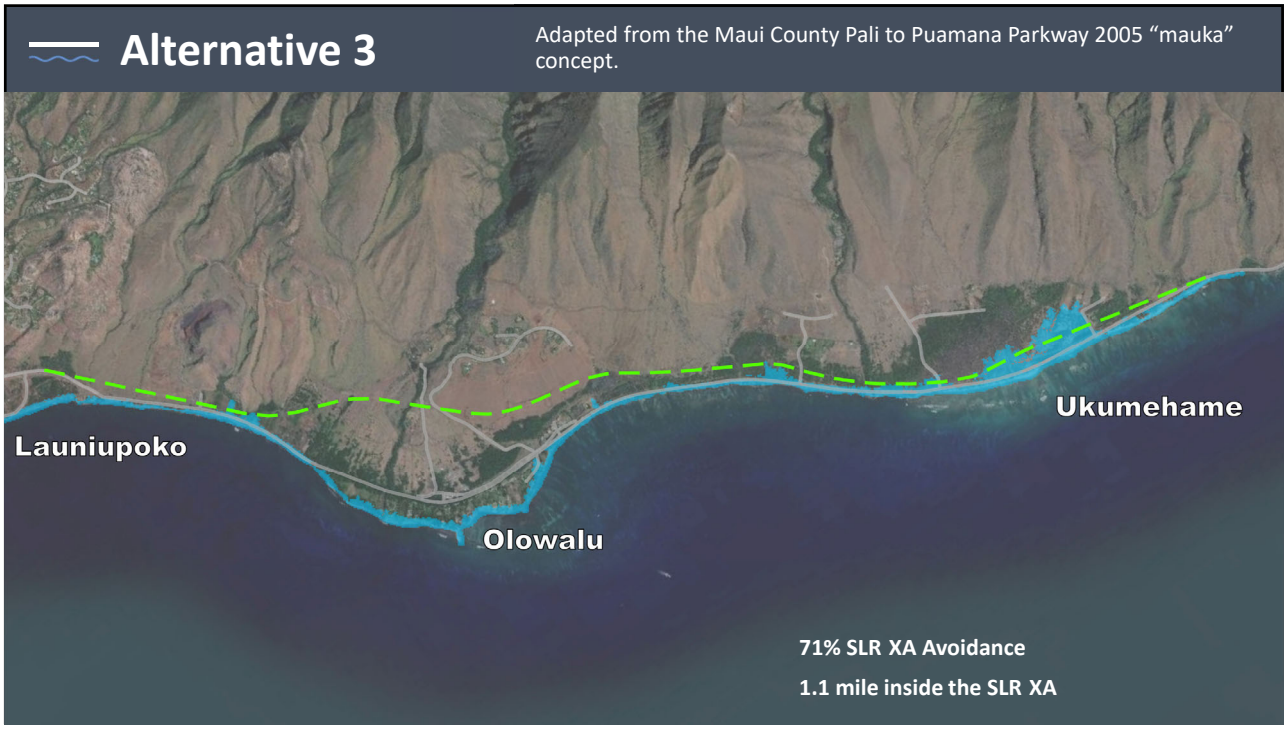
Alternative 1

Adapted from the Maui County Pali to Puamana Parkway 2005 coastal or makai concept

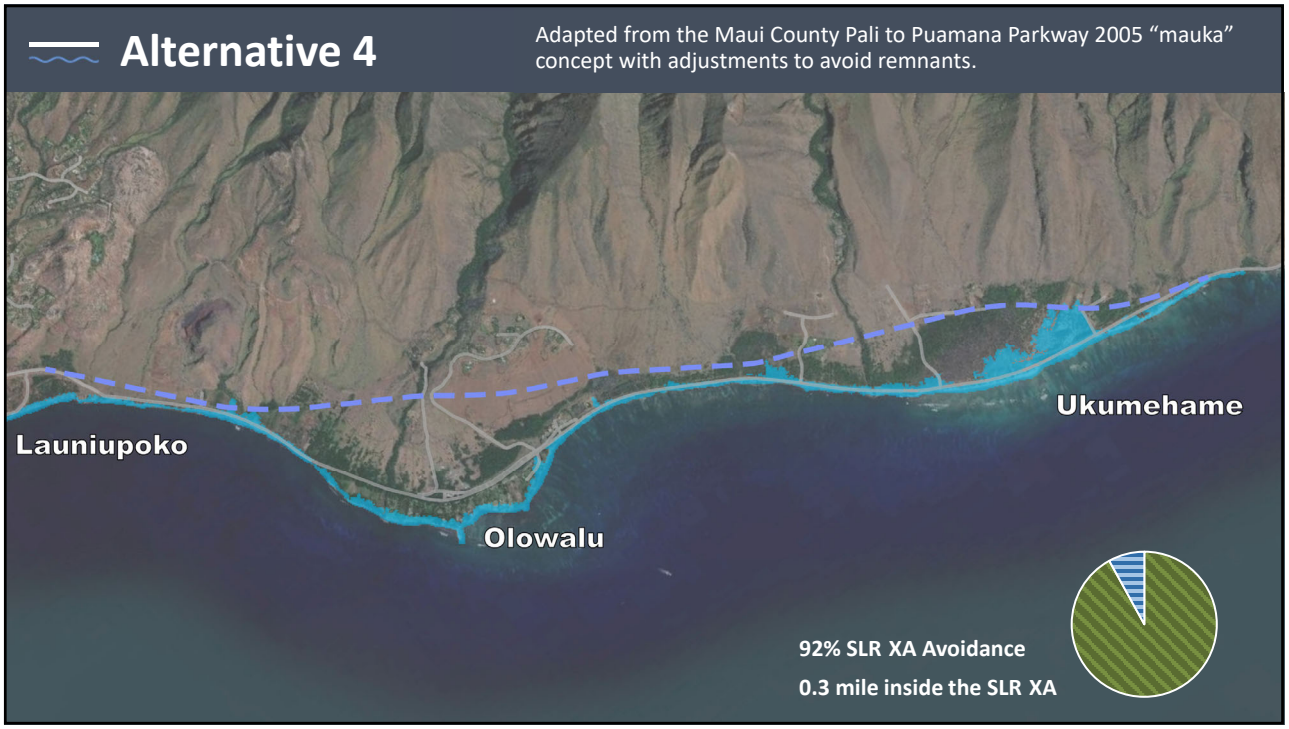
20


Alternative 2
Adapted from the Maui County Pali to Puamana Parkway 2005 “middle” concept.
Launiupoko
Olowalu
Ukumehame
71% SLR XA Avoidance
1.1 mile inside the SLR XA

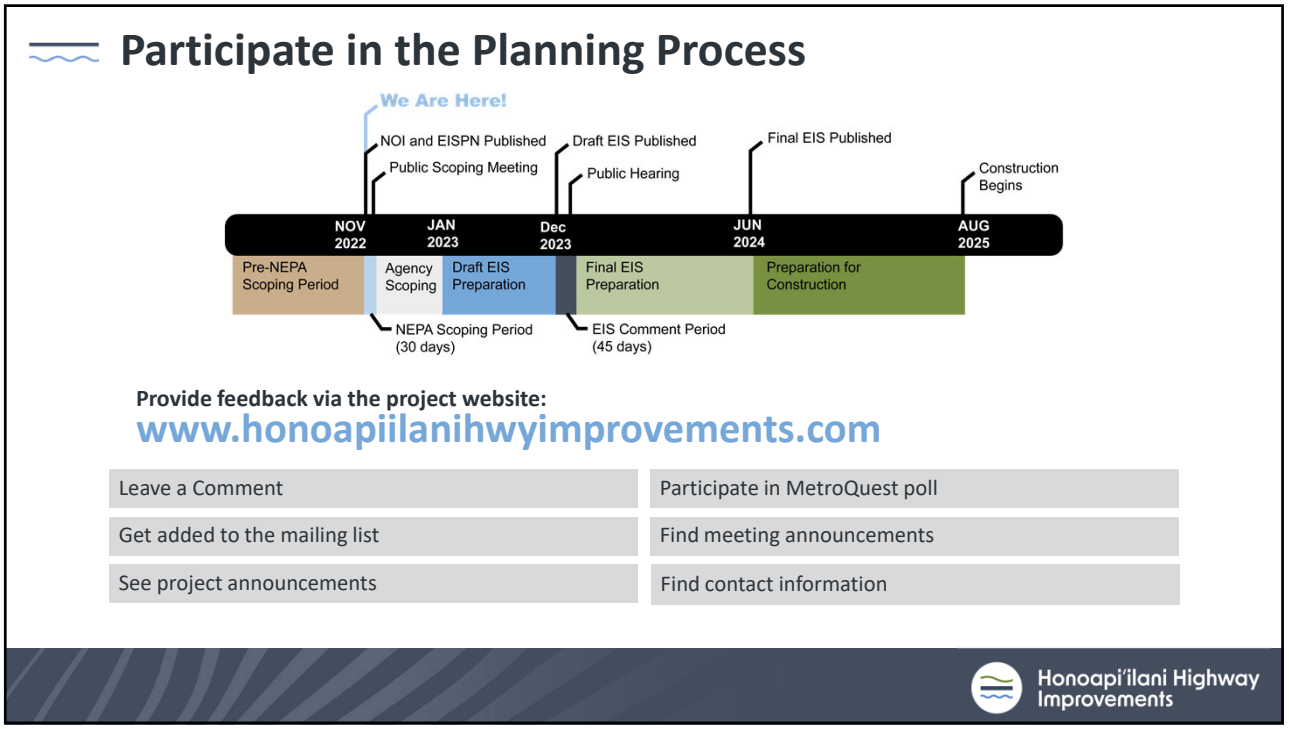
21


Alternative 3
Adapted from the Maui County Pali to Puamana Parkway 2005 “mauka” concept.
Launiupoko
Olowalu
Ukumehame
71% SLR XA Avoidance
1.1 mile inside the SLR XA

22


Alternative 4
Adapted from the Maui County Pali to Puamana Parkway 2005 "mauka" concept with adjustments to avoid remnants.
Launiupoko
Olowalu
Ukumehame
92% SLR XA Avoidance
0.3 mile inside the SLR XA

23


Participate in the Planning Process
We Are Here!
NOI and EISPN Published
Public Scoping Meeting
Draft EIS Published
Public Hearing
Final EIS Published
Construction Begins
NOV 2022
JAN 2023
Dec 2023
JUN 2024
AUG 2025
Pre-NEPA Scoping Period
Agency Scoping
Draft EIS Preparation
Final EIS Preparation
Preparation for Construction
NEPA Scoping Period (30 days)
EIS Comment Period (45 days)
Provide feedback via the project website:
www.honoapiilanihwyimprovements.com
Leave a Comment
Participate in MetroQuest poll
Get added to the mailing list
Find meeting announcements
See project announcements
Find contact information
Honoapi'ilani Highway Improvements

24

Your Thoughts and Comments

How to participate virtually

- Raise your virtual hand
- Type a question in the Comment box
- For telephone callers, the last 4 digits of your phone number will be called upon

How to participate if in-person

- Come to the microphone

Opportunities to comment after tonight

For more information:

Visit our website for more information and to stay involved!

www.HonoapiilaniHwyImprovements.com

Honoapiilani Highway Improvements

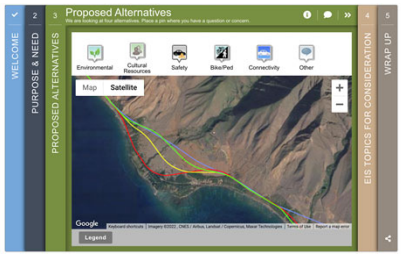
25

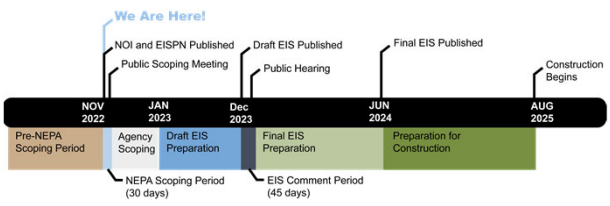
Mahalo!

Questions or Comments?
Contact: Genevieve Sullivan, Project Manager, HDOT
genevieve.h.sullivan@hawaii.gov

www.HonoapiilaniHwyImprovements.com

Provide feedback via the project website:
www.honoapiilanihwyimprovements.com





DEPARTMENT OF TRANSPORTATION · STATE OF HAWAII

U.S. Department of Transportation
Federal Highway Administration

26

Honoapi‘ilani Highway Improvements Project,
West Maui: Ukumehame to Launiupoko

Scoping Report

Appendix 2: Comment Matrix

May 2023

Prepared For
Honoapi‘ilani Highway Improvements

Prepared For
wsp

HONOAPI‘ILANI HIGHWAY IMPROVEMENTS PROJECT

Comment Log

Commentor	Comment	Log No.	Scoping Report Section	Scoping Report Comment
12.14.2022 Day Session				
Michael Downing	I was a state engineer on my way for 25 years, and retired in 2012 and just, oh, **I can't tell you guys how much I really appreciate having you start that project (1)** ‘cause I worked on a Honoapiilani bypass and bridges on Maui. I was very fortunate to be in there as well as Molokai, and when I saw this come online and my emails of you guys having this project, how well organized you have it with the feds and I just can't thank you, guys. Mahalo, mahalo, malalo. And have a very merry Christmas and success in getting this project, pau hana in 2025, so thank you so much, for everything.	1	5.2	1
Lucienne Denaie	My name is Lucienne Denaie and I served back in the day on a County Wide task force, about looking at alternative routes for the Bypass in Lahina. I Represented the Non-governmental Organizations on Maui and we sat through a year or so of hearings and ended up kind of giving up and saying there's no money, so we're not sure what we should do, so it's really great to hear that this is happening my **question is there going to be additional archaeological survey work**? **(2)** This is a very, very rich area. And although there have been surveys in the past, we have new techniques now, and it would really be good to know more about the areas before we choose the route. And I will say just personally, **something that's not so high up would be of less impact those routes, that go way high up in Olawalu they will impact cultural resources. (2 continued)**	2	5.4.4	40
Doug Ballard	Okay, Doug Ballard, as the roadway shifts upcountry a bit, is the study and plans go to include **beach access opportunities and open space opportunities**? **(3)**	3	5.4.3	38
Wayne Hedani	Okay, thank you, I have a couple of comments. **Do you folks have a 100% alignment that would keep us out of the sea level rise area. (4)** And the road from the Pali to Puamana, currently provides unbroken beach access to the general public for about 6 miles of beach. The question is **will the realignment affect that beach access and are there provisions to somehow provide for maybe a major park in that area makai of the Ukumehame section or allow for continued public access to the Beach for this segment of the project.(5)**	4 5	5.3 5.4.3	25 38

Bob Pure	My name is Bob pure. I've been involved in transportation issues since the 20 years that I've been here in Lahaina. First of all I want to say congratulations to Robin and his Promotion. Well deserved, Robin Congratulations on on your new job. Just a simple question. I'm a layman, I'm a not a technician, or an engineer. Looking at those 4 routes, I'm assuming the DOT Feels that all 4 of them can be done. Obviously, they're, gonna find out that one is better than others. My question is pretty simple. **What criteria does the DOT feel, of those 4 routes, that they will need to make one of them the priority? (6)** In other words, how do you pick one out of 4? As I say, I'm not an engineer. I don't know which one is better than the other one. What will the DOT be looking at to pick one of those 4 roots?	6	**5.3**	26
Ke'eaumoku Kapu	Hi! Aloha. Mahalo put this opportunity. My name is Ke'eaumoku Kapu for there's quite a few areas I am concerned about. And I'm glad that we're going to the process of the Environmental Impact Statement. Just a heads up**, one of the areas of concern for me is Puamana Park location, where throughout the past there have been a lot of erosion and from that erosion a lot of bones, or burials that entered into the ocean from 2017**. **(7)** So because the County had shut down the whole park, because of that we're really looking at what would be a long term plan for that area. **So I think right now, it gives us a great opportunity to be involved in a process from the beginning, especially when it comes to the cultural impact assessment that needs to be done. (7 Cont)** Not only Puamana, but guard rails of Launiupoko. **There's another era that is designated as a grave along the shorelines of Launiupoko (7 Cont)** and I've seen the studies pertaining to the degraded areas that basically we will be part of the the ocean within the next 20 to 30 years. My bigger concern is also the **Olowalu area, and all that there is a draft that went out before selected a primary areas**, **(7 Cont)** I think, is really important that, you know, as you continue the process archaeological data recovery, that's been done quite a few times by different archaeological teams. You'll see that the area is largely clustered with cultural overlays. So **I really hope that being involved in the process and at the same time being what we know on the area helpful to address those issues**. **(7 Cont)** I'll be definitely involved probably at the 6 O'clock hour and I also will be present tomorrow at the Lahaina Civic Center.	7	**5.4.5**	44
Albert Perez	So we're glad that this EIS is being done. Right now, we're… the previous solutions shoreline hardening have been leading to beach loss. So we're glad that this is being proposed. However, there are some concerns. **I'll say upfront that the EIS needs to consider: impacts on flora and fauna; air quality; noise; archaeological resources; cultural resources; scenic resources; population; housing; economic impacts; fiscal impacts; public facilities; traffic; utilities; energy; climate change; drainage, water resources, and wastewater; storm water; run-off into the ocean from the facility, the highway facility. It would also need to discuss, cumulative**	8 9 10 11	**5.4** **5.2** **5.4.5** **5.4.3**	30 2 46 39

	and secondary impacts, and would need to examine consistency with state and County plans and policies, which it sounds like you're doing. Also reasonable alternatives, including a no-action alternative. Alternatives that might enhance the quality of the environment in the project Area. That's a very important one. Secondary population and growth impacts resulting from this action, And of course, unresolved issues. (8) In particular, I am concerned that the assumption that there's gonna be **3.2 feet of sea level rise may be inadequate**. We're starting to see data that says that that's gonna be probably surpassed and **I'm hearing maximum scenarios of 8 or 9 feet**, although I'm not a climate scientist, I'm not an expert on that. But I think that the EIS needs to consider the possibility of under-design and in terms of not being high enough up mauka for the lifetime of the structure. **(9)** And then, of course, **the further mauka you go that there are cultural sites** mauka not only in Olowalu, but in other areas of the project as well. **(10)** There's also **the potential for the existing road to act as a seawall and cause beach loss if is left in place**. **We want continued to access to our Beach, but we don't want the existing road to cause beach loss**. **(11) We need to have some way for bikeways to be involved. Alternative transportation modes. (12)** Thank you.	12	**5.2**	3
Lucienne Denaie	**The Sierra Club Maui would like to be a consulted party on this project**. **(13) We have concerns about historic and cultural sites/ continued public access to the shoreline for recreational and cultural use; impacts on wetland areas and native fauna and flora; impacts on kuleana land owners in Ukumehame and planning for sea level rise. (14)**	13 14	**5.2** **5.4**	4 32
Michael S. Downing# P. E.	In time there **will be beach access during and when the project is finished in 2025. (15)**	15	**5.4.3**	39
Albert Perez	**How many lanes are being proposed? (16)**	16	**5.2**	5
Ke'eaumoku Kapu	**I am the CEO for Aha moku o Maui Inc. and would like to be a consulted party to this project.(17) My concern is that we need to do a cultural overlay of the entire stretch of this corridor from Puamana to Ukumehame. (18)**	17 18	**5.2** **5.4.5**	6 45
Albert Perez	**The EIS needs to consider future costs and impacts if sea level rises more than 3.2 feet. (19)**	19	**5.2**	2
Jennifer Maydan	**What will be done/who will be responsible for the old highway after it is relocated? (20)**	20	**5.2**	7

12.14.2022 - Evening Session				
William Spence	My name is William Spence, I was the planning director for Maui County from the 2011 to mid-2018, this was an important project that we discussed with Director Sniffen back in I think 2013 or 2014, so I'm very glad to see that it's getting off the ground so thank you very much. One comment, I have the has probably been touched on before. It is the firing range, **and I think each one of the alternatives should evaluate the impacts to the range**, **(21)** you have recreational users that really there's only two legal ranges on the island, one of them is indoors, so it's impractical for hunters and their rifles or people who like to shoot longer distances, and the indoor range is not as capacity. You have hunters that want to sign in their rifles for hunting purposes so they're safe. If they don't have a legal place to go, I think that's going to be a problem for the thousands of owners on this island. **It's also a health and safety issue for the general public because the police department of the National Guard, the Department of Public Safety, and I'm told that others also use it for training purposes. (21 Cont)** I can't begin to tell you how important it is for our police and our law enforcement community to be able to have a place to train and qualify and learn what they need to do to safely do their jobs. So, that's pretty much what I got. I thank you for holding these meetings, I think it is a very important project, thank you.	21	**5.4.11**	59
Tiare Lawrence	Aloha, I was I wanted to ask you about Alternative A but actually all the alternatives because it looks like where you come into Olowalu town and it starts to head up mauka towards behind Kapaiki Village, **was there any consultation with Ohana Hooikaika, one of the last remaining Hawaiian families that live right there, looks like the Highway would go right in back of their house if not on their house, has there been any consultation with that family. (22)**	22	**5.2**	8
Aja Eyre	Hi, this is Asja. I'm just wondering you did bring up the **Pali to Puamana plan (23)** and that it was used to identify the alternative routes, and for those listening that was prepared in 2005 and its on the county website. **To what degree are you consulting with that, it's my understanding that there was a lot of public input given for that plan and its been there waiting to be enacted for many years. How are you using that (23 Cont)** and the other question is just, **is there going to be another cultural site survey done before the EIS**? **(24)** I think the survey that we have on Olowalu is not new and it would make more sense if **cultural sites surveys need to be more done are archaeological surveys**. **(24 Cont)** I guess those two questions to what degree is the Pali to Puamana plan going to be utilized and what's the plans for the archaeological surveys before the EIS.	23 24	**5.4.1** **5.4.4**	36 41

Aja Eyre	Alright one more question, did these when you guys do **the EIS, is it going to address what would be done with the shoreline if the highway moves away? (25)** If it moves mauka, does the is this talked about in the plan, is there still going to be **shoreline access for fisherman, you know what's going to be done with the old road? How do you take that account in this plan and in that EIS? (25 Cont)** …Yeah Robin mentioned that the road lower road will remain open obviously during that work but in the EIS will it will it verify if there is an intention to have that lower road removed?	25	4.5.3	39
Aja Eyre	Yeah, **is the EIS looking at a two-lane highway or a four lane? Or a two lane with the opportunity to expand into a four lane? (26)** I mean with the Lahaina bypass it's already four lanes so just wondering I can't that's something I haven't been able to find on the website but what the width of the road is that you're seeking EIS for.	26	5.2	5
Tiare Lawrence	Was there any consideration for the when you get past right now Alternative A has you going above Ohana Ikaika house around that area, **was there any consideration to continue that road and then veer off past Olowalu town up above Kapaiki**? **(27)**	27	5.3	27
Kai Nishiki	Hi, so I had trouble seeing your map while you were doing the presentation when Genevive could or when she was doing the presentation, it was fine, it was when Robin was doing his presentation that the slides went into the small box in the corner, and so anyway I pulled it up off of your website but **I just wanted to confirm the alternatives that are being and the diagram there, so section of road that you're talking about is between Ukumehame and Launiupoko? (28)** Okay, I have a comment and a question about that. So, through emergency proclamations, **the shoreline was hardened at Ukumehame and it resulted in extensive beach loss in the area (28 Cont)** so how is that going to be addressed and I have additional follow up questions but I'd like to know that first.	28	5.2	9
Kai Nishiki	Okay but, as part of the project it seems that the **loss of beaches due to shoreline hardening should be considered as far as perhaps removing the hardened shoreline in those areas. Could that be looked at as part of the project**? **(29)**	29	5.2	9
Kai Nishiki	Okay, but you folks are aware of the areas that were I would say, that it shouldn't have that an emergency proclamation shouldn't have been used to harden the shoreline in that area and so I would definitely like that to be acknowledged by the DOT and some mitigation for the loss of those beaches **I would suggest removal of the shoreline hardening and to look at how we can encourage beaches to come back to those areas. (30)**	30	5.2	9
Kai Nishiki	And I have another additional comment or question, **I know that our community is very concerned that where the alignment is proposed, that certain developers will be looking to use to use the infrastructure improvements that are made in the area to push forward development in Olowalu and so I want to know what measures are being taken to disallow development makai of whatever alignment is eventually decided upon. (31)**	31	5.4.1	33

Kai Nishiki	I have another question. Okay, I was looking at the sea level rise inundation encroachment area and I was just going to suggest that the or maybe it just I need to expand on this. **None of the completely avoid sea level rise inundation and so is it all in the area of or mostly in the area of Launiupoko where it is not outside of that area? (32)** I mean and maybe if you could clarify is the blue the light blue is that the sea level rise inundation area? On your map?	32	**5.3**	25
Aja Eyre	Yeah, sorry I didn't want to take away from Kai because she had some great question that I would have echoed as well. But one question I'm looking at the survey on there, **is it all or nothing which each alternative (33)** so for example and I'm not saying this as what I would recommend but if you wanted to go mauka in Ukumehame and come makai in Olowalu, to avoid the cultural sites like does it have to be does the national highway standards, are these built and you've got to take that direction I can't imagine why that would be the case, but **is there a way to combine all of the alternatives? (33 Cont)** Are you looking at that as well, cause there are two very separate areas, I mean Olowalu and Ukumehame, there are two different I mean fairly different issues between those two areas.	33	**5.3**	26

Kai Nishiki	So, I know that very early on in the consultation process for the bypass by cut mountain, Tiare Lawrence and I were both in attendance in that meeting and we had a huge concern that the land between the bypass and the low road thoughtful consideration was not put in early on as to what the exact plan was and so now exactly the fears that we expressed that at that meeting several years ago have come to fruition, and I know anyone who lives in West Maui, you drive by Cut Mountain, and you see the disgusting unsanitary condition of that property and it is horrifying that nothing has been done to address that and you know the state and the county kind of just point fingers at each other and there's issues with like disposition and who has authority to do what in the area but in the meantime our community is left dealing with, I mean my brother's a firefighter, and constantly, they are being called for **car fires and trash fires, and all kinds of illegal drug activity and it's a disaster**, **(34)** so I would hate to see that happen I mean it's already happening **all along the current the current highway there's all the houseless and cars all along our shoreline and all in the bushes all along that area and I just think that it needs to be a huge priority that that consideration and a plan is in place before we just move the highway** **(34 Cont)** and just everyone goes on their merry way because we can see what happened at Cut Mountain and that cannot be allowed to proliferate and I really do think that it was no one really taking Tiare and I seriously when we brought up that concern you know like everyone just kind of like just like "Aw yeah don't worry about it we'll figure it out" and now you can see it wasn't figured out and now our community is left with this disastrous disgusting mess that who's gonna clean it up and our resources are being you know our fire department and police department are having to put resources into dealing with that situation that could've been avoided if a plan had been put in place and secured the area and work with organizations to make it a beautiful and well maintained area for our shoreline users and now it just like when I go to the beach or I ask my teenage to join me at the beach, like they won't even come over there because their scared their cars are gonna get ripped off or they're gonna step in doo doo or it's just really gross **so I just hope that a more thoughtful approach is taken to address this.** **(34 Cont)** Thank you.	34	**5.2**	10
Aja Eyre	Thanks again, so, you mentioned that the EIS would not address the abandoned highway but **I'm wondering why an Environmental Impact Statement wouldn't address what's being left behind because if the highway's moved it doesn't just impact where the new highway is, it impacts what's being left** **(35)** and what Kai was saying is the impact of that area going to be left makai of the new highway so is there a reason why that cannot be addressed in the EIS? I'm also along that just the drainage in wetlands **I'm sure you guys have provisions to addressing drainage issues and wetlands in the EIS**.**(36)** So sorry, two questions again, and I think that's my last one.	35 36	**5.2** **5.4.7**	7 49

Tiare Lawrence	Aloha, I just wanted to provide comment for the Olowalu area as a lineal descendant of that area. **I'm really concerned about a big highway just impeding on Kawailoa Heiau and the petroglyphs**, I just feel that all of the other alternatives besides Alternative A would just basically take away the.. you know when you're up there**, it just doesn't sit well with me that we're going to put a highway near these significant cultural sites that area very special and so I know for myself and our family and Aha Moku and other Hawaiian Organizations that we are very adamantly opposed to you know the mauka preferred alignments and so I just wanted to put that on record tonight. (37)**	37	**5.4.5**	46
Kai Nishiki	Will you please, well first I want to say that I fully advocate for the realignment of Honoapiilani Highway. It is sorely needed and instead of temporary fixes, this is a long term thoughtful approach to addressing sea level rise and coastal erosion in the area and Tiare Laurence and I had camped out at Olowalu and many of the signs that we had when we were protesting against further shoreline hardening and revetments proposed in the area, was to move the road so, I just wanted to let you folks know that I fully support the realignment, I just think that there are concerns that we need to address and I wanted to know what and who will guide what ultimately is proposed in the EIS as the preferred alignment because normally I understand that there are usually you know you start out with seven or eight you narrow it down to two or three and then what gets proposed to look at in the EIS is a few different alternatives so I'm so sorry if that is on your website and I just didn't look at it but **could you explain a little bit about like what the process will be and who will guide the ultimately what the preferred alignment proposal will be? (38)** And I that I also like to volunteer Tiare and myself to be on any working groups or any kind of sessions that you have on that. Thank you.	38	**5.3**	26
No Name Given	Just a quick question, **are the recordings of these webinars going to be available on the websites**, and the other question is **the comments that were made tonight, do we need to put these in writing or are you guys taking notes enough that the comments made tonight and tomorrow and the in-person meeting and the earlier meeting are those already taken into consideration? (39)**	39	**3.1**	Process Question - Answered in Session

12.15.2022 - Evening In-Person Session				
Darren McDaniel	Super quick question was like slide 2, I am a sucker for details, so the primary purpose, I noticed that the word primary was on there, **are there other purposes besides the primary purpose of moving this because of sea level rise or are there any other purposes that are not aware of that are involved with this? (40)** You mentioned benefits in there, sorry sucker for details, so again, what are the benefits outside of moving this road for sea level rise that we are getting from this? I am trying to be specific with this. I need some specifics if you don't mind because I am trying to be educated about this. **So would it be fair to say for the record then that the only reason that this road is getting moved is for sea level rise, safety, and possibly inured some congestion or basically relieve some congestion and that would be the scope of the reason. (40 Cont)** Is that fair to say or is there any other reason that we want to address? Got that, just want to make sure on everything else, thanks.	40	**5.2**	11
Alison Wolferd	I am the second sucker for details. Um the picture before this, is there any way **we could have a little more landmarks to exactly where these roads are? (41)** Like when we drive this road, we see Leoda's and the firing range and things like that so. My name is Alison Wolferd. Okay, some of our questions are related to like the locations of everything, like the firing range ...[in audible]	41	**5.2**	12
Mark Dicos	I was just curious the primary reason is to get out of the sea level rise zone. I'm just a little bit concerned that most of these alternatives, I mean this is, you know, this one is still in the SLR-XA zone, at least 8% and the SLR-XA is the 3.2, and we know the 3.2 is from the 2014 worst case scenario and the new NOAA models are showing 4 feet as the intermediate, the 80% probability, so if we go back I don't know what the percent of the first alternative. It looked like at least um at least 25% was in the SLR-XA just seems that given that the amount of money and the amount of effort to move this road out of the hazard zone that the 84% avoidance ok you know you basically this is using 3.2 and that's the full flood, you know, doesn't take into account what we are seeing now which is the high tide, the spring tide, and the storm surge and which is having a effect so I just **is there going to be, sort of, Is the EIS going to show perhaps different uh sea level rise models that maybe are more updated and is that a concern if we are going to be in this situation again in possibly 30 years? (42)**	42	**5.2**	2

Art Palaci	Hello, my name is Art Palaci born and raised in Maui. I have a solution to the problem of uh where the water coming over the highway by Ukumehame, Olowalu, and Launiupoko and it be one simple design on how to uh fix that problem because [this is a design to put on top of the wall and dakine is like **180 with stainless steel pipes one here and go back to the ocean**. **(43)** See that? Like this, Lanipoko put on top the wall, water come up like this and the water go back to waterline. Yeah like, 180 but can make them longer, only see water come up, understand this project? More easy down the road. Got to use stainless stee, don't rust for like 40 years, okay? That is my solution.	43	**5.3**	28
Jason Wolferd	Good evening, Jason Wolferd, question is in regards to the alignment so far that I have seen we've talked about Ukumehame area and the firing range is right there. So far, all of your designs either run through the firing range or above the firing range, is that correct? Okay. **Directly beside there, you have protected wetlands all through there. That's why the national guard a year and a half ago tried to resurrect to be able to use their firing range there, 600-yard range, and they were stopped from being able to do that so I was just kind of curious if our military cannot use the wetlands how are you even going to accomplish being able to build a highway though wetlands? (44)** Okay, that I was under the impression that it already is because that is why the national guard was stopped from using this [source 27:31]. Okay.	44	**5.4.7**	50
Mark Dicos	Mark Dicos again, I just wanted to address, I think the SLR-XA does take in the elevation um so and just elevating the road isn't going to address the erosion line hazard, right? it is going to eat away at the foundation so um I just think **there is a great opportunity here to um to restore natural shoreline, which I mean we lost 4 or 5 miles of beaches in Maui um in the last few decades so this is a rare opportunity we have potentially 7 miles of shoreline from Puamana to the Pali so it's a great opportunity. (45)** Yes, we are putting people out of the hazard zone, uh realigning the highway, but there is a real opportunity to then restore that shoreline back to a natural shoreline, so allowing it to recede like normal shorelines do and then um so I think as a second objective, I know it is not the primary, **I think that restoration is of huge value to the people of Maui and of course having access to that shoreline as well from the new highway. (45 Cont)**	45	**5.4.3**	38
Chris Brown	My name is Chris brown. I just have a quick question, **is the Ukumehame firing range going to be able to stay open or will that have to be closed because of this realignment? (46)**	46	**5.4.11**	59
Kahiki Niles	Hi, Aloha, I am Kahiki Niles from Lahaina um and e kala mai if you guys had already went over this, but **um I was just wondering if the roads are going to be raised roads like on pillars or are they going to be flat roads like how the bypass is? (47)** Um yeah, that is my question.	47	**5.2**	13

Ke'eaumoku Kapu	Aloha mai kakou Keamoku, um I know we looking at, you know, the best way to try to figure out how uh these roads gone be put in. Similar to what is happening right now, over the bypass is in you still get Honoapiilani Highway on the bottom which it doesn't alleviate anything. **A lot of people would rather use the bottom road and come out where it ties in where it merges again so that's kind of a major concern because along the shoreline over there you get a lot of recreational users that just basically jumping over the railing doing whatever they please to do. (48)** Puamana is being inundated right now on shoreline erosion **and the county uh they basically shut down Puamana because of burials**, **(49)** the 12 boxes that was reentered at Puamana Park and as you go towards guardrails we have an old 1883 map that shows more additional graves alongside that area too going toward Laniopoko so anywhere from Puamana all the way to Olowalu when you hit Olowalu, man, you guys got to have your guys eyes on the ground because there's a lot of anomalies and I don't know whether or not you did some studies with [kipuka 32:10] Kipu got data base, will give you a kind of a background on how many land [commission or what you may be impacting in that area and with land commission or what 32:20] royal pact things **you definitely going find burials in that area** so I'm not trying to be the devils advocate but the bottom line boils down to **when you do the feasibility study for this whole area you got to kind of brush this with a fine tooth comb because all the way through Olowalu you going come up with a lot archeological sites, possible burials and all those things**.**(49 Cont)** Ukumehame that's another issue and I don't know whether or not office of Hawaiian affairs going kind of intervene but that is ceded lands and we seen to much of our lands just basically be taken away because those lands are supposed to be for the benefit of native Hawaiians uh private ceded lands [something 33:02] help housing and education as well so I really hope that something is really done and to really look at this area as a primary resource. I know we talk about bringing back the natural beauty of the shoreline **and the tradeoff for me is like you know we going bring back the shoreline but we going create more mess up mauka** so on the [unheard 33:33] of Maui I like to still be a consultant all the way across the board when you guys get into these areas and also work side by side with the archeologists too, thank you. Aina Archelogy that is Tonya Lee Greg. There's also two other Archaeological data recovery's that was submitted, one by Paul Rosental back in the early 80's I think so there is a whole different scenario of archeological data recovery that was basically done for the Olowalu area and we all know what Olowalu is right**? The Massacre of Olowalu**. **(50)** That was one of the most hardest things that our families still face today when Metcalfe came and slaughtered everybody in that area so lets not forget about that we start talking about safety and all those **things let's talk about history, let's talk about degradation, let's talk about genocide, let's talk about all those kind of things because we can't just wipe this thing clean and not think that this is important because it is still important to us, the lineal descendants that are still here today**,**(50 Cont)** thank you.	48 49 50	**5.2** **5.4.4** **5.4.5**	10 42 47

Darren McDaniel	My name is Darren McDaniel for the record, some of my friends call me crazy white Darren, there is a reason behind that. Um the reason behind it is, it is just I get a little choked up when I talk about this because I guess everybody dies, we are all going to die, we are going to leave some legacy behind and what we say means a lot and how did we get here? Why are we in this position right now? And to me it is pretty simple and it's a curse I have, I can't stand it, it makes me crazy. 97% of the world counts, 1, 2, 3 ,4 ,5, 6, 7, 8, 9, 10. I don't. I count 1, 2, 4, 8, 16, 32, 64, 256, 512. Same 10 periods but one went from one to 10 and one went to 1 to 256 and that is something called exponential growth and it is what is going on in our world and it is what is causing all of this, it is why we are here and why we have to move this road and it is the only reason we're here is because of exponential growth and it is not a disease, just to here in Maui, it's a disease all throughout the world. We are growing at 2.2%. If you look at the stats in Maui I think it is close to 5, 6%. West Maui alone is just booming so that's a population that goes from 50,000 right now to 160 in Maui, now we are going to be 320, what's the doubling rate? Everybody know the formula for that? It's pretty simple. You take any growth rate and divide it into 72. If we are at 2.5% you divide that into 72, we are doubling almost every almost 30	51	5.2	14

something years so when you take these metrics that were done in 2014, they are outdated because we haven't addressed the root cause yet and when are we going to do that? When are we as a society, when are we as West Maui going to grow up and going to say, you know what? This is not how we should live. We got to figure out how to stop that growth. There is a planning commissioner that unfortunately is on this, has this thing that growth is inevitable, growth is inevitable, that's what she said to me. I wanted to throw up in my mouth when I heard that. It is not inevitable. All it takes is a human conscience to say you know what? I am going to be responsible for me and my community and I am not going to participate in this exponential growth. Frankly, the only people I want to see breathing these days are my Hawaiian friends till we get a population back to more than 50% of Hawaiian blood on this island, you know, I don't belong here, but that's what's right and that's what's just and if those are the last words I say before I die that's my legacy anyway is that that's how I want to live my life. **I'd encourage anybody to stop looking at this and when you are doing this and if its going to be built that word sustainability with the greenwashing, man, if you don't address the growth, it is exactly that, it's just greenwashing and that's what I asked, this road is being built for growth? (51)** Or there's any intention, if that is the last thing I could say to anyone's plan, "oh yeah we are building this to accommodate growth" you are part of the problem, you are not part of the solution at all so I would really encourage you to think about that when you start and look at this project and say "how could we build this to make a sustainable community" and leave it at that, I will stop it at that. Thank you so much.

Nameaaea Hoshino	Aloha My name is Nameaaea Hoshino, long time kuleana families from Lahaina. Was raised in Olowalu as well too with my ohana the Noikaikas. You know, it's very hard to look at this plan because 20 years ago, or more before that, um a hospital could have been built and we are living out the situation right now but with the plans is very sketchy because what is going to be the next plans after this by-pass, this uh road that is being built? Because if you look into developing coming up in Olowalu, I won't support it**. I won't support this because this going be detrimental to our resources especially how much water that should be coming from Olowalu and Ukumehame** you know, **we have families like the Palafox, Tosh ohana's that came to Naiakane and mentioned that their aina is going to be in jeopardy. They gonna have that road that is going to be above them and right now where the highway is right now by Ukumehame is right next to them** and so I know there was talks about it, some of the families did come and mentioned about that and so you know you guys are in a tough spot. **(52)** Like for me, you know, if sea rising coming, it's coming. There's nothing that we can do about it, I'll tell you that because… but if we continue to push this type of thing that is going to hurt us and the next generation yeah, I think we the now having talks about the hospital that's really that's now coming up right now it's really a push back and a slap in our face that that should have been talked about way before this. That should have been talked about. **The hospital should have been talked about because it alleviates all the things that we have here on Maui, we only have one hospital, one hospital, and still, we didn't make the choice of building a hospital in Lahaina** and so that's my concerns and my comments. **(53)**	52 53	**5.4.7** **5.4.1**	51 34

Mark Dicos	Thank you, I don't want to hog the mic here, Mark Dicos again, and uh I mean certainly all the cultural aspects need to be taken into account, I am not an expert in that and hopefully there is an alignment that can mitigate those impacts but um again, this stretch were looking at here, Olowalu it is adjacent to one of our prized possessions, **the Olowalu reef, which has been slated as the number one priority for restoration and protection**. **(54)** It is 1000 acres. It certainly the existing highway is impacting that with the shoreline hardening um but with the realignment, whatever that realignment ends up being, I hope I know there is some discussion with other stakeholders where there could be some added values you are basically making a line across there the biggest threat to the reef there is sediment runoff from brown water, storm water events, so when you run a line across **there you have an opportunity to intercept that and prevent that from reaching the reefs (54 Cont)** so whether that's slowing you know, army core has a tendency to direct that water to a storm water channel as quickly as possible so it shoots out to the ocean. **We know the impacts that has um so if there are opportunities to design it where you're slowing, spreading, soaking that water so the sediment is trapped it then recharges the aquifer which is another huge benefit um to that.(54 Cont)** I just think there's design value to address not just you know, a low impact realignment but to address the stormwater, **possibly a fire break**,**(55)** maybe, you know, some vegetation on that mauka side that can prevent the fires from coming down and um then you know on the makai side, I know that is not your guys purview but **there's been talk about restoring the wetlands down there so those become functional again and I just hope that is part of the big picture when either part of the EIS or part of the design process and those stakeholders that have knowledge, you know, perhaps a private-public partnership so that you can leverage funds in the design so that you can achieve multiple uh benefits, not just uh protecting the drivers.(56)** Thank you	54 55 56	**5.4.7** **5.4.8** **5.4.7**	52 55 49

Ke'eaumoku Kapu	Keamoku Kapu again, um mahalo for all of this um mana'o that is being shared. So, I gone give you one perfect scenario, once the by-pass from um Lahaina Luna to Launiupoko, everybody, commercial industries gone hit the shoreline, so we talking about regenerating the shoreline, I like what uh Dave said because **we got to address the population growth** because we get people coming, not just from Lahaina but more from the other side, yeah, and **they operating surf schools abundantly along the shoreline so how are we going take care of the shoreline if we are going to allow those things to happen? (57)** Once you put in the by-pass most definitely. I see Olowalu, I know what their plans are. They are trying to push the by-pass mauka so that they can privatize the beaches so these are the kind of things that we always get left out, us, all of us, the community, the people that live there, the people that have been living there for generations and we tired of being second class citizens already so bottom line I am letting you know if you guys gone create something**, if that road gone disappear, cause that's the only way that thing is going to ever alleviate any kind of issues and then at the same time again you got to figure out what kind of anomalies you going hit mauka when you start doing the mauka realignment so it's like a double edge blade over here.(58)** You guys got to be real makaala and have some future plans that will be, yeah, like how Mark was talking about, **replenishing the shoreline**. Once this road is put in, watch everybody nail the damn shorelines, everybody. Right now, Ukumehame, they already get one loads of them, you get kayak tours, you get longboards, you get people going in areas they never went before. All [unclear] grounds, all fishing grounds are being destroyed, why? **Because you get people who feel they have the public right to do whatever the hell they like commercially, so if you are going to address these kinds of things, you'll address the population growth, address to figure out how you gone downsize on this.(57 Cont)** A coral study was put together by the county to try to address those issues pertaining to these so called "operation companies" that are derogating our shoreline and nothing has been done yet so it is just a kind reminder, yeah, we looking at the best possible solution for everything but **I see more problems than solutions**, thank you.	57 58	**5.2** **5.4.4**	14 42

Jason Wolferd	Jason again, **looking at your timeline here, you have construction slated at starting 2025, is that correct? (59)** If everything goes as according as planned, how do you view that construction work being done? **Is that going to be started after the by-pass, the north end of the bypass is finished? Because we're going to have to deal with construction there, the construction of the bypass which is supposed to be done, or should have been done long ago (59 Cont)**and still hasn't done yet and I understand that project is shut already and there is supposed to be money for that **so are we going to have to deal with traffic from Ukumehame all the way to the bypass and then as we try to go north to our homes again deal with even more construction and more congestion? (59 Cont)** Has that been taken into consideration in your start plan of the construction? [question can't hear 48:41] That project is supposed to be completed before even [inaudible] the EIS is [inaudible] so why is this project not being done? Now you are jumping ship to another project, but you still haven't finished what you have already started. How are you not finished this project in your timeline? **So, is the funding from the bypass going to be diverted to this? (60)** Is that going to be diverted to this like the new bypass**?** If it is a state law that those funds are used for that, how can those funds be diverted if the state law states what it must be used for? How are you getting around state law? … why is this project not being done?	59 60	**5.4.10** **5.2**	57 15
Sen. McKelvey	My predecessor discussed it before she left, when we passed the rental car tax law was for the Lahaina by-pass north so to say it is completely dead? No, we are definitely, my representative and I are going to be having this conversation Robin at the legislature this session because the Lahaina by-pass north was supposed to be ready to go, I mean, you said the EIS was done, you guys had it on your website a little while ago, before COVID you were looking to put it out for RFP for construction. Now, I understand that we have to deal with the ocean situation but, you know, you can't just simply say "okay well we are not going to do that at all" and you have a hospital you have DHHL Honokowai project you got Pualelehua coming up there so we will defiantly need to have this discussion this session and I have been talking with my colleagues about it and a good representative over here has been as well. So I know we are here for the NEPA, for this but there's no hard decisions being made by the DOT unilaterally okay, with all due respect so because at the end of the day we passed this law in tax and rental cars for specifically like this gentleman said so you can't just simply pull the plug	61 62 63	**5.2** **5.4.7** **5.2**	16 49 9

and Paia by-pass by the way which I know is on the tip on some of the out years doesn't even have any identifiable route, no buy in from the private land owners and I'll just say this for the NEPA record**, you're being really unrealistic if you think you are going to get construction going by 2025, you've got a lot of issues, Keamoku just touched upon some of them already, you've got a cultural issue, the original by-pass this phase here was set back because of the archeological terraces and so you had Brennan Morioka had to sit down with the native Hawaiian community and the had to do a realignment of it and so I think realistically, you know, you're going to have to be more realistic in the timeline.** **(61)** Meanwhile you have a shovel ready, project ready to go and I am going to keep this conversation with our new congresswoman, Tokuda, who took up to Keawe street. All of our growth is occurring up there right now and proposed to go up there. Are we going to tell our beneficiaries for Honokowai lots that no, you are going to have to wait because there is no alternative access potentially for you guys to tie in? I mean, so it's not a done deal I mean I respect the fact that we're here just for this and the NEPA but I want to make it clear from the policy making, the legislature, the house and the senate that, you know, getting the bypass north going has to still continue to be a priority so I appreciate the fact that we're here for this. To get back to the NEPA and this**, I think your timeline is highly unrealistic. I don't think you will be doing construction by 2025. I mean, look at all the agencies that you have to consult with and Keamoku brought up, you are going to have to OHA is going to have to be involved, there's ceded lands on there, (56) it's maybe not in the wetland inventory right now** priority so I appreciate the fact that we're here for this. To get back to the NEPA and this**, I think your timeline is highly unrealistic. I don't think you will be doing construction by 2025. I mean, look at all the agencies that you have to consult with and Keamoku brought up, you are going to have to OHA is going to have to be involved, there's ceded lands on there, (61 Cont) it's maybe not in the wetland inventory right now but if there is potential for wetland restoration, is that going to trigger potentially additional federal permits or lengthening of the time? (62)** So, I mean, I think that as you discuss the alternatives, you should probably look at the fact that to do this project, you may need to piece meal it out, you may need to look at areas on the alternatives that aren't going to be so involved, I mean, you just hit the little bit of the surface today and **then there is the issue of decommissioning the existing road which has been brought up. Are we going to keep the sea walls in place that are causing all of the erosion exasperation, or will there be a plan for removal of the walls and or partial of the road so that eventually you only have one route going on the mauka and not have two roads? If it's not, and you guys are going to be keeping that lower road, what is the game plan for keeping it in use? Is it going to be more sea walls and hardening? (63)** I think that the community is not going to be very happy about that and will want to be consulted so, you now, again, it is the first step for this project alone but, you know, I think that we want to discuss the fact that we've worked hard over the years for the Lahaina by-pass north and we are simply not just going to toss it aside so, appreciate your thoughts, thank you.

Darren McDaniel	Keamoku guys, real quick, and Mark Dicos, it is really a pleasure to put a name to the face because I recognize that mark has been doing a lot of work out there on that reef and I've dived out there a lot and you know, when you talk about taking care of the aina, that's one thing when I look at that road as being a horrible, horrible design from the start. It was so close to the ocean so, if you were to ask me if I am a proponent of moving the road, I actually am um because of the fact you see the break dust, the petroleum. Every time roll over to Ukumehame, how many people see uncle washing his car into the stream? And you see all the uncles is right next door fishing out there, you know like god, you know, it's just heartbreaking, petroleum going in there and just killing off the reef and everything else so I'm a big proponent of moving to road actually, um taking the growth thing and getting off topic out of the equation, which is very relevant mind you, good. It must suck to be in your shoes, I'm so sorry, you guys got one hell of a job over there, let's keep it real, but move the road, but yeah, **why don't you get rid of that purpose of doing it for sea rise and make it 100% about improving the environmental and cultural impact of the lower road. (64)** Just keep it that, our entire intent to move that road is because we want to improve the environmental and cultural impact of that road. Now, that's a tough one, with the cultural impact, that's why I am saying it's hard to be in your shoes, but otherwise, I would like to encourage you guys to consider that. I think that is the right way to go right there, is **do it for the environmental and for the cultural impact, not for the sea level rise**. **(64 Cont)** Just do it for the reasons, for the right reasons. All relevant.	64	**5.2**	17
Ke'eaumoku Kapu	I know you guys talked about funding and all that federal money so, **does that mean that once those monies come in you guys going have to be compliant to the 106 consultation process? And if so, where the party? (65)** Mahalo.	65	**5.4.4**	43
Mark Dicos	Thank you, Mark Dicos again, uh just two questions, one, is **the EIS just going to deal with the realignment or is it going to include the makai portion, like the P2P plan area? (66)** And question number two, just following up on our representatives, uh **is there any plan for the lower road that you can discuss here or alternative plans for the lower road? (67)** Thank you.	66 67	**5.2** **5.2**	18 9

Comments Received Via the Website				
Jennifer Maydan	Thank you for the informative project specific website. I suggest one correction related to the West Maui Community Plan. It was adopted by the Maui County Council and finalized in January 2022. It can be accessed here: https://westmaui.wearemaui.org/ **(68)**	68	**5.2**	19
Terry Lewison	My personal residence is located at 45 Kehalea Place, Lahaina (Ukumehame). **Do you have a map that you can email me in PDF that shows in more detail the potential routes that the State is considering for the highway realignment? (69)** Thank you	69	**5.2**	12
Carter Barto	I live in Pukalani and work in Lahaina, I travel his highway twice a day, 4 days a week. It is imperative that we take action ASAP to **move the portion of the highway inland, preferably the MOST Mauka option**. And **PLEASE make it 2 lanes in each direction (70)** from the pali all the way into Lahaina town, and extend the Bypass north to Kaanapali at least, ideally all the way to the Kapalua Airport. **There are several LARGE new communities planned for West Maui**, **(70 Cont)** one just off the bypass (already under construction) and the even larger community planned for the land Mauka of the Highway in Honokawai**. We NEED to improve our road ways now BEFORE the traffic nightmares ensue from the added traffic these new, and very much needed, communities are built**. **(70 Cont)** Again, beyond moving the highway Mauka, we NEED 4 lanes for the Highway, two lanes is not enough for even the existing usage of the highway during peak tourism seasons, and is a threat to the health and prosperity of all Maui residents and visitors alike. Mahalo for considering these thoughts.	70	**5.2**	20
Nikolaus Nielsen	Hi, I own a farm in Ukumehame. 550 Ehehene, Lahaina, HI 96761. It appears that the purple route will travel right through my property? **Could you tell me what alternative is furthest away from my property boundary? (71) Also what is the plan for the numerous squatters that have built structures in the right of way. (72)**	71 72	**5.2** **5.4.2**	21 37
Raymond Ishii	Aloha. My name is Raymond Ishii and I am the President of the Valley Isle Sports Shooters Club (VISSC). VISSC is one of the original clubs authorized to use the Ukumehame Shooting range and over the last 32 years, our club with the support of the civilian user of the Ukumehame Shooting range has maintained and made many improvements including building the pistol range, **The Ukumehame Shooting range is the only public shooting range on the island and is used by thousands of sportsmen and women every year. (73)** In addition State and County Law Enforcement, and the military also use the range.	73	**5.4.11**	59

	We recognize the need to move the highway inland and we are concerned that such a move may impact or close the range. **The range is located at the beginning of the proposed project and if the plan is to build in the undeveloped area between the existing highway and the rifle and pistol range and not effect range operations.** **(73 Cont)** I believe that would be a reasonable accommodation and most of the shooters would not object to it. **However we have heard rumors that the plan might move the highway closer to the mountain and shut down the range. This is would be very unacceptable to all the sportsmen and women's who use the range as that is the only legal public shooting range on the island.** **(73 Cont)**			
Lily Villarin	I am for moving the highway but please do not move the highway through the firing range. The ukumehame firing range is the only place we can safely practice shooting. **Please do not shut down the firing range.** **(74)**	74	**5.4.11**	59
Tracy Samio	I'm a resident of Maui for the past 22 years, for the past years other firearm owner's and myself have been fortunate to use the Ukumehame Shooting Range. This is the state's only shooting range, I understand that they want to make improvements to the highway, there is room for both the highway and the shooting range. **Please don't make changes that will jeopardize the only existing state shooting range.** **(75)** If the plan is to route the highway through the existing range, please have legitimate ideas of a new location for the shooting range.	75	**5.4.11**	59
James Revells	I have been going to the shooting range for the past 20 years as a member of VISSC. The range is used by the community, MPD and shooting clubs. The area is the only public range that is opened in Hawaii at this time. The range serves as a recreation area for many of the public. **Removal of the range is not an option for many of us. I would like you to take this into consideration as businesses will be affected by its closure as well as the shooting community.** **(76)** Moving the road back 3/4 of a mile will force the removal of the entire shooting complex. I would be in favor of using the plan that calls for moving the road 100 yards inland of the existing road.	76	**5.4.11**	59
James Revells	As I understand it, the County has been sitting on the Federal funds allotted this project for a number of years. I can only imagine how much the costs of doing this improvement have risen during this period, The County's response is to place the road in areas already in use by VISSC, MPD and a trap shooting clubs. Up until a couple of years ago, a lot of people involved in County business didn't know the complex existed even with the large sign posted just off the highway. I've been going to the range for 20 plus years**. To take away the facilities there would take away a valuable space where comraderies happen, friendships formed and recreation is had by all attending.** **(77)**	77	**5.4.11**	59
Bob Schmidt	As Deputy Director of Environmental Management for Maui County, our interface with this project will be Olowalu Transfer Station. Re-entering the highway during heavy traffic can be difficult, especially turning left. **Assuming traffic counts will be done for this intersection and merge lanes might be incorporated as deemed appropriate.** **(78)**	78	**5.4.9**	56

Richard "Dick" Mayer	BACKGROUND: For 34 years I taught economics at Maui Community College from which I retired as a professor emeritus; I have served on the Maui Planning Commission; I was the Vice Chair of the Maui General Plan Advisory committee which formulated the Maui Island Plan; and for many years I was the Maui representative to review Maui environmental documents for the University of Hawaii Environmental Center. RECOMMENDATIONS: I believe the following items should be contained in the Final Environmental Impact Statement for the Honoapi'ilani Highway realignment. 1. The maps in the preparation notice indicate a very conservative 3.2 ft sea level rise. I recommend that in the Final EIS that two additional lines be placed on all the maps to help guide in the selection of a proper Highway alignment. **I would recommend a line ALSO indicating BOTH a 6 ft. and a 10 ft. ocean level rise.** **(79)** Given the fact that a highway of this type is expected to operate at least through the 21st century, it would be wise to locate this major and expensive highway at an elevation that will be safe from sea level rise of more than 3.2 ft. Drawing 3.2' 6' 10' contour lines on ALL the maps, indicating higher sea level rise potential, will guide the selection of a proper alignment more effectively. Lower elevation alternatives can be more easily discarded for further consideration. 2. **The Final EIS should include a right-of-way that would permit a highway with two lanes in each direction**.**(80)** This highway will connect the very important West Maui tourist area (a major State economic resource) to Maui's airport in Kahului. It can be expected that there will be considerably more traffic in the future such than a single lane in each direction would be inadequate. 3. Because this mauka highway will traverse a route that is quite a distance from the existing coastal highway (that will be alternatively purposed) and the coastline, **there needs to be a provision made for connecting roads between the new mauka highway and the coastal highway and coastline every 3 miles.** **(81)** These connecting roads are essential and should become components of the new mauka highway and should be included in the Final Environmental Impact Statement. 4. This very long highway from the Pali to Launiupoko will need to have a number of amenities that should be included as part of the Final Environmental Impact Statement. **The following should be located and described in the Final EIS: Scenic pull-outs and parking for viewing, some picnic spots, rest spots with bathrooms (which may need a water supply), etc.** **(82)** 5. Given the prohibitive cost of creating a fixed-rail route between the airport and the West Maui tourist area**, it is highly likely that at some point (sooner rather than later) a major investment will be made in establishing a better bus system between Central Maui and West Maui.** **(83)** These busses will traverse the entire the entire new highway alignment and therefore it is necessary to indicate at least two or three stops along the way where the busses may be able to pull over safely. Certainly, there needs to be a stop on the highway above the present Olowalu town. Hopefully these recommendations will be helpful in completing an excellent Final EIS.	79 80 81 82 83	**5.2** **5.2** **5.4.7** **5.4.6** **5.3**	2 5 54 48 29

Charles Augustowski	As this project will be taking so long**, I would prefer to see the Lahaina Bypass road completed prior to this construction beginning in 2025** **(84)** which is the earliest time that Consgtruction is hoped to begin. Completing the Lahaina Bypass road would save lives as well as money with reduced accidents (and potential death), especially on and at the intersection of Keawe and Honoapiilani Highway and the heavily traveled part of the highway between Lahaina and Kaanapali. I beg you to please guide the completion of there Lahaina Bypass NOW (restoring funding) before we see more accidents resulting in people being seriously hurt.	84	5.2	20
Mahesh Cleveland	Aloha, As detailed in the Earthjustice comment letter emailed to Ms. Genevieve Sullivan on December 23, 2022 (which cannot be attached via this public comment portal), Earthjustice submits the following scoping comments on the environmental impact statement ("EIS") for the proposed Honoapiilani Highway Improvement project for West Maui, Ukumehame to Launiupoko ("Project").	85	5.4.1	35
	Under both federal and state environmental review laws, **the EIS for the Project must analyze the growth-inducing indirect effects of facilitating development or other changes in the pattern of land use caused by increasing traffic capacity through the Project area and realigning the highway mauka.** **(85)** The EIS must specifically consider how realigning and widening the highway would allow for development in Olowalu Town along the lines of the development considered in the 2015 Olowalu Town Plan FEIS.			
	Please refer to Earthjustice's emailed comment letter for further details and discussion, including factual and legal citations. Mahalo, Mahesh Cleveland, Earth Justice			
Comment Letter – Maui Tomorrow Foundation (12/20/22)				
Albert Perez	**Comment:** Maui Tomorrow is pleased to provide the following comments on the subject EISPN. We also request that we be considered a Consulting Party on this matter.			
	1. **The EIS should take into account the latest projections for sea level rise, and should not restrict itself to a 3.2 foot sea level rise scenario.** **(86)** It is our understanding that the latest models show a comparable prediction of 8 feet of rise by the year 2100.	86	5.2	2
		87	5.4.7	49
		88	5.2	3
	2. **The EIS needs to evaluate the costs and impacts of underestimating the amount of sea level rise.** **(86 Cont)**	89	5.2	9
		90	5.3	29
	3. **Wetlands, contributing watersheds, and drainage facilities need to be surveyed, mapped, and discussed in the EIS.** **(87)**	91	5.4.1	35
		92	5.2	10
	4. As the sea level rises, existing wetlands will need room to move mauka, or their functions may be compromised. **The EIS should evaluate the possibility of providing mitigation by acquiring land for mauka migration of wetlands.** **(87 Cont)**	93	5.4.3	39
		94	5.3	26
		95	5.2	17
	5. T**he EIS should weigh the costs and impacts of including a bikeway and beach recreational areas, as well as access to both along the highway.** **(88)**	96	5.4.7	53
		97	5.4.1	36

6. **The EIS should weigh the pros and cons of leaving the current highway in place. (89)** Specifically, the EIS should discuss the likelihood that if left in place, the existing highway may eventually function as a hardened shoreline, with consequent impacts including loss of beaches. This is extremely important, because most of the West Maui coastline is federally designated critical habitat for the endangered Hawaiian Monk Seal. See the following links for more info: (https://www.fisheries.noaa.gov/species/hawaiian-monk-seal) and (https://media.fisheries.noaa.gov/dam-migration/monk_seal_ch_maps.pdf)

7. **The EIS should address the possibility of providing 3 travel lanes, with one lane used for mass transit such as buses, and with mass transit vehicles being given priority signaling through the Pali tunnel. (90)** The EIS should discuss the possibility that this alternative may increase the attractiveness of using mass transit as a travel option through this transportation corridor.

8. **The impact on land use in the area makai of the new highway needs to be addressed. The degree to which each alternative may induce and/or facilitate development needs to be thoroughly analyzed. (91)**

9. **The EIS should address impacts on the presence of police and conservation officers in the area makai of the highway**. **(92) This area needs to be kept accessible to fishers, surfers and other shoreline users**. **(93) It also needs to be kept safe from criminal activity. Environmentally damaging activities such as dumping of cars and litter need to be prevented, (92 Cont)** and the area needs to be kept free of development so that it is ready to accommodate sea level rise. **(93)** The EIS needs to discuss each of these issues in the context of each of the alternatives.

10. **The EIS should look at the possibility of using some elements from different alignment alternatives**. **(94) The recommended alignment should not be based solely on avoidance of sea level rise, but should take into account land rights, including the interests of the heirs of allodial title holders; cultural sites, cultural access, and cultural practices; and recreational and residential access. (95)**

11. The EIS should address more than the runoff generated by the highway itself. **The EIS should explore the opportunity to coordinate with mauka landowners on projects that can mitigate drainage impacts from areas mauka of the highway. The EIS should also address the consequences of failing to undertake such coordination (96)** - a situation that currently exists, as is evidenced by clogging of Hawaii DOT drainage infrastructure with silt and debris whenever intense storms occur; this situation reduces the effectiveness of said drainage infrastructure, and may cause damage to the roadway itself when water is forced to find other ways around it.

12. The EIS should address the plan's adherence to the West Maui Community Plan and the Pali-to-Puamana Plan of 2005. **(97)**

Comment Letter –Earth Justice (12/23/22, see attached original letter for full text)				
Mahesh Cleveland	**Federal and state law require that environmental review for the Project analyze the growth-inducing impacts of realigning and widening Honoapi'ilani Highway, including the potential for the Project to facilitate development along the new transportation corridor. (97)**	97	**5.4.12**	60

	In November 2015, notice of a final environmental impact statement ("FEIS") for the Olowalu Town Master Plan ("Olowalu Plan") was published in The Environmental Notice. The Commission voted 6-to-1 in favor of rejecting the FEIS. The Commission noted that the FEIS's traffic impact assessment report was based on widening the Honoapi'ilani Highway, but it was unclear whether HDOT's and FHA's highway realignment project would involve widening. (98)	98	**5.4.1**	33
	Seven years later, HDOT and FHA have resumed plans to realign the Honoapi'ilani Highway, including near Olowalu Town. **Although one of the EISPN's stated objectives is to have "sufficient right-of-way width to accommodate a future four-lane facility throughout the project limits," the EISPN makes no mention of how any of the realignment routes and road widening under consideration could impact growth and development, including in Olowalu Town. (99)**	99	**5.2**	5
	Under NEPA and HEPA, the scope of environmental review for the Project should encompass the indirect effects of realigning and widening Honoapi'ilani Highway, including the potential for the Project to induce growth and facilitate development, for each of HDOT's proposed alternatives. (100)	100	**5.4.12**	60

Comments Submitted Via MetroQuest Poll (Online)				
	The project area is rich in cultural history, contains many important archaeological sites, and ongoing cultural practice continues. The project needs to carefully consider these factors, and needs to avoid, minimize and/or mitigate impacts to these important resources and practices.	MQ1	5.4.4	42
	I think secondary objectives should include: 1) to help preserve and restore the natural shoreline along this stretch of coastline; 2) to help mitigate brownwater events originating from the mauka side of the new highway to help protect and restore the Olowalu Reef; and 3) to support the availability of alternative modes of transportation.	MQ2	5.2	22
	Reliable transportation is vital. However, so is preserving our natural environment, including our beaches, oceans, mountains. Please also consider the preservation of the original families who reside in these neighborhoods.	MQ3	5.2	23
	It is important to look at multiple functions for the new highway so in addition to moving cars safely, it could also slow/soak/spread stormwater on the mauka side of the highway to recharge the aquifer and protect the reef, it can provide a fire break for fire coming from mauka, maybe with fire proof vegetation such as wiliwili trees, and can also facilitate a means of alternative transporation such as bikes and scooters (working in alignment with the West Maui Greenway Project).		5.2	24
	The pros and cons of night work should be discussed.	MQ5	5.4.10	58
	Perhaps covered under water resources but want to make sure the this also includes marine water resources (flora, fauna, and coral reefs) since everything mauka affects makai.	MQ6	5.4.7	52
	Mass transit should be seriously examined since this realignment won't do much to reduce existing traffic issues, addressing ways to reduce the number of cars transiting must be evaluated.	MQ7	5.3	29

Honoapi‘ilani Highway Improvements Project,
West Maui: Ukumehame to Launiupoko

Scoping Report

Appendix 3: Environmental Impact Statement Technical Chapter Approach

May 2023

Prepared For
Honoapi‘ilani Highway Improvements

Prepared For
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Contents

Acronyms

ACRONYM	DEFINITION
ALISH	Agricultural Lands of Importance to the State of Hawai‘i
APE	Area of Potential Effect
DLNR	Department of Land and Natural Resources
Draft EIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
GHG	Greenhouse gases
HDOT	Hawai‘i Department of Transportation
HRS	Hawai‘i Revised Statutes
LCA	Land Commission Awards
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standards
SHPD	State Historic Preservation Division
SMA	Special Management Areas
TNM	Traffic Noise Model
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

1. Environmental Analysis Approach and Methodology

The environmental review will assess potential direct, indirect, and cumulative effects of the Project. Federal Highway Administration (FHWA) and Hawaiʻi Department of Transportation (HDOT) will use established methodologies and approaches to the impact assessment for each technical impact assessment area. These are described in the following sections, including a determination of study areas, applicable regulatory requirements, and criteria for identifying potential environmental and cultural impacts in the Draft Environmental Impact Statement (Draft EIS). Methodologies will be further detailed and refined as appropriate in the corresponding assessments within the Draft EIS.

1.1 LAND USE AND CONSISTENCY WITH RELATED GOVERNMENTAL PLANS, POLICIES, AND REGULATIONS

1.1.1 Land Use and Zoning

The study area generally consists of agricultural, open space, rural residential, and state conservation land uses. The Honoapiʻilani Highway Improvements Project (the Project) could intersect with two residential subdivisions—Olowalu and Ukumehame, with 34 and 45 lots, respectively. In both locations, roads and infrastructure are partially completed and some lots have been developed. The Olowalu subdivision includes a greenway, archaeological buffer easements, and the creation of the Olowalu Cultural Reserve. The Ukumehame subdivision also includes an archaeological buffer easement.

The analysis will map and describe existing land uses and zoning within a study area where realigned roadways may be located (as well as areas immediately adjacent). Reasonably foreseeable changes in land use and zoning within the study area, overall consistency and potential adverse effects of the Project with land use and zoning will be assessed. This will include future access to uses and properties with the proposed realignment. Public scoping comments indicate a community concern for the potential of new development makai of a highway alignment. The assessment will evaluate the potential for future land use changes based on an alternative alignment.

1.1.2 Plans, Policies, and Regulations

The analysis will also assess consistency with the following related governmental plans, policies, and regulations:

- Maui County's 2005 Pali to Puamana Parkway Master Plan
- Maui County's 2022 West Maui Community Plan
- Maui Metropolitan Planning Organization's (MPO) Hele Mai Maui Long-Range Transportation Plan 2040 (2019)
- West Maui Greenway Plan (September 2022)

- Hawai‘i State Coastal Zone Management Objectives (Chapter 205A of the Hawai‘i Revised Statutes [HRS]).

1.1.3 Farmlands and Ranching

Agricultural Lands of Importance to the State of Hawai‘i (ALISH) are located throughout the project area. “Prime” agricultural lands (defined by ALISH) are located in Ukumehame to the southeast and Luaniupoko to the northwest, with a small portion located along the shoreline area in Olowalu. “Other” agricultural lands (defined by ALISH) are located in the Olowalu area and along the coastal areas between Ukumehame and Olowalu. Historically, Launiupoko, Olowalu, and Ukumehame contained large-scale sugar cane agricultural production from the late 1800s until 1998 and while sugar cane is no longer grown in these locations, there are many other small-scale operations throughout the region. In adjacent areas outside the project area, there are also several agricultural resources in Olowalu and Ukumehame located farther mauka, which would be expected to be largely unaffected by the Project. The EIS will identify these areas and describe their relationship to the Project’s alternative alignments.

The analysis of farmland and ranching will involve field verification of the locations of active agricultural uses within the project area. Once the locations of active agricultural uses are identified, the analysis will determine where and how much agricultural area has the potential to be affected or displaced by the Project. As part of this analysis, the project team will coordinate with potentially affected facilities to understand the agricultural operations, strategize methods to minimize impacts, and identify mitigation measures as appropriate. The EIS assessment will also summarize the findings of the Project’s potential effect or consistency with the Farmland Protection Policy Act, based on the U.S. Department of Agriculture’s review of the information provided in its NRCS-CPA-106 form.

1.1.4 Key Assessment Measures

- Potential effects on existing land uses, including changes to accessibility
- Consistency with related plans and policies
- Effects on active agricultural uses by number of farms and total area affected and consistency with the Farmland Protection Policy Act

1.2 LAND ACQUISITION, DISPLACEMENT, AND RELOCATION

The project area contains both public and privately owned property. The County of Maui generally owns the land on the mauka side of the existing Honoapi‘ilani Highway between Ukumehame and Launiupoko. The County of Maui owns the Ukumehame Firing Range and the State of Hawai‘i (Hawai‘i National Guard) owns the parcel just north of the facility. HDOT owns the sedimentation basin that abuts the existing highway and firing range property. State-owned lands are predominantly mauka of privately owned lands in the study area leading into the West Maui Natural Reserve. Privately owned land is located along either side of the existing highway in Olowalu and the areas of the existing Olowalu and Ukumehame subdivisions.

While the Project would use State of Hawaiʻi and County of Maui-owned lands to the maximum extent practicable, some permanent easements or acquisition of privately owned property is expected. The acquisition of privately owned property could result in displacement or relocation of residents and businesses. Each alternative analyzed in the Draft EIS will be evaluated for the number lots and overall land area and land use affected by acquisition requirements. The analysis of land acquisition, displacement, and relocation will comply with the Federal Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601) as well as Hawaiʻi's eminent domain requirements (HRS § 101-2).

The extent of acquisition required will be described for each affected tax parcel. The analysis will identify the current use of each property, the estimated number of residents or employees associated with each property, and its assessed value if available. GIS data will be used to the extent practicable, with confirmations obtained through field verifications and through correspondence with Maui County, as necessary.

1.2.1 Key Assessment Measures

- Number of required state, county, and private parcels affected
- Number of full takings or partial takings and easements
- Number of residents and employees potentially affected

1.3 PARKLANDS AND RECREATIONAL RESOURCES/BEACH ACCESS

Publicly accessible beaches are located along the shoreline within the project area with limited areas for parking along the existing Honoapiʻilani Highway. In addition, the County of Maui operates the Ukumehame Firing Range, which is in the project area. Regional plans, including the 2022 West Maui Community Plan and the 2022 West Maui Greenway Plan, identify objectives to improve recreational access to the shoreline within the project area.

The analysis of parklands and recreational resources will include the mapping and descriptions of the current shoreline beach and park resources as well as any short- and long-term planned changes to open space resources in the project area. The assessment will determine consistency of the Project's alternative alignment with existing and future recreational access. The analysis will also include the Project's potential to adversely affect access to or use of the identified existing and proposed open space resources within the project area. As suggested by several commenters, access to beaches will be described in the context of the future jurisdiction and use of the existing highway.

Potential impacts to parklands and recreational resources will be identified in the EIS and mitigation measures would be determined, as appropriate.

1.3.1 Key Assessment Measures

- Effects on access to existing beaches and recreational resources

1.4 ARCHAEOLOGICAL AND HISTORIC RESOURCES

The project area contains archaeological and historic resources, including mapped archaeological sites, the Olowalu Petroglyphs, and remnant plantation infrastructure and landforms. Several Land Commission Awards (LCA) properties are also located throughout Ukumehame and Olowalu; LCAs are indicators of pre-contact settlement and the potential to encounter archaeological resources located throughout Ukumehame and Olowalu.

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. As defined in the Section 106 regulations, historic properties include "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places" (36 CFR §800.16(l)(1)). Similarly, effects on historic and archaeological resources need to be assessed for State of Hawai'i actions pursuant to HRS Chapter 6E-8.

The archaeological and historic resources assessment for the EIS will be conducted in accordance with the requirements of Section 106 and 6E-8 and will include consultation with the Hawai'i State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation, Native Hawaiian Organizations, and Consulting Parties. In coordination with the SHPD, Consulting Parties invited to participate will be provided opportunities to participate through meetings, review of documents, and written comments. This includes input on the identification of historic and cultural resources, the assessment of effects, the consideration of measures to avoid, minimize, or mitigate adverse effects, and the development of a Programmatic Agreement to define the areas of evaluation and the mitigation protocol to be followed.

The analysis will first establish an Area of Potential Effect (APE) for the assessment of potential direct and indirect effects on archaeological and historic resources (the APE will be presented to SHPD for concurrence). The APE establishes the area for the identification of historic properties. Areas that may be subject to direct in-ground disturbance are broadly defined as the areas within or adjacent to an alignment. Any area where historic and archaeological resources may be indirectly affected through changes in setting or changes that would diminish their historic integrity will also be accounted for.

The assessment of all project alternatives will be based on the completion of Archaeological Literature Review Study, Ethnographic Study, and a surface-level reconnaissance of the alternative alignments identifying and describing known or potential cultural resources and architectural historic resources. As required, the Chapter 6E project area will be defined, and subsurface Archaeological Investigation Studies will be undertaken, for the Preferred Alternative when it is identified (on publication of the Draft EIS). The assessment will identify potential direct (i.e., demolition, alteration, or potential damage from construction) or indirect (i.e., the introduction of visual, audible, or atmospheric elements) that may alter the characteristics of any identified historic property that is, or could, qualify for inclusion in the National Register of Historic Places.

1.4.1 Key Assessment Measures

- Potential direct and indirect adverse effects on archaeological and historic resources.

1.5 CULTURAL RESOURCES AND PRACTICES

The project area contains several LCAs along the coastal areas and within the mauka inland areas. Early coordination initiatives with Native Hawaiian Organizations and community leaders have identified these areas, and engagement will continue throughout the environmental review process. The Project will avoid the Awalua Cemetery located north and west of the Olowalu Stream. Based on early coordination, in addition to archaeological and historic resources, cultural resources and practices of significance were identified with respect to surface waters (Olowalu Stream and Ukumehame Streams), farmland, shorelines and water access, and wildlife resources (i.e., oʻopu migration). Building off these assessments, a Cultural Impact Assessment will be prepared for this assessment, which will use information from the Ethnographic Study and the broader Section 106 consultation as appropriate. Potential effects of the project alternatives will be evaluated and compared as part of the determination of a Preferred Alternative. Potential mitigation measures for cultural resources and practices will be identified and integrated into the Programmatic Agreement to complete the Section 106 review as well as any final agreement requirements generated by the HRS 6E process.

1.5.1 Key Assessment Measures

- Potential direct and indirect adverse effects on cultural resources and practices

1.6 VISUAL AND SCENIC CHARACTER

The project area is in a scenic corridor with coastal views toward Kahoolawe and Lanai Islands and views toward and into the West Maui mountains. The area along the coast is more vegetated while there is a more open and arid visual character as elevation increases mauka of the coastline.

With the Project, portions of the highway along the coast will be elevated or realigned within the project area, which will influence viewsheds to or from visual resources compared with the existing coastal alignment of the existing highway. The more makai alignments will be lower in elevation and in a more vegetated area. Mauka alignments are anticipated to be more visible from all areas at a similar or higher elevation and from longer viewpoints toward the project area, including from offshore. These distant viewpoints will be a consideration for many of the cultural sites located in the project area, including navigation/wayfinding cultural practices for voyaging canoes.

Visual and scenic character assessment will be based on U.S. Department of Transportation's *Guidelines for the Visual Impact Assessment of Highway Projects* (January 2015). The existing visual character and quality of the affected environment, as well as the viewer response to those resources, will provide the framework for assessing the change in visual character as a result of the Project. Major viewer groups and different levels of sensitivity will be evaluated, such as travelers using the highway as well as views from public places such as coastal beaches and public trails.

The identification of an appropriate study area will include the area within visual range of project elements, accounting for topography, vegetation, and obstructing structures. The analysis will describe the visual character of the project area and study area, aesthetic/visual resources and viewer groups,

key views for the visual assessment; and visible components for each of the project alternatives. Aesthetic design considerations and an assessment of the visual impacts of the project alternatives will also be described. Potential impacts to the visual and scenic character and mitigation measures will be determined, as appropriate. Visual simulations will be prepared to show the roadway alignment alternatives within the context and setting of the project area.

1.6.1 Key Assessment Measures

- Adverse effects on viewsheds from public use vantage points within the project area

1.7 WATER RESOURCES, WETLANDS, AND FLOODPLAINS

Three primary streams are located within the project area—Launiupoko, Olowalu, and Ukumehame streams—as well as other surface waterbodies. The Project's alternative alignments will cross all three primary streams. In addition, according to the U.S. Fish and Wildlife Service Wetland Mapper, small, isolated wetlands may exist in the project area. These include human-made features such as the irrigation infrastructure and the HDOT retention basin adjacent to the Ukumehame Firing Range and Pāpalaua Wayside Park. Additional wetland areas may be found adjacent to the existing highway where it impedes stormwater flow. Portions of Honoapiʻilani Highway are located in flood-prone areas, as defined by the Federal Emergency Management Agency. Some flood zones extend inland along stream corridors or low elevation areas. The Project's temporary construction effects and permanent stormwater management could have the potential to affect localized and project area drainage patterns.

The analysis of water resources, wetlands, and floodplains will identify, map, and describe primary streams and tributaries, ditch systems, wetlands and other "Waters of the U.S." consistent with 33 CFR 328.3(b) that the Project could affect. The analysis will require fieldwork to be conducted to identify and delineate wetlands that may be affected, and delineation will be done in coordination with state and federal resource agencies. The analysis will also identify, map, and describe existing and future flood-prone areas. A new roadway could affect regional drainage patterns; therefore, the analysis will examine the potential impact of each of the alternative alignments on the project area's hydrology, drainage, and flood conditions. The analysis will include an evaluation of project effects on existing stormwater management and sedimentation conditions as well as future conditions in terms of temporary construction effects and permanent operations, particularly stormwater management. This analysis will be coordinated with the analysis of the Coastal Zone Management Act and Hawaiʻi Special Management Areas (Section 4.3.20).

1.7.1 Key Assessment Measures

- Identified potential adverse effects on water resources, wetlands, and floodplains
- Identified potential adverse effects on hydrology, drainage, and flooding

1.8 FLORA AND FAUNA, ENDANGERED SPECIES

The project area contains a mix of habitats but is characterized primarily by its high level of historic disturbance by prior agricultural uses. Although the project area could contain both threatened and endangered plant and animal species, most of the flora and fauna are invasive. Stream crossings may require in-water disturbance during construction, which could affect habitat for aquatic species. Additionally, stakeholders have indicated that run-off sediment could affect coral reefs after storm events.

The analysis of flora and fauna and endangered species will include preparing technical reports on biological resources to characterize the ecology of the project area. The analysis will include an assessment of protected species (e.g., botanical resources, terrestrial animals, and birds) and the potential for the Project to result in an adverse effect on these resources. A botanical survey and wetland study will be prepared to identify vegetation types and plant communities within the project area. FHWA and HDOT will consult with the U.S. Fish and Wildlife Service (USFWS), and the National Oceanic and Atmospheric Administration will be coordinated with in accordance with Section 7 of the Endangered Species Act, as well as the State of Hawai'i Department of Land and Natural Resources (DLNR). If applicable, mitigation measures will be identified and coordinated with USFWS. As recommended by the DLNR as part of the agency coordination and outreach, the EIS assessment will also solicit the input of marine management stakeholder organizations, including Maui Nui Marine Resource Council, The Nature Conservancy of I Marine Program, and the Maui Nui Makai Network.

1.8.1 Key Assessment Measures

- Identified potential adverse effects on threatened and endangered species
- Identified potential adverse effects on ecological habitats

1.9 GEOLOGY AND SOILS

The project area contains a wide range of topography—from coastal areas with relatively flat terrain to steeply sloped hillsides with gulches and ravines. Prior agricultural uses within the surrounding area have resulted in extensive soil disturbance and grading, including the presence of large push-piles.

The analysis of geology and soils will summarize overall characteristics of the project area, including topography, geologic conditions and hazards, and soil mapping. The analysis will use information contained within other EIS sections, including natural hazards, flora/fauna/threatened and endangered species, and farmlands/ranching. The Project's alternative alignments will be assessed for potential adverse effects on the underlying geological characteristics or where geographic hazards affect roadway design or alignment feasibility.

1.9.1 Key Assessment Measures

- Identified potential adverse effects on underlying geological characteristics

1.10 NATURAL HAZARDS

All the Project's alternative alignments will be susceptible to earthquakes, while the most makai alignments will be more susceptible to tsunami. The Project will relocate portions of the highway in new areas, potentially creating new wildfire hazards based on proximity of relocated roadway traffic (i.e., sparks and heat from vehicles, new trash and still burning cigarettes and matches), particularly where alignments are located in more arid environments compared to existing coastal highway alignment.

The analysis of natural hazards will identify and map flood zones and tsunami inundation areas and determine seismic zones within the project area. The alternative alignments of the Project will then be evaluated for their susceptibility to natural hazards. All alternative alignments of the Project would be designed consistent with applicable construction codes to increase resilience to natural hazards to the extent practicable. These design considerations will be described in the analysis of natural hazards.

1.10.1 Key Assessment Measures

- Alignment avoidance of natural hazard delineations
- Identified potential adverse effects on or adjacent to alignment alternatives

1.11 COASTAL ZONE MANAGEMENT ACT, HAWAIʻI SPECIAL MANAGEMENT AREAS

Coastal Zone Management includes the consideration of recreational uses, historic resources, open space resources, coastal ecosystems, economic use, coastal hazards, managing development, coastal non-point pollution control, beach protection, marine resources, and public engagement. Hawaiʻi Special Management Areas are mapped throughout the project area coastline with some minor inland extensions across the existing highway. The Project's alternative alignments will relocate portions of the highway more inland, minimizing coastal exposure and potential adverse effects for Coastal Zone Management or Special Management Area reviews and approvals. Coastal erosion and sediment loading concerns identified by stakeholders and comments generated during scoping will also be addressed as part of these applicable reviews and approvals for the Project. The EIS will identify and describe the state and federal regulatory basis of Coastal Zone Management and Special Management Areas, including the procedural requirements associated with review and approval of the Project, such as a requirement for a certified coastal survey.

1.11.1 Key Assessment Measures

- Consistency with Coastal Zone Management policies
- Extent of Special Management Area permit requirements and potential impacts

1.12 CLIMATE CHANGE AND SEAL LEVEL RISE

The Project is designed to allow for a realigned roadway that improves resilience to anticipated 3.2 feet of average sea level rise within the Sea Level Rise Exposure Area (SLR-XA). The alternative alignments will be partially within the SLR-XA and will require design accommodations and assessment of resulting potential adverse environmental and community effects. As noted in comments during the public scoping period, the EIS will describe the SLR-XA in terms of the amount and mapping of inundation zones from sea level rise by the ranges established in the SLR-XA analyses and present the basis for using the 3.2 feet average sea level rise as the applicable standard for roadway design.

The analysis of climate change and sea level rise will establish background and basis for the overall project, including the documented vulnerability to coastal hazards from erosion and flooding. Technical documentation will be developed in coordination with resource agencies and HDOT to incorporate the current applicable data and regulatory guidance into the assessment. The alignments and design for alternatives will then be assessed for their ability to avoid and minimize risk from SLR-XA exposure zones based on the 3.2 feet average sea level rise. Effects of higher sea level rise scenarios will be qualitatively assessed.

The relationship of climate change and sea level rise with other coastal and natural resource evaluations will be identified and carried through all impact assessments presented in the EIS.

1.12.1 Key Assessment Measures

- Percentage of alignment out of SLR-XA 3.2 feet average seal level rise mapped area
- Potential effects on alignment with sea level rise greater than 3.2 feet assessed by creating a 6-foot SLR-XA sea level rise mapped area (based on other precedent recommendations)

1.13 TRAFFIC, RIGHT-OF-WAY, PEDESTRIANS/BICYCLES

The Project's alternative alignments will create a viable transportation route in light of SLR-XA estimated sea level rise. While starting with one moving lane in each direction, the Project will be designed to provide right-of-way for a future four-lane configuration. A future four-lane configuration would not in itself generate an increase of trips compared to the No-Build Alternative traffic volumes because regional travel demand would not change based on a new alignment. The Project will require new intersections (or roundabouts) with key cross streets and connections to existing homes and businesses. The location and provision of pedestrian and bicycle infrastructure would be developed in coordination with stakeholders.

The transportation analyses will consider the system of moving people and goods from place to place. It will include various modes of travel (i.e., cars, buses, trucks, bicycles, and walking) that work collectively to get people and goods to their destinations. The transportation analysis in the EIS will assess the individual modes of travel in the study area to determine whether project alternatives would hinder the safe or efficient movement of people and goods. The EIS will consider both the local and regional effects of project alternatives on transportation.

Regional travel patterns are important in understanding the need for the Project and are the basis for anticipating and designing for future travel demand as well as for projecting regional vehicle emissions and their resultant effects on air quality. Travel projections will be consistent with those provided by the Maui MPO and other sources that provide a common base for future projections throughout the island. No non-transportation actions are associated with the Project, which will limit the Project's effect on regional long-term travel demand.

Local travel patterns are important in understanding the effects of mobility in the immediate project area. The assessment of potential effects on local travel patterns will focus on individual intersections and their capacity to process a projected volume of vehicles (i.e., cars, buses, and trucks) as well as pedestrians and cyclists. Methods documented in the *Highway Capacity Manual*, developed by the Transportation Research Board, are typically used to evaluate existing and projected local traffic conditions.

The following steps will be undertaken to prepare the transportation analysis in the EIS:

- Establish the regional and local transportation study areas:
  - The regional study area will include areas under the jurisdiction of the Maui MPO to provide inputs pertinent to the air quality analysis (see Section 4.3.13).
  - The local traffic study area will include highway segments and local streets where modifications are proposed or where traffic patterns may change as result of a project alternative.
- Coordinate with Maui MPO and HDOT to project regional travel patterns and conditions for the 2045 analysis year based on the Maui MPO's Travel Demand Model.
- Collect traffic data (volumes, speeds, vehicle types, pedestrian and cyclist volumes, and highway geometric features) at key locations within the local study area.
- Collect traffic safety data and map high incidence locations (number and type vehicular and pedestrian accidents including, property damage, injuries and fatalities, and road closures).
- Identify planned improvements for transportation in the regional and local study areas that are expected to occur with or without the project.
- Assess traffic operations in the existing, future No-Build Alternative, and Build Alternatives conditions for the analysis years.
- Assess existing pedestrian and bicycle facilities in proximity to the Honoapiʻilani Highway.
- Identify any locations where traffic impacts may occur as a result of project alternatives and develop reasonable measures to mitigate these impacts, as applicable.
- Identify connectivity and mobility enhancements of the Build Alternatives and describe their potential to improve vehicular, pedestrian, and bicycle circulation.

1.13.1 Key Assessment Measures

- Disruptions to continuous access to existing properties and uses
- Changes in traffic flow and levels of service
- Ability to improve transportation safety

1.14 AIR QUALITY AND ENERGY

Air quality is characterized by levels of certain pollutant gases or microscopic particles. The U.S. Environmental Protection Agency (USEPA) has set National Ambient Air Quality Standards (NAAQS) for six air pollutants (i.e., carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide) of concern to our nation's air quality. In addition to NAAQS, emissions of other pollutants from vehicles (known as mobile source air toxics, or MSATs) are also often considered for large transportation projects. All of Maui is considered in attainment for key criteria pollutants, and this status will be confirmed as part of the EIS assessment.

On a regional basis, travel demand and overall number of vehicles or miles traveled would not change based on the Project, so air pollutant concentrations are not anticipated change as a result of the Project. Similarly, energy consumption is not anticipated to materially change as a result of the Project.

However, while the Project would not change regional travel demand, realignment of the highway could place vehicles farther or closer to existing or planned sensitive locations such as residencies. Therefore, realignment could change the level of traffic-related emissions at nearby sensitive receptors.

The air quality analysis for the EIS will identify whether implementation of project alternatives would result in any potential exceedances of NAAQS or any substantial increases or decreases in air pollutant emissions. If any potential exceedances of the NAAQS are identified in the analysis, further analysis will be conducted.

The air quality analysis will include a largely qualitative mesoscale emission analysis for the defined project area and may also include a microscale or local analysis if it is determined that the project may result in localized exceedances of the NAAQS based on changes in traffic volumes. The mesoscale analysis will evaluate the net change in emissions associated with the Project, stemming from the projected changes in speed, vehicle miles traveled, and roadway type and configuration, as applicable. Emission rates developed using EPA's MOVES model will be used for any quantitative emissions assessment conducted. If required, microscale analysis for carbon monoxide and particulate matter will be conducted according to the USEPA's *Guideline for Modeling Carbon Monoxide From Roadway Intersections* and *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas*, respectively.

In addition, the air quality and energy analysis will include an assessment of greenhouse gases (GHG) performed in accordance with the Council on Environmental Quality's National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change. GHGs include a variety of chemical compounds in the earth's atmosphere that absorb and re-emit heat, which warm

the planet. However, an overabundance of these gases contributes to an over warming of the planet and to global climate change. The energy analysis prepared for the EIS will include an assessment of the Project's potential energy consumption and GHG emissions determined by the change in vehicle speeds and miles traveled due to each project alternative, although, as noted previously, there is no anticipated change in overall travel demand as a result of the Project. Additionally, the analysis will address direct and indirect energy consumption during construction (i.e., energy required to produce and transport construction materials).

1.14.1 Key Assessment Measures

- Qualitative assessment of mesoscale effects and GHG emissions
- Potential quantitative assessment of mesoscale or microscale effects

1.15 NOISE

The existing Honoapiʻilani Highway is immediately adjacent to beaches and recreational resources and close to several residential and commercial uses in Olowalu. While the Project would not independently increase traffic volumes, realignment of the highway could place vehicles farther or closer to existing or planned sensitive locations such as residences and cultural resource areas. Therefore, realignment could change the level of traffic-related noise at nearby sensitive receptors.

Noise, or unwanted sound, is an important consideration for highway projects. Per FHWA's implementing regulations (23 CFR Part 772), the Project is classified as a "Type I" noise project and thus requires an analysis of traffic noise.

The following steps will be used to assess noise in the EIS:

- Establish study area: The areas and associated activities (i.e., land uses) in proximity to the project area that could potentially be affected by realignment will be identified.
- Measure existing noise levels and perform simultaneous traffic counts at up to six representative sample of noise-sensitive receivers (up to three along the existing highway alignment and up to three locations where realignment may occur).
- Establish future traffic noise levels for the alternative alignments using FHWA's Traffic Noise Model (TNM).
- Identify any sites where a noise impact could occur based on the results of the TNM.
- Where traffic noise impacts would occur, evaluate abatement measures and determine whether they are reasonable and feasible.
- The anticipated need for Hawaii Community Noise Permits and Variances will be identified and described.

1.15.1 Key Assessment Measures

- Modeled and adverse changes in noise levels at receptor locations
- Amount of noise mitigation required

1.16 INFRASTRUCTURE AND UTILITIES

Generally, the project area contains limited infrastructure and utilities in terms of public water and sewer as well as other utilities such as gas, energy, and telecommunications. Local electrical distribution and regional transmission lines traverse the project area. Possible relocation of utilities and infrastructure as part of the new roadway are anticipated and will be described in the EIS. The analysis of infrastructure and utilities will inventory existing and planned infrastructure within the project area. For each alternative, the EIS will evaluate and determine potential effects including requirements for relocation or substantial changes to existing or planned infrastructure.

1.16.1 Key Assessment Measures

- Extent of type of utility relocation required
- Disruption of planned infrastructure and utility improvements

1.17 HAZARDOUS MATERIALS AND TOXIC SUBSTANCES

The realignment alternatives identified for the Project have some level of potential to disturb or expose hazardous materials present within the project area from prior agricultural uses as current and historic uses. The alternative alignments will have a similar alignment outside the active shooting area of the Ukumehame Firing Range, thereby minimizing potential risk of disturbing contaminated soils from the firing range. Additionally, the alternative alignments will have the same or similar alignment in the area of the former landfill and existing recycling center.

As defined by the Resource Conservation and Recovery Act of 1976 (42 USC § 1609 et seq.), a hazardous waste or contaminated material is a solid, liquid, or gas that—because of quantity, concentration, or physical, chemical, or infectious characteristics—may cause or significantly contribute to an increase in mortality or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Potential exposure to hazardous and contaminated materials is typically greatest during construction when in-ground disturbance and disturbance to structural materials are occurring. While the analysis of hazardous wastes and toxic substances will consider potential exposure during the future operation of the Project, the analysis will overlap with the construction analysis provided in the construction effects chapter (described in Section 4.3.21).

The hazardous materials and toxic substances analysis will include the following:

- Undertake a corridor and project area hazardous materials assessment based on database searches of historic and active spill and contaminated sites to identify known areas of potential concern.
- Summarize the regulatory protocol that will be part of the construction plan to minimize and avoid adverse effects of disturbing or disposing of potential hazardous materials.

1.17.1 Key Assessment Measures

- Identified potential areas of disturbance and exposure to hazardous materials

1.18 CONSTRUCTION EFFECTS

The assessment of construction effects will summarize construction techniques (i.e., pile, micro-pile, fill) as established in the description of alternative alignments for construction-period effects. The assessment will include descriptions of construction staging areas and phasing by key activities (clearing, grading, infrastructure installment, roadway construction, landscaping, and finishing).

Construction effects, though temporary, can result in a nuisance or disruption within the project area. The primary adverse effects related to construction activities typically involve traffic, noise, air quality, and hazardous materials. The EIS will identify appropriate measures to be implemented during construction to avoid or minimize potential temporary adverse effects associated with construction activities and will take into consideration the unique characteristics of some of the sensitive receptors within the project area.

The construction analysis will evaluate the potential construction effects on relevant subject areas analyzed in the EIS, as applicable, including the following:

- **Archaeological and Historic Resources.** The Section 106 process will document potential impacts to archaeological and historic resources during construction and any adverse effects will be resolved by developing appropriate measures to avoid or minimize inadvertent impacts to historic resources during construction.
- **Cultural Resources and Practices.** This section will describe any adverse effects and measures developed to avoid or minimize inadvertent impacts to cultural resources during construction.
- **Traffic, Right-of-Way, Pedestrians/Bicycles.** This assessment will consider traffic generated by construction workers and deliveries, taking into account the time of day that construction-generated traffic will be greatest. The assessment will also consider how construction activities may disrupt pedestrian and bicycle routes within the project area.
- **Air Quality and Energy.** The potential for air quality impacts caused by construction activities—including construction traffic (mobile sources) on local roadways—will be evaluated. Air pollutant sources include combustion exhaust associated with non-road engines (e.g., machinery) and on-road engines operating on-site (e.g., delivery trucks), as well as on-site activities that generate

fugitive dust (e.g., excavation and demolition). The pollutants of concern include carbon monoxide, particulate matter, and nitrogen dioxide. The analysis will assess potential impacts on up to two air quality at sensitive receptors in the project area. This section will also include an evaluation of energy consumed for construction and anticipated GHG production.

- **Noise.** Noise generated from construction activities on up to six sensitive receptors within the project area will be determined using FHWA's Roadway Construction Noise Model. In addition, the EIS will review the requirements of the Hawaiʻi Community Noise Permit/Noise Variance requirements.
- **Hazardous Materials and Toxic Substances.** In coordination with the work performed for hazardous materials, actions to be taken during construction activities (including any areas of the change or decommissioning of the existing Honoapiʻilani Highway within the project area) to limit exposure of construction workers and the general public to potential contaminants will be summarized.
- **Natural Hazards.** This assessment will consider potential construction-related effects to sensitive ecological resources identified within the project area.

1.18.1 Key Assessment Measures

- Number and extent of potential adverse effects from construction, including historic and archaeological resources, cultural resources and practices, air quality, noise, hazardous materials, and natural resources

1.19 ENVIRONMENTAL JUSTICE AND SOCIOECONOMIC CONDITIONS

Environmental justice populations are within the project area, and the Project is intended to avoid direct impact or takings in areas where environmental justice populations are present. Generally, the Project would provide a large regional benefit to all environmental justice residents by improving reliability and access to east–west mobility. Pursuant to Executive Order 12898, an environmental justice analysis will be prepared to identify any disproportionately high and adverse impacts on minority or low-income populations. As applicable, the analysis will follow methodologies and guidance established by the Council on Environmental Quality, U.S. Department of Transportation Order 5610.2(a), and FHWA Order 6640.23A.

Outreach to environmental justice populations has already included discussions with community leaders early-on in the development of the Projectʻs purpose and need and identification of alternatives, and these groups were specifically invited to participate in the public scoping meetings. Additionally, Native Hawaiian Organizations, lineal descendants, cultural advisers, and other local leaders are being asked to participate in the evaluation of cultural resources through the Section 106 consultation process.

The analysis will examine the potential effects for the full range of environmental topic areas addressed in the EIS and then determine whether the Project would result in disproportionately high and adverse (direct or indirect) impacts on minority and low-income populations. If potential disproportionately high and adverse impacts are identified, the Draft EIS will assess whether there are

any practicable alternatives to avoid and reduce the adverse effect. Potential measures to mitigate adverse effects on environmental justice populations will be described.

In addition, the Draft EIS will assess the Project's potential effects on socioeconomic conditions, such as population, housing, and business sectors following guidance from FHWA's Technical Advisory T6640.8A. As part of the analysis, the EIS will establish an appropriate study area and summarize socioeconomic setting and context for the defined area. The analysis will also summarize regional setting and context—including regional economic and workforce characteristics—and present short- and long-term population and labor forecasts available from the County of Maui, the U.S. Census Bureau, and the Maui MPO. The analysis will identify potential adverse or beneficial social and economic impacts and describe any measures that would be implemented to mitigate adverse impacts, as appropriate.

1.19.1 Key Assessment Measures

- Disproportionate high and adverse effects on low-income or minority and Native Hawaiian populations
- Effects on existing residential and worker populations

1.20 SECTION 4(f)

As described previously, the project area contains the County of Maui-owned Ukumehame Firing Range, which is designated as a county recreational facility. The alignments of the Project will traverse the County of Maui property and will be analyzed for the potential of displacing the existing recreational resource (although it is noted that the project sponsors are seeking an alternative that preserves use and access to the firing range).

Section 4(f) prohibits U.S. Department of Transportation (including FHWA) from approving any project that "uses" or has a constructive use of public parks, wildlife refuges, or historic resources unless there is no feasible and prudent alternative to that use and all measures to minimize harm have been implemented. If an alternative has the potential to use a Section 4(f) resource(s), FHWA technical guidance will be used to determine the level of documentation that will be conducted (i.e., *de minimis* impact determination, individual evaluation, or programmatic evaluation). The Section 4(f) evaluation will incorporate information from the EIS as appropriate.

1.21 INDIRECT AND CUMULATIVE IMPACTS

As described previously, the Honoapiʻilani Highway is a vital transportation link to West Maui for residents, visitors, and goods. The Project is not anticipated to change regional travel demand, and there are no non-transportation development elements associated with the Project. Council on Environmental Quality regulations (40 CFR Parts 1500 through 1508) define indirect impacts as those that are "caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable." Generally, these impacts are induced by a project. Indirect effects can occur within the full range of impact areas, such as changes in land use, socioeconomic conditions, traffic,

air quality, noise, and natural resources. The EIS will include an evaluation of indirect effects, both adverse and beneficial, that would have the potential to occur as a result of the Project.

NEPA and HEPA also require consideration of cumulative effects of a project. Cumulative impacts may result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions (40 CFR 1508.8). The analysis will address cumulative impacts to both environmental resources and socioeconomic conditions accounting for independent projects identified in Maui or West Maui.

1.22 SHORT-TERM USES OF THE ENVIRONMENT VERSUS LONG-TERM PRODUCTIVITY AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The relationship between short-term uses versus long-term productivity considers the potential short-term effects of a project necessary to realize its long-term public benefits. The EIS will summarize and present these findings.

The assessment of irreversible and irretrievable commitment of resources considers materials and resources—such as land, building materials, energy, human labor, and fiscal resources— that will be committed to the Project, and therefore unavailable either during the lifetime of the Project (e.g., irreversible use of land) or in perpetuity (e.g., irretrievable commitment of human labor). The EIS will summarize and present these findings.